Alice Zhou

From: GMD Personal <garry.downs@xtra.co.nz>
Sent: Thursday, 19 January 2023 1:01 pm
To: Unitary Plan
Cc: 'Garry Downs'
Subject: PC78 Further Submission
Attachments: PC-78-Further-Submission (1) January 2-23.pdf

Dear Sir/Madam

Please find attached my further submission to Plan 78.

Ngā mihi Garry

Garry Downs
Mobile: +6421 761 601

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Garry Downs

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz

941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

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

Signature of person making further submission:

Garry Downs

Date:
19/1/23

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)
Garry.downs@xtra.co.nz

Telephone:
021761601

Postal address:
27 Dedwood Terrace St Mary's Bay Auckland 1011

Contact person:
(*name and designation, if applicable*)
Garry Downs

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

Alice Zhou

From: Fi Groves <fi@odd1.co.nz>
Sent: Thursday, 19 January 2023 11:48 am
To: Unitary Plan
Cc: Fi Groves
Subject: PC78 Further Submission
Attachments: PC-78-Submission-19-01-23.pdf

Dear Sir/Madam

Please find my further submission to Plan Change 78 attached.

Regards Fi Groves

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Fi Groves

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703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz

894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com

1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz

2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

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10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Date:

19 January 2023

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)

fi@odd1.co.nz

Telephone:

21346627

Postal address:

64 St Marys Road, St Marys Bay, Auckland 1011

Contact person:
(*name and designation, if applicable*)

Fi Groves

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

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- 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.

Alice Zhou

From: Gill Chappell <gillian@chappell.nz>
Sent: Thursday, 19 January 2023 11:33 am
To: Unitary Plan
Cc: 'Cath O'Brien'
Subject: PC78
Attachments: Appendix One - BARNZ further submissions PC78 AUP.pdf; Form 6 Further Submission BARNZ FINAL.pdf

Please find attached, by way of filing, further submissions on behalf of BARNZ in relation to PC78.

Ngā mihi | Kind regards,
Gill

Gillian Chappell
Barrister

M 0273034757 |
Foundry Chambers |
| **Level 4, Vulcan Buildings, Vulcan Lane,**
P O Box 1502 | **DX CP 19020** |
Auckland
E gillian@chappell.nz | **W** **www.chappell.nz**

Form 6 (Resource Management (Forms, Fees and Procedure) Regulations 2003

FURTHER SUBMISSIONS BY BOARD OF AIRLINE REPRESENTATIVES OF NEW ZEALAND INC ("BARNZ") IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSIONS ON PROPOSED CHANGE 78 TO THE AUCKLAND UNITARY PLAN

TO: AUCKLAND COUNCIL

These further submissions are made by the Board of Airline Representatives of New Zealand Inc ("BARNZ") in support of or in opposition to submissions on the proposed Change 78 to the Auckland Unitary Plan ("AUP").

BARNZ was a submitter on proposed Change 78 to the AUP and is an incorporated society with membership comprising member airlines operating scheduled and code share international and domestic services throughout New Zealand, including at Auckland Airport.

Regulatory planning that may adversely affect aircraft activity at Auckland Airport, including through effects such as reverse sensitivity, directly impacts the activities of the airline members of BARNZ.

BARNZ therefore has an interest in submissions made which relate to Auckland Airport, which is greater than the interest the general public has.

For further background information refer to the BARNZ submission on PC78 to the AUP.

BARNZ's further submissions in support of, or in opposition to various original submissions, the relevant provisions of PC 78 to the AUP, the particular parts of the submissions it supports or opposes, its reasons and relief are set out in Appendix One to this form.

BARNZ wishes to be heard in support of its further submissions.

If others make similar submissions or further submissions BARNZ will consider presenting a joint case with them at any hearing.

Dated this 19th day of January 2023

_____

Cath O'Brien
Executive Director
BARNZ

Contact details:
Address for service of submitter:
P O Box 2779
Auckland 1140
Telephone: 0273034757
Email: gillian@chappell.nz;
cath@barnz.org.nz;

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by BARNZ:	Reasons:
126.1	Madue Properties Limited parash@asapfinance.co.nz	Amend the Moderate Aircraft Noise Areas overlay to not apply the blanket density rule of 400m² per site and instead treat applications on a case by case basis under the AUP (in particular in relation to 13 Sidley Avenue, Flat Bush). [See attached resource consent application].	Oppose	Disallow all of the submission.	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
409.1	MBSB Investments Ltd Munish2000@hotmail.com	Remove the Moderate Aircraft Noise Area (MANA) standard requiring average minimum site size of 400m2 and assess on a case by case basis.	Oppose	Disallow all of the submission.	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
612.1	Kevin Pan Kpan2202@gmail.com	Remove Aircraft Noise Overlay D24 as a Qualifying Matter.	Oppose	Disallow all of the submission.	To the extent that this relief might increase residential intensification within the HANA or MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
612.2	Kevin Pan Kpan2202@gmail.com	Remove the density limit in Aircraft Noise Overlay D24 for MANA (Moderate Aircraft Noise Area) where new dwellings in a residential zone cannot exceed a density of one dwelling per 400m².	Oppose	Disallow all of the submission.	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
612.3	Kevin Pan Kpan2202@gmail.com	Apply the density exceptions in I412 Flat Bush Precinct Plan, (sub-precinct D and sub-precinct E with a maximum allowable density of 150m² and 180m² per dwelling) to 219 Portage Road, Papatoetoe and the area nearby.	Oppose	Disallow all of the submission.	To the extent that this relief might increase residential intensification within the HANA or MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.1	Kāinga Ora developmentplanning@kain	Delete the Residential - Single House Zone entirely. Rezone with Residential - Mixed Housing Urban Zone as a minimum as set out in Appendix 2 of the submission. This includes applying the	Oppose	Disallow those parts of the submission that would potentially affect	To the extent that this relief might increase residential intensification within the HANA and MANA, that outcome would be

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by BARNZ:	Reasons:
	gaora.govt.nz	Residential - Mixed Housing Urban Zone to the 23 settlements currently excluded such as Helensville, Clarks Beach, Glenbrook Beach, Karaka, Maraetai, Riverhead and others. See Appendix 1, Table 1, row 43. Zone mapping changes summarised in separate submission points by suburb and Appendix 2 map number.		development on land located within the HANA and MANA.	inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.2 873.32	Kāinga Ora developmentplanning@kaingaora.govt.nz	Delete the Residential - Low Density Residential Zone entirely. See Appendix 1, Table 1, row 44. Rezone with either the Residential - Mixed Housing Urban Zone or the Residential Terrace Housing and Apartment Buildings Zone as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within the HANA and MANA.	To the extent that this relief might increase residential intensification within the HANA and MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.3	Kāinga Ora developmentplanning@kaingaora.govt.nz	Delete the Residential - Mixed Housing Suburban Zone entirely. See Appendix 1, Table 1, row 45. Rezone with Residential - Mixed Housing Urban Zone as a minimum as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. Refer also to the separate submission point on the Auckland Light Rail Corridor exclusion area.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within the HANA and MANA.	To the extent that this relief might increase residential intensification within the HANA and MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.4	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Residential - Mixed Housing Urban Zone provisions to: 1) Improve consistency across development standards applying to up to three dwellings and those applying to four or more dwellings; 2) Enable up to five storey development in identified locations where adjacent to land zoned for ten storey Terrace Housing and Apartment Buildings, to allow for a 'stepping down' of building heights; and 3) Simplify and streamline matters of discretion and associated assessment criteria. Make amendments to H5 as set out in Appendix 1, Table 2, Rows 138 to 163 of the submission. Refer to Appendices 2 and 3 for building heights. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within the HANA and MANA.	To the extent that this relief might increase residential intensification within the HANA and MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.46	Kāinga Ora developmentplanning@kain	Retain the High Aircraft Noise Area (HANA) as a qualifying matter, but amend it by rezoning any Residential - Low Density Residential Zone and Residential - Terrace Housing and	Oppose	Disallow the whole of the submission (with the exception of that part of	To the extent that this relief might increase residential intensification within the HANA, that outcome would be inappropriate. As this

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by BARNZ:	Reasons:
	gaora.govt.nz	Apartment Buildings Zoned areas to Residential - Mixed Housing Urban Zone. Refer to Appendix 1, Table 1, Row 30 of the submission, and Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. Buildings Zoned areas to Residential - Mixed Housing Urban Zone. Refer to Appendix 1, Table 1, Row 30 of the submission, and Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.		the relief that supports retention of the HANA.	would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.47	Kāinga Ora developmentplanning@kaingaora.govt.nz	Delete the Moderate Aircraft Noise Area (MANA) as a qualifying matter and delete the blanket density restrictions for residential sites within the MANA overlay and make other amendments as set out in Appendix 1, Table 1, Row 31 of the submission.	Oppose	Disallow the whole of the submission	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.59 873.377	Kāinga Ora developmentplanning@kaingaora.govt.nz	Delete the 1412 Flatbush Precinct density standards that relate to the Moderate Aircraft Noise Area Overlay. Remove the provisions relating to the MANA from the precinct and apply the city wide overlay provisions. Also summarised under the qualifying matter topic.	Oppose	Disallow the whole of the submission	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
873.62 873.378	Kāinga Ora developmentplanning@kaingaora.govt.nz	Delete the density restriction standards pertaining to the 'moderate aircraft noise area overlay' and from the I438 Takanini Precinct framework. Also summarised under the qualifying matter topic. Delete qualifying matters pertaining to 'Flooding' from the I438 Takanini Precinct framework where this matter has been applied beyond the spatial extent of the identified control. Rezone the residential zones that are affected by the designation as either Residential - Mixed Housing Urban Zone or Residential - Terrace Housing and Apartment Buildings Zone, as appropriate..	Oppose	Disallow that part of the submission that affect land within the MANA.	To the extent that this relief might increase residential intensification within the MANA, that outcome would be inappropriate. As this would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, more ASAN should not be enabled.
1284.2	Exponential Properties Limited colin@hardacreplanning.co.nz	Remove D24 Aircraft Noise overlay and Appendix 19 from 8 Freyberg Avenue, Papatoetoe.	Oppose	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by BARNZ:	Reasons:
					significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
1962.12	Aedifice Property Group jessica@civix.co.nz	Delete the QM relating to the Aircraft Noise overlay..	Oppose	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
2025.18	Greater Auckland Lowrie.matt@gmail.com	Add as a walkable catchment Rapid Transit Stop the Airport to Botany corridor, which has a confirmed design and some funding in the Regional Long Term Plan for interim improvements ahead of a longer-term major investment.	Oppose in part	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled..
2025.38	Greater Auckland Lowrie.matt@gmail.com	Rezone the Airport to Botany Corridor - Ti Irirangi Drive to THAB Zone as meets the criteria for being a planned rapid transit corridor. Project design is now well advanced and station locations confirmed. (See map in submission).	Oppose in part	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
2272.31	Civil Plan Consultants aaron@civilplan.co.nz	Amend D24.4.3(A37) and D24.4.3(A38) to refer to dwellings that comply with and do not comply with Standard D24.6.3, deleting the minimum density requirements.	Oppose	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
2272.32	Civil Plan Consultants aaron@civilplan.co.nz	Delete "restrictions on the numbers of people to be accommodated through zoning and density mechanisms" from	Oppose	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by BARNZ:	Reasons:
		Policy D24.3(3)(a).			within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
2272.33	Civil Plan Consultants aaron@civilplan.co.nz	Make consequential changes to the Flat Bush Precinct to remove all density requirements based on the Auckland Airport moderate aircraft noise area.	Oppose	Disallow the whole of the submission.	To the extent that the relief would have implications for residential intensification within the HANA or MANA the relief is opposed. Increased intensification within the HANA or MANA would have potentially significant reverse sensitivity effects on Auckland Airport and by extension, the airlines, so more ASAN should not be enabled.
2273.48	Aaron Grey aaronjgrey@gmail.com	Delete the Auckland International Airport Aircraft Noise Notification Area from the mapped extent of the Aircraft Noise Overlay.	Oppose	Disallow the whole of the submission.	The Aircraft Noise Notification Area appropriately notifies people that aircraft noise is present and assists in preventing reverse sensitivity effects.

Alice Zhou

From: Pam Wyse <msjresidents@gmail.com>
Sent: Thursday, 19 January 2023 2:20 pm
To: Unitary Plan
Subject: Proposed Plan Change 78 - Intensification
Attachments: Mt St John Res Gp Inc sub January 2023.pdf; Salmond Reed report re Mt St John.pdf; pc-78-form-6_Mt St John Residents Gp Inc.pdf

Dear Sirs

I write on behalf of the Mount St John Residents Group Incorporated and attach the following for your consideration:

1. Form 6
2. Our submission (which includes Appendices 1 and 2)
3. A supporting document from Salmond Reed Architects.

Regards
Pam Wyse
Secretary
Mount St John Residents Group Inc

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.

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@aucklandcouncil.govt.nz or post to :

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mrs Pamela Wyse

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

Mount St John Residents Group Incorporated

Address for service of Further Submitter

2 Belvedere Street, Epsom, Auckland 1051

Telephone: 274927456 Fax/Email: msjresidents@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to attached submission

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to attached submission

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

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 ☒

Pamela Wyse
Signature of Further Submitter
(or person authorised to sign on behalf of further submitter)

01/18/2023
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)**

Secretary of the Mount St John Residents Group Inc

☐ **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)**

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.

Submission Details:

This is a further submission to:

Plan Change number: Plan Change 78

Plan Change name: PC 78: Intensification

Original Submission Details: Mount St John Residents Group Incorporated: made on 27 September 2022. Original Submission number: 1395

Registered Office: c/o 2 Belvedere Street Epsom, Auckland 1051

Email address: msjresidents@gmail.com

Officers: Chair – Mr Aaron Beer; Secretary: Mrs Pam Wyse Phone 027 492 7456

****

1) We support our original submission (Number 1395) and all its contents. These are attached in Appendix 2 again.
2) We oppose submissions made on behalf of those groups/individuals listed in Appendix 1.

The reasons for our support and our opposition are as follows:

1) The reasons for support and opposition are as set out in our primary submission (Appendix 2).
2) We oppose submissions that challenge the identification of Special Character areas as a qualifying matter and/or those that challenge the extent of the Special Character overlay. This is because, if these submissions (which challenge the Special Character overlay) are allowed, they will detrimentally affect Auckland's character.
3) We support protection of character housing in the area around Mount St John. One reason for this is that lower height, smaller mass housing protects the maunga. We strongly support the Special Character overlay on Mount St John Avenue, Belvedere Street, parts of Halifax Avenue (the end closest to the maunga), parts of Warborough Avenue (closest to the maunga).
4) We oppose the rezoning of parts of Market Road, Margot Street and Maxfield place on the grounds that Council's scoring for those areas as 'non character housing' is capricious (as outlined in our original submission). Our view was supported by the assessment of Salmond Reed architects which was attached to our original submission. We have amply demonstrated that there are Council inconsistencies in its own assessment of these character areas.
5) We support special protection of the Auckland's volcanic field by continuing to restrict the intensification, allowable building heights and mass in close proximity to the individual volcanic cones, even where these volcanic cones are within walkable catchment areas. Our reasons are that Tamaki Makaurau's volcanic field is of international, national and regional significance. They are taonga tuku iho to the mana whenua of the area with spiritual, cultural, historical, archaeological and geological landscape values of great importance, and as such demand every effort of preservation and conservation. These cones are iconic and tapu, and outstanding features of Auckland's landscape and are a very important part of Auckland's identity and character. Further, there is ample evidence that these iconic maunga

have historically been protected by lower density, lower height, smaller mass buildings and development.

6) We oppose the rezoning of areas in close proximity and surrounding Auckland's volcanic cones where these are within walkable catchments. Our reasons are that the mass, height and density of subdivision and building proposed in walkable catchments is highly destructive of Auckland's volcanic cones and to their amenity, visibility (to the maunga and between the maunga) and taonga value for the community at large.
7) We also oppose the rezoning of Market Road and Maxfield Place on the basis that these areas are immediately adjacent to a taonga – Tītī Kōpuke or Mount St John – and rezoning of them will damage one of Auckland's most important maunga [notwithstanding that these are within walkable catchments].
8) We strongly support the Maunga Viewshafts and the Height and Building Sensitive Areas Overlay parts of the notified version of Plan Change 78.
9) We back Council's view that the height sensitive areas and volcanic viewshafts are an appropriate, sound qualifying matter under the RMA and accordingly the Auckland Unitary Plan should be amended.
10) We agree with Council that localised viewshafts are protected as a qualifying matter and are of national importance under the RMA.
11) We advocate that further building height and density within the Height Sensitive area overlay, and outside that overlay, which reduces the protection of Tītīkōpuke/Mount St John (and of all other maunga) is in conflict with the RMA.
12) As well, the Mount St John Residents Group Inc presents that the Low Density Residential Zone should pertain to all residential zoned land withi the Height and Building Sensitive Areas Overlay.
13) We therefore submis that midifications are needed to the current proposal to achieve the above, and protect the maunga, including and especially its smalles: Tītīkōpuke/Mount St John.
14) We oppose pepper-potting where Council is proposing to rezone individual or small groups of properties for intensification in the midst of contiguous and significant character areas of housing on the grounds that it is poor quality urban planning, with no basis in urban planning purpose or intention.
15) We support the amendment made to Mount St John Avenue in the Special Character overlay amendment in PC 78 Special Character Residential Findings Reports Central Isthmus Part 1 report (as follows).

SUMMARY OF AREA FINDINGS

SPECIAL CHARACTER AREAS: RESIDENTIAL

Area details

Name	**Mt St John**
SCA Overlay	Isthmus C
Survey Area Number(s)	4c (Isthmus C only)

PLEASE NOTE:

The sub-area identified within this report has been amended. The map below replaces the 'Potential Historic Heritage and High-Quality Special Character Flags' map in the report below and shows the area to be identified as a qualifying matter.

The sub-area has been reviewed and amended in response to feedback. The amended sub-area is inside a walkable catchment and meets the threshold of 75% or more of individual properties scoring a 5 or 6.

Updated: August 2022



Please note where the map in this report differs from the map in the Plan Viewer, the map in the Plan Viewer takes precedence.

Supporting Documents:

Appendices 1 & 2.

We wish to be heard in support of this submission.

We would consider presenting a joint case at a hearing if others have made a similar submission.

Declaration:

What is our interest in this proposal? We are residents and landowners in the area of the maunga Tītī Kōpuke/Mount St John, with special interest in preservation of the maunga and of the character areas surrounding the maunga, which have served to protect it and its visibility. The original purpose of our group was to protect the maunga, and we have continued to do so throughout our decades long existence. We believe the maunga will be adversely affected by the proposals – we look first to its protection, for the people of Auckland, and secondly to the preservation of an almost contiguous example of early Auckland architecture.

We declare that:

- we understand that we 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
- we accept by taking part in this public submission process that our submission (including personal details, names and addresses) will be made public.

Appendix 1: **SUBMISSION POINTS OPPOSED**

9.2: Jason Zhang: relating to 25 Mount St John Avenue, Epsom Auckland 1051

873.221: Kainga Ora: relating to Mount St John Avenue, Margot Street, Belvedere Street, Halifax Avenue, Market Road, Maxfield Place

873.222: Kainga Ora: relating to Mount St John Avenue, Margot Street, Belvedere Street, Halifax Avenue, Market Road, Maxfield Place

1029.1: Fang Liu: relating to properties in Margot Street, Belvedere Street, Mount St John Avenue and Market Road

2023.5: Chloride Trust: relating to properties in Mount St John Avenue, Market Road and Maxfield Place.

2023.6: Chloride Trust: relating to properties in Mount St John Avenue and Market Road

We also oppose any points raised in the following submissions that negatively impact Special Character as a qualifying matter and protection of the maunga of Auckland's volcanic field:

2036	Evans Randall Investors Ltd
840	Auckland City Residents Group
871	Property Council New Zealand
2033	Classic Group
2040	Mike Greer Developments
2041	Neilston Homes
1086	Sonn Group
1585	Gibbonsco Management Ltd
1079	The Coalition for More Homes
1210	Kelvin James Norgrove
899	Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development
1066	Avant Group Ltd and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings
1886	Angela Lim
2025	Greater Auckland
2273	Aaron Grey
2386	Zeo Limited
938	NZ Housing Foundation
2083	Universal Homes

941	Foodstuffs North Island Ltd
1584	30 Hospital Road Limited Partnership
1953	Matthew Wansbone
2049	Waka Kotahi

Appendix 2: **Original Submission of Mount St John Residents Group Incorporated**

27 September 2022

Registered Office: C/- 2 Belvedere Street, Epsom, Auckland 1051
msjresidents@gmail.com

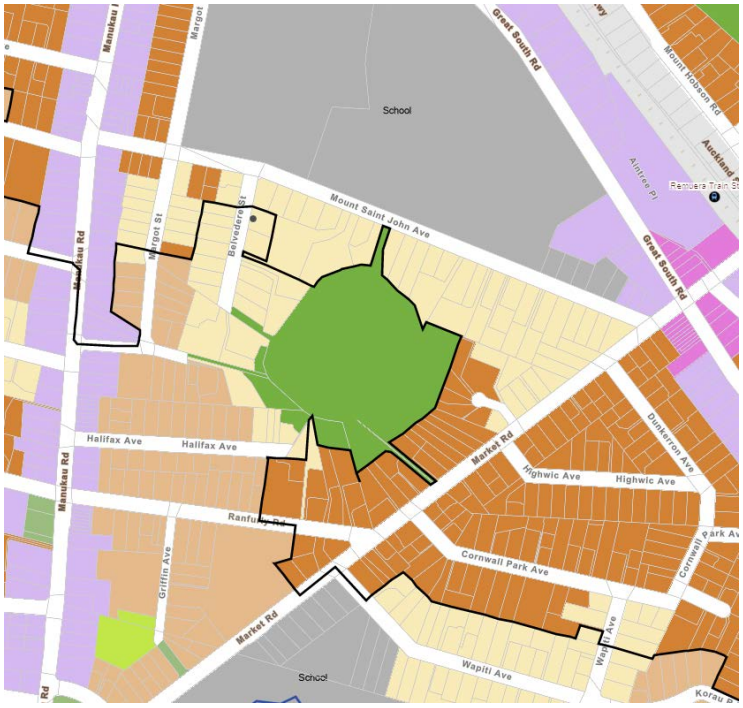
Chair: Mr Aaron Beer
Secretary: Mrs Pamela Wyse, 027 492 7456

This submission sets out the **Mt St John Resident's Group Inc**. response to proposed Plan Change 78 – Intensification; and to proposed plan changes 79-83.

Those plan changes in turn are a response to the National Policy Statement on Urban Development 2020 and the Medium Density Residential Standards.

Our chief concerns centre around the Mount St John Tītī Kōpuke (Epsom) area, and the intensification and changes in that area (see below illustration – which illustrates our area of focus).

Plan Changes Proposed for the Mount St John Area (snipped from the actual maps).



About the Mount St John Residents Group Inc:

Our group was formed in 1999 (prior to the establishment of the Tūpuna Maunga Authority) specifically to protect Tītī Kōpuke (Mount St John) and its environs from development, so that the views to the puke (maunga) might be maintained unobstructed, clear and local; and this important taonga for mana whenua might be conserved with cultural importance intact. We have consistently and repeatedly defended the puke and sacrificed the opportunity of subdivision (which would have brought with it increased land price) in order to conserve this maunga, one of the smallest in Auckland's continuous volcanic field.

1. Prohibition of Intensification under proposed plan changes:

1.1 We support the Council's current response to protecting the maunga (Mount St John Tītī Kōpuke) by prohibiting intensification along Mount St John Avenue, Belvedere Street, the end of Warborough Avenue, some of Margot Street and at the end of Halifax Avenue (as shown in the figure above as light yellow). We support Council's recognition of those areas as special character.

2. Supporting Tūpuna Maunga as a Qualifying Matter

2.1 We support Auckland Council's position that the Tupuna Maunga are a qualifying matter under the National Policy Statement on Urban Development and under Section 6 of the Resource Management Act (1991), and therefore that Auckland's volcanic field must be protected.

3. Protection of Auckland's Volcanic Field Needed within this Plan Change

3.1 Tamaki Makaurau's volcanic field is of international, national and regional significance. They are taonga to the mana whenua of the area, and as such demand every effort of preservation and conservation. They should not be obliterated by intensification. Culturally, the maunga are revered by mana whenua both collectively and individually.

3.2 To Aucklanders and New Zealanders, the volcanoes are iconic. They have been placed on UNESCO's tentative list of world Heritage sites. They are outstanding natural features of Auckland's landscape because of their number and juxtaposition within the urban environment. The Auckland Regional Policy Statement (and other documents and policies) recognised this for decades. Through these statements, policies and other documents, Council after Council and Governments recognised that the importance of Mount St John Tītī Kōpuke is not just individual nor local; it is regional, national and must be seen in the context of all other volcanoes in Auckland's volcanic field – as they are seen by mana whenua.

3.3 Auckland's volcanoes are also unique geologically. In his 1976 report on the volcanoes of Auckland, Roy Turner said that they are geologically unique "*firstly because of the very large number of individual cones set in so small an area, and secondly for the small size of the individual cones….The isthmus of Auckland is one of the most remarkable volcanic districts on earth*."

3.4 Therefore Auckland Council **must continue to apply building height restrictions all around the maunga via the overlays to be found in the Auckland Unitary Plan. Put simply: Auckland Council must continue to apply the Volcanic Viewshafts and Height Sensitive Areas Overlay to this area, right around Mount St John Tītī Kōpuke.**

3.5 Auckland Council must also **continue to ensure that the outstanding natural features and landscapes represented by the maunga, including Mount St John Tītī Kōpuke, are protected from subdivision, use and development**.

3.6 Because of the importance of the maunga to mana whenua, the importance to Aucklanders, the importance of the geological field, and the importance of the field individually and collectively internationally, **Auckland Council should also include more properties that abut Mount St John Tītī Kōpuke and surround it, in its prohibition of intensification in a ring around the puke, including all those suggested by Salmond Reed architects in their latest, revised submission (see below 4.6 and 4.7).**

4. Character Housing – Qualifying Matter and Overlay

4.1 We support the Council's position that housing character is a qualifying matter under the National Policy Statement on Urban Development.

4.2 We strongly support the special character overlay on Mount St John Avenue, Belvedere Street, parts of Halifax Avenue (end closest to mountain); and parts of Warborough Avenue (end closest to the maunga). These are all the areas that are currently on the plan change proposal (seen above/on the maps in light yellow)

4.3 Character housing has historically helped protect the maunga of Auckland from visual obliteration, especially Mount St John because of the puke's low height. Character housing is typically lower in height, tends to mimic the form of the maunga, and is lesser in scale and mass. All of those attributes of character housing help preserve the visual character, form and cultural value of Tītī Kōpuke.

4.4 In our original submission during the pre-submission period, we argued that Council had used an assessment tool for housing 'character and quality' and applied it in a manner that had yielded inconsistent results and is mathematically capricious. We proposed that the application of special character areas should be to the current B1 & C2a zoning in its entirety. We demonstrated the capricious application of the zoning in the original Council proposal, and how it could better be accurately applied to the entire ring around Mount St John (the B1 & C2a zoning) using the Council's own methodologies and calculations.

4.5 Salmond Reed Architects supported our concerns, and (on our commission) Salmond Reed provided a submission sent to Council on our behalf which showed that if some areas of Market Road and Margot Street were included, Council's scoring for that would still be 86% - and easily meet the threshold proposed by Council for preservation of character housing.

4.6 Salmond Reed have now revised their submission regarding Mt St John, and we attach it. **It extends the area covered by Special Character considerably around the maunga and advocates that some of Market Road, all of Mount St John Avenue and some of Margot Street are included. Jeremy Salmond shows that the new, recommended area (Option 1 in his re-submission) satisfies the Council policy of 75%, and in fact scores 76%.**

4.7 We attach the new Salmond Reed submission.

5.0 Pepper-Potting or Inconsistencies in Zoning

5.1 We note with concern the Council's current proposed zoning on the proposed plan includes some pepper-potting of individual or small groups of properties zoned for intensification in Margot Street and at the Manukau Road end of Mount St John Avenue.

5.2 Rational zoning and consistency of zoning are fundamental principles of good urban planning. These principles seem to have been abandoned with the decision not to zone contiguous properties the same. Inconsistency of zoning leads to inconsistency of decision making. **We urge Council to revise its view and bring the 'inconsistent outliers' back into a consistent zoning framework, with the same zoning as their neighbours currently have on this proposed plan (refer figure below).**

Inconsistent outliers (snipped from the actual maps).

Salmond Reed report attached separately as pdf file.



Margot Ave – Mt St John Ave – Market Rd

Jeremy Salmond has assessed SCAs using google streetview and in some cases area visits.

For this area Council tables from the Findings Report have been used and are summarised on the following page.

While the 3 areas are Isthmus A, B and C, with respect to special character they can be analysed as a group. A sub-area has been identified which satisfies the 5s6s-75% criterion using Council scores.

JS has re-assessed several properties and overall the new scores provide a stronger indication of Special Character. Only one up-score elevates a property (85 Market Road) to the 5s6s group, but the SCA recommended is not dependent on this. JS supports the identification and retention of a larger SCA here.

The preferred SCA is as shown as Option 1. It is achieved using Council 5s6s scores.

A brief report from Jeremy for each SCA will be available when he is back at work. In the meantime this work has been produced using his input and assessments and is being forwarded now given timeframes available.

12/07/2022

JS Map and scores (wip)

JS has re-scored one property from the lower group into the 5s6s group, 85 Market Road.

Other re-assessments have strengthened the SCA but not change individual property scores



Calculations (using Finding Report tables)

Using the sub-area identified on the following map, 76% is achieved using Council scores. This is a 'good pass' noting that part of the area is outside the walkable catchments.
(Note: one of the removed properties could be added back and the level would still be above 75%).

Re-scoring of 85 Market Road from 4 to 5 increases the result to 77% but does not change the recommended area.
(Note: although it does allow another removed property to be added back).

Council Score	Margot	Mt St John	Market	Total	
6	12	16	6	34	
5	5	16	7	28	
4	3	10	2	15	
3	7	5	2	14	
2	2	3	0	5	
1	0	0	0	0	
0	0	0	0	0	
A = R/V	3	18	7	28	
B = No. of Properties	32	68	24	124	
C = 5s and 6s	17	32	13	62	
D = Scored properties	29	50	17	96	
5s6s %age	**59%**	**64%**	**76%**	**65%**	Using Council 5s6s
Identify sub-area with fewer properties					
E = removed scored properties	6	7	1	14	See map
F = D -E New denominator	23	43	16	82	
New 5s6s %age	74%	74%	81%	**76%**	Using Council 5s6s
JS re-scores which elevated properties into the 5s6s group					
G = JS Re-scores in 5s6s	0	0	1	1	
H = C + G New 5s6s	17	32	14	63	
New 5s6s %age	74%	74%	88%	**77%**	Using 1 JS re-score

Note
The 74% results for Margot and Mt St John on their own do not apply given that the three areas are taken collectively, but the (unnecessary) removal of one more property from these areas would change the score to above 75%.

Recommended sub-area

The recommended sub-area shown satisfies the 5s6s-75% Council policy. It scores 76%.
Adding the JS re-score for 85 Market Road lifts the result to 77%.



PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Carolyn Reid:

.....

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and/or live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
504	Charles H Levin	patrick@mulliganlegal.co.nz
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz
2031	Paul Gunn	paulgunn416@gmail.com

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz

1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz

2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Carolyn A. Reid

Date: 19 January 2023

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:

Telephone: 0275 488-238

Postal address: 5 Ryle Street, Freemans Bay, Auckland 1011

Contact person: Carolyn Reid - Owner

Note to person making further 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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

Note: This was also submitted electronically, from my colleague, [Colleen Cole's] computer, on 19/1/2023

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

Carolyn A. Reid

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

Attn: Unitary Plan

Auckland Council
23 JAN 2023
CBD - ALBERT STREET

To Auckland Council –

1. Carolyn Reid:

.....

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and/or live in the area affected by the Proposal.

4. I **support** the following submissions of:

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1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz
2031	Paul Gunn	paulgunn416@gmail.com

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz

1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz

2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Carolyn A. Reid

Date: 19 January 2023

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:

Telephone: 0275 488-238

Postal address: 5 Ryle Street, Freemans Bay, Auckland 1011

Contact person: Carolyn Reid - Owner

Note to person making further 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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

Alice Zhou

From: Madeleine Wright <madeleine@sallygepp.co.nz>
Sent: Thursday, 19 January 2023 2:24 pm
To: Unitary Plan; Sarah El Karamany
Cc: mich@riverrd.nz; joel.bouzaid@gmail.com; rhettgrover@yahoo.com; kester@rockhopper.co.nz; redbeachtomos@gmail.com; nickr@barker.co.nz; Rebecca Sanders; parkerb@xtra.co.nz; brabantcj@outlook.com; diane.maloney@xtra.co.nz; sarah.robson@ckl.co.nz; Ross Cooper; scott@engineous.co.nz; Renee Fraser-Smith; Andrew Allsopp-Smith; Andrew Fawcet
Subject: Shildon Ltd - further submission on PC 78 to the AUP
Attachments: 20230119 Shildon Ltd further submission on PC78.pdf

Good afternoon

Please find **attachment** for lodgement and by way of service a further submission on **PC78** to the AUP on behalf of Shildon Ltd.

Please advise if you would like a hard copy.

Kind regards

Madeleine C Wright
Barrister

Tel: 0274687778

www.sallygepp.co.nz

This email is from Sally Gepp, Barrister. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact me on 021 558 241 and then delete the email. I do not accept responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

FURTHER SUBMISSION ON PLAN CHANGE 78 TO THE AUCKLAND UNITARY PLAN OPERATIVE IN PART

1. SUBMITTER DETAILS

Submitter name: Shildon Ltd

Submitter address: Shildon Ltd
c/o Madeleine Wright / Sally Gepp - Barristers
madeleine@sallygepp.co.nz / sally@sallygepp.co.nz
Level 1, 189 Hardy Street, Nelson

Primary submission no.: 944

Date: 19 January 2023

Scope: PC78 to the Auckland Unitary Plan Operative in Part ("AUP")

Hearing: Shildon Ltd wishes to be heard in support of its submission and further submission

Standing: As a submitter on PC78, and as an entity which undertakes residential development, Shildon Ltd has an interest in PC78 that is greater than the interest of the general public[1]

2. FURTHER SUBMISSION

Submission #	Submitter name	Submission point #	Submission point	Shildon Ltd position
125	Mich Kora	125.1	Decline the plan change because of significant wastewater issues due to inadequate infrastructure in the Orewa/Red Beach area.	**Oppose** It is not appropriate to decline to implement the MDRS across an entire part of Auckland because of potential infrastructure constraints in a discrete

[1] Sch 1 Part 1 cl 8(1)(b), Sch 1 Part 6 cl 95(2)(k)

				area. In many parts of Orewa/Red Beach infrastructure is adequate to support intensification. In others, constraints can be overcome through development design and upgrades.
		125.2	Decline the plan change. Parking is already at high capacity in the Orewa/Red Beach area.	**Oppose** It is not appropriate to decline to implement the MDRS across an entire part of Auckland because of potential infrastructure constraints in a discrete area. Parking can be provided for within development design.
		125.3	Decline the plan change because there are already issues with the power lines and infrastructure surrounding the exchange for Orewa/Red Beach.	**Oppose** It is not appropriate to decline to implement the MDRS across an entire part of Auckland because of potential infrastructure constraints in a discrete area. In many parts of Orewa/Red Beach infrastructure is adequate to support intensification. In others, constraints can be overcome through development design and upgrades.
		125.4	Decline the plan change due to significant issues with the drinking water in the Orewa/Red Beach area, resulting in sickness.	**Oppose** It is not appropriate to decline to implement the MDRS across an entire part of Auckland because of potential infrastructure constraints in a discrete area. In many parts of Orewa/Red Beach infrastructure is adequate to support intensification. In others,

				constraints can be overcome through development design and upgrades.
138	Joel Bouzaid	138.2	Reject Qualifying Matter water and waste water constraints from Orewa as it will lower property values.	**Support** Blanket application of a Qualifying Matter across and entire part of Auckland because of concerns in discrete areas is not appropriate. The RMA requires a much more fine-grained, site-specific approach to applying Qualifying Matters. In many parts of Orewa/Red Beach infrastructure is adequate to support intensification. In others, constraints can be overcome through development design and upgrades.
953	Rhett Grover	953.2	Rezone to Single House zone (SHZ) for Red Beach, Orewa, Silverdale and the Hibiscus Coast.	**Oppose** Blanket rezoning to SHZ across the entire Orewa area would be inconsistent with and fail to implement the MDRS. The RMA requires a much more fine-grained, site-specific approach to applying the MDRS.
1018	Queen's Home Limited	1018.4	Amend I530 Orewa 2 Precinct provision "I530.6.4. height in relation to boundary" to apply the MDRS standard.	**Support** The MDRS should apply to the Orewa 2 Precinct, including sub-precinct B.
		1018.5	Amend I530 Orewa 2 Precinct provision "I530.6.5. Yards" to apply the MDRS standard.	**Support** The MDRS should apply to the Orewa 2 Precinct, including sub-precinct B.

		1018.6	Amend I530 Orewa 2 Precinct provision I530.6.6. to apply the MDRS standard within a Physical Limitation Area or underlying zone is applied for max. building coverage (50%) and max. Impervious area (60%).	**Support** The MDRS should apply to the Orewa 2 Precinct, including sub-precinct B.
		1018.7	Amend I530 Orewa 2 Precinct provision I530.6.1. to apply standard E38.8.4.1.	**Support in part** Agree that I530.6.1. needs to be amended. However, only support application of E38.8.4.1 in situations where a proposed development does not meet the 'no minimum lot size' requirement in cl 8 Sch 3A RMA. If cl 8 is met then no minimum lot size should apply.
1053	H and C Thomson	1053.2	Rezone to Single House zone (SHZ) for Red Beach, Orewa, Silverdale and the Hibiscus Coast.	**Oppose** Blanket rezoning to SHZ across the entire Orewa area would be inconsistent with and fail to implement the MDRS. The RMA requires a much more fine-grained, site-specific approach to applying the MDRS.
1073	Fulton Hogan Land Development Ltd	1073.4	Amend objective to clarify MHU plays role in reducing carbon emissions.	**Support** MHU density and the location of the zoning will support emissions reductions.
		1073.7	Amend objective HS5.2(1):	**Support**

			Land ~~near the Business – Metropolitan Centre Zone and the Business – Town Centre Zone, high-density residential areas and close to the public transport network~~ is efficiently used for ~~higher~~ medium density residential living and to provide urban living that increases housing capacity and choice ~~and access to public transport~~.	Agree objective's focus on high density does not align with medium density focus of MDRS.
		1073.8	Approve deletion of objective H5.2(3).	**Support** Agree objective does not align with outcomes sought by the MDRS and so is no longer applicable.
		1073.10	Retain operative version of objective H5.2(4).	**Support** Agree that addition of term "high quality amenity" is unclear.
		1073.11	Delete objective H5.2(5).	**Support** Agree matter covered elsewhere. Duplication should be avoided.
		1073.13	Amend objective H5.2(7): Development is supported by adequate infrastructure and services.	**Support** Agree that infrastructure constraints should be managed through matters of discretion and assessment criteria and that revised objective better aligns with this approach.
		1073.15	Delete objective H5.2(9) relating to SEAs as Qualifying Matters.	**Support** Agree that protection of SEAs adequately covered by other AUP provisions. Blanket application of SEAs as Qualifying Matters not justified; a site specific analysis is required under the relevant RMA provisions. In some cases

				this may justify application of a Qualify Matter, in others it may not.
		1073.16	Delete objective H5.2(10) which relates to avoiding development in areas with significant transport constraints.	**Support** Agree that infrastructure constraints can be overcome via funding mechanism which sit outside the AUP. Extremely directive nature of the policy risks preventing this type of arrangement in order to 'unlock' currently isolated or semi-isolated areas.
		1073.17-1073.27	Retain new policies/deleted policies.	**Support** New policies are mandatory MDRS policies. Policies deleted are replaced by MDRS policies.
		1073.28	Replace policy H5.3(6A) with three new policies relating to quality urban form.	**Support in part** Agree that it is important for policies to be as concise and clear as possible. However, Shildon Ltd wants to ensure the wording of policies is focused on high-level courses of action to achieve objectives and leaves developers flexibility in implementation. In its view, less is generally more, in terms of policy direction.
		1073.33	Delete policy H5.3(11).	**Support** Agree policy direction already captured by policies in other parts of the AUP. Duplication should be avoided.
		1073.34, 1073.35	Amend policies H5.3(12) and (13):	**Support**

			Require proposals for four or more residential units to demonstrate that there is adequate capacity in the infrastructure networks to support the development	Better aligns with matters of discretion and assessment criteria.
		1073.36	Delete policy H5.3(14)	**Support** Acknowledge importance of safe street environment, but Shildon Ltd agrees that if the intent of the policy is to drive extensive public realm upgrades this is a matter that sits outside the AUP.
		1073.37	Delete policy H5.3(15)	**Support in part** Acknowledge that protection of s 6(c) significant ecological areas is a matter of national importance. However, Shildon Ltd agrees that SEAs are already, and more appropriately, managed under the SEA provisions in the AUP.
		1073.38	Delete policy H5.3(16)	**Support** Reasons as at 1073.16 above.
		1073.41-1073.52	Variously amend, delete, or retain activity statuses applying to activities in Activity Table H5.4.1	**Support in part** Agree with the reasons provided for changes in the submission and relief sought to the extent it aligns with relief sought by Shildon Ltd in its submission.
		1073.53	Amend clause preventing public notification of applications of 4 or more dwellings, to delete various standards that must be complied	**Support** Agree that potential for notification should only be triggered where there are breaches of standards which relate to

			with to receive non-notification benefit.	effects outside the site envelope. Public input not relevant to breaches of standards within the site envelope.
		1073.54	Delete H5.6.3B setting permitted activity standards requiring connection to existing stormwater network in combined waste water / stormwater areas.	**Support** Infrastructure constraints are already captured by the MHU provisions and are best addressed via matters of discretion and assessment criteria. There is no 'one size fits all' approach.
		1073.55	Delete H5.63C setting permitted standard relating to provision of stormwater.	**Support** Reasons as above at 1073.54.
		1073.56	Retain H5.6.4 building height	**Support** Aligns with the MDRS.
		1073.57	Retain H5.6.5 height in relation to boundary, except (2)(b)	**Support** Aligns with MDRS.
		1073.58	Remove deletion to H5.6.5(2)(b)	**Support** Deleted text does not align with the MDRS.
		1073.59, 1073.60	Support deletion of H5.6.6 and H5.6.7 alternative height in relation to boundary provisions	**Support** Replaced by new MDRS compliant provision.
		1073.62	Retain H5.6.9 regarding max impervious area.	**Oppose** Notified standard does not align with MDRS which allow 50% site coverage– only allowing an additional 10% for eaves and parking areas, paved patios for

				outdoor living will create perverse urban amenity outcomes. 70% should apply as sought in Shildon Ltd's submission.
		1073.63	Remove clause in H5.6.10 applying different approach to building coverage for sites with SEAs.	**Support** SEAs adequately protected via exiting AUP provisions. No direct correlation between coverage and SEA presence provided to support clause.
		1073.66	Delete standard relating to daylight.	**Support** Unnecessary.
		1073.67, 1073.68	Various amendments to H5.6.14 Outdoor living spaces to better align with MDRS.	**Support** For reasons set out in Shildon Ltd's submission. Shildon Ltd also agrees that there is no reason for distinguishing between developments of up to 3 and over 3 given oversight RDA status provides for developments over 3.
		1073.69	Amend H5.6.15 standard relating to side and rear fences and walks to increase maximum height to 2.5m.	**Support** Better reflects the realities of developing on steeper land, which is inevitable in Auckland given its overall typography.
		1073.70	Amend H5.6.16 standard relating to studios to decrease footprint to 40m2 for 1 bedroom dwellings.	**Support** Provides more development flexibility.
		1073.71, 1073.72	Amend H5.6.17 standard relating to rain water tanks to provide a size dimension alternative to the height (1m) standard, and some flexibility to be above ground.	**Support** Provides more development flexibility.

		1073.73	Delete or amend H5.6.18 as it applies to developments of 4 or more dwellings.	**Support in part** Standard should align with the MDRS. Unnecessary additional controls should be avoided as they curtail development design flexibility.
		1073.78	Amend matters of discretion relating to developments of 4 or more dwellings to make them simpler and clearer.	**Support** Matters of discretion should be broadly framed so that they do not denote specific outcomes to be achieved but rather enable consideration of relevant matters.
		1073.80	Retain operative matters of discretion for buildings that do not meet standards.	**Support** Matters are broadly framed and address relevant issues.
		1073. 81	Retain proposed deletion matters of discretion relating to alternative height in relation to boundary.	**Support** Consequential to relevant standards being deleted to implement the MDRS.
		1073.82, 1973.83	Delete matters of discretion relating to 1 or more dwelling in water, waste water or stormwater control areas.	**Support** Consequential to change to standard sought above.
		1073.84	Amend assessment criteria for 4 or more dwellings.	**Support** Amendments reflect proper level of detail for assessment criteria and proper point of focus for assessing effects of 4 or more dwellings.

		1073.86	Amend assessment criteria for buildings exceeding building height standards.	**Support in part** Agree that criteria as notified are overly restrictive and do not align with the intent of the NPSUD and the MDRS. Criteria need to be appropriately framed to focus on areas of potential effect without pre-determining the outcome of a consent application.
		1073.89	Amend assessment criteria for exceeding height in relation to boundary.	**Support** Agree that amendments properly focus on potential effects of infringement as identified as being of import by the NPSUD.
		1073.95	Amend assessment criteria for building coverage.	**Support** Agree criteria overly complex and how they would be applied is unclear. Criteria effectively reframe policies in more complex language.
		1073.99, 1973.108	Amend assessment criteria to remove requirements for communal open space and provide room for a reduction in private outdoor spaces.	**Support** Mandatory requirement for communal open space reduces development flexibility and developable land area, and may not always be justified. Flexibility around size of private open space important for enabling flexible design.
		1073.102	Amend assessment criteria for dwelling size.	**Support** Agree that a standard based on 'typical' furniture size is unworkable as there is

				no standard for this, and varying views. Agree criteria should avoid reframing policy outcomes.
		1073.103, 1973.109	Delete criteria and special information for deep soil trees.	**Support** Consequential to opposition. Benefit of deep soil trees not clear.
		1073.106, 1973.107	Delete standards relating to waste, waste water, and stormwater controls.	**Support** Consequential.
		1073.216	Delete objectives E38.2(10)(d) and (e).	**Support** Objectives have the effect of requiring infrastructure supporting subdivision and development in place before said subdivision and development. This is not how development projects work.
		1073.217	Retain objective E38.2(11).	**Support** Aligns with the MDRS.
		1073.218-1073.221	Variously delete or retain policies relating to urban subdivision.	**Support** Agree with reasons in Fulton Hogan submission.
		1073.228, 1073.229	Delete rules making subdivision RDA where water, waste water, or stormwater control applies.	**Support** Not required. Issue already captured by standards applying to subdivision.
		1073.230, 1073.231	Retain notification provision relating to 1-3 dwellings in MHU, and amend notification provision relating to 4+ dwellings in MHU.	**Support** Notification provision for 1-3 dwellings aligns with MDRS. Amendments to notification provision for 4+ dwellings

				appropriately focused notification opportunity on situations where public input may assist decision-making.
		1073.233, 1073.234	Retain standards in E38.8.1A as notified.	**Support** Implement the MDRS.
		1073.235	Delete previous E38.8.2.4.	**Support** Standard does not align with the NPSUD.
		1073.235, 1073.236	Delete standards relating to water, waste water and stormwater control areas.	**Support** Consequential to deletion of rule. Standards not required as provided for elsewhere in provisions.
		1073.238, 1073.239	Retain matters of control.	**Support** Matters algin with MDRS.
		1073.240-1073.243	Delete matters of discretion and assessment criteria relating to water, waste water, and stormwater control areas.	**Support** Consequential.
1095	Bernard Adrian Parker	1095.10	Amend the plan to make stormwater a qualifying matter in catchments were there are flood prone or flood plain areas.	**Oppose** The flood plain overlay is a non-statutory overlay that is not of sufficient qualify to be used as a Qualifying Matter of blanket application, either on its own or as a proxy for stormwater.
1113	Claire Brabant	1113.1, 1113.2	Rezone all land affected by significant infrastructure constraints (water and waste water)	**Oppose** It is acknowledged that in some situations water and waste water

			outside a walkable catchment to LDRZ.	constraints may justify application of a Qualifying Matter over a particular area or site. However, a 'blanket' approach to applying Qualifying Matters across Auckland should not be adopted. The RMA demands a much more detailed, careful approach. In addition, in many situations perceived constraints can be overcome through developer funded upgrades or additions to the water and/or waste water networks. This Qualifying Matter should only be applied to those areas where a site-specific assessment confirms ability to overcome constraints is not possible or extremely difficult.
1114	Diane Dorothy Maloney	1114.1, 1114.2	Include stormwater constraints as outlined in Watercare's maps as Qualifying Matters.	**Oppose** A 'blanket' approach to applying Qualifying Matters across Auckland should not be adopted. The RMA demands a much more detailed, careful approach. In addition, in many situations perceived constraints can be overcome through high qualify stormwater infrastructure specifically tailored to the particular development site.
1270	Orewa Developments Ltd	1270.1	Remove the water and/or waste water Constraints Control is removed from 289 West Hoe Heights, Orewa as a qualifying matter.	**Support** Blanket application of a Qualifying Matter across and entire part of Auckland because of concerns in

				discrete areas is not appropriate. The RMA requires a much more fine-grained, site-specific approach to applying Qualifying Matters. Shildon Ltd has also sought this be removed as a Qualifying Matter from 250 and 256 West Hoe Heights.
		1270.2	Remove the Orewa 2 Precinct as a qualifying matter and amend the relevant provisions to reflect this.	**Support** Blanket application of a Qualifying Matter across and entire part of Auckland because of concerns in discrete areas is not appropriate. The RMA requires a much more fine-grained, site-specific approach to applying Qualifying Matters. Using the Orewa 2 Precinct as a Qualifying Matter effectively renders redundant the MHU zoning that has been applied 'underneath'.
		1270.3	Delete Standards I530.6.1. Minimum net site area for land not within a Physical Limitation Area, I530.6.3. Height, I530.6.4. Height in relation to boundary, I530.6.5. Yards, I530.6.6. Maximum impervious area and building coverage and I530.6.7. Building frontages entirely.	**Support** Agree that Council's retention of these standards to "prevent" development does not align with the MDRS, and that these standards are not necessary.
		1270.4	Amend I530.4. Activity table, I530.6. Standards, and I530.8.2.2. Two or more dwellings on a site.	**Support**

				Agree that three dwellings per site should be a permitted activity in the MHU in the Orewa 2 Precinct as this aligns with the MDRS in Sch 3A RMA and the intent of the MHU.
		1270.5	Delete rule H5.4.1(A2A) in its entirety.	**Support** Agree that the rule effectively extends the boundary of a mapped SEA across an entire site, even where the SEA only covers part of the site and that this is inappropriate. There are adequate protections from activities impacting SEAs elsewhere in the AUP.
		1270.6	Delete rule H5.4.1(A2B) in its entirety.	**Support** Agree that the rule effectively extends the boundary of a mapped SEA across an entire site, even where the SEA only covers part of the site and that this is inappropriate. There are adequate protections from activities impacting SEAs elsewhere in the AUP.
		1270.7	Delete standard H5.6.10(2)(a).	**Support** Agree sufficient controls on activities near or within a SEA are provided for elsewhere in the AUP.
		1270.8	Delete standard H5.6.10(2)(b)	**Support** Agree sufficient controls on activities near or within a SEA are provided for elsewhere in the AUP.

		1270.9	Delete standard H5.6.10(2)(c).	**Support** Agree sufficient controls on activities near or within a SEA are provided for elsewhere in the AUP.
		1270.10	Remove Flood Plains as a qualifying matter.	**Support** Blanket application of a Qualifying Matter across and entire part of Auckland because of concerns in discrete areas is not appropriate. The RMA requires a much more fine-grained, site-specific approach to applying Qualifying Matters. The flood plains overlay in the RMA is a non-statutory overlay and not of sufficient quality to use for this purpose.
1543	Winton Land Ltd	1543.3	Retain proposed rule C1.6A.	**Support** Rule provides clarity about interrelationship between overlay, precinct, zone, and Auckland-wide provisions.
		1543.7	Remove presence of notable trees as a Qualify Matter.	**Support** Blanket approach to Qualifying Matters does not reflect site-based approach required by RMA. Notable trees subject to sufficient protection through existing AUP provisions.
		1543.21	Remove local and public views overlay as a Qualifying Matter.	**Support**

				Blanket approach to Qualifying Matters does not reflect site-based approach required by RMA. Local views not of sufficient importance to meet s 77I and 77O threshold for being a Qualifying Matter.
		1543.23	Remove special character as a Qualifying Matter.	**Support** As above for 1543.7 and 1543.21.
		1543.48-1543.50	Remove natural hazards and flooding as a Qualifying Matter, and delete reference to these being Qualifying Matters in E36.	**Support** Importance of managing natural hazards and flooding is acknowledged, however appropriately addressed via existing AUP provisions. Blanket application of Qualifying Matters risks inhibiting development in situations where risks are in fact low or non-existent, and is inconsistent with the site-specific approach required.
		1543.51, 1543.208, 1543.52, 1543.53, 1543.56, 1543.59, 1543.60	Delete objective, policies, standards, matters of discretion, assessment criteria providing for subdivision where it can be serviced by stormwater, water, waste water.	**Support** Infrastructure requirements already provided for elsewhere in the plan. Agree these constraints should not be Qualifying Matters as usually constraint able to be overcome as part of development design.
		1543.57, 1543.58	Delete matters of control, except for compliance with an approved land use consent.	**Support** Effects covered by land use consent, thus exclusive focus on compliance with

				that consent all that is needed. Better aligns with MDRS.
		1543.65, 1543.66	Delete Qualifying Matters from MHU.	**Support in part** There may be some specific sites where it is appropriate that a Qualifying Matter is applied. However, this should be determined by a specific site-by-site assessment, not my blanket application of Qualifying Matter status to overlays or non-statutory layers. The effect of this approach is to unjustifiably render the MHU zoning otiose across much of Auckland.
		1543.67	Delete all proposed objectives from H5.2 MHU zone.	**Support in part** Agree with underlying intent that zone objectives should be kept focused on uses within the zone, and that duplication of other equivalent objectives elsewhere in the AUP should be avoided.
		1543.68	Delete all proposed policies from H5.3 MHU zone.	**Support in part** Reasons as above for 1543.67.
		1543.69	Delete proposed rules restricting development on sites where an SEA is present.	**Support** Protection of SEAs provided through other AUP provisions. Current wording of provisions restricts development even if on part of site that is not covered by the SEA itself.

		1543.72	Delete permitted activity standard relating to combined sewers.	**Support** More appropriately addressed via assessment criteria or a broader standard that makes room for innovative stormwater solutions.
		1543. 73	Delete permitted activity standard relating to stormwater disposal constraints control.	**Support** As above for 1543.72.
		1543.78	Delete standards relating to SEAs in H5.6.10 regarding building coverage.	**Support** SEA protection provided for elsewhere in the AUP.
		1543.79	Delete standards in H5.6.11 landscape area that are additional to the MDRS.	**Support** Additional provisions for 4+ dwellings will significantly reduce developable area.
		1543.81	Delete or amend standards in H5.6.12 outlook space, relating to 4+ dwellings.	**Support** Additional provisions put additional expectations on 4+ that are not put on up to 3 dwellings, and are unachievable with some standard medium density design typologies (e.g. terrace).
		1543.84	Delete or amend standards in H5.6.14 Outdoor living space relating to 4+ dwellings.	**Support** Overly prescriptive.
		1543.85	Delete standard for deep soil and canopy trees.	**Support** Overly prescriptive. Significant reduction in developable area. In many

				medium density designs not possible or practical to extent standard requires.
		1543.86	Delete standard providing safety and privacy buffer from private pedestrian and vehicle access ways.	**Support** Overly prescriptive. Traffic safety measures need to be designed specifically for a site.
		1543.87	Delete standard requirement 1.4m2 area for waste bins per dwelling.	**Support** Overly prescriptive. Bin space location and size should be able to be flexibly designed to match the site and development design. For example, it is sufficient to state that adequate and accessible storage and collection space is required.
		1543.88	Delete matter of control H5.6.1 relating to one dwelling on site with SEA.	**Support** Consequential to changes addressed above.
		1543.90-1543.95, 1543.213-217.	Amend matters of discretion in H5.8.1(2) relating to 4+ dwellings and related assessment criteria.	**Support in part** Agree matters/criteria are excessive and worded in a way that supports their application as standards, as opposed to identifying high-level issues to be considered when assessing a consent application. Amendments required to more tightly focus on matters relevant to objectives and policies (as sought to be amended), and ensure discretion is retained.

		1543.97	Delete matters of discretion in H5.8.1 relating to more than one dwelling in water, waste water, stormwater control areas.	**Support** Consequential to changes sought above.
		1543.98	Delete assessment criteria for building heights in H5.8.2(4).	**Support in part** Some criteria are needed however current criteria are too prescriptive and are inappropriately framed to favour decision-making that does not support heights over permitted standards.
		1543.102	Delete assessment criteria relating to building coverage in H5.8.2(11).	**Support in part** Some criteria are needed, however current criteria are too prescriptive. In addition, focus on current and planned character of the zone is inappropriate as it fails to align with NPSUD recognition that neighbourhoods change overtime.
		1543.103	Delete assessment criteria relating to landscape area in H5.8.2(12).	**Support in part** Some criteria are needed, however current criteria are too broad. Consequential amendments also needed in light of changes referred to above.
		1543.104	Delete assessment criteria relating to outlook space in H5.8.2(13).	**Support in part** Some criteria are needed, however current criteria are too broad. In addition, framing of (d) suggests that consent should not be granted if overlooking not minimized to maximum extent possible, however multiple other

				factors go into design which mean that minimizing to max extent is not the best outcome. Reframing needed to ensure discretion to assess is retained.
		1543.105	Delete assessment criteria relating to daylight in H5.8.2(14).	**Support in part** Some criteria are needed, however current criteria are too broad.
		1543.106	Retain notified assessment criteria for outdoor living space in H5.8.2(15).	**Support** Criteria tightly focused on key issues of relevance. Framed so as to provided discretion, not presuppose outcome.
		1543.107	Delete assessment criteria in H5.8.2(15A) relating to windows to street and pedestrian accessway.	**Support in part** Some criteria are needed, however current criteria are too broad.
		1543.108	Delete assessment criteria relating to H5.8.2(16) relating to front, side, and rear walls.	**Support in part** Some criteria are needed, however current criteria are too broad.
		1543.109	Delete assessment criteria in H5.8.2(17) for minimum dwelling size.	**Support in part** Some criteria are needed, however current criteria are too broad.
		1543.110	Delete assessment criteria in H5.8.2(18) relating to deep soil area and canopy.	**Support** Consequential to changes sought above.
		1543.113, 1543.114	Delete assessment criteria in H5.8.2(21) and (22) relating to dwellings in water, waste water, stormwater control areas.	**Support** Consequential to changes sought above.

		1543.115	Delete new special information requirements.	**Support in part** Some guidance in AUP regarding assessments Council is likely to want/request is helpful to applicants. However current framing is too prescriptive and does not allow for assessment to be commensurate to scale of development.
		1543.189	Delete new definition of "landscaped area".	**Support** A definition is needed, however revised definition is unduly narrow and risks resulting in a significant and unjustified reduction in developable area.
		1543.191	Delete definition of 'urban heat island'.	**Support** Scientific basis for concept not clear.
2398	Scott Lamason	2398.2	Remove the waste water and water supply Qualifying Matter from all of Orewa and Whangaparāoa.	**Support** Blanket application of a Qualifying Matter across and entire part of Auckland because of concerns in discrete areas is not appropriate. The RMA requires a much more fine-grained, site-specific approach to applying Qualifying Matters.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 1:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Auckland International Airport Limited
Attachments: PC 78 Further Submission FINAL.pdf

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

Contact details

Full name of person making a further submission: Auckland International Airport Limited

Organisation name: Auckland International Airport Limited

Full name of your agent: Taylor Mitchell

Email address: taylor.mitchell@russellmcveagh.com

Contact phone number: 09 367 8000

Postal address:
Level 30
Vero Centre
48 Shortland Street
Auckland Central
Auckland 1140

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:
Please refer to file attached

Submission number: Please refer to file attached

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

Specific parts of the original submission that your submission relates to:
Point number Please refer to file attached

The reasons for my or our support or opposition are:
Please refer to file attached

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

Specify the parts of the original submission you want to allow or disallow:
Please refer to file attached

Submission date: 19 January 2023

Supporting documents
PC 78 Further Submission FINAL.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? No

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:
Please refer to submission attached.

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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Auckland Airport

FURTHER SUBMISSION ON PLAN CHANGE 78 (INTENSIFICATION) TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

To: Auckland Council ("**Council**")

Name: Auckland International Airport Limited (**"Auckland Airport"**)

Address: At the address for service below

Scope of further submission

1. This is a further submission in support of, and in opposition to, submissions on Plan Change 78 ("**PC78**").

2. Auckland Airport has an interest in PC78 that is greater than the interest that the general public has because it has made submissions on the aspects of PC78 to which this further submission relates. In particular, it has made submissions on the adverse effects that residential intensification in the Moderate and High Aircraft Noise Areas ("**MANA**" and "**HANA**") will have on Auckland Airport and the environment generally.

Submissions supported and opposed

3. The submissions supported and opposed are set out in the table **attached** as **Schedule 1** to this further submission.

General reasons for further submission

4. For the submissions that Auckland Airport supports in **Schedule 1**, those submissions should generally be allowed as they:

   (a) promote sustainable management of resources, achieve the purpose of the Resource Management Act 1991 ("**RMA**") and are not contrary to Part 2 and other provisions of the RMA;

   (b) provide and promote greater health and amenity outcomes, as well as preserve the operational and developmental capacity for nationally significant infrastructure (such as the Airport), consistent with section 77I of the RMA;

   (c) enable the social, economic, and cultural wellbeing of the South Auckland and Manukau communities; and

   (d) meet the reasonably foreseeable needs of future generations.

5. For the submissions that Auckland Airport opposes, those submissions should generally be disallowed as they will not:

   (a) promote or enable the social and economic wellbeing of the community in South Auckland or Manukau or reasonably meet the needs of future generations;

(b) promote or enable efficient use and development of Airport infrastructure and those activities that are dependent on, or benefit from, the operation of the Airport;

(c) promote sustainable management of resources, will not achieve the purpose of the RMA, and are contrary to Part 2 and other provisions of the RMA;

(d) adequately protect and provide for the Airport's current and future operations; and

(e) provide positive health and amenity outcomes for people locating in proximity to the Airport.

6. Without limiting the general reasons above, further specific reasons why Auckland Airport supports or opposes each submission are set out in **Schedule 1**.

Decision sought

7. Auckland Airport seeks the following relief:

(a) That the submissions supported as set out in **Schedule 1** be allowed.

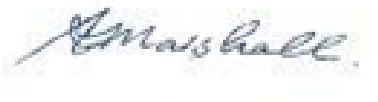
(b) That the submissions opposed as set out in the **Schedule 1** be disallowed.

(c) Such further, alternative or other consequential amendments as may be necessary to fully address Auckland Airport's further submission as set out above and below.

8. Auckland Airport wishes to be heard in support of this further submission.

AUCKLAND INTERNATIONAL AIRPORT LIMITED

Date: 19 January 2023



Signature: _____

Andrea Marshall
Head of Master Planning and Sustainability

Address for Service: C/- Taylor Mitchell

taylor.mitchell@russellmcveagh.com

Russell McVeagh

Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone: +64 9 367 8000

SCHEDULE 1 (PC 78)

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
1.	126.1	Madue Properties Limited	Amend the Moderate Aircraft Noise Areas ("**MANA**") overlay to not apply the blanket density rule of 400m² per site and instead treat applications on a case-by-case basis under the AUP (in particular in relation to 13 Sidley Avenue, Flat Bush).	parash@asapfinance.co.nz	Oppose	Sections 77I and 77O of the RMA clearly enable matters required for the purpose of ensuring the safe and efficient operation of nationally significant infrastructure to be recognised as a qualifying matter. The Council has appropriately recognised the MANA Overlay and its density restrictions as an existing qualifying matter. Auckland Airport opposes this submission on the basis that it seeks to remove these density restrictions as a qualifying mater. This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the Auckland Unitary Plan ("**AUP**") process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment, and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to aircraft noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of activities sensitive to aircraft noise ("**ASAN**") does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary. The controls within the MANA also serve the important function of ensuring that communities that do establish around the Airport have healthy living environments.	Disallow submission
2.	409.1	MBSB Investments Ltd	Remove the MANA standard requiring average minimum site size of 400m^2 and assess on a case-by-case basis.	munish2000@hotmail.com	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment, and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	
3.	612.1	Kevin Pan	Remove Aircraft Noise Overlay D24 as a Qualifying Matter.	kpan2202@gmail.com	Oppose	Auckland Airport is nationally significant infrastructure and ensuring its safe and efficient operation clearly falls within s77I and 77O of the RMA as a qualifying matter. The Council has appropriately recognised the MANA Overlay and its density restrictions as an existing qualifying matter. For the reasons set out in its original submission, Auckland Airport seeks that it is retained.	Disallow submission
4.	612.2	Kevin Pan	Remove the density limit in Aircraft Noise Overlay D24 for MANA (Moderate Aircraft Noise Area) where new dwellings in a residential zone cannot exceed a density of one dwelling per 400m².	kpan2202@gmail.com	Oppose	The submission selectively quotes parts of the relevant D24 policies and does not include those parts which identify that both acoustic treatment **and** density controls are required to manage aircraft noise, or which identify the importance of protecting Auckland Airport from reverse sensitivity effects. The submission also suggests there is housing demand surrounding the Airport due to the Airport's development and growing jobs. However, if not managed carefully, the Airport's future development will be constrained if the Airport is surrounded by increased ASAN and subject to the resulting reverse sensitivity effects. This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment ,and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	
5.	612.3	Kevin Pan	Apply the density exceptions in I412 Flat Bush Precinct Plan, (sub-precinct D and sub-precinct E with a maximum allowable density of 150m² and 180m² per dwelling) to 219 Portage Road, Papatoetoe and the area nearby.	kpan2202@gmail.com	Oppose	The vast majority of the Flat Bush Precinct within the MANA has a maximum density of 1:400m^2. Flat Bush Sub-Precincts D and E are relatively small master planned mixed-use areas of Terraced Housing and Apartment Building ("**THAB**") zoning within the overall Precinct. 219 Portage Road does not fall within the Flat Bush Precinct (or any of its sub-precincts) or within THAB zoning (it is zoned Mixed Housing Suburban under the current Unitary Plan zoning). The reasons set out in row 4 above in respect of the appropriateness of the MANA provisions also applies to 219 Portage Road.	Disallow submission
6.	873.2	Kāinga Ora	Delete the Residential - Low Density Residential Zone ("**LDR**") entirely. See Appendix 1, Table 1, row 44. Rezone with either the Residential - Mixed Housing Urban Zone or the Residential Terrace Housing and Apartment Buildings Zone as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	The proposal to delete the LDR Zone and control housing purely through qualifying matters is an inefficient approach which would result in duplication across the Plan of relevant rules and standards by requiring each of the qualifying matter overlays to capture the permitted activity rules and standards currently within the zone. It also results in plan provisions that are internally inconsistent, as high density zoning would apply to all sites (with relevant objectives and policies promoting intensification) and in qualifying matter areas this zoning and its policy and rule framework would be inconsistent with any Overlays. This approach creates a lack of clarity for plan users as applying a higher density zoning in all areas, including the High Aircraft Noise Area ("**HANA**"), suggests intensification can occur in these areas when it is prohibited within the HANA by the Aircraft Noise Overlay. In respect of the Airport, the zones beneath the HANA and MANA assist the Overlays in minimising the number of people located within areas of high and moderate aircraft noise. This is	

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						critical to ensure adverse health effects of high aircraft noise on these people and subsequent reverse sensitivity effects on the Airport are minimised. It is for this reason that Auckland Airport has sought in its original submission for LDR Zoning to apply to all of the residentially zoned land within the extent of the HANA and MANA.	
7.	873.3	Kāinga Ora	Delete the Residential - Mixed Housing Suburban ("**MHS**") Zone entirely. See Appendix 1, Table 1, row 45. Rezone with Residential - Mixed Housing Urban Zone as a minimum as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. Refer also to the separate submission point on the Auckland Light Rail Corridor exclusion area.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out at Row 6 and its primary submission, Auckland Airport opposes the proposal in Row 7 to delete the MHS Zone.	Disallow submission
8.	873.10	Kāinga Ora	Amend to apply the THAB Zone within a 1200m (approx. 15 minutes) walkable catchment from the edge of any Business Metropolitan Centre Zone. Make amendments summarised out in Appendix 1, Table 1, Row 42, and Appendices 2 and 3 of the submission. Zone mapping changes are set out in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out in Row 6 above, Auckland Airport considers application of zoning under PC 78 needs to take into account qualifying matters, including the HANA and MANA Overlays. In respect of the HANA and MANA, areas of both overlays fall within the Business Metropolitan Centre Zone. It is inappropriate for areas within the MANA and HANA Overlay to be zoned THAB (given the significant increase in density changes proposed to THAB through PC 78) as this is significantly out of line with the residential development enabled and anticipated by the Overlays.	Disallow submission
9.	873.11	Kāinga Ora	Amend to apply the THAB Zone within a 1200m (approx. 15 minutes) walkable catchment from a RTS [This is assumed to mean an RTN station] as set out in Appendices 2 and 3 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out in Row 6 above, Auckland Airport considers application of zoning under PC 78 needs to take into account qualifying matters, including the HANA and MANA Overlays. In respect of the HANA and MANA, areas of both overlays fall within walkable catchments to RTN stations. It is inappropriate for areas within the MANA and HANA Overlay to be zoned THAB (given the significant increase in density changes	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						proposed to THAB through PC 78) as this is significantly out of line with the residential development enabled and anticipated by the Overlays.	
10.	873.13	Kāinga Ora	Amend to apply the THAB Zone within: 1) 400m (approx. 5 minute walk) of stops on FTN routes with service to or through a Business - Metropolitan Centre Zone or the Business - City Centre Zone; 2) 800m (approx. 10 minute walk) in some highly accessible locations; as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out in Row 6 above, Auckland Airport considers application of zoning under PC 78 needs to take into account qualifying matters, including the HANA and MANA Overlays. In respect of the HANA and MANA, areas of both overlays fall within 400m – 800m of FTN routes with service to or through a Business – Metropolitan Centre Zone or the Business – City Centre Zone. It is inappropriate for areas within the MANA and HANA Overlay to be zoned THAB (given the significant increase in density changes proposed to THAB through PC 78) as this is significantly out of line with the residential development enabled and anticipated by the Overlays.	Disallow submission
11.	873.14	Kāinga Ora	Amend to apply the THAB Zone within 800m (approx. 10 minute walk) from the edge of the Business - Town Centre Zone except in identified settlements, as set out in Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out in Row 6 above, Auckland Airport considers application of zoning under PC 78 needs to take into account qualifying matters, including the HANA and MANA Overlays. In respect of the HANA and MANA, areas of both overlays fall within 800m of Business – Town Centre Zoning. It is inappropriate for areas within the MANA and HANA Overlay to be zoned THAB (given the significant increase in density changes proposed to THAB through PC 78) as this is significantly out of line with the residential development enabled and anticipated by the Overlays.	Disallow submission
12.	873.15	Kāinga Ora	Amend to apply the THAB Zone within 400m (approx. 5 minute walk) from the edge of the Business - Local Centre Zone except in identified settlements, as set out in Appendix 2 of the submission. Zone mapping changes are set out in separate submission points by suburb and Appendix 2 map number.	developmentplanning@kaingaora.govt.nz	Oppose	For the reasons set out in Row 6 above, Auckland Airport considers application of zoning under PC 78 needs to take into account qualifying matters, including the HANA and MANA Overlays. In respect of the HANA and MANA, areas of both overlays fall within 400m of Business – Local Centre Zoning. It is inappropriate for areas within the MANA and HANA Overlay to be zoned THAB	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						(given the significant increase in density changes proposed to THAB through PC 78) as this is significantly out of line with the residential development enabled and anticipated by the Overlays.	
13.	873.28	Kāinga Ora	Amend the majority of the qualifying matters to be applied by overlays rather than zones or precincts. An example of where this is not requested is for the flooding qualifying matter. See also Appendix 1, Table 1, Row 3 of the submission.	developmentplanning@kaingaora.govt.nz	Oppose	Auckland Airport is nationally significant infrastructure and ensuring its safe and efficient operation clearly falls within s77I and 77O of the RMA as a qualifying matter. The draft PC78 provisions primarily reflected this qualifying matter through the retention of the HANA and MANA Overlay. However, as sought in Auckland Airport's original submission and set out in further detail at Row 6 above, the qualifying matters relevant to the Airport also need to be applied through the zoning that falls within the HANA and MANA Overlay. Auckland Airport considers it most appropriate for LDR Zoning to apply to all residential zones within the HANA and MANA extent, in order to ensure the scale and form of residential development in these zones is appropriately restricted to minimise the numbers of ASAN locating within the HANA and MANA.	Disallow submission
14.	873.29	Kāinga Ora	Amend the qualifying matters so that they are managed consistently and are not managed by zones.	developmentplanning@kaingaora.govt.nz	Oppose	This submission point is similar to that outlined in Row 13 and Auckland Airport opposes this submission for the reasons set out in Row 13.	Disallow submission
15.	873.29	Kāinga Ora	Delete all references to the Residential - Low Density Residential Zone including as set out in Appendix 1, Table 1, Rows 1, 39 and 40 of the submission and any consequential changes.	developmentplanning@kaingaora.govt.nz	Oppose	This decision is consequential to the relief sought to delete the LDR Zone, which Auckland Airport opposes as set out above at Row 6.	Disallow submission
16.	873.34	Kāinga Ora	Amend C1.6A(2) by deleting reference to "an overlay rule" as set out in as set out in Appendix 1 Table 1 Row 2 of the submission.	developmentplanning@kaingaora.govt.nz	Oppose	The reasons for the submission state that “a minor amendment is required to confirm that precinct rules should not override / replace overlays” but the amendment proposed appears to have the opposite effect. Auckland Airport supports the current situation where precinct rules do not	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						override or replace overlays.	
17.	873.46	Kāinga Ora	Retain the HANA as a qualifying matter, but amend it by rezoning any LDR Zone and THAB Zoned areas to MHU Zone. Refer to Appendix 1, Table 1, Row 30 of the submission, and Appendix 2 of the submission. Zone mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. [inferred: proposes to rezone some or all of the properties in streets within the Auckland Airport HANA from LDR Zone to MHU Zone including: Clendon Avenue, Puhinui Road, Ranfurly Road, Ballance Avenue, Seddon Avenue, Atkinson Avenue, Freyberg Avenue, Stafford Avenue, Papatoetoe; Burrell Avenue, Plunket Avenue, and Noel Burnside Road, Manukau Central] [inferred: proposes to rezone some or all of the properties in streets within the Auckland Airport HANA from Residential - Terrace Housing and Apartment Buildings Zone to Residential - Mixed Housing Urban Zone including: Clendon Avenue, Puhinui Road, Ranfurly Road, Ballance Avenue, Seddon Avenue, Atkinson Avenue, Freyberg Avenue, Stafford Avenue, Wyllie Road, and Milan Road, Papatoetoe; Burrell Avenue, Plunket Avenue, and Noel Burnside Road, Manukau Central]	developmentplanning@kaingaora.govt.nz	Oppose in Part	Auckland Airport supports the retention of the HANA as a qualifying matter and downzoning of THAB areas within the HANA but opposes the rezoning of LDR and THAB zoned areas within the HANA to MHU zone. Given the development of any new ASAN (including new dwellings) are prohibited activities within the HANA (D24.4.3 (A29)) Auckland Airport considers any zoning which indicates residential intensification is possible in the HANA to be inappropriate. This position is set out in further detail above at Row 6.	Allow submission in part regarding retention of HANA as a qualifying matter and downzoning of THAB within the HANA but disallow rezoning of LDR and THAB areas to MHU.
18.	873.47	Kāinga Ora	Delete the MANA as a qualifying matter and delete the blanket density restrictions for residential sites within the MANA overlay and make other amendments as set out in Appendix 1, Table 1, Row 31 of the submission.	developmentplanning@kaingaora.govt.nz	Oppose	The MANA performs an important function in ensuring the safe and efficient operation of Auckland Airport, as nationally significant infrastructure and therefore clearly falls within s77I and 77O of the RMA as a qualifying matter. Exposing large numbers of people to high levels of aircraft noise that cannot be mitigated in the external environment not only creates an unhealthy living and learning environment for those exposed but can lead to restrictions on the efficient operation of New Zealand's critical airport infrastructure.	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment, and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	
19.	873.59	Kāinga Ora	Delete the 1412 Flatbush Precinct density standards that relate to the Moderate Aircraft Noise Area Overlay. Remove the provisions relating to the MANA from the precinct and apply the city-wide overlay provisions. Also summarised under the qualifying matter topic.	developmentplanning@kaingaora.govt.nz	Oppose	The MANA performs an important function in ensuring the safe and efficient operation of Auckland Airport, as nationally significant infrastructure and therefore clearly falls within s77I and 77O of the RMA as a qualifying matter. Exposing large numbers of people to high levels of aircraft noise that cannot be mitigated in the external environment not only creates an unhealthy living and learning environment for those exposed but can lead to restrictions on the efficient operation of New Zealand's essential airport infrastructure. This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary. While Auckland Airport would support applying the	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						same overlay density restrictions (1:400m2 maximum density) to all Sub-Precincts in the Flat Bush Precinct, it opposes the removal of the current density restrictions in the MANA as sought by the submitter.	
20.	873.377	Kāinga Ora	Delete the 1412 Flatbush Precinct density standards that relate to the Moderate Aircraft Noise Overlay. Also summarised under the precinct topic.	developmentplanning@kaingaora.govt.nz	Oppose	Auckland Airport opposes this submission for the reasons outlined in Rows 1 and 19 above.	Disallow submission
21.	873.378	Kāinga Ora	Delete the density restriction standards pertaining to the 'moderate aircraft noise area overlay' and from the I438 Takanini Precinct framework. Also summarised under the precinct topic.	developmentplanning@kaingaora.govt.nz	Oppose	While Auckland Airport would not be affected by the removal of density restrictions in the Takanini Precinct and so therefore does not oppose that element of this submission point, it opposes the removal of density restrictions within the MANA generally for the reasons stated above at Rows 1 and 19.	Disallow submission
22.	1083.36	Board of Airline Representatives New Zealand Inc	Retain the ANNA on the planning maps.	cath@barnz.org.nz gillian@chappell.nz	Support	While showing the Aircraft Noise Notification Area does not result in AUP restrictions on ASAN, it performs a useful function in alerting people to the location of an aircraft noise environment that could be annoying to some people. Controls for aircraft noise at the levels captured within the ANNA are recommended in the relevant New Zealand Standard (NZS 6805:1992).	Allow submission
23.	1284.1	Exponential Properties Ltd	Regularly update D24 Aircraft Noise overlay and Appendix 19.	colin@hardacreplanning.co.nz	Oppose	The Aircraft Noise Overlay and the FANC in Appendix 19 of the AUP were developed through a comprehensive and public hearing process during the development of the AUP and were reviewed and modelled by experts in acoustics and aircraft noise prediction taking into account the aircraft that were currently in use at Auckland Airport and predicted to use the airport in future.	Disallow submission
24.	1284.2	Exponential Properties Ltd	Remove D24 Aircraft Noise overlay and Appendix 19 from 8 Freyberg Avenue, Papatoetoe.	colin@hardacreplanning.co.nz	Oppose	8 Freyberg Avenue Papatoetoe is located within the HANA. New residential development is a prohibited activity in the HANA and it would be inappropriate to increase the numbers of people exposed to high levels of aircraft noise in this environment. Exposing large numbers of people	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						to high levels of aircraft noise that cannot be mitigated in the external environment not only creates an unhealthy living and learning environment for those exposed but can lead to restrictions on the efficient operation of New Zealand's critical airport infrastructure through reverse sensitivity effects.	
25.	1401.15	Angela Joy Goodwin	Delete designations as a qualifying matter.	angela@potentialis.co.nz	Oppose	Designations clearly fall within s77I and 77O of the RMA as a qualifying matter.	Disallow submission
26.	1401.16	Angela Joy Goodwin	If designations are not removed as a qualifying matter, clarify in the provisions that Designation X the airspace designation is not included.	angela@potentialis.co.nz	Oppose	It is assumed that the reference to "…Designation X the airspace designation…" is a reference to Auckland Airport's Designation 1102. Designation 1102 includes obstacle limitation surfaces and other restrictions related to aviation safety that are designed to ensure the safe and efficient operation of Auckland Airport, as nationally significant infrastructure and therefore clearly falls within s77I and 77O of the RMA as a qualifying matter. Even where permitted height levels fall below the Designation 1102 restriction in parts of the region, it is necessary to have the Designation 1102 clearly identified as a qualifying matter to ensure developments which seek to rely on more enabling provisions or policies (which could be utilised to increase height beyond permitted levels) also must consider any relevant policies referring to the consideration of qualifying matters like Designation 1102.	Disallow submission
27.	1465.6	Maheeka Ariyapperuma	Retain Aircraft Noise areas as qualifying matters.	mpga29@gmail.com	Support	The submitter seeks that aircraft noise areas "…should be included in the plan for the protection of health purposes". Auckland Airport agrees with the submitter for the reasons set out in detail above at Row 1.	Allow submission
28.	1643.5	Deborah Chambers	Review designations with Requiring Authorities, and amend where these do not align with policies and purpose of the NPS-UD.	debchambers@bankside.co.nz	Oppose	Designations clearly fall within s77I and 77O of the RMA as a qualifying matter. Designations are often used to ensure the safe and efficient operation of nationally significant infrastructure which is also a qualifying matter. For example	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						Auckland Airport Designation 1102 includes obstacle limitation surfaces and other restrictions related to aviation safety that are designed to ensure the safe and efficient operation of Auckland Airport, as nationally significant infrastructure. Requiring engagement with requiring authorities on whether designations should or should not be recognised within the plan change would be inefficient and unnecessary.	
29.	1962.12	Aedifice Property Group	Delete the QM relating to the Aircraft Noise overlay.	jessica@civix.co.nz	Oppose	The Aircraft Noise Overlay performs an important function in ensuring the safe and efficient operation of Auckland Airport, as nationally significant infrastructure and therefore clearly falls within s77I(e) and 77O(e) of the RMA as a qualifying matter. Exposing large numbers of people to high levels of aircraft noise that cannot be mitigated in the external environment not only creates an unhealthy living and learning environment for those exposed but can lead to restrictions on the efficient operation of New Zealand's critical airport infrastructure through reverse sensitivity effects. This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission
30.	1962.15	Aedifice Property Group	Delete the QM relating to designations.	jessica@civix.co.nz	Oppose	Designations clearly fall within s77I and 77O of the RMA as a qualifying matter. Designations are often used to ensure the safe and efficient	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						operation of nationally significant infrastructure which is also a qualifying matter. For example Auckland Airport Designation 1102 includes obstacle limitation surfaces and other restrictions related to aviation safety that are designed to ensure the safe and efficient operation of Auckland Airport, as nationally significant infrastructure.	
31.	2269.31	Ms Amy Margaret Parlane and Mr Leslie James Parlane	Reduce the existing effects of aircraft noise and manage any future flight paths which may result in additional aircraft noise.	a_parlane@yahoo.com	Oppose	While Auckland Airport agrees with the submitter that it is undesirable to expose increased numbers of people to high levels of aircraft noise, this should be achieved by prohibiting new residential development within the HANA and lowering density within the MANA not by restricting aircraft movements to New Zealand's critical airport infrastructure. Further, it is beyond the scope of PC78 and the IPI process to impose new restrictions in the AUP on aircraft movements or the operation of Auckland Airport. Overflying of aircraft beyond the immediate take-off and landing areas of airports, and the surrounding management of ASAN through Noise Overlays, is out of the scope of the RMA and is instead managed through the Civil Aviation Act 1990.	Disallow submission
32.	2272.31	CivilPlan Consultants Limited	Amend D24.4.3(A37) and D24.4.3(A38) to refer to dwellings that comply with and do not comply with Standard D24.6.3, deleting the minimum density requirements.	aaron@civilplan.co.nz	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
33.	2272.32	CivilPlan Consultants Limited	Delete “restrictions on the numbers of people to be accommodated through zoning and density mechanisms” from Policy D24.3(3)(a).	aaron@civilplan.co.nz	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission
34.	2272.33	CivilPlan Consultants Limited	Make consequential changes to the Flat Bush Precinct to remove all density requirements based on the Auckland Airport moderate aircraft noise area.	aaron@civilplan.co.nz	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission
35.	2273.45	Aaron Grey	Amend D24.4.3(A37) and D24.4.3(A38) so refer to dwellings that comply with and do not comply with Standard D24.6.3, deleting the minimum density requirements.	aaronjgrey@gmail.com	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	
36.	2273.46	Aaron Grey	Delete "restrictions on the numbers of people to be accommodated through zoning and density mechanisms and" from Policy D24.3(3)(a).	aaronjgrey@gmail.com	Oppose	This submission does not recognise the reasons for the MANA density controls which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission
37.	2273.47	Aaron Grey	Make consequential changes to the Flat Bush Precinct to remove all density requirements based on the Auckland Airport moderate aircraft noise area.	aaronjgrey@gmail.com	Oppose	This submission does not recognise the reasons for the MANA density controls (including those imported directly into the Flat Bush Precinct) which were carefully considered and established through the AUP process, including the need to limit the numbers of people exposed to high levels of aircraft noise in the external environment and to ensure Auckland Airport is protected from reverse sensitivity effects of increased numbers of people subject to this noise seeking to constrain the Airport's current or future activities. Acoustic treatment of the internal environment of ASAN does not address all the effects of aircraft noise and subsequent reverse sensitivity effects – a combined approach of these controls and applying density restrictions is necessary.	Disallow submission
38.	2273.48	Aaron Grey	Delete the Auckland International Airport Aircraft Noise Notification Area from the mapped extent of the Aircraft Noise Overlay.	aaronjgrey@gmail.com	Oppose	While showing the Aircraft Noise Notification Area does not result in AUP restrictions on ASAN, it performs a useful function in alerting people to the location of an aircraft noise environment that could be annoying to some people. Controls for aircraft noise at the levels captured within the ANNA are recommended in the relevant New Zealand	Disallow submission

Item	Sub No.	Name	Decision sought by submitter	Email	Support / Oppose	Reasons	Decision Sought
						Standard (NZS 6805:1992)	

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 12:01 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Dilworth Trust Board
Attachments: PC78 Dilworth - Further Submission.pdf

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

Contact details

Full name of person making a further submission: Dilworth Trust Board

Organisation name: Dilworth Trust Board

Full name of your agent: Anthony Blomfield

Email address: ablomfield@bentley.co.nz

Contact phone number: 0211339309

Postal address:
PO Box 4492
Shortland Street
Auckland 1140

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:
Refer attached

Submission number: Refer attached

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 Refer attached

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

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:
Refer attached

Submission date: 19 January 2023

Supporting documents
PC78 Dilworth - Further Submission.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:
Refer attached

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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Form 6
Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: Dilworth Trust Board ("**Dilworth**")

1. This is a further submission in support of and in opposition to submissions on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Dilworth made an original submission on PC78, submission number 1811.

2. Dilworth could not gain an advantage in trade competition through this further submission.

3. Dilworth is a person with an interest in the plan change and the identified primary submissions that is greater than the interest the general public has, as Dilworth made a submission on PC78 and owns various properties which are affected by PC78 and by the relief sought in the identified primary submissions.

Further submissions

4. The submissions supported or opposed by Dilworth, and the reasons for the support or opposition, are detailed in the table attached as **Appendix A**.

Decision sought

5. The relief sought by Dilworth is detailed in the table attached as **Appendix A**.

Hearing

6. Dilworth wishes to be heard in support of this further submission.

7. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

Dilworth Trust Board
By its planning and resource management consultants Bentley & Co. Ltd



Anthony Blomfield

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140
Attention: Anthony Blomfield

Mobile: 0211339309
Email: ablomfield@bentley.co.nz

Note for submitters:

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.

Appendix A – Further Submission of Dilworth Trust Board

Dilworth supports/opposes the submission of:	The particular part/s of the submission Dilworth supports/opposes are:				Summary of the submission	Relief sought by submitter	The reasons for Dilworth's support/ opposition are:	Dilworth seeks that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Support/ oppose	Topic	Subtopic				
873 Kainga Ora – Homes and Communities PO Box 74598 Greenlane Auckland 1051	873.53	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Delete the proposed provisions seeking to further restrict land disturbance within the Height Sensitive Areas overlay as set out in Appendix 1, Table 1, Rows 33, 34 and 35 of the submission.	Accept the plan change with amendments	The submitter seeks that the Height Sensitive Area Overlay is deleted in its entirety. In addition to Dilworth's primary submission (1811.1), Dilworth supports the relief sought by the Submitter for the following reasons: • The Height Sensitive Area Overlay constrains height to 9m (or 13m in Devonport), and is a significant constraint on urban intensification. • The Height Sensitive Area Overlay generally affects land which is otherwise suitable for greater development and intensification, and in particular land in the Auckland Isthmus which is located in close proximity to rapid transit services and corridors, the CBD, and other centres and amenities. • The Height Sensitive Area Overlay has not been comprehensively reviewed relative to the outcomes that are intended by the NPS-UD, and significantly impacts the extent to which the NPS-UD's outcomes can be achieved in Auckland.	Allow the submission.
	873.175	Support	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/ Precinct to limit height)	Insert Height Variation Controls of 37m and 43m for various business zones in parts of Herne Bay,St Marys Bay, Ponsonby and Freemans Bay. Refer to Appendix 2 Map 062 of the submission. [Inferred: proposes height variation control requests of 37 metres for some or all properties in these streets, including: Hamilton Road, Sarsfield Street, Jervois Road, Sentinel Road, Masefield Avenue, Albany Road, Lawrence Street, Curran Street, and Amiria Street, Herne Bay; Shelly Beach Road, Islington Street, St Marys Road, Hackett Street, Westwood Terrace, Clarence Street, Ardmore Road, John Street, Wanganui Avenue, Swift Avenue, Percival Parade, Ring Terrace, Vine Street, O'Neill Street, Trinity Street, Emmett Street, Cowan Street, Provost Street, Cameron Street, Ponsonby Terrace, Scott Street, Tweed Street, Amiria Street, Pompallier Terrace, Prosford Street, and Vermont Street, Ponsonby] [Inferred: proposes height variation control requests of 43 metres for some or all properties in these streets, including: Victoria Street West, and Beaumont Street, Auckland Central; Ireland Street, College Hill, Cascade Street, The Boardwalk, Ryle Street, Brickfield Way, Russell Street, Fisher-Point Drive, Beaumont Street, Elizabeth Street, Telpher Street, Wilkins Street, England Street, Wood Street, Napier Street, Georgina Street, Spring Street, Arthur Street, Margaret Street, Ponsonby Road, Franklin Road, Middle Street, Weld Street, Renall Street, Pember Reeves Street, Costley Street, and Scotland Street, Freemans Bay; Jervois Road, and Curran Street, Herne Bay; London Street, Vine Street, St Marys Road, Prosford Street, Seymour Street, New Street, Hargreaves Street, Swift Avenue, Dunedin Street, Redmond Street, Yarborough Street, Hackett Street, Cameron Street, Melford Street, Ponsonby Road, Harbour Street, Cowan Street, Blake Street, Ring Terrace, College Hill, Waitemata Street, Shelly Beach Road, St Francis De Sales Street, Sheehan Street, Dublin Street, Caroline Street, Green Street, Provost Street, Pompallier Terrace, Clarence Street, Ponsonby Terrace, Dedwood Terrace, Amiria Street, Selby Square, Westwood Terrace, and Bayard Street, Ponsonby]"	Accept the plan change with amendments	Dilworth owns the land at 25 College Hill, Ponsonby, and made a primary submission seeking a Height Variation Control to be applied to this land (and all neighbouring Mixed Use zoned land) to enable height of at least 35m. The Submitter seeks a Height Variation Control of 43m for the Mixed Use zoned land on the western periphery of the CBD, which includes Dilworth's landholding at 25 College Hill. Dilworth supports the relief sought, insofar as it relates to the Mixed Use zone between Beaumont Street, College Hill, New Street and State Highway 1, for the following reasons: • The land is within the walkable catchment of the City Centre Zone. • The land is not subject to any Qualifying Matter that otherwise constrains height (other than a Volcanic Viewshaft overlay, which is not proposed to change). • The minimum height restriction imposed by the Volcanic Viewshaft is 32m. There are other examples of sites which are subject to a Height Variation Control, and that are subject to a Volcanic Viewshaft (which imposes a lower height restriction). This situation is appropriately managed by the structure of the AUP in terms of the relationship of overlays and other provisions. • There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development capacity. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment.	Allow the submission as it relates to 25 College Hill, Ponsonby

							• The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households. • The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	
	873.196	Support	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/Precinct to limit height)	Insert Height Variation Controls of 22m, 29m, 37m and 43m for various business zones in Grey Lynn, Ponsonby, Freemans Bay, Eden Terrace, Newton, Kingsland, Mount Eden, Grafton, and Newmarket. Refer to Appendix 2, Map 071 of the submission. Note that part of this map includes the light rail exclusion area which is addressed in a separate submission point. [Inferred: proposes height variation control of 22 metres for some or all properties in these streets, including: Altham Avenue, Rossmay Terrace, Collins Street, McDonald Street, and Ethel Street, Kingsland] [Inferred: proposes height variation control of 29 metres for some or all properties in these streets, including: New North Road, Western Springs Road, Reimers Avenue, School Road, Second Avenue, Rossmay Terrace, Shaw Street, Kingsland Avenue, Sandringham Road, First Avenue, Fourth Avenue, Third Avenue, Altham Avenue, Leslie Avenue, Ethel Street, Kowhai Street, McDonald Street, Marlborough Street, Cricket Avenue, and Royal Terrace, Kingsland; Morningside Drive, Morningside; Raleigh Street, Mount Eden; Morningside Drive, Gordon Road, New North Road, and Taylors Road, St Lukes; Western Springs Road, and Don Croot Street, Western Springs] [Inferred: proposes height variation control of 37 metres for some or all properties in these streets, including:Haultain Street, Eden Terrace; Savannah Street, Glenfell Place, and Mountain Road, Epsom; Great North Road, Browning Street, Surrey Crescent, Allen Road, Crummer Road, Selbourne Street, Schofield Street, Rona Avenue, Herringson Avenue, Sackville Street, Chamberlain Street, Shirley Road, Tutanekai Street, Coleridge Street, Elgin Street, Commercial Road, Baildon Road, Tuarangi Road, Williamson Avenue, Farrar Street, Ivanhoe Road, Harcourt Street, Hakanoa Street, Westmoreland Street West, Prime Road, Dryden Street, Jessel Street, Cockburn Street, Tay Street, Westmoreland Street East, Richmond Road, Firth Road, Northland Street, Arnold Street, Edwards Road, Cooper Street, Allen Lane, Wallingford Street, Seddon Street, Barrington Road, Grosvenor Street, and Sefton Avenue, Grey Lynn; Jervois Road and Albany Road, Herne Bay; Kingsland Terrace, Tawari Street, Second Avenue, Onslow Road, New North Road, Central Road, Third Avenue, Kowhai Street, Walters Road, School Road, Kingsland Avenue, New Bond Street, Sandringham Road, King Street, Fourth Avenue, Aitken Terrace, Marlborough Street, Akepiro Street, First Avenue, Bond Street, Hesketh Street, Cricket Avenue, and Charles Street, Kingsland; Alderley Road, Esplanade Road, Lovelock Avenue, George Street, View Road, Edenvale Park Road, Edwin Street, Edenvale Crescent, Dominion Road, Mount Eden Road, Charles Street, Horoeka Avenue, Mary Street, Bellevue Road, Wynyard Road, Kamahi Street, Cromwell Street, Kawaka Street, Valley Road, Graysons Lane, Leamington Road, Sherbourne Road, Brentwood Avenue, Punga Street, Normanby Road, Sylvan Avenue East, Lisnoe Avenue, Hillside Crescent South, Carrick Place, Sylvan Avenue West, Onslow Road, Percy Street, Sydenham Road, Akiraho Street, Hillside Crescent North, Kelly Street, Lauder Road, Horopito Street, Walters Road, Puka Street, Tawari Street, Bellwood Avenue, Wrights Spur, and Clive Road, Mount Eden; Moira Street, Islington Street,	Accept the plan change with amendments	Dilworth owns the land at 272-302 Great North Road, Grey Lynn, and made a primary submission seeking a Height Variation Control to be applied to this land (and all neighbouring Mixed Use zoned land along Great North Road between Scanlan Street and Grosvenor Street) to enable height of at least 27m. The Submitter seeks a Height Variation Control of 43m for the Mixed Use zoned land along Great North Road, including Dilworth's landholding at 272-302 Great North Road. Dilworth supports the relief sought, insofar as it relates to the Mixed Use zoned land front Great North Road between Scanlan Street and Grosvenor Street, for the following reasons: • The land is within the walkable catchment of the Ponsonby Town Centre. • The land is not subject to any Qualifying Matter that otherwise constrains height. • The land is located along a significant arterial route with frequent bus services, and has excellent access to transport routes and modes, and amenities located within nearby centres. • There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development capacity. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households. • The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Dilworth also owns the property at 51-63 Normanby Road, Eden Terrace, which is located within the 'Auckland Light Rail Corridor' which was excluded from PC78. The Submitter has stated that they consider this area to be within scope of PC78, and have sought a Height Variation Control of 43m to be applied to the Mixed Use zoned land within Eden Terrace, which includes Dilworth's property at 51-63 Normanby Road. In the event that the relief sought is found to be within scope of PC78, Dilworth supports the relief sought in relation to 51-63 Normanby Road for the following reasons: • The land is within the walkable catchment of	Allow the submission as it relates to 272-302 Great North Road, Grey Lynn and 51-63 Normanby Road, Eden Terrace.

					Ardmore Road, John Street, Wanganui Avenue, Lincoln Street, Vermont Street, Richmond Road, Norfolk Street, Stuart Street, Tawariki Street, Clarence Street, Summer Street, O'Neill Street, Trinity Street, Cowan Street, Ponsonby Terrace, Scott Street, Douglas Street, Mokau Street, and Pompallier Terrace, Ponsonby; Finch Street Western Springs] [Inferred: proposes height variation control of 43 metres for some or all properties in these streets, including: Symonds Street, Auckland Central; MacAulay Street, Fleet Street, Alexander Street, Dundonald Street, Symonds Street, Charlotte Street, Shaddock Street, Ruru Street, Flower Street, Minnie Street, Haslett Street, Ngahura Street, New North Road, Rendall Place, Takau Street, Bright Street, Norwich Street, Haultain Street, Virginia Avenue East, Newton Road, Porters Avenue, Fenton Street, Exmouth Street, Basque Road, Virginia Avenue West, Mount Eden Road, Piwakawaka Street, Nikau Street, Evelyn Street, Copeland Street, Diamond Street, Devon Street, Couldry Street, Suffolk Street, and Korari Street Eden Terrace, Glenfell Place, Gillies Avenue, Mountain Road, Almorah Road, Gilgit Road, Alpers Avenue, Seccombes Road, Maungawhau Road, Albury Avenue, Owens Road, Rockwood Place, Almorah Place, Omana Avenue, Savannah Street, Castle Drive, Withiel Drive, Manukau Road, and Silver Road, Epsom; Beresford Street West, Wellington Street, Collingwood Street, Hepburn Street, Ryle Street, Howe Street, Russell Street, Pratt Street, Anglesea Street, Barrie Street, Hopetoun Street, Ponsonby Road, Elizabeth Street, Gwilliam Place, Beresford Street Central, Wood Street, Napier Street, Ireland Street, Georgina Street, Franklin Road, Arthur Street, Grattan Place, Spring Street, England Street, Gunson Street, Winn Road, Picton Street, Tahuna Street, Paget Street, Foundries Lane, Pember Reeves Street, Heke Street, Hereford Street, Sheridan Lane, Smith Street, Costley Street, Wilkins Street, Colin Shaw Lane, and Middle Street, Freemans Bay; Nugent Street, Khyber Pass Road, Grafton Road, Carlton Gore Road, Burton Street, Madeira Lane, Symonds Street, Seafield View Road, Auburn Street, Park Avenue, Boston Road, Hohipere Street, Glenside Crescent, Arawa Street, Severn Street, Arotau Place, Mount Eden Road, Burleigh Street, Park Road, Beckham Place, Ferncroft Street, Edward Wayte Place, Kari Street Grafton; Dean Street, Rose Road, Leighton Street, Grosvenor Street, Great North Road, Sussex Street, Crummer Road, Niger Street, Dickens Street, Turakina Street, Keppell Street, Partridge Street, Williamson Avenue, Pollen Street, Murdoch Road, Home Street, Burgoyne Street, Millais Street, King Street, Scanlan Street, Ariki Street, Vinegar Lane, Chapman Street, Elgin Street, Beaconsfield Street, Potatau Street, Monmouth Street, Bond Street, Harcourt Street, Julian Street, Maidstone Street, MacKelvie Street, Commercial Road, Wallingford Street, Arnold Street, Nixon Street, Kirk Street, Cooper Street, Putiki Street, Northland Street, Burns Street, Chamberlain Street, Waima Street, Brisbane Street, and Richmond Road, Grey Lynn; New North Road, Aitken Terrace, Akepiro Street, Alexander Street, Hesketh Street, Mostyn Street, Richbourne Street, Buchanan Street, King Street, Charles Street, and Ace Place, Kingsland; Wynyard Road, Harold Street, Normanby Road, Edwin Street, Charles Street, Enfield Street, Mary Street, Mount Eden Road, Akiraho Street, Sylvan Avenue East, Brentwood Avenue, Dominion Road, Graysons Lane, Edenvale Crescent, Water Street, View Road, Sylvan Avenue West, Kelly Street, Boston Road, Lauder Road, Clive Road, Horopito Street, George Street, Kawaka Street, Tawari Street, Esplanade Road, and Wrights Spur, Mount Eden; Maungawhau Road, Carlton Gore Road, Edgerley Avenue, Seccombes Road, Park Avenue, Khyber Pass Road, Parkfield		the Mt Eden Train Station. • The land is not subject to any Qualifying Matter that otherwise constrains height, except for the Volcanic Viewshafts overlay which imposes varying heights. At 51-63 Normanby Road, the height of the Volcanic Viewshafts are at least 44.5m above ground level. • There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development capacity. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households. • The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	

					Terrace, Claremont Street, Glasgow Terrace, Boyle Crescent, Outhwaite Lane, Huntly Avenue, Park Road, Railway Land, Clovernook Road, Broadway Newmarket, St Benedicts Street, Dacre Street, Upper Queen Street, Newton Road, Karaka Street, Symonds Street, France Street South, Randolph Street, Cargill Street, West Street, and Stable Lane, Newton; Stanley Street, Nicholls Lane, Parnell Rise, and Carlaw Park Avenue, Parnell; Lincoln Street, Norfolk Street, Richmond Road, Brown Street, Douglas Street, Summer Street, Cowan Street, Tole Street, O'Neill Street, Ponsonby Terrace, Ponsonby Road, Fitzroy Street, Vermont Street, Mira Street, Bayard Street, and Kent Street, Ponsonby.]			
	873.222	Support	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/ Precinct to limit height)	Insert Height Variation Controls of 22m, 29m, 37m and 43m for various business zones in parts of Epsom, Ellerslie Greenlane and Remuera. Refer to Appendix 2, Map 081 of the submission. [Inferred: proposes height variation control of 22 metres for some or all properties in these streets, including: Main Highway, Hudson Street, Great South Road, Mitchelson Street, Cawley Street, Stanway Place, Kalmia Street, Sultan Lane, Sultan Street, and Park Avenue Ellerslie; Green Lane West, Annie Buxton Place, Manukau Road, Corbett-Scott Avenue, Campbell Crescent, Kimberley Road, Dunkerron Avenue, Inverary Avenue, and Gardner Road Epsom; Great South Road, Atarangi Road, Ascot Avenue, Garland Road, Ellerslie Racecourse Drive, Green Lane East, Puriri Avenue, Woodbine Avenue, Waiohua Road, Matai Road Greenlane, Remuera Road, Green Lane East, St Vincent Avenue, Clonbern Road, Ascot Avenue, Ohinerau Street, and Avice Street Remuera] [Inferred: proposes height variation control of 29 metres for some or all properties in these streets, including:Remuera Road, Armadale Road, Ascot Avenue, Market Road, Te Kowhai Place, Victoria Avenue, Ōrākei Road, Risk Road, Platina Street, Ohinerau Street, Clonbern Road, St Vincent Avenue, Green Lane East, Cotter Avenue, Dromorne Road, Waiata Avenue, Portland Road, Omahu Road, Eastbourne Road, Ranui Road, Lillington Road, Wairua Road, Muir Road, Woodley Avenue, Mount Hobson Road, Tirohanga Avenue, Norana Avenue, Carmont Street, Lochiel Road, Elmstone Avenue, Garden Road, Chatfield Place, Rothesay Street, Westbury Crescent, Entrican Avenue, Koangi Street, Avice Street, Raukura Lane, and Mount Hobson Lane Remuera] [Inferred: proposes height variation control of 37 metres for some or all properties in these streets, including: Inverary Avenue, Epsom Avenue, Griffin Avenue, Market Road, Manukau Road, Bracken Avenue, Mount St John Avenue, Halifax Avenue, Margot Street, Ranfurly Road, Gillies Avenue, Warborough Avenue, Belvedere Street, Highwic Avenue, Dunkerron Avenue, and Maxfield Place Epsom; Great South Road Greenlane, Great South Road, Mount Hobson Road, Remuera Road, Ridings Road, Arney Road, Bell Road, Westbourne Road, Crocus Place, Mount Hobson Lane, Buttle Street, Patey Street, Dunholme Road, Westbury Crescent, and Market Road Remuera] [Inferred: proposes height variation control of 43 metres for some or all properties in these streets, including: Manukau Road, Domett Avenue, Kipling Avenue, Owens Road, Margot Street, Bracken Avenue, Alpers Avenue, Clyde Street, Mount St John Avenue, Gillies Avenue, Epsom Avenue, Ngaire Avenue, Warborough Avenue, Belvedere Street, and Silver Road Epsom; Edgerley Avenue, Clovernook Road, and Broadway Newmarket; Remuera Road, St Marks Road, Great South Road, Mauranui Avenue, MacMurray Road, Ridings Road, Mount Hobson Road, Dilworth Avenue, Robert Hall Avenue, Pere Street, Arney Road, Glen Esk Place, Buttle Street, Bassett Road, and Market	Accept the plan change with amendments	Dilworth owns land zoned Business – Mixed Use: • Within the block bound by Great South Road, Mauranui Avenue and St Marks Avenue; • Within the block bound by Great South Road, Mauranui Avenue, Market Road, and the Railway Corridor/State Highway 1 • At 71 Great South Road • At 7-9 and 11-15 Great South Road • At 8 and 9 St Marks Road • At 99, 101, 105, 109 and 139 Remuera Road The Submitter seeks a Height Variation Control of 43m for the majority of Dilworth's landholdings identified above, and of 37m for the property at 71 Great South Road. Dilworth supports the relief sought by the Submitter, insofar as it relates to Dilworth's landholdings, for the following reasons: • The landholdings are within the walkable catchment of the Newmarket Metropolitan Centre and rapid transit stops, and are located on or close to significant arterial road corridors with frequent bus services connecting to the CBD and other centres. • While some of the land is subject to the Volcanic Viewshafts Overlay, this should not be determinative of the appropriate 'underlying' height opportunity that is otherwise enabled. • While some of the land is subject to the Height Sensitive Areas Overlay, the Submitter has sought the deletion of this overlay (which is supported by Dilworth). • There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development capacity. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the heights sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the heights sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households. • The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	Allow the submission.

					Road Remuera]			
	873.223	Support	Height	Residential Height - Strategic Approach (use of a single control HVC/Zone/ Precinct to limit height)	"Insert Height Variation Controls of 29m, 37m and 43m for various residential zones in parts of Epsom, Ellerslie, Greenlane and Remuera. Refer to Appendix 2 Map 081 of the submission. [Inferred: proposes height variation control of 29 metres for some or all properties in these streets, including: Remuera Road, Armadale Road, Ascot Avenue, Market Road, Te Kowhai Place, Victoria Avenue, Ōrākei Road, Risk Road, Platina Street, Ohinerau Street, Clonbern Road, St Vincent Avenue, Green Lane East, Cotter Avenue, Dromorne Road, Waiata Avenue, Portland Road, Omahu Road, Eastbourne Road, Ranui Road, Lillington Road, Wairua Road, Muir Road, Woodley Avenue, Mount Hobson Road, Tirohanga Avenue, Norana Avenue, Carmont Street, Lochiel Road, Elmstone Avenue, Garden Road, Chatfield Place, Rothesay Street, Westbury Crescent, Entrican Avenue, Koangi Street, Avice Street, Raukura Lane, and Mount Hobson Lane Remuera] [Inferred: proposes height variation control of 37 metres for some or all properties in these streets, including: Inverary Avenue, Epsom Avenue, Griffin Avenue, Market Road, Manukau Road, Bracken Avenue, Mount St John Avenue, Halifax Avenue, Margot Street, Ranfurly Road, Gillies Avenue, Warborough Avenue, Belvedere Street, Highwic Avenue, Dunkerron Avenue, and Maxfield Place Epsom; Great South Road Greenlane, Great South Road, Mount Hobson Road, Remuera Road, Ridings Road, Arney Road, Bell Road, Westbourne Road, Crocus Place, Mount Hobson Lane, Buttle Street, Patey Street, Dunholme Road, Westbury Crescent, and Market Road Remuera] [Inferred: proposes height variation control of 43 metres for some or all properties in these streets, including: Manukau Road, Domett Avenue, Kipling Avenue, Owens Road, Margot Street, Bracken Avenue, Alpers Avenue, Clyde Street, Mount St John Avenue, Gillies Avenue, Epsom Avenue, Ngaire Avenue, Warborough Avenue, Belvedere Street, and Silver Road Epsom; Edgerley Avenue, Clovernook Road, and Broadway Newmarket; Remuera Road, St Marks Road, Great South Road, Mauranui Avenue, MacMurray Road, Ridings Road, Mount Hobson Road, Dilworth Avenue, Robert Hall Avenue, Pere Street, Arney Road, Glen Esk Place, Buttle Street, Bassett Road, and Market Road Remuera]"	Accept the plan change with amendments	Dilworth owns the land at 13 and 15 Dilworth Avenue, Remuera, which is proposed to be zoned Residential – Terrace Housing and Apartment Building. The Submitter seeks a Height Variation Control of 43m for residential zoned land in Remuera, including Dilworth's landholding at 13 and 15 Dilworth Avenue. Dilworth supports the relief sought by the Submitter, insofar as it relates to Dilworth's landholdings, for the following reasons: • The landholdings are within the walkable catchments of the Newmarket Metropolitan Centre and rapid transit stops. • While Dilworth's land is subject to the Height Sensitive Areas Overlay, the Submitter has sought the deletion of this overlay (which is supported by Dilworth). • There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development and housing capacity. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the heights sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment. • The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the heights sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households. • The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	Allow the submission as it relates to 13 and 15 Dilworth Avenue, Remuera.
897 Catholic Diocese of Auckland C/- Campbell Brown Planning Limited PO Box 147001 Ponsonby AUCKLAND 1144	897.71	Support	Other Zones provisions	H29 Special Purpose - School Zone	Amend H29.6.6 (Height in relation to boundary) to allow for the height in relation to boundary control in adjoining zones to apply to a Special Purpose - School Zone site boundary. Refer to Attachment A, page 19 for details.	Amended H29.6.6 as follows: ~~(1) Buildings must not project beyond a 45-degree recession plane measured from 3m vertically above ground level at any site boundary adjoining a site in the residential zones (except the Residential – Terrace Housing and Apartment Buildings Zone), rural zones or the Future Urban Zone .~~ Where a site in the Special Purpose – School Zone directly adjoins a site in another zone, the height in relation to boundary standard that applies in the adjoining zone applies to the Special Purpose – School Zone site boundary. (2) Where the adjoining zone does not specify a height in relation to boundary rule, the yard and/or setback standards in the adjoining zone apply to the Special Purpose – School Zone boundary (3) Buildings must not project beyond a 45 degree recession plane measured from 8m vertically above ground level at any site boundary adjoining a road, or another Special Purpose – School Zone ~~or any other zone boundary not specified H29.6.6(1)~~. (4) Floodlights, steeples, spires, minarets and similar structures must not project beyond a 45 degree	The submitter seeks to amend Standard H29.6.6 of the Special Purpose – School zone to replace the existing 3m+45 degree standard that applies to boundaries adjoining a residential (except the THAB zone), rural or Future Urban zone, with a standard that adopts the equivalent standard of the zoning of the adjoining land. The purpose of such an amendment is to ensure the Height in Relation to Boundary standard applying to development within the School Zone 'keeps up' with the amendments being made to other zones under PC78 to implement the requirements of the Medium Density Residential Standards. Dilworth supports the outcome sought by the submitter, in principle, to 'update' the standards of the School Zone to provide for consistency where the Height in Relation to Boundary standard for other zones are proposed to be increased (relative to the operative standard in the School Zone). However Dilworth considers that amendments to the relief sought are necessary. The current (operative) wording of Standard H29.6.6(1) applies only to boundaries of a site within the School zone which adjoin a residential, rural or Future Urban zone, whereas the standard proposed by	Allow the submission, subject to the relief sought be amended to include a relevant control for a boundary of a site in the School zone which adjoins another zone with a similarly worded Height in Relation to Boundary standard. The following is provided by way of example (text in blue is new): ~~(1) Buildings must not project beyond a 45-degree recession plane measured from 3m vertically above ground level at any site boundary adjoining a site in the residential zones (except the Residential – Terrace Housing and Apartment Buildings Zone), rural zones or the Future Urban Zone .~~ Except where otherwise specified in Standard H29.6.6(2), (3) or (4), ~~W~~where a site in the Special Purpose – School Zone directly adjoins a site in another zone, the height in relation to boundary standard that applies in the adjoining zone applies to the Special Purpose – School Zone site boundary. (2) Where the adjoining zone is an Open Space zone, the following standards apply to the School zone boundary: (a) Standard H6.6.6(1A) for any development outside a walkable catchment; (b) Standard H6.6.6(1B) and (1C) for any development in a walkable catchment (3) Except where Standard H29.6.6(2) applies, where the adjoining zone does not specify a height in relation to boundary rule, the yard and/or setback standards in the

						recession plane measured from 12m vertically above ground level at any site boundary. (5) This standard does not apply to buildings located on St Cuthberts College land at its boundary with Cornwall Park commencing at a point 32m east of the Market Road frontage and extending to a maximum of 210m east of the Market Road frontage. [Strikethrough and red text denotes amendments requested by the Submitter.]	the Submitter is not exclusive to such adjoining zones, and would therefore apply to any adjoining zone. The proposed Standard H29.6.6(2) would require the yard and/or setback standards of an adjoining zone to be applied, in the event that the adjoining zone does not have a height to boundary standard. The School zone is not the only zone which applies such a standard. For example, the Open Space zones also have a Height in Relation to Boundary standard which requires development to be subject to the standard of the adjoining zone, and in the event the adjoining zone does not have a Height in Relation to Boundary standard, then the Yard standard of the adjoining zone applies. The relief sought creates an unintended consequence. To illustrate the issue with this scenario, Dilworth's Junior Campus at 27 Omahu Road adjoins an Open Space – Sport and Active Recreation zone. If the Submitter's relief were to be accepted, neither zone would have a specified Height in Relation to Boundary standard, and both would therefore be required to adopt the Yard standard of the adjoining zone. This would result in the School zoned land being subject to a 6m yard standard (rather than the 3m standard that currently applies in the School zone), and vice versa the Open Space zone would benefit from a 3m yard standard (rather than the 6m standard that applies in the Open Space zone). In Dilworth's submission, it is appropriate that in such situations, the School zone is subject to a Height in Relation to Boundary standard that is consistent with the proposed standard to be applied to the Residential – Terrace Housing and Apartment Building zone (where it adjoins an Open Space Zone). The reasons for Dilworth's support, subject to the amendments requested, are: • The relief sought will enable the efficient use and development of land in the Special Purpose – School zone, which is intended to enable the efficient use of land for school facilities. • The relief sought is consistent with the outcomes that are intended by the NPS-UD in respect of enabling urban residential intensification which has good accessibility to housing, jobs, community services (including schools), natural spaces, and open spaces.	adjoining zone apply to the Special Purpose – School Zone boundary (4) Buildings must not project beyond a 45 degree recession plane measured from 8m vertically above ground level at any site boundary adjoining a road, or another Special Purpose – School Zone ~~or any other zone boundary not specified H29.6.6(1)~~. (5) Floodlights, steeples, spires, minarets and similar structures must not project beyond a 45 degree recession plane measured from 12m vertically above ground level at any site boundary. (6) This standard does not apply to buildings located on St Cuthberts College land at its boundary with Cornwall Park commencing at a point 32m east of the Market Road frontage and extending to a maximum of 210m east of the Market Road frontage.
952 The Ascot Hospital and Clinics Limited ablomfield@bentley.co.nz	952.5	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Amend D14.4.1(A6) to remove non-compliance with Standard D14.6.4. [Refer to Attachment 2 in the full submission].	Approve the plan change with the amendments requested	The Submission seeks to remove Standard D14.6.4 and to make amendments to the provisions of Chapter D14 to delete the standards which require resource consent for temporary construction and safety structures which intrude into a Volcanic Viewshaft or a Height Sensitive Area. Dilworth supports the relief sought. The operative provisions of Chapter D14 require a Non-complying, publicly notified resource consent application to be made for any temporary construction crane (and other structures) which intrude into a viewshaft for more than 30 days. The onerous activity status and the requirement for a publicly notified process for such an activity is not commensurate with the temporary nature of such activities, and with the typically benign visual effects of such construction structures which intrude into long-range, panoramic views. The process generates additional time, cost, delays and uncertainty to the resource consent process. With regards to the NPS-UD, the operative provisions of Chapter D14, as they relate to temporary construction and safety structures, are not, and will not contribute to the enabling of a well-functioning urban	Allow the submission.
	952.6	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Amend D14.4.1(A11) to remove non-compliance with Standard D14.6.4. Refer to Attachment 2 in the full submission.	Approve the plan change with the amendments requested		Allow the submission.
	952.7	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Delete Standard D14.6.4. [Refer to Attachment 2 in the full submission].	Approve the plan change with the amendments requested		Allow the submission.

							environment, or to the enabling of increased housing supply and commercial activities, or supporting community facilities. It is appropriate that the amendments requested by the Submitter are allowed, to ensure that appropriate development can be undertaken in a manner that contributes to the well-functioning urban environment, and in a manner that is efficient and cost-effective.	
2226.1 Scentre (New Zealand) Limited cmcgarr@bentley.co.nz	2226.5	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Amend the Volcanic Viewshafts and Height Sensitive Areas Overlay to provide for the exclusion of temporary crane activities.	Approve the plan change with the amendments requested	The Submitter seeks amendments to Chapter D14 to provide an exclusion for temporary construction and safety structures within the Volcanic Viewshafts and Height Sensitive Areas Overlay. Dilworth supports the relief sought by the Submitter, for the same reasons described above in respect of the submission by The Ascot Hospital and Clinics Limited.	Allow the submission.
2049 Waka Kotahi evan.keating@nzta.govt.nz	2049.28	Oppose	Plan making and procedural	General	Include an overlay to require sensitive activities within 100m of a state highway to provide mitigation for noise in accordance with Waka Kotahi standards (set out in Appendix 1).	Include an overlay which requires sensitive activities within 100m of a state highway to provide mitigation for noise effects in accordance with Waka Kotahi standards. The current standards are copied in appendix 1 below but we are open to discussing alternative provisions which would achieve the same objective.	The Submitter seeks a new overlay to be applied to all land within 100m of a state highway, which would have the effect of imposing internal noise and ventilation standards for activities that are sensitive to noise, in order to protect the operator of the state highway network from perceived reverse sensitivity effects. The relief sought by the Submitter is in effect consistent with the 'High Land Transport Noise overlay' which was previously included in the Proposed Auckland Unitary Plan (in 2013). In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this overlay was deleted. The Panel's recommendation report stated:[1] *The Panel was concerned with proceeding with the extensive application of this overlay in the absence of a rigorous cost benefit assessment, including no assessment of who should appropriately bear the costs involved. In the absence of that assessment the Panel recommends this overlay be deleted.* Dilworth opposes the relief sought by the Submitter for the following reasons: • The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD. • The relief sought will impose all costs of mitigating noise effects and perceived reverse sensitivity effects on to individual property owners and residents. • It is incumbent on Waka Kotahi, both in terms of construction and operation of the state highway network, to manage the acoustic effects generated to a reasonable level. • The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the (much smaller) High Land Transport Noise overlay in the Proposed Auckland Unitary Plan.	Disallow the submission.
2069 KiwiRail michelle.grinlinton-hancock@kiwirail.co.nz	2069.2	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend Chapter A Table A1.4.8.1 (Qualifying matters in zones, overlays and Auckland-wide provisions) to include land adjacent to the rail corridor as an area subject to a qualifying matter. [Refer to page 8 of submission for proposed plan text].	Accept the plan change with amendments	The Submitter seeks a new overlay to apply internal noise and ventilation mitigation requirements for noise sensitive activities within zones adjoining the Strategic Transport Corridor Zone, and vibration mitigation requirements for sensitive activities within 60m of the Strategic Transport Corridor Zone.	Disallow the submission.
	2069.3	Oppose	Qualifying	Strategic	Add new standard: E25.6.10A (Noise levels for noise	Accept the plan change with amendments		Disallow the submission.

[1] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.2.

			Matters A-I	Transport Corridors	sensitive spaces in all zones adjoining the Strategic Transport Corridor) [see pages 8-10 of submission for full proposed plan text]. Or alternatively insert requested standards in all zones and precincts adjoining the Strategic Transport Corridor Zone.		The nature of the relief sought by the Submitter is similar to the relief sought by Waka Kotahi (submission 2049) in respect of standards to require internal noise and ventilation standards for noise sensitive activities within 100m of the state highway network. Dilworth opposes the relief sought by KiwiRail in respect of new noise, ventilation and vibration standards, for the same reasons set out above relative to the submission of Waka Kotahi (2049.28).	
	2069.4	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend E25.6.30 (Vibration) (4)-(5) to include new vibration controls to apply to sensitive uses within 60m of the legal boundary of the Strategic Transport Corridor Zone [refer to page 10-11 for full proposed plan text]. Or alternatively insert these standards in all zones and precincts adjoining the Strategic Transport Corridor Zone.	Accept the plan change with amendments		Disallow the submission.
	2069.5	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend E25.8.1 (Matters of discretion) to provide for the new noise and vibration standards sought elsewhere in submission [refer to page 11 for full proposed plan text]. Or alternatively insert requested changes in all zones and precincts adjoining the Strategic Transport Corridor Zone.	Accept the plan change with amendments		Disallow the submission.
	2069.6	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend E25.8.2 (Assessment criteria to provide for the new noise and vibration standards) sought elsewhere in submission [see page 11-12 for full details]. Or insert requested changes in all zones and precincts adjoining the Strategic Transport Corridor Zone.	Accept the plan change with amendments		Disallow the submission.
	2069.7	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend all Yard standards in all Residential - Single House, Low Density Residential, Mixed Housing Suburban, Mixed Housing Urban and Terraced Housing and Apartment Buildings zones to require all buildings and structures to be setback 5m from a boundary with a rail corridor/5m from the edge of the Strategic Transport Corridor Zone. Or insert similar amendment in Chapter E27 - Transport to have region wide effect.	Accept the plan change with amendments	The Submitter seeks to introduce a 5m Yard standard to all Zones and Precincts that would apply to all land adjoining the Strategic Transport Corridor Zone. The relief sought by the Submitter is similar to relief that was sought (also by KiwiRail) on the Proposed Auckland Unitary Plan (2013). However, at that time, KiwiRail sought a 2.25m yard on all land adjoining the railway corridor. In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this standard was not included in the Auckland Unitary Plan. The Panel's recommendation report stated:[2] *The Panel was concerned that these provisions would apply in a blanket fashion along the rail corridor whether needed or not, that it is an issue that could be addressed through the application of KiwiRail's designation powers if needed, and that the costs of the Overlay would fall entirely on property owners with insufficient evidence that such an approach would lead to an efficient outcome. In this context the Panel recommends that the building setback from the rail corridor provisions not be included in the plan.* Dilworth opposes the relief sought by the Submitter for the following reasons: • The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD, particularly being land which is typically in close proximity to a train station (a rapid transit service). • The Submitter has previously sought a 2.25m wide yard standard to apply to land adjoining the railway corridor in the Proposed Auckland Unitary Plan, which was rejected by the Independent Hearings Panel. The Submitter now seeks (in its submission on PC78) an increased yard setback of 5m. • The reasons why the Independent Hearings Panel rejected the submission of KiwiRail on the Proposed Auckland Unitary Plan continue to apply to the relief sought by KiwiRail in its submission on PC78, namely:	Disallow the submission.
	2069.8	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend Matters of Discretion in all Residential - Single House, Low Density Residential, Mixed Housing Suburban, Mixed Housing Urban and Terraced Housing and Apartment Buildings zones for activities that do not comply with the requested 5m yard setback to consider the effects on the safe and efficient operation of neighbouring infrastructure. Or amend matters of discretion in E27 - Transport on a region-wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.9	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Insert new standard in all City Centre, Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, Mixed Use, General Business, Business Park, Heavy Industry and Light Industry zones as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.10	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Insert new standard in all other zones listed in Chapter H [H18 - H21 and H23 - H30] as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.11	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Insert new standard in all precincts adjoining the rail corridor [inferred all Precincts listed in Chapter I] as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.12	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend matters of discretion in all Precincts adjoining the rail corridor [inferred all Precincts listed in Chapter I] for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access	Accept the plan change with amendments		Disallow the submission.

[2] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.4.

					and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.		○ A 'blanket' yard control is a blunt and inefficient mechanism to address a perceived issue which has not been reasonably justified by the Submitter to be necessary in the first instance. ○ The yard standard will result in all costs being borne by private landowners. Such costs involve the cost of the foregone use of land within the requested yard, and the costs of making a resource consent application to develop that land. ○ There has been no analysis of the necessity for such a standard in the first instance, including the width of the standard. • The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the relief sought by KiwiRail in its submission on the Proposed Auckland Unitary Plan.	
	2069.13	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend matters of discretion in all City Centre, Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, Mixed Use, General Business, Business Park, Heavy Industry and Light Industry zones for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.14	Oppose	Qualifying Matters A-I	Strategic Transport Corridors	Amend matters of discretion in all other zones listed in Chapter H [H18 - H21 and H23 - H30] for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.15	Oppose	Residential Zones	Residential Zones (General or other)	Amend all Yard standards in all Residential - Single House, Low Density Residential, Mixed Housing Suburban, Mixed Housing Urban and Terraced Housing and Apartment Buildings zones to require all buildings and structures to be setback 5m from a boundary with a rail corridor/5m from the edge of the Strategic Transport Corridor Zone. Or insert similar amendment in Chapter E27 - Transport to have region wide effect.	Accept the plan change with amendments		Disallow the submission.
	2069.16	Oppose	Residential Zones	Residential Zones (General or other)	Amend Matters of Discretion in all Residential - Single House, Low Density Residential, Mixed Housing Suburban, Mixed Housing Urban and Terraced Housing and Apartment Buildings zones for activities that do not comply with the requested 5m yard setback to consider the effects on the safe and efficient operation of neighbouring infrastructure. Or amend matters of discretion in E27 - Transport on a region-wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.17	Oppose	Residential Zones	Residential Zones (General or other)	Insert new standard in all City Centre, Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, Mixed Use, General Business, Business Park, Heavy Industry and Light Industry zones as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.18	Oppose	Business Zones provisions	Business Zones (General or other)	Insert new standard in all City Centre, Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, Mixed Use, General Business, Business Park, Heavy Industry and Light Industry zones as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.19	Oppose	Residential Zones	Residential Zones (General or other)	Insert new standard in all other zones listed in Chapter H [H18 - H21 and H23 - H30] as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.20	Oppose	Precincts - NPSUD MDRS Response	Chapter I Precincts - General (Other)	Insert new standard in all precincts adjoining the rail corridor [inferred all Precincts listed in Chapter I] as follows: HX.X Strategic Transport Corridor Zone setback A building or parts of a building or structure must be set back 5m from the boundary of a site	Accept the plan change with amendments		Disallow the submission.

					adjoining the Strategic Transport Corridor Zone. Or alternatively insert similar standard in E27 - Transport on a region wide basis.			
	2069.22	Oppose	Precincts - NPSUD MDRS Response	Chapter I Precincts - General (Other)	Amend matters of discretion in all Precincts adjoining the rail corridor [inferred all Precincts listed in Chapter I] for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.23	Oppose	Business Zones provisions	Business Zones (General or other)	Amend matters of discretion in all City Centre, Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, Mixed Use, General Business, Business Park, Heavy Industry and Light Industry zones for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.
	2069.24	Oppose	Residential Zones	Residential Zones (General or other)	Amend matters of discretion in all other zones listed in Chapter H [H18 - H21 and H23 - H30] for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor as follows: (X) The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. Or alternatively insert similar standard in E27 - Transport on a region wide basis.	Accept the plan change with amendments		Disallow the submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 11:01 am
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - The Ascot Hospital and Clinics Limited
Attachments: PC78 Ascot H and C - Further Submission.pdf

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

Contact details

Full name of person making a further submission: The Ascot Hospital and Clinics Limited

Organisation name: The Ascot Hospital and Clinics Limited

Full name of your agent: Anthony Blomfield

Email address: ablomfield@bentley.co.nz

Contact phone number: 0211339309

Postal address:
PO Box 4492
Shortland Street
Auckland 1140

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:
Refer attached

Submission number: Refer attached

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 Refer attached

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

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:
Refer attached

Submission date: 19 January 2023

Supporting documents
PC78 Ascot H and C - Further Submission.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:
Refer attached

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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Form 6
Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: The Ascot Hospital and Clinics Limited ("**Ascot**")

1. This is a further submission in support of and in opposition to submissions on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Ascot made an original submission on PC78, submission number 952.

2. Ascot could not gain an advantage in trade competition through this further submission.

3. Ascot is a person with an interest in the plan change and the identified primary submissions that is greater than the interest the general public has, as Ascot made a submission on PC78 and owns properties in Epsom that are affected by PC78 and the relief sought by submissions.

4. As detailed in its primary submission, Ascot owns the land at 98-110 Mountain Road and 15-17 Gilgit Road, and associated landholdings at 90 and 94 Mountain Road and 1 and 3 Gilgit Road, Epsom.

Further submissions

5. The submissions supported or opposed by Ascot, and the reasons for the support or opposition, are detailed in the table attached as **Appendix A**.

Decision sought

6. The relief sought by Ascot is detailed in the table attached as **Appendix A**.

Hearing

7. Ascot wishes to be heard in support of this further submission.

8. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

The Ascot Hospital and Clinics Limited
By its planning and resource management consultants Bentley & Co. Ltd



Anthony Blomfield

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140
Attention: Anthony Blomfield

Mobile: 0211339309
Email: ablomfield@bentley.co.nz

Note for submitters:

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.

Appendix A – Further Submission of The Ascot Hospital and Clinics Limited

Ascot supports/opposes the submission of:	The particular part/s of the submission Ascot supports/opposes are:				Summary of the submission	Relief sought by submitter	The reasons for Ascot's support/ opposition are:	Ascot seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Support/ oppose	Topic	Subtopic				
26 Geoffrey William John Hinds 12/24 Sherbourne Rd Mt Eden Auckland 1024	26.1	Oppose	Qualifying Matters Other	Notable Trees (D13)	Any developments on the above-mentioned properties [Around area of Gilgit Rd, Almorah Rd and Almorah lane in the vicinity of Withiel Reserve] and any other similar properties must ensure the preservation of mature native species.	Approve the plan change with the amendments requested	Ascot's landholdings are located at and front Gilgit Road and Almorah Road. It is not clear whether Ascot's landholdings are included in the spatial area to which the submitter requests protection of trees. Ascot does not support the inclusion of new rules to protect trees and vegetation, particularly within land which is zoned Special Purpose – Healthcare Facility and Hospital, for the following reasons: • The submission raises new matters which have not been subject to an evaluation under s32 or s32AA of the Resource Management Act 1991. • The introduction of new tree protection provisions will result in unreasonable and unnecessary constraints on development of land, including Ascot's landholdings, in a manner which is efficient and provides for the functional and operational needs of healthcare facilities and hospitals. • The relief sought conflicts with the outcomes that are intended by the NPS-UD.	Disallow the submission
202 Donald James and Catherine Elizabeth Lyon and the Donald & Catherine Lyon Trust clyon@xtra.co.nz	202.8 202.9 202.10	Oppose	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Further strengthen the controls of the [Maunga Viewshafts and Height and Building Sensitive Areas] Overlay through: the introduction of a minimum impermeable surface control to maintain the open, highly vegetated character of the maunga slopes, reduce the effects of excessive runoff and to reinforce the landscaping control; the retention of a more restrictive height in relation to boundary (HIRB) control that is more in keeping with the values of the maunga, more in keeping with the intentions of the height sensitive overlay controls and mitigates the impact of large imposing structures on the maunga slopes (the HIRB control of the current unitary plan zoning seems more appropriate); and add additional or strengthened assessment criteria that address the matters raised [in submission points 8-9] and require applicants to undertake a comprehensive visual and landscape impact assessment that wholistically assesses the impact of additional site development or new buildings on the objectives and policies of the [Maunga Viewshafts and Height and Building Sensitive Areas] Overlay.	Accept the proposed plan change / variation with amendments as outlined in the submission	As notified, PC78 proposes new provisions within Chapter D14 Volcanic Viewshafts and Height Sensitive Areas Overlay which include more restrictive development standards within 'residential' zones. Ascot did not submit on these aspects of PC78, on the basis that the proposed provisions do not apply to land with a 'non-residential zone' (such as the Special Purpose – Healthcare Facility and Hospital Zone that applies to Ascot's landholdings). The relief sought by the submitter, namely the introduction of further standards and assessment criteria to control development within the Height Sensitive Area overlay, is not specifically limited to land with a residential zone. Ascot opposes the relief sought for the following reasons: • The submission raises new matters which have not been subject to an evaluation under s32 or s32AA of the Resource Management Act 1991. • The introduction of new bulk and location standards would unnecessarily and unjustifiably constrain the development opportunity of Ascot's landholdings, and will conflict with the purpose of the Special Purpose – Healthcare Facility and Hospital Zone and the higher-order provisions of the Auckland Unitary Plan which seek to achieve a quality compact urban form supported by appropriate and efficient social facilities (including healthcare facilities and hospitals). • The introduction of new bulk and location standards is a conflation of the purpose of the Height Sensitive Area Overlay. • The relief sought by the submitter will unduly (and without merit) conflict with the outcomes intended by the NPS-UD.	Disallow the submission
219 Jo Banks 1a Summit Drive Mt Albert Auckland 1025	219.3	Oppose	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Amend to strengthen the provisions of the Maunga Viewshafts and Height Sensitive Areas overlay through the introduction of: a minimum impermeable surface control, a more restrictive height in relation to boundary control, additional or strengthened assessment criteria, requiring applicants to undertake a comprehensive visual and landscape assessment including the totality	Approve the plan change with the amendments requested	As notified, PC78 proposes new provisions within Chapter D14 Volcanic Viewshafts and Height Sensitive Areas Overlay which include more restrictive standards within 'residential' zones. Ascot did not submit on these aspects of PC78, on the basis that the provisions do not apply to land with a 'non-residential zone' (such as the Special Purpose – Healthcare Facility and	Disallow the submission

					and integrity of the maunga natural and cultural landscape as a whole.		Hospital Zone that applies to Ascot's landholdings). The relief sought by the submitter, namely the introduction of further standards and assessment criteria to control development within the Height Sensitive Area overlay, is not specifically limited to land with a residential zone. Ascot opposes the relief sought for the following reasons: • The submission raises new matters which have not been subject to an evaluation under s32 or s32AA of the Resource Management Act 1991. • The introduction of new bulk and location standards would unnecessarily and unjustifiably constrain the development opportunity of Ascot's landholdings, and will conflict with the purpose of the Special Purpose – Healthcare Facility and Hospital Zone and the higher-order provisions of the Auckland Unitary Plan which seek to achieve a quality compact urban form supported by appropriate and efficient social facilities (including healthcare facilities and hospitals). • The introduction of new bulk and location standards is a conflation of the purpose of the Height Sensitive Area Overlay. • The relief sought by the submitter will unduly (and without merit) conflict with the outcomes intended by the NPS-UD.	
873 Kainga Ora – Homes and Communities PO Box 74598 Greenlane Auckland 1051	873.43	Support	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	Retain the Maunga Volcanic Viewshafts as a qualifying matter but delete all Height and Building Sensitive Areas entirely and their use as a Qualifying Matter. Retain or delete text as set out in Appendix 1, Table 1, Rows 18, 19, 20 and 21 of the submission.	Accept the plan change with amendments	The submitter seeks that the Height Sensitive Area Overlay is deleted in its entirety. Ascot has historically supported the extent of the Height Sensitive Areas Overlay relative to its' landholdings. The reason for Ascot's support of the Height Sensitive Area Overlay is that, where land is also subject to a Volcanic Viewshaft (which constrains height to a level below 9m), it was intended to enable a reasonable level of development (generally up to 9m) as a permitted activity. Such an outcome (that is intended to be enabled by the Height Sensitive Areas Overlay) is potentially implicated by the drafting of the provisions of Chapter D14, in that both the Height Sensitive Areas Overlay and the Volcanic Viewshafts Overlay apply equally (as detailed in Ascot's primary submission). Noting the ongoing anomalous relationship between the Volcanic Viewshaft and Height Sensitive Areas Overlays, Ascot supports the relief sought by the submitter, subject to the inclusion of appropriate rules which enable (as a permitted activity) development up to a reasonable scale on land which is subject to the Volcanic Viewshafts overlay, where the height of the viewshafts is less than 9m, in order to maintain the opportunity that is intended by the Height Sensitive Areas Overlay.	Allow the submission, with amendments to the provisions of Chapter D14 to enable development within the Volcanic Viewshafts overlay up to 9m as a permitted activity.

Alice Zhou

From: David Alison <davidalison@xtra.co.nz>
Sent: Thursday, 19 January 2023 4:14 pm
To: Unitary Plan
Subject: Further Submission - Plan Change 78
Attachments: FurtherSub.PC78.DAA.pdf

Please find Further Submission to Plan Change 38 Attached to this email.

Kind regards,
David Alison

Auckland Unitary Plan - Proposed Plan Change 78

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78

David Alison,

43 Wood Street,

Freemans Bay,

Auckland, 1011.

Email: davidalison@xtra.co.nz

Phone: +64 (09) 376-2978

I am directly affected by the issues referred to in this Further Submission. I live in Wood Street, Freemans Bay and so have a greater interest than the general public, as I would be directly affected by the proposal. I have previously submitted on Plan Change 78.

A. I <u>specifically support</u> sections stated of the following submissions:

1. Submission 1262-Sarah Kember (skember@xtra.co.nz)

a. (1262.1) Retain the proposed Special Character Areas in Freemans Bay.

b. (1262.2) Retain the Low Density Residential Zone in Freemans Bay.

c. (1262.3) Amend the Special Character Overlay to include the entire area previously covered by the AUP Operative Overlay.

d. (1262.4) Reject re-zoning of 2-8 Ryle Street, 32 Wood Street and 34 Wood Street, Freemans Bay.

e. (1262.5) Rezone 2-8 Ryle Street, 32 Wood Street, and 34 Wood Street, Freemans Bay to Low Density Residential Zone.

2. Submission 2305-Keith Vernon (kvernon@xtra.co.nz)

a. (2305.13) Introduce a provision for Height in Relation to Boundary controls to be introduced between SCA's and any other site.

b) (2305.14 - 16) Amend Chapter H6 to require setbacks between SCA's and any other site.

B. I <u>support in entirety</u> the following submissions:

Submission #	Submitter Name	Submitter Address
504	Charles H Levin	patrick@mulliganlegal.co.nz
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	mariankohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz
2031	Paul Gunn	paulgunn416@gmail.com

The reasons for my support are that these submissions:

a) consistently support the historic heritage and special character of Freemans Bay as currently protected under the Auckland Unitary Plan.

b) recognise the lack of necessary infrastructure to support intensification in Freemans Bay.

c) recognise access to sunlight and privacy are recognised amenities.

C. I <u>specifically oppose</u> sections stated of the following submission:

1. Submission 949 – Piper Property Consultants Limited (Tom.Morgan@Tattico.co.nz and layne@bastiongroup.co.nz

a) Seeks to delete provisions relating to development controls, including Height and HRB controls from Chapter D18.6.1.1-7 and D18.8.1-2

D. I oppose the following submissions:

Sub #	Submitter Name	Submitter Address
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com

1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowrie .matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

The reasons for my opposition are that these submissions:

a) all adversely affect the historic heritage and special character of Freemans Bay which is currently protected under the Auckland Unitary Plan.

b) do not recognise the lack of necessary infrastructure to support intensification in Freemans Bay.

c) do not recognise access to sunlight and privacy are recognised amenities.

I seek that the whole of each identified submission is disallowed.

D. Hearing

I wish to be heard in support of my Further Submission.

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



David Alison

19/01/2023

Alice Zhou

From: alexdonald <adonald@abdonaldltd.co.nz>
Sent: Thursday, 19 January 2023 3:00 pm
To: Unitary Plan
Subject: further submission on Plan #78
Attachments: pc-78-form-6.pdf

Attn:

The Planning Technician,

Auckland Council, Private Bag 92300, Auckland

--
Kind regards
Alex Donald
Director, A.B. Donald Ltd
Vintage Camera Dealers
www.abdonaldltd.co.nz
www.salicylate.org
021 2693541

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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) AB and LC Donald

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

Address for service of Further Submitter

10 Alderley Road, Mt Eden 1024

Telephone: 212693541 Fax/Email: adonald@abdonaldltd.co.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☒ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Eden Park Neighbours Assoc Inc

Character Coalition Inc Point # 2021

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**
2366	2366

The reasons for my support / opposition are:

Plan change #78 fails to protect Auckland's special character heritage architecture in areas where these properties form the dominant streetscape

Plan change #78, if allowed will cause the destructions of significant private green space and mature trees, including many native trees.

Retain the special character overlay areas as a qualifying matter. Reinstate the operative special character overlay areas if, during the hearing, site specific evidence warrants this.

(continue on a separate sheet if necessary)

I seek that:

the whole : ☒

or part ☐ (describe precisely which part) _____

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 ☐

Alexander Donald
_____
Signature of Further Submitter
(or person authorised to sign on behalf of further submitter)

01/23/2019
_____
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)**

_____

_____

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.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Larry Small
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 1SG.pdf

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

Contact details

Full name of person making a further submission: Larry Small

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 1SG.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:
Owner own property in the area subject to the proposal/submission

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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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:24 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 1SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Larry Small
Postal Address:	1 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
  - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 1 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Larry Small*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Larry Small
Postal Address: 1 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Sarah Redfern and David Deavoll
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 22SG.pdf

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

Contact details

Full name of person making a further submission: Sarah Redfern and David Deavoll

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 22SG.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:
Submitter owns property in area subject to this proposal/submission

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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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:26 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 22SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Sarah Redfern & David Deavoll
Postal Address:	22 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 22 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Sarah Redfern & David Deavoll*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Sarah Redfern and David Deavoll
Postal Address: 22 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Scott Douglas
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 20SG.pdf

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

Contact details

Full name of person making a further submission: Scott Douglas

Organisation name: Douglas Sierra Trust

Full name of your agent: Pos

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 20SG.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:
Submitted owns property in area subject to this proposal/submission

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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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:26 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 20SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Douglas Sierra Trust
Postal Address:	20 Stoneyroyd Garden, Remuera
Email Address:	scott@southbourne.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 20 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Douglas Sierra Trust*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Douglas Sierra Trust
Postal Address: 20 Stoneyroyd Gardens, Remuera
Email Address: scott@southbourne.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Sally and Nick Gunn
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 13SG.pdf

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

Contact details

Full name of person making a further submission: Sally and Nick Gunn

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 13SG.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:
Submitter owns property in area subject to this proposal/submission

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
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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:26 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 13SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Sally & Nick Gunn
Postal Address:	13 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 13 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Sally & Nick Gunn*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Sally and Nick Gunn
Postal Address: 13 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Teri and Moore Yang
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 12SG.pdf

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

Contact details

Full name of person making a further submission: Teri and Moore Yang

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 12SG.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:
Submitter owns property in area subject to the proposal/submission

I declare that:

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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:25 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 12SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Teri & Moore Yang
Postal Address:	12 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 12 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Teri & Moore Yang*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Teri and Moore Yang
Postal Address: 12 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Myron Zhu and Amy Yan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 24SG.pdf

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

Contact details

Full name of person making a further submission: Myron Zhu and Amy Yan

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

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Point number Refer to attached further submission document

The reasons for my or our support or opposition are:
Refer to attached further submission document

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

Submission date: 19 January 2023

Supporting documents
Further Submission - PC78 - Stoneyroyd Gardens - 24SG.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

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Specify upon which grounds you come within this category:
Submitter owns property in area subject to this proposal/submission

I declare that:

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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:27 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 24SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
Auckland 1010

Office +64 9 302 0461
DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

www.positiveplanning.co.nz

19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Myron Zhu & Amy Yan
Postal Address:	24 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 24 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Myron Zhu & Amy Yan*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Myron Zhu and Amy Yan
Postal Address: 24 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Rebecca and Reid McRobie
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 26SG.pdf

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

Contact details

Full name of person making a further submission: Rebecca and Reid McRobie

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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:
Refer to attached further submission document

Submission number: Refer to attached further submission document

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

Specific parts of the original submission that your submission relates to:
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I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 19 January 2023

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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

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Alice Zhou

From: Matthew Harrison <matthew@positiveplanning.co.nz>
Sent: Thursday, 19 January 2023 3:27 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 Auckland Unitary Plan
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 26SG.pdf

Dear Sir/Madam,

Please find attached our further submission to the proposed Plan Change 78 – Auckland Unitary Plan.

Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

Positive Planning Limited
Level 17, 55 Shortland Street
PO Box 228, Shortland Street
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Office +64 9 302 0461
DDI 028 2555 4840
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19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Rebecca & Reid McRobie
Postal Address:	26 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 26 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

5.0 Preferred Outcome:

For the reasons stated in section 4.0 of this further submission, we consider the following outcomes appropriate:

- Reject Kainga Ora's proposed intensification particularly for those sites located within established suburbs/neighbourhoods, such as Stoneyroyd Gardens and the suburb of Remuera, and to retain the suburban character of the area with an appropriate zoning.

6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Rebecca & Reid McRobie*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Rebecca and Reid McRobie
Postal Address: 26 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Emma Douglas and George Grant
Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 6SG.pdf

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

Contact details

Full name of person making a further submission: Emma Douglas and George Grant

Organisation name:

Full name of your agent: Positive Planning Ltd. - Matthew Harrison

Email address: matthew@positiveplanning.co.nz

Contact phone number: 093020461

Postal address:
Level 17
55 Shortland Street
Auckland Central
Auckland 1010

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Plan change name: PC 78: Intensification

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Attachments: Further Submission - PC78 - Stoneyroyd Gardens - 6SG.pdf

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Kind regards,
Matt Harrison Assoc.NZPI BSc (LPDP)

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Level 17, 55 Shortland Street
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DDI 028 2555 4840
Email matthew@positiveplanning.co.nz

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19th January 2023

Auckland Council
Private Bag 92300
Auckland 1142

AUCKLAND UNITARY PLAN – PROPOSED PLAN CHANGE 78 – INTENSIFICATION – FURTHER SUBMISSION

1.0 Submitter Details

Name:	Emma Douglas & George Grant
Postal Address:	6 Stoneyroyd Garden, Remuera
Email Address:	C/o- gary@positiveplanning.co.nz

2.0 Agent Details:

Organisation:	Positive Planning Limited
Contact:	Gary Deeney
Postal Address:	PO Box 582, Shortland Street 1140
Email Address:	gary@positiveplanning.co.nz
Phone:	(09) 302 0461 or 021 828 969

3.0 Stance on Proposed Plan Change 78 Submission/s in relation to this Further Submission:

This is a further submission relating to the following submission/s:

*Submission to **Oppose**:*

- Submission #873 – Kainga Ora
    - Address for service: developmentplanning@kaingaora.govt.nz

To summarise, the abovementioned submissions seek to intensify all properties within Auckland. This includes intensifying residentially zoned sites located on Stoneyroyd Gardens and surrounding area, notably including the site located at 6 Stoneyroyd Gardens, Remuera.

4.0 Reasons for the Submission

Our reasons for supporting the abovementioned submissions are as follows:

- The proposed rezoning sought by Kainga Ora in their submission is excessive and ill-conceived. No regard has been given to site characteristics, particularly for established streets and neighbourhoods, such as Stoneyroyd Gardens/Remuera.
- A blanket intensification approach has been undertaken by Kainga Ora, predominantly by re-zoning most central residential sites to Terrace Housing and Apartment Building Zone. In our view, this will destroy these established and high-quality living areas/suburbs.

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6.0 Hearings:

We wish to be heard in support of this further submission. If others make a similar further submission, we will consider presenting a joint case with them at a hearing.

Yours Faithfully,

Positive Planning Limited

On behalf of – *Emma Douglas & George Grant*



Gary Deeney
B.R.P (Hons), MNZPI
Director

ADDENDUM TO FURTHER SUBMISSIONS LODGED TO COUNCIL

Further Submission Details:

1.0 Submitter Details:

Name: Emma Douglas and George Grant
Postal Address: 6 Stoneyroyd Gardens, Remuera
Email Address: C/o- gary@positiveplanning.co.nz

ADDENDUM TO LODGED FURTHER SUBMISSION:

7.0 Submitters Interest in Proposal/Submission:

The submitter has an interest in the proposal/submissions that is greater than the interest of the general public because they own a property and/or live in the area affected by the proposal/submission.

Alice Zhou

From: Admin (Planning Collective) <admin@thepc.co.nz>
Sent: Thursday, 19 January 2023 4:05 pm
To: Unitary Plan
Cc: Diana Bell; Jessica Andrews; neville.simmons@outlook.com; Charles Simmons
Subject: Further Submission PC78 - Submitter #1468
Attachments: Form 6 Further Submission - Ellper Holdings - 14 Mason Heights, WW_FINAL.pdf

Hi

Please find attached a further submission relating to the above.

A copy will be sent to the Submitter's that the further submission relates to next week and within 5 working days as required.

Ngā mihi / Kind regards

Nicola Jones
Practice Manager BMS

THE PLANNING COLLECTIVE

M: +64-21-422-681 W: www.thepc.co.nz E: admin@thepc.co.nz

A hub of planning excellence

THE PLANNING COLLECTIVE

Form 6

Further Submission on a notified proposal for policy statement or plan changes or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: Ellper Holdings Limited, owners of 14 Mason Heights, Warkworth (Lot 2 DP 483779)

This is a further submission on behalf of Ellper Holdings Limited, in opposition to, submissions made to Auckland Council on the Proposed Plan Change 78: Intensification to the Auckland Unitary Plan

Introduction and Scope of Further Submission

Auckland Council notified Proposed Plan Change 78 (PC78) on 18 August 2022 and the Summary of Decisions Requested was notified on 5 December 2022. An errata to the Summary of Decisions Requested was notified on the 12 December 2022. The period for making further submissions closes on 20 January 2023. A second errata to the Summary of Decisions Requested was notified on the 16 January 2023 and the period for making a further submission to these missed submission points closes on the 30 January 2023.

Ellper Holdings Limited made a submission to Auckland Council on PC78 (submitter number: 1468) which sought the following relief from Auckland Council:

- That PC78 be approved in part subject to the matters raised within the submission, namely the rezoning of the site at 14 Mason Heights to the Medium Density Residential zone with no qualifying factors applying.
- Any other relief required to achieve the outcomes sought in this submission.

Ellper Holdings Limited has an interest in PC78 that is greater than the interest the general public as Ellper Holdings Limited lodged an original submission to PC78.

Ellper Holdings Limited could not gain an advantage in trade competition through this submission.

Further Submission

The submission points on PC78 that are opposed by Ellper Holdings Limited are set out in the table provided in **Attachment 1** to this further submission.

Decision Sought

In addition to the specific decisions sought as set out in **Attachment 1**, Ellper Holdings Limited seeks any other relief required to achieve the outcomes sought in this further submission.

Hearing of Submission

Ellper Holdings Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



Diana Bell (Agent)
Planner / Manager
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date: 20 January 2023

Address for Service:
Ellper Holdings Limited
C/- The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: Diana Bell
E: Diana@thepc.co.nz
Ph: 021-382-000

Attachments:
1: Further Submission Table

Attachment 1:

Further Submission Table

Plan Change 78: Intensification Further Submission Table

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	Ellper Holdings Limited position	Decision sought
1	39.1	Aaron Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
2	40.1	Ngahine Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
3	42.1	SLD Family Trust	Plan making and Procedural	General	Exempt Warkworth from the plan change.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
4	70.1	Barbara Larsen	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Decline the plan change relating to Warkworth due to existing infrastructure not being able to cope with increase in dwellings. Present AUP allows for growth.	OPPOSE	There is sufficient planned infrastructure for urban growth in Warkworth. Warkworth has been planned as a growth area since the Auckland Plan was Adopted by Auckland Council in March 2012. Intensifying areas closer to existing infrastructure, particularly larger vacant sites and older housing stock where it is likely to be more economic to provide for intensification in a cost effective and quality way, is more efficient.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	Ellper Holdings Limited position	Decision sought
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
5	165.1	Susan Elizabeth Stevens	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Concerns relating to public transport infrastructure, neighbourhood well being associated with intensification. The plan change does not recognise the identity and needs of Warkworth. Warkworth is already experiencing huge growth.	OPPOSE	Warkworth has several planned and under construction roading projects, including planned extensions to public transport links. For example, the Puhoi to Warkworth extension of SH1 and the Supporting Growth arterial network. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
6	171.1	Carl James Larcombe	Qualifying Matters - Additional	Qualifying Matters - Additional	Reject Warkworth being included in the plan change due to its unique character and lifestyle being reduced with intensification.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Lifestyle is not a Qualifying Matter. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
7	384.1	Roger Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Identify Warkworth as having the same qualifying matter of Transport Infrastructure constraint as Beachlands.	OPPOSE	Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Warkworth does not have a Transport Infrastructure constraint as Beachlands does. Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
8	422.1	Glyn Evan Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Add new qualifying matter for Transport in Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	Ellper Holdings Limited position	Decision sought
							Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
9	422.2	Glyn Evan Williams	Qualifying Matters - Additional	Infrastructure - Water and wastewater constraints	Add qualifying matters for Wastewater in Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
10	593.1	Gail Lorraine Stratton	Qualifying Matters - Additional	Qualifying Matters - Additional	Apply Transport as a QM to reduce impact of MDRS in Warkworth, as applies to (operative) Single House zoned sites.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
11	593.2	Gail Lorraine Stratton	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Apply Infrastructure as a QM to reduce impact of MDRS in Warkworth as applies to (operative) Single House zoned sites.	OPPOSE	Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has various planned infrastructure upgrades, some of which are under construction. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	Ellper Holdings Limited position	Decision sought
12	595.1	Gordon Loughnan	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Decline the plan change: Warkworth needs infrastructure upgrades to cope with growth.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
13	595.2	Gordon Loughnan	Plan making and procedural	General	Decline the plan change: Warkworth does not have a transport hub commensurate with MDRS of PC78.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
14	675.1	Warkworth Area 7iaison Group [WALG]	Qualifying Matters – Infrastructure	Infrastructure – Water and wastewater constraints	Add wastewater QM for Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
15	675.2	Warkworth Area 7iaison Group [WALG]	Qualifying Matters – Additional	Qualifying Matters – Additional	Add a Transport QM for Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	Ellper Holdings Limited position	Decision sought
16	978.2	Noeline Walsh	Urban Environment	Larger rezoning proposal	Reject the proposed housing intensification of Warkworth Central area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
17	1769.30	Anne Perratt	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR	Include Warkworth as a Special Character Area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
18	2392.13	Ngāti Te Ata Waiohua	Outside Urban Environment	Future Urban Land Proposals - Excluded from IPI PC	Support no rezoning of either Future Urban Zone land or other non-residential sites through the NPS-UD.	OPPOSE	The legislation clearly enables Future Urban Zoned land to be considered as part of PC78 through the creation of 'new residential zones'. This is particularly relevant where Future Urban zoned land has been developed for residential purposes prior to a live zoning being applied to the land through the Unitary Plan process. The rezoning of developed Future Urban zoned land through PC78 will result in a more efficient use of the land and will contribute to a well-functioning urban environment. Rezone Future Urban zoned land, including land such as 14 Mason Heights, Warkworth, that has been developed for residential purposes, to Residential - Mixed Housing Urban with no qualifying matters.

End of Report

Alice Zhou

From: Burnette O'Connor <burnette@thepc.co.nz>
Sent: Thursday, 19 January 2023 4:25 pm
To: Unitary Plan
Cc: horners@xtra.co.nz; Admin (Planning Collective)
Subject: Further Submissions - The Kilns - PC 78, 79, 80
Attachments: Form 6 Further Submission - The Kilns - 36 Sandspit Rd, WW_Final.pdf

Please find attached further submissions on behalf of The Kilns Limited relating to Decisions sought on Plan Changes 78, 79, and 80.

A copy will be forwarded to the submitters the further submissions relate to within 5 working days.

Burnette O'Connor
Director | Planner BREP (Hons), MNZPI and RMLA
M: +64-21-422-346 W: www.thepc.co.nz E: burnette@thepc.co.nz
THE PLANNING COLLECTIVE
A hub of planning excellence

Form 6

Further Submission on a notified proposal for policy statement or plan changes or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: The Kilns Limited

This is a further submission on behalf of The Kilns Limited in support of, and in opposition to, submissions made to Auckland Council on the Proposed Plan Change 78: Intensification, Proposed Plan Change 79: Transport, Proposed Plan Change 80 to the RPS on Well-functioning Urban Environments, Resilience to the Effects of Climate Change and Qualifying Matters and Proposed Plan Change 82 Amendments to Schedule 14 Historic Heritage Schedule, Statements and Maps

Introduction and Scope of Further Submission

Auckland Council notified Proposed Plan Change 78 (PC78), Proposed Plan Change 79 (PC79), Proposed Plan Change 80 (PC80) and Plan Change 82 (PC82) on 18 August 2022 and the Summary of Decisions Requested was notified on 5 December 2022. An errata to the Summary of Decisions Requested was notified on the 12 December 2022. The period for making further submissions closes on 20 January 2023. A second errata to the Summary of Decisions Requested was notified on the 16 January 2023 and the period for making a further submission to these missed submission points closes on the 30 January 2023.

The Kilns Limited lodged a submission to Auckland Council on PC78, PC79 and PC80 (PC78 submitter number: 1244, PC79 submitter number: 82 and PC80 submitter number: 54) which sought the following relief from Auckland Council:

PC78:

- To zone the land at 34 & 36 Sandspit Road, Warkworth Residential – Mixed Housing Urban with no qualifying matters.

PC79:

- Amend Rule E38.4.2 (A30) to change the activity status to RD – Restricted Discretionary from D – Discretionary.

- Amend Rule E38.4.2 (A31) to change the activity status to RD – Restricted Discretionary from D – Discretionary
- Add matters of discretion and assessment criteria to E38.12 and E38.12.1 to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.

PC80:

- Amend B2.2.1 (1) to specify more directly outcomes to be achieved to obtain a well-functioning urban environment (additions are underlined) e.g.
    - (e) greater cultural and social vitality to be achieved through access to quality public open spaces and community facilities.
    - (l) improved, safe and functional multi modal connections between areas for living and areas for working.
    - (j) The natural environment is protected and enhanced.
    - (k) Quality built form designed in sustainable ways that will achieve longevity.
- B2.2.2 (2) (aa) contribute to a well-functioning urban environment that promotes quality-built form, sustainability, quality urban design outcomes and protects and enhances the natural environment.

PC82:

- The Kilns Limited submission to Plan Change 82 is:
  Amend the Extent of Place Overlay for ID 569 Combes Daldy Lime Works in Schedule 14 as shown below:

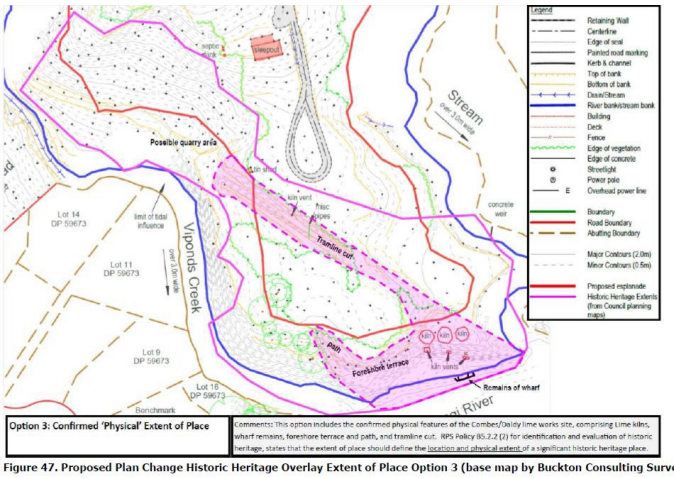


Figure 47. Proposed Plan Change Historic Heritage Overlay Extent of Place Option 3 (base map by Buckton Consulting Surveyors Ltd Sept 2021)

Figure 11: Preferred Extent of Place, Option 3

The Kilns Limited has an interest in PC78, PC79, PC80 and PC82 that is greater than the interest the general public has because they own land affected by submissions, were a submitter themselves and have a resource consent and private plan change request seeking development of the land that could be directly affected by the outcomes of submissions sought.

The Kilns Limited could not gain an advantage in trade competition through this submission.

Further Submission

The submission points on PC78, PC79 and PC80 that are supported and opposed by The Kilns Limited are set out in the table provided in **Attachment 1** to this further submission.

Decision Sought

In addition to the specific decisions sought as set out in **Attachment 1**, The Kilns Limited seeks any other relief required to achieve the outcomes sought in this further submission.

Hearing of Submission

The Kilns Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



Burnette O'Connor (Agent)
Director | Planner
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date: 19 January 2022

Address for Service:

The Kilns Limited
C/- The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: Burnette O'Connor
E: burnette@thepc.co.nz
Ph: 021-422-346

Attachments:

1: Further Submission Table

Attachment 1:

Further Submission Table

Plan Change 78: Intensification Further Submission Table

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
1	39.1	Aaron Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations. Future Urban zoned land can also be included because it is not excluded from the definition of relevant residential zone. Warkworth is an area that is predominantly urban in character and is already part of an urban environment. The MDRS can be applied via a new residential zone.
2	40.1	Ngahine Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
3	42.1	SLD Family Trust	Plan making and Procedural	General	Exempt Warkworth from the plan change.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
4	70.1	Barbara Larsen	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Decline the plan change relating to Warkworth due to existing infrastructure not being able to cope with increase in dwellings. Present AUP allows for growth.	OPPOSE	There is sufficient planned infrastructure for urban growth in Warkworth. Warkworth has been planned as a growth area since the Auckland Plan was Adopted by Auckland Council in March 2012. Intensifying areas closer to existing infrastructure, particularly larger vacant sites and older housing stock where it is likely to be more economic to provide for intensification in a cost effective and quality way, is more efficient.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
5	165.1	Susan Elizabeth Stevens	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Concerns relating to public transport infrastructure, neighbourhood well being associated with intensification. The plan change does not recognise the identity and needs of Warkworth. Warkworth is already experiencing huge growth.	OPPOSE	Warkworth has several planned and under construction roading projects, including planned extensions to public transport links. For example, the Puhoi to Warkworth extension of SH1 and the Supporting Growth arterial network. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations. Future Urban zoned land can also be included because it is not excluded from the definition of relevant residential zone. Warkworth is an area that is predominantly urban in character and is already part of an urban environment. The MDRS can be applied via a new residential zone.
6	171.1	Carl James Larcombe	Qualifying Matters - Additional	Qualifying Matters - Additional	Reject Warkworth being included in the plan change due to its unique character and lifestyle being reduced with intensification.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Lifestyle is not a Qualifying Matter. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
7	384.1	Roger Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Identify Warkworth as having the same qualifying matter of Transport Infrastructure constraint as Beachlands.	OPPOSE	Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Warkworth does not have a Transport Infrastructure constraint as Beachlands does. Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
8	422.1	Glyn Evan Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Add new qualifying matter for Transport in Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
9	422.2	Glyn Evan Williams	Qualifying Matters - Additional	Infrastructure - Water and wastewater constraints	Add qualifying matters for Wastewater in Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
10	593.1	Gail Lorraine Stratton	Qualifying Matters - Additional	Qualifying Matters - Additional	Apply Transport as a QM to reduce impact of MDRS in Warkworth, as applies to (operative) Single House zoned sites.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
11	593.2	Gail Lorraine Stratton	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Apply Infrastructure as a QM to reduce impact of MDRS in Warkworth as applies to (operative) Single House zoned sites.	OPPOSE	Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has various planned infrastructure upgrades, some of which are under construction.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
							Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
12	595.1	Gordon Loughnan	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Decline the plan change: Warkworth needs infrastructure upgrades to cope with growth.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
13	595.2	Gordon Loughnan	Plan making and procedural	General	Decline the plan change: Warkworth does not have a transport hub commensurate with MDRS of PC78.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
14	675.1	Warkworth Area Liaison Group [WALG]	Qualifying Matters – Infrastructure	Infrastructure – Water and wastewater constraints	Add wastewater QM for Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations. Future Urban zoned land can also be included because it is not excluded from the definition of relevant residential zone. Warkworth is an area

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
							that is predominantly urban in character and is already part of an urban environment. The MDRS can be applied via a new residential zone.
15	675.2	Warkworth Area Liaison Group [WALG]	Qualifying Matters – Additional	Qualifying Matters – Additional	Add a Transport QM for Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
16	978.2	Noeline Walsh	Urban Environment	Larger rezoning proposal	Reject the proposed housing intensification of Warkworth Central area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations. Future Urban zoned land can also be included because it is not excluded from the definition of relevant residential zone. Warkworth is an area that is predominantly urban in character and is already part of an urban environment. The MDRS can be applied via a new residential zone.
17	1769.30	Anne Perratt	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR	Include Warkworth as a Special Character Area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
18	82.1	Michael Kelly	Outside Urban Environment	Future Urban Land Proposals -	Include properties on Sandspit Road including 99 Sandspit Road, Warkworth as part of the walkable catchment of Warkworth.	SUPPORT in PART	Properties surrounding 34 and 36 Sandspit Road will have improved pedestrian and cycling access to the Town Centre when the development s consented and constructed.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
				Excluded from IPI PC			Urban Design principles promote locating residential density in proximity to Town Centre where walking and cycling options are viable. Provide intensification zoning to existing and proposed residential areas in Warkworth.
19	2392.13	Ngāti Te Ata Waiohua	Outside Urban Environment	Future Urban Land Proposals - Excluded from IPI PC	Support no rezoning of either Future Urban Zone land or other non-residential sites through the NPS-UD.	OPPOSE	Future Urban land and other non-residential sites should be considered through the NPS-UD. Greenfields land generally enables higher residential density to be provided in a more efficient way than infill development, while ensuring environment effects are recognised, managed, and protected, where appropriate, through design. Future Urban land and non-residential urban sites should be considered through the NPS-UD. This enables a proper holistic consideration of where and how best to provide for growth in the Auckland region to achieve a quality well functioning urban environment. Excluding areas clearly earmarked for urban development results in a piecemeal and inefficient approach to growth.
20	885.2	Neil B Woodhams	Outside Urban Environment	Future Urban Land Proposals - Excluded from IPI PC	Require a blue green spatial network to be produced, consulted on and agreed upon before any development of the Future Urban areas such as Whenuapai.	OPPOSE	Future Urban land and non-residential urban sites should be considered through the NPS-UD. This enables a proper holistic consideration of where and how best to provide for growth in the Auckland region to achieve a quality well functioning urban environment. Excluding areas clearly earmarked for urban development results in a piecemeal and inefficient approach to growth. Development proposals such as that proposed by The Kilns at 34 & 36 Sandspit Road are supported by extensive technical assessment and analysis. The site is also subject to the Auckland Council Warkworth Structure Plan and directly adjoins the existing urban area and is within a distance of approximately 200 metres to the Warkworth Town Centre. A further structure plan was prepared prior to the development proposal to test the best land use for the site in the context of the NPS UD.

Plan Change 79: Transportation Further Submission Table

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
1	101	8	Auckland Council	Approve the plan change with the amendments requested	Amend the notified provisions to ensure consistency between related provisions in Chapters E27 and E38 to achieve the purpose of the plan change including to E38.8.1.2 Access to rear sites, as follows: (3) Accessways serving four to ten ~~six or more rear sites must provide separated pedestrian access, which may be located within the formed driveway except that E38.8.~~	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4.

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
					~~1.2.3 does not apply when E27.6.6.3(a) and Table E27.6.6.3 do not require pedestrian access~~ adjacent to the vehicle access.		Retain the existing standards i.e. accessways serving 1, 2-5 and 6-10 sites.
2	122	29	Clare Steel	Approve the plan change with the amendments requested	Approve E38.8.1.2 Access to rear sites.	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4. Retain the existing standards i.e. accessways serving 1, 2-5 and 6-10 sites.
3	123	29	Jack van de Water	Approve the plan change with the amendments requested	Approve E38.8.1.2 Access to rear sites.	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4. Retain the existing standards i.e. accessways serving 1, 2-5 and 6-10 sites.
4	102	33	Kainga Ora	Approve the plan change with the amendments requested	Delete standard E38.8.1.2.	SUPPORT	Decision sought is to amend the table as sought in the Kainga Ora submission. NOTE: We note the Council table is incorrect. Original submission does not seek to delete the standard, rather make amendments – we have submitted based on the wording in the original submissions
5	92	5	10x10 Architecture Limited	Decline the plan change, but if approved, make the amendments requested	Reject Table E38.1.2.1 Access to rear site as the 6.975m wide requirement is not practical or achievable.	SUPPORT	The decision sought is to retain the existing Standards. Insufficient reasoning is provided to demonstrate the need and benefit of the changes sought.

Plan Change 80: Well-functioning Urban Environments, Resilience to the Effects of Climate Change and Qualifying Matters. Further Submission Table

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
1	10	8	Ian McManus	Approve the plan change with the amendments requested	Qualifying Matters	B2.9 Para 6 Either delete the proposed reference to a well functioning urban environment in paragraph 6 or better integrate the reference into the paragraph so that it does not read like an afterthought.	SUPPORT	Support the outcomes sought in this submission point. The reference to well functioning urban environment as proposed in paragraph 6 is superfluous and lacking in context.

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
2	22	24	Fletcher Residential Limited	Approve the plan change with the amendments requested	Qualifying Matters	Amend objective B2.5.1(2) as follows: Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a well functioning urban <u>environment</u> with a quality compact urban form and ~~contributes to a well functioning urban environment.~~	SUPPORT	The amendment sought to objective B2.5.1 (2) with the further amendment to delete “and” then add a full stop after the words “urban form”.
3	48	2	Motu Design	Approve the plan change with the amendments requested	Qualifying Matters	Reference to a greater range of qualifying matters to include other matters that support the local identity, character, and quality of areas where there is a public benefit. This should include areas adjoining and supporting places of high amenity and/or landscape value. Including volcanic landscape, ecological corridors, and premium public spaces (inclusive of some streets and beaches) of local and/or regional significance.	SUPPORT in PART	This submission is supported to the extent that additional policy context is required to provide guidance on what a well functioning urban environment will look like (or means) in different parts of Auckland. These differentiations can be addressed via policy wording and additional Qualifying Matters are not required.
4	38	8	Waka Kotahi NZ Transport Agency	Approve the plan change with the amendments requested	RPS Other matters	Amend B2.2.2 to provide a new policy that addresses criteria for unanticipated or out of sequence development as directed in NPS UD 3.8(3).	OPPOSE	The submission is opposed because the NPS Urban Development has a clear policy framework for making planning decisions. Provision 3.8(3) of the NPS UD states that criteria are to be provided in every RPS to determine what plan changes will be treated, for the purpose of implementing policy 8, as adding significantly to development capacity. Therefore, the criteria has to be directed at defining what, in the context of Auckland, *adding significantly to development capacity* means.
5	38	2	Waka Kotahi NZ Transport Agency	Approve the plan change with the amendments requested	Climate Change Resilience	Amend B2.1 to add issues for urban growth and form to include the links between urban growth and form and greenhouse gas emissions.	SUPPORT in PART	The submission is supported to the extent the primary submission of the Submitter sought policy amendments to provide greater specificity in the policy wording to better guide resource management decision making in Auckland.
6	38	5	Waka Kotahi NZ Transport Agency	Approve the plan change with the amendments requested	Climate Change Resilience	Amend Policy B2.2.2(2) as follows: (2) Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that:… <u>(g1) supporting reductions in greenhouse gas emissions</u> (l) avoiding areas with significant natural hazard risks and where practicable avoiding areas prone to natural hazards including coastal hazards and flooding, ~~including the effects of climate change and sea-level rise on the extent and frequency of hazards; and…~~	SUPPORT in PART	The decision sought is that the wording shown as strikethrough is deleted because it is superfluous to the understanding and meaning of the Policy. The proposed additional wording is not required because it directly repeats Policy 1 of the NPS UD (e) which states *support reductions in greenhouse gas emissions; and…*
7	38	7	Waka Kotahi NZ Transport Agency	Approve the plan change with the amendments requested	Climate Change Resilience	Amend B2.2.2(7) as follows: (7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:	OPPOSE	The proposed additional wording is not required because it directly repeats Policy 1 of the NPS UD. As sought by the Further Submitter additional wording to Policy should provide additional guidance of well functioning urban environment in the context of Auckland. This

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Topic	Summary of Decisions Requested	The Kilns Ltd position	Decision sought
						(ba) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; […] (cb) supporting reductions in greenhouse gas emissions		needs to be specific to Auckland and areas within Auckland not simply repeat Policy 1 of the NPS UD.

End of Report

Alice Zhou

From: Anne Howe <AnneHowe@wilsonmckay.co.nz>
Sent: Thursday, 19 January 2023 4:22 pm
To: Unitary Plan
Cc: Al Stokes
Subject: Plan Change 78 Submissions
Attachments: 0496_001.pdf

Dear Sirs

Attached please find further submissions in relation to Plan Change 78 from Alan Clive Stokes.

Please acknowledge receipt of the attached submissions.

Yours sincerely

Alan Stokes

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/~~Mrs/Miss/Ms~~(Full Name) ALAN CLIVE STOKES

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

Address for service of Further Submitter

1 PUKEORA AVE, REMUERA, AUCKLAND 1050

Telephone: (0274) 866-466 Fax/Email: alanstokesnz@outlook.com

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

See attached submission and appendix.

(Please identify the specific parts of the original submission)

Submission Number	Point-Number

The reasons for my support / opposition are: See: Submission attached.

(continue on a separate sheet if necessary)

I seek that: (See attached submission)

the whole : ☐

or part ☐ (describe precisely which part) _____

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)

19 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)**

See attached submission.

_____

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.

Contact details

Full name of person making a further submission: Alan Clive Stokes.

Email address: alanstokesnz@outlook.com

Contact phone number: 0274 866 466

Postal address:
1 Pukeora Ave, Remuera
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

Submission details. **2086.1; 2087.1 and 1972.1**

Submissions opposed for PC 78

Original submitters names and addresses: As listed in the Appendix.

Submission number: As listed in the Appendix.

I oppose those parts of the submissions listed in the Appendix for the reasons below.

Reasons

The reasons for my or our opposition are:

- The relief sought in them would be contrary to the purposes and principles of the Resource Management Act (the Act) and the Objectives and Policies of the Auckland Unitary Plan, would not give effect to sections 6 (f) &7 (b) and (f) of the Act and would have significant adverse effects on the environment which could not be avoided, remedied, or mitigated.
- The reasons set out in our primary submission, and the matters raised with Council for further consideration under the ADR process.
- The Council (using their own grading system for qualifying matters for character and heritage) incorrectly graded houses in our area and have failed to adopt a consistent treatment of scoring between houses in our area and adjacent areas. The Council more particularly has failed to correctly score the properties at 712 Remuera Road as a 5 as suggested and supported by two independent expert heritage assessments from Jeremy Salmond of Salmond Reed and Robin Bryon of Heritage New Zealand) which if correctly graded would have resulted in our reduced special character area remaining protected as a special character area.
- The methodology by which special character areas (which Council have determined are qualifying matters) is incomplete and missing several important considerations insofar as the methodology relates to the contextual nature of the area being considered. By way of

example only, inter alia: our area is correctly described in the Unitary Plan as a garden suburb, but contextually has been completely ignored by Council and is not considered a relevant matter for scoring. In addition, scheduled trees which have been afforded protection under the Unitary Plan and being deemed worthy of protection have not been included as matter for scoring within the current Auckland Council scoring system.

- We fully support the **attached** comments of Mr Jeremy Salmond in his response to PC 78 dated 28 November 2022 setting out in summary form the deficiencies in Council's own scoring system.
- That the Kainga Ora submissions (referred to in Appendix A) to rezone properties from low density to either Mixed Housing Urban Zone or Terrace Housing and Apartment Zone if accepted would completely destroy the special character of areas in Remuera, and in particular Remuera East.
- The intensification for Remuera and Remuera East in particular is excessive and inappropriate given the established garden nature of the housing in Remuera referred to in the Unitary Plan, as well as infrastructure restraints in the area.
-

We want Auckland Council and the Independent Hearings Panel to:

- disallow parts of the original submissions listed in the Appendix, and
- to retain the identified character overlays as a qualifying matter in Remuera: and
- to specifically retain the special character overlay for Remuera East previously submitted upon as a qualifying matter.

Supporting documents

Appendix A and Jeremy Salmond's letter dated 28 November 2022.

Attend a hearing

I 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? *(Specify)*

Specify upon which grounds you come within this category:

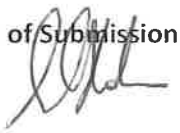
I am a person having a greater interest than the general public in that my property will be adversely affected by the proposals.

In addition, I and others in my area (Remuera East)are collectively concerned at the potential adverse effects of the proposals and the imminent loss of our character and heritage in our area and wish to reinstate the above area as a special character area.

I declare that:

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

Date of Submission: 19 January 2023



SALMOND REED ARCHITECTS

58 CALLIOPE ROAD
DEVONPORT
AUCKLAND 0624
TEL 09 445 4045

salmondreed.co.nz

AUCKLAND UNITARY PLAN (Operative In Part)

PLAN CHANGE 78 – **opinion by Jeremy Salmond**

1. This note has been prepared by way of an advice to parties submitting to Auckland Council on the matter of PC78, related to Special Character Areas, with particular reference to the methodology adopted by the Council for its assessments, the necessity of undertaking such assessments, and the conclusions reached by the Council, in formulating its planning response to the National Policy Statement - Urban Design (NPS-UD) mandated by Government, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

2. In my opinion, Special Character Areas have properly been included as a qualifying matter, but In its application of qualifying matter status, the Council has introduced other matters unrelated to the intent and purpose of the Special Character Area designation, in such a way as to frustrate its purpose and distort its intent;

3. In particular:

   a. it has not carried forward all the Special Character Areas that are currently contained in the Unitary Plan.

   b. It has fabricated a threshold of "high quality" in deciding which Special Character Areas to carry forward, which is a nonsense since SCAs are, by definition, areas of high environmental urban quality;

   c. Further introduced arbitrary percentage measures to determine whether any SCA meets the "high quality" threshold – these measures are themselves readily susceptible to manipulation and are meaningless as a true reflection of the distinguishing character of any SCA;

   d. Arbitrarily applied a limited set of assessment criteria to assess whether individual houses meet the quality threshold – these criteria are partial in that they do not account for the full range of factors originally used to determine the extent of each SCA and take no account of the qualities related to streetscape, setting, topography or vegetative cover;

   e. The character of any locality does not subsist solely in the buildings themselves – although these are central to its identification. The character areas were defined to recognise and protect parts of the city where buildings in the aggregate combine with topographical, vegetative, and other environmental qualities to form distinctive urban fabric.

   f. The Council survey has invented a numerical system (for individual houses) to generate a "score" to determine whether any house

contributes (or not) to the identified character (by reference to the character descriptions set out in Chapter 15);

g. The survey incorporates arbitrary assessment matters – such as garages in front yards – which are perceived as diminishing the potential score of properties where these exist. In many cases, however, these structures do not materially diminish the contribution of a primary dwelling to the streetscape or to a character area in general;

h. Those properties surveyed, which have been altered during the lifetime of the AUP, will have been subject to rigorous assessment for consent that these under Chapter 18 of the Plan. Council has, therefore, explicitly accepted that these works have met the test for appropriate change.

i. The Council survey has not followed its own survey guidelines in applying the numerical scorings to the calculation of percentage thresholds. Instead, properties which score 4 and which are characterised as "contributing" to character have been excluded, while admitting those scored 5, also assessed as "contributing";

j. The impacts of the scores possible under the assessment methodology are simplistic and unhelpful. Hence, while I disagree with the numerical scoring methodology, I observe that for example, rather than have 2 categories (scores 4 &5) reckoned to "contribute to the character", it would have been better to have adopted existing more finely-grained gradations – for example:
   - Score 6 = character *defining*
   - Score 5 = character *contributing*
   - Score 4 = character *supporting*

k. Because the assessment method takes no account of wider criteria related to the *area* of an SCA (ie: ignores factors beyond the individual buildings) it precisely fails to comprehend the specific character of any area – in particular, fails to take into account the differing *types* of character area defined in the Unitary Plan as Isthmus A, B, & C, and described in detail in chapter L Schedule 15 of the Plan Change – in particular:
   - scale of development
   - density/Pattern of development
   - visual coherence
   - subdivision
   - road pattern
   - streetscape
   - Vegetation and landscape characteristics

l. The Council assessments presume that the three Isthmus A, B & C areas are materially different from each other because of their respective Isthmus status, but the survey assessments fail to recognise or quantify this. In my opinion this is not now a relevant consideration since the

Council assessments have not had regard to those distinguishing qualities that differentiate Isthmus A, B, or C areas. Since the Council assessments are limited to buildings only, there is nothing on the ground which enables the survey methodology to distinguish buildings in one overlay category from those which occupy adjacent SCAs.

m. Notwithstanding the failure of the survey methodology to distinguish these differentiating characteristics, the assessments persist in separating the 3 categories of SCA, and treating them as separate and different without substantive justification. It is, therefore, illogical to maintain these distinctions in the context of this survey, which has been carried out for an entirely other purpose and provides no clear basis for treating the SCA categories as different for the purposes of intensification.

n. Having therefore excluded consideration of the differing types of SCA in this way, the assessment methodology arbitrarily fails to acknowledge continuity of built character across these typological boundaries. This 3effectively limits the potential critical mass of an area that might otherwise satisfy the arbitrary percentage targets which the Council has determined as a basis for establishing "high quality" character.

o. The Council has elsewhere sought to break individual SCAs into sub-areas, thus reducing their extent and diminishing their potential contribution to the urban cultural landscape

4. As a result of these methodological flaws, the survey outcomes, as reported in the published maps, grossly misrepresent the true character of the surveyed areas, and distort the true extent of the legacy of special character attributable to the built heritage of Auckland City.

5. Although the survey was ostensibly carried out to satisfy the requirements of central government, it was unnecessary, since it repeats work comprehensively undertaken at the time of the establishment of the character areas, in which site-by site surveys were undertaken of all character areas – in particular, following public submissions on the published maps.

6. Similarly, the assessments fail to recognise the significant work undertake by the former Auckland City Council as part of Plan Change 163, in which approximately 10000 houses were individually professionally assessed against similar, but more focused criteria, and formed the underlying framework for the character areas subsequently confirmed in the AUP(OP).

7. The present plan change process differs from that of PC163 in that the latter provided for the democratic rights of property owners to make submissions on the assessed contribution of their own (or any other) property, whereas PC78 is mandated by Government fiat and has been made operative with no opportunity for submission -- except after the event.

8. The survey method used as part of PC78 and resultant conclusions is clearly not intended to support the retention of the established SCAs but has rather been contrived to facilitate the incursion of medium- to high-density residential development within the defined areas.

9. The survey method focus on the perceived built qualities of individual buildings and the failure to take account of the wider qualitative matters that define the various SCAs has no value simply because it does not focus on the *area* (the prime artefact to be preserved and managed) but rather the individual houses.

10. Chapter L - Schedule 15 - Special Character Schedule states that "The Special Character Areas Overlay – Residential and Business seeks to "*retain and manage the character of traditional … residential neighbourhoods by enhancing existing traditional buildings, retaining intact groups of character buildings, and designing compatible new building infill and additions that do not replicate older styles and construction methods, but reinforce the predominant streetscape character*." It is manifestly obvious that the introduction of multistorey development with greatly increased bulk and location into these areas will have precisely the opposite effect.

11. The assessments made by the Council, based on the site-by-site surveys, are clearly targeted at reducing the quantum of sites contained within SCAs and have resulted in many cases in the creation of significant pockets of potential intensification *within* identified, but reduced, SCAs, such that those sites will not be subject to Unitary Plan controls designed to protect the environmental and urban qualities for which the affected SCAs have been recognised. The method thus signally fails to achieve the intent of the overlay in such instances.

12. The Council has been advised that there are in excess of 3¼ million potential development sites available within the metropolitan area, of which qualifying matters (not solely SCAs) might reduce this by around 463,000 (about 14%). Of an estimated 2017 stock of in excess of 80,000 houses from all historical periods, protection under the AUP was limited to a quarter of that number (roughly 21,000) which, under PC78 will be further reduced by 33% to approximately 14,000.

13. The extensive capacity enabled by PC78 means that the effects on potential housing supply of retaining all existing SCAs are inconsequential, whereas the effect of the plan change on the valuable stock of buildings that contribute to the legacy of distinctive residential character is disproportionately high and profoundly destructive.

14. The plan change – insofar as it relates to the city's legacy of high quality high character residential buildings - is contrary to good planning and best use of resources. It sets out to actively enable the loss of those parts of the housing stock that have been professionally identified as having particular value as a non-renewable resource enhancing the amenity, form and attractiveness of the city, and which preserves the important legacy of buildings of quality and their associated streetscapes.

15. In this respect, the plan change fundamentally challenges the integrity of the Unitary Plan.

16. The Council has far exceeded its obligations under the provisions of the NPS(UD) which requires the Council to inter alia

    i. incorporate Medium Density Residential Standards that enable three storey housing ***in relevant residential zones*** in urban Auckland, and

    ii. implement qualifying matters to ***reduce the height and density of development*** required by the RMA to the extent necessary ***to accommodate a feature or value that means full intensification is not appropriate***. (my emphasis)

17. In my view, the SCAs are not ***relevant residential zones*** for the purposes of the NPS, and full intensification is not appropriate in these areas, meaning the required ***height and density of development*** requires to be reduced where intensification is implemented, in a manner consistent with the existing provisions for development within the SCAs.

18. The NPS(UD) does not oblige the Council to reduce the quantum of sites within the SCAs – merely to confirm on the basis of site-by-site inspection the general integrity of the areas as found.

19. The provisions of the plan change do not therefore satisfy the above provisions.

Preferred outcomes

In my opinion, pc78 should:

1. Retain in toto all existing SCAs as defined in the AUP(OP);
2. Provide for intensification within SCAs in such a way as to maintain the key distinguishing characteristics of each area – particularly in relation to scale, form and proportion of new construction and in the relationship to the streetscape;
3. Develop specific controls and rules to achieve this;
4. To the extent that new development may be permitted within any SCA, this should be subject to development controls which have regard to the intrinsic scale, character and spatial format defined in the AUP for that area.

Jeremy Salmond
QSO, MArch, FNZIA
NZIA Gold Medalist 2018

28 November 2022

Appendix: Submission Points opposed for PC 78

Sub#/Point	Submitter Name	Address for Service
20.1	Samuel Cormack	sam.cormack@gmail.com
86.2	Nathaniel Brown	nathaniel.brown@xtra.co.nz
113.1	Iain Butler	iaintbutler@gmail.com
116.1	Thomas Dodd	tompipdodd@gmail.com
152.2	Oliver Wilson	oliver.wilson.o.w@gmail.com
174.2	Nikolas Rusten	nikolas@rusten.co.nz
258.2	Christopher Rapson	chris.rapson@gmail.com
379.1	Cameron William Churchill	cameron.w.churchill@gmail.com
482.1	Michael Richard Adamson	mike22240@hotmail.com
515.1	Liam Appleton	liamappleton@msn.com
711.7	Jessica de Heij	deheij@gmail.com
753.1	Lynda Murphy	lynda@paperspaces.co.nz
830.3	Ockham Group Ltd	barrykaye@xtra.co.nz
839.85	Russell Property Group	Vijay.lala@tattico.co.nz
840.13	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
840.14	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
840.15	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
841.108	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz
841.11	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz
873.18 - 200	Kāinga Ora	developmentplanning@kaingaora.govt.nz
873.2	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.201	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.221	Kainga Ora	developmentplanning @kaingaora.govt.nz
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873.329	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.33	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.331	Kainga Ora	developmentplanning @kaingaora.govt.nz
898.7	Cornwall Park Trust Board	mark.vinall@tattico.co.nz
899.1	Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development	RMAPlans@hud.govt.nz n.grala@harrisongrierson.com
934.1	John MacKay	john@urbs.co.nz Luke.Hinchey@chapmantripp.com
947.105	Retirement Villages Association of New Zealand Incorporated (RVA)	marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz
949.154	Piper Properties Consultants Limited	Tom.Morgan@Tattico.co.nz and layne@bastiongroup.co.nz
1066.109	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
1066.21	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
1066.22	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
1066.23	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
1066.54	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
1079.2	The Coalition for More Homes	morehomesnz@gmail.com
1079.28	The Coalition for More Homes	morehomesnz@gmail.com
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1202.4	Brad Allen	bradjamesallen@gmail.com
1206.9	Daniel Graham Maier-Gant	dmaiergant@gmail.com
1210.1	Kelvin James Norgrove	kelvin.norgrove@strategease.co.nz
1223.2	Emma Dixon	cowie.ea@gmail.com
1271.1	Prasanthi	prasanthi.cottingham@gmail.com
1387.5	Sally Helen Jacobson	sally.jacobson@xtra.co.nz
1430.2	Hanno Willers	hwillers@gmail.com
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1593.7	Logan Paul O'Callahan	o'callahanl@wsc.school.nz
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1717.3	Sarah C	greenredblueblack@gmail.com
1729.2	Scott M Winton	scottwinton@hotmail.com
1747.1	Harry Platt	harryplatt555@icloud.com
1792.2	Cameron Wallace	camwallacenz@gmail.com
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1818.2	Marie Roberta Taylor & Richard Heywood Taylor	elliot@tailorinc.co.nz
1818.3	Marie Roberta Taylor & Richard Heywood Taylor	elliot@tailorinc.co.nz
1840.1	Edward Siddle	eddetchon@yahoo.co.nz
1856.1	Jonathan Rickard	jonathan.rickard.nz@gmail.com
1886.11	Angela Lin	angela.qi.lin@gmail.com
1886.12	Angela Lin	angela.qi.lin@gmail.com
1888.2	Anthony James Chapman	ajchapman@gmail.com
1895.1	Damian Light	damian@damianlight.co.nz
1895.2	Damian Light	damian@damianlight.co.nz
1915.3	Jack Gibbons	gibbonsj97@gmail.com
1929.1	Jamie Simmonds	j.b.c.simmonds@gmail.com
1930.8	Jed Robertson	jed.l.j.roberts@gmail.com
1953.6	Matthew Wansbone	matthew.wansbone@gmail.com
1953.61	Matthew Wansbone	matthew.wansbone@gmail.com
1961.4	Oscar Sims	oscar@oscarsims.co.nz
1962.22	Aedifice Property Group	jessica@civix.co.nz
1962.64	Aedifice Property Group	jessica@civix.co.nz
1976.1	Susan King and Abe King	sunny@avantplanning.co.nz
1976.1	Susan King and Abe King	sunny@avantplanning.co.nz
2023.3	Chloride Trust	david@whitburngroup.co.nz
2025.3	Greater Auckland	Lowrie.matt@gmail.com
2025.12	Greater Auckland	lowrie.matt@gmail.com
2034.1	Craigieburn Range Trust	sukhi.singh@babbage.co.nz
2038.1	Highbrook Living Limited	sukhi.singh@babbage.co.nz
2042.1	NZ Storage Holdings Limited	sukhi.singh@babbage.co.nz
2049.21	Waka Kotahi	evan.keating@nzta.govt.nz
2049.22	Waka Kotahi	evan.keating@nzta.govt.nz
2055.5	Brett Carter Family Trust	brettcarter2000@hotmail.com
2143.1	James Penwarden	hjpenwarden@gmail.com
2146.2	Henderson Enterprises Limited	Nick@civix.co.nz
2248.127	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2248.86	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2272.11	CivilPlan Consultants Limited	aaron@civilplan.co.nz
2272.12	CivilPlan Consultants Limited	aaron@civilplan.co.nz
2273.13	Aaron Grey	aaronjgrey@gmail.com

2273.44	Aaron Grey	aaronjgrey@gmail.com
2275.4	Richard Hanson	vignesh@mhg.co.nz
2356.7	Matthew Olsen	matthew.r.olsen@gmail.com

Alice Zhou

From: Anne Howe <AnneHowe@wilsonmckay.co.nz>
Sent: Thursday, 19 January 2023 4:16 pm
To: Unitary Plan
Cc: Mark Andrews
Subject: Plan Change 78 Submissions
Attachments: 0495_001.pdf

Dear Sirs

Attached please find further submissions in relation to Plan Change 78 from Mark Dolling Andrews.

Please acknowledge receipt of the attached submissions.

Yours sincerely

Mark Andrews
Consultant

Wilson McKay
Barristers and Solicitors
PO Box 28347
Remuera
Auckland

Phone: +64 9 520 4544
Direct Dial: +64 9 523 0755
E-Mail: markandrews@wilsonmckay.co.nz
www.wilsonmckay.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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/~~Mrs/Miss/Ms~~(Full Name) MARK DOLLING ANDREWS

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

Address for service of Further Submitter

704 REMUERA ROAD, REMUERA, AUCKLAND 1050.

Telephone: (021) 471-278 ~~Fax~~/Email: mda1@xtra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☑ (tick one) **the submission of:**

(Original Submitters Name and Address)

(See attached submission) and appendix.

(Please identify the specific parts of the original submission)

Submission Number	Point-Number

The reasons for my ~~support~~ / opposition are: See: Submission attached.

(continue on a separate sheet if necessary)

I seek that: (See attached submission)

the whole : ☐

or part ☐ (describe precisely which part) _____

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 ☐

_____ 19/01/2023

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

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)**

See attached submission

_____

_____

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.

Contact details

Full name of person making a further submission: Mark Dolling Andrews

Email address: mda1@xtra.co.nz

Contact phone number: 021 471 278

Postal address:
704 Remuera Road
Remuera
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

Submission details. **2203.1; 2087.1 and 1972.1**

Submissions opposed for PC 78

Original submitters names and addresses: As listed in the Appendix.

Submission number: As listed in the Appendix.

I oppose those parts of the submissions listed in the Appendix for the reasons below.

Reasons

The reasons for my or our opposition are:

- The relief sought in them would be contrary to the purposes and principles of the Resource Management Act (the Act) and the Objectives and Policies of the Auckland Unitary Plan, would not give effect to sections 6 (f) &7 (b) and (f) of the Act and would have significant adverse effects on the environment which could not be avoided, remedied, or mitigated.
- The reasons set out in our primary submission, and the matters raised with Council for further consideration under the ADR process.
- The Council (using their own grading system for qualifying matters for character and heritage) incorrectly graded houses in our area and have failed to adopt a consistent treatment of scoring between houses in our area and adjacent areas. The Council more particularly has failed to correctly score the properties at 712 Remuera Road as a 5 as suggested and supported by two independent expert heritage assessments from Jeremy Salmond of Salmond Reed and Robin Bryon of Heritage New Zealand) which if correctly graded would have resulted in our reduced special character area remaining protected as a special character area.
- The methodology by which special character areas (which Council have determined are qualifying matters) is incomplete and missing several important considerations insofar as the

methodology relates to the contextual nature of the area being considered. By way of example only, inter alia: our area is correctly described in the Unitary Plan as a garden suburb, but contextually has been completely ignored by Council and is not considered a relevant matter for scoring. In addition, scheduled trees which have been afforded protection under the Unitary Plan and being deemed worthy of protection have not been included as matter for scoring within the current Auckland Council scoring system.

- We fully support the **attached** comments of Mr Jeremy Salmond in his response to PC 78 dated 28 November 2022 setting out in summary form the deficiencies in Council's own scoring system.
- That the Kainga Ora submissions (referred to in Appendix A) to rezone properties from low density to either Mixed Housing Urban Zone or Terrace Housing and Apartment Zone if accepted would completely destroy the special character of areas in Remuera, and in particular Remuera East.
- The intensification for Remuera and Remuera East in particular is excessive and inappropriate given the established garden nature of the housing in Remuera referred to in the Unitary Plan, as well as infrastructure restraints in the area.
-

We want Auckland Council and the Independent Hearings Panel to:

- disallow parts of the original submissions listed in the Appendix, and
- to retain the identified character overlays as a qualifying matter in Remuera: and
- to specifically retain the special character overlay for Remuera East previously submitted upon as a qualifying matter.

Supporting documents

Appendix A and Jeremy Salmond's letter dated 28 November 2022.

Attend a hearing

I 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? *(Specify)*

Specify upon which grounds you come within this category:

I am a person having a greater interest than the general public in that my property will be adversely affected by the proposals.

In addition, I and others in my area (Remuera East)are collectively concerned at the potential adverse effects of the proposals and the imminent loss of our character and heritage in our area and wish to reinstate the above area as a special character area.

I declare that:

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

Date of Submission: 19 January 2023



SALMOND REED ARCHITECTS

58 Calliope Road
Devonport
Auckland 0624
Tel 09 445 4045

AUCKLAND UNITARY PLAN (Operative In Part)

PLAN CHANGE 78 – **opinion by Jeremy Salmond**

1. This note has been prepared by way of an advice to parties submitting to Auckland Council on the matter of PC78, related to Special Character Areas, with particular reference to the methodology adopted by the Council for its assessments, the necessity of undertaking such assessments, and the conclusions reached by the Council, in formulating its planning response to the National Policy Statement - Urban Design (NPS-UD) mandated by Government, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

2. In my opinion, Special Character Areas have properly been included as a qualifying matter, but In its application of qualifying matter status, the Council has introduced other matters unrelated to the intent and purpose of the Special Character Area designation, in such a way as to frustrate its purpose and distort its intent;

3. In particular:

   a. it has not carried forward all the Special Character Areas that are currently contained in the Unitary Plan.

   b. It has fabricated a threshold of "high quality" in deciding which Special Character Areas to carry forward, which is a nonsense since SCAs are, by definition, areas of high environmental urban quality;

   c. Further introduced arbitrary percentage measures to determine whether any SCA meets the "high quality" threshold – these measures are themselves readily susceptible to manipulation and are meaningless as a true reflection of the distinguishing character of any SCA;

   d. Arbitrarily applied a limited set of assessment criteria to assess whether individual houses meet the quality threshold – these criteria are partial in that they do not account for the full range of factors originally used to determine the extent of each SCA and take no account of the qualities related to streetscape, setting, topography or vegetative cover;

   e. The character of any locality does not subsist solely in the buildings themselves – although these are central to its identification. The character areas were defined to recognise and protect parts of the city where buildings in the aggregate combine with topographical, vegetative, and other environmental qualities to form distinctive urban fabric.

   f. The Council survey has invented a numerical system (for individual houses) to generate a "score" to determine whether any house

contributes (or not) to the identified character (by reference to the character descriptions set out in Chapter 15);

g. The survey incorporates arbitrary assessment matters – such as garages in front yards – which are perceived as diminishing the potential score of properties where these exist. In many cases, however, these structures do not materially diminish the contribution of a primary dwelling to the streetscape or to a character area in general;

h. Those properties surveyed, which have been altered during the lifetime of the AUP, will have been subject to rigorous assessment for consent that these under Chapter 18 of the Plan. Council has, therefore, explicitly accepted that these works have met the test for appropriate change.

i. The Council survey has not followed its own survey guidelines in applying the numerical scorings to the calculation of percentage thresholds. Instead, properties which score 4 and which are characterised as "contributing" to character have been excluded, while admitting those scored 5, also assessed as "contributing";

j. The impacts of the scores possible under the assessment methodology are simplistic and unhelpful. Hence, while I disagree with the numerical scoring methodology, I observe that for example, rather than have 2 categories (scores 4 &5) reckoned to "contribute to the character", it would have been better to have adopted existing more finely-grained gradations – for example:
   - Score 6 = character *defining*
   - Score 5 = character *contributing*
   - Score 4 = character *supporting*

k. Because the assessment method takes no account of wider criteria related to the *area* of an SCA (ie: ignores factors beyond the individual buildings) it precisely fails to comprehend the specific character of any area – in particular, fails to take into account the differing *types* of character area defined in the Unitary Plan as Isthmus A, B, & C, and described in detail in chapter L Schedule 15 of the Plan Change – in particular:
   - scale of development
   - density/Pattern of development
   - visual coherence
   - subdivision
   - road pattern
   - streetscape
   - Vegetation and landscape characteristics

l. The Council assessments presume that the three Isthmus A, B & C areas are materially different from each other because of their respective Isthmus status, but the survey assessments fail to recognise or quantify this. In my opinion this is not now a relevant consideration since the

Council assessments have not had regard to those distinguishing qualities that differentiate Isthmus A, B, or C areas. Since the Council assessments are limited to buildings only, there is nothing on the ground which enables the survey methodology to distinguish buildings in one overlay category from those which occupy adjacent SCAs.

m. Notwithstanding the failure of the survey methodology to distinguish these differentiating characteristics, the assessments persist in separating the 3 categories of SCA, and treating them as separate and different without substantive justification. It is, therefore, illogical to maintain these distinctions in the context of this survey, which has been carried out for an entirely other purpose and provides no clear basis for treating the SCA categories as different for the purposes of intensification.

n. Having therefore excluded consideration of the differing types of SCA in this way, the assessment methodology arbitrarily fails to acknowledge continuity of built character across these typological boundaries. This 3effectively limits the potential critical mass of an area that might otherwise satisfy the arbitrary percentage targets which the Council has determined as a basis for establishing "high quality" character.

o. The Council has elsewhere sought to break individual SCAs into sub-areas, thus reducing their extent and diminishing their potential contribution to the urban cultural landscape

4. As a result of these methodological flaws, the survey outcomes, as reported in the published maps, grossly misrepresent the true character of the surveyed areas, and distort the true extent of the legacy of special character attributable to the built heritage of Auckland City.

5. Although the survey was ostensibly carried out to satisfy the requirements of central government, it was unnecessary, since it repeats work comprehensively undertaken at the time of the establishment of the character areas, in which site-by site surveys were undertaken of all character areas – in particular, following public submissions on the published maps.

6. Similarly, the assessments fail to recognise the significant work undertake by the former Auckland City Council as part of Plan Change 163, in which approximately 10000 houses were individually professionally assessed against similar, but more focused criteria, and formed the underlying framework for the character areas subsequently confirmed in the AUP(OP).

7. The present plan change process differs from that of PC163 in that the latter provided for the democratic rights of property owners to make submissions on the assessed contribution of their own (or any other) property, whereas PC78 is mandated by Government fiat and has been made operative with no opportunity for submission – except after the event.

8. The survey method used as part of PC78 and resultant conclusions is clearly not intended to support the retention of the established SCAs but has rather been contrived to facilitate the incursion of medium- to high-density residential development within the defined areas.

9. The survey method focus on the perceived built qualities of individual buildings and the failure to take account of the wider qualitative matters that define the various SCAs has no value simply because it does not focus on the *area* (the prime artefact to be preserved and managed) but rather the individual houses.

10. Chapter L - Schedule 15 - Special Character Schedule states that "The Special Character Areas Overlay – Residential and Business seeks to "*retain and manage the character of traditional … residential neighbourhoods by enhancing existing traditional buildings, retaining intact groups of character buildings, and designing compatible new building infill and additions that do not replicate older styles and construction methods, but reinforce the predominant streetscape character*." It is manifestly obvious that the introduction of multistorey development with greatly increased bulk and location into these areas will have precisely the opposite effect.

11. The assessments made by the Council, based on the site-by-site surveys, are clearly targeted at reducing the quantum of sites contained within SCAs and have resulted in many cases in the creation of significant pockets of potential intensification *within* identified, but reduced, SCAs, such that those sites will not be subject to Unitary Plan controls designed to protect the environmental and urban qualities for which the affected SCAs have been recognised. The method thus signally fails to achieve the intent of the overlay in such instances.

12. The Council has been advised that there are in excess of 3¼ million potential development sites available within the metropolitan area, of which qualifying matters (not solely SCAs) might reduce this by around 463,000 (about 14%). Of an estimated 2017 stock of in excess of 80,000 houses from all historical periods, protection under the AUP was limited to a quarter of that number (roughly 21,000) which, under PC78 will be further reduced by 33% to approximately 14,000.

13. The extensive capacity enabled by PC78 means that the effects on potential housing supply of retaining all existing SCAs are inconsequential, whereas the effect of the plan change on the valuable stock of buildings that contribute to the legacy of distinctive residential character is disproportionately high and profoundly destructive.

14. The plan change – insofar as it relates to the city's legacy of high quality high character residential buildings - is contrary to good planning and best use of resources. It sets out to actively enable the loss of those parts of the housing stock that have been professionally identified as having particular value as a non-renewable resource enhancing the amenity, form and attractiveness of the city, and which preserves the important legacy of buildings of quality and their associated streetscapes.

15. In this respect, the plan change fundamentally challenges the integrity of the Unitary Plan.

16. The Council has far exceeded its obligations under the provisions of the NPS(UD) which requires the Council to inter alia

i. incorporate Medium Density Residential Standards that enable three storey housing ***in relevant residential zones*** in urban Auckland, and

ii. implement qualifying matters to ***reduce the height and density of development*** required by the RMA to the extent necessary ***to accommodate a feature or value that means full intensification is not appropriate***. (my emphasis)

17. In my view, the SCAs are not ***relevant residential zones*** for the purposes of the NPS, and full intensification is not appropriate in these areas, meaning the required ***height and density of development*** requires to be reduced where intensification is implemented, in a manner consistent with the existing provisions for development within the SCAs.

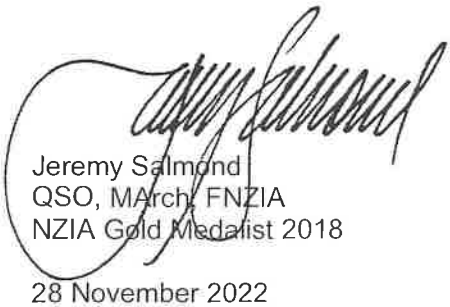
18. The NPS(UD) does not oblige the Council to reduce the quantum of sites within the SCAs – merely to confirm on the basis of site-by-site inspection the general integrity of the areas as found.

19. The provisions of the plan change do not therefore satisfy the above provisions.

Preferred outcomes

In my opinion, pc78 should:

1. Retain in toto all existing SCAs as defined in the AUP(OP);
2. Provide for intensification within SCAs in such a way as to maintain the key distinguishing characteristics of each area – particularly in relation to scale, form and proportion of new construction and in the relationship to the streetscape;
3. Develop specific controls and rules to achieve this;
4. To the extent that new development may be permitted within any SCA, this should be subject to development controls which have regard to the intrinsic scale, character and spatial format defined in the AUP for that area.



Jeremy Salmond
QSO, MArch, FNZIA
NZIA Gold Medalist 2018

28 November 2022

Appendix: Submission Points opposed for PC 78

Sub#/Point	Submitter Name	Address for Service
20.1	Samuel Cormack	sam.cormack@gmail.com
86.2	Nathaniel Brown	nathaniel.brown@xtra.co.nz
113.1	Iain Butler	iaintbutler@gmail.com
116.1	Thomas Dodd	tompipdodd@gmail.com
152.2	Oliver Wilson	oliver.wilson.o.w@gmail.com
174.2	Nikolas Rusten	nikolas@rusten.co.nz
258.2	Christopher Rapson	chris.rapson@gmail.com
379.1	Cameron William Churchill	cameron.w.churchill@gmail.com
482.1	Michael Richard Adamson	mike22240@hotmail.com
515.1	Liam Appleton	liamappleton@msn.com
711.7	Jessica de Heij	deheij@gmail.com
753.1	Lynda Murphy	lynda@paperspaces.co.nz
830.3	Ockham Group Ltd	barrykaye@xtra.co.nz
839.85	Russell Property Group	Vijay.lala@tattico.co.nz
840.13	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
840.14	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
840.15	Auckland City Centre Residents Group	nbuckland@xtra.co.nz
841.108	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz
841.11	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz
873.18 - 200	Kāinga Ora	developmentplanning@kaingaora.govt.nz
873.2	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.201	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.221	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.222	Kainga Ora	developmentplanning @kaingaora.govt.nz
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873.225	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.329	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.33	Kainga Ora	developmentplanning @kaingaora.govt.nz
873.331	Kainga Ora	developmentplanning @kaingaora.govt.nz
898.7	Cornwall Park Trust Board	mark.vinall@tattico.co.nz
899.1	Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development	RMAPlans@hud.govt.nz n.grala@harrisongrierson.com
934.1	John MacKay	john@urbs.co.nz Luke.Hinchey@chapmantripp.com
947.105	Retirement Villages Association of New Zealand Incorporated (RVA)	marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz
949.154	Piper Properties Consultants Limited	Tom.Morgan@Tattico.co.nz and layne@bastiongroup.co.nz
1066.109	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz
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1856.1	Jonathan Rickard	jonathan.rickard.nz@gmail.com
1886.11	Angela Lin	angela.qi.lin@gmail.com
1886.12	Angela Lin	angela.qi.lin@gmail.com
1888.2	Anthony James Chapman	ajchapman@gmail.com
1895.1	Damian Light	damian@damianlight.co.nz
1895.2	Damian Light	damian@damianlight.co.nz
1915.3	Jack Gibbons	gibbonsj97@gmail.com
1929.1	Jamie Simmonds	j.b.c.simmonds@gmail.com
1930.8	Jed Robertson	jed.l.j.roberts@gmail.com
1953.6	Matthew Wansbone	matthew.wansbone@gmail.com
1953.61	Matthew Wansbone	matthew.wansbone@gmail.com
1961.4	Oscar Sims	oscar@oscarsims.co.nz
1962.22	Aedifice Property Group	jessica@civix.co.nz
1962.64	Aedifice Property Group	jessica@civix.co.nz
1976.1	Susan King and Abe King	sunny@avantplanning.co.nz
1976.1	Susan King and Abe King	sunny@avantplanning.co.nz
2023.3	Chloride Trust	david@whitburngroup.co.nz
2025.3	Greater Auckland	Lowrie.matt@gmail.com
2025.12	Greater Auckland	lowrie.matt@gmail.com
2034.1	Craigieburn Range Trust	sukhi.singh@babbage.co.nz
2038.1	Highbrook Living Limited	sukhi.singh@babbage.co.nz
2042.1	NZ Storage Holdings Limited	sukhi.singh@babbage.co.nz
2049.21	Waka Kotahi	evan.keating@nzta.govt.nz
2049.22	Waka Kotahi	evan.keating@nzta.govt.nz
2055.5	Brett Carter Family Trust	brettcarter2000@hotmail.com
2143.1	James Penwarden	hjpenwarden@gmail.com
2146.2	Henderson Enterprises Limited	Nick@civix.co.nz
2248.127	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2248.86	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2272.11	CivilPlan Consultants Limited	aaron@civilplan.co.nz
2272.12	CivilPlan Consultants Limited	aaron@civilplan.co.nz
2273.13	Aaron Grey	aaronjgrey@gmail.com

2273.44	Aaron Grey	aaronjgrey@gmail.com
2275.4	Richard Hanson	vignesh@mhg.co.nz
2356.7	Matthew Olsen	matthew.r.olsen@gmail.com

Alice Zhou

From: Kate Cooke <jb.ch.cooke@gmail.com>
Sent: Thursday, 19 January 2023 3:59 pm
To: Unitary Plan
Subject: Plan Change 78

I am writing a submission to support the Remuera Heritage Society, number 948.

They list the homes worthy of a special character overlay. I support their recommendation that 117 Arney Road does not need the special character overlay. This needs to be removed.

This property's value has diminished as no one can develop the site because of the restrictions imposed with this overlay. The rates for this property are high based on a CV which is unrealistic given that it is virtually unsaleable with the special character overlay in place.

I trust you will give this submission due consideration..

Kate Cooke
Ph: 09-5210357

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:46 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Mark Self

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

Contact details

Full name of person making a further submission: Mark Self

Organisation name:

Full name of your agent:

Email address: gripper24@hotmail.com

Contact phone number: 021721527

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Auckland International Airport
C/ Taylor Mitchell
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Submission number: 870

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

Specific parts of the original submission that your submission relates to:
Point number .35

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021.

Noise effects can be mitigated through construction and other methods, and development and subdivision should not be reduced or precluded by downzoning the site from Mixed Housing Suburban to Low Density Residential.

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

Specify the parts of the original submission you want to allow or disallow:
Point 0.35 of Submission 870

Submission date: 19 January 2023

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:
I reside at 1 Selfs Road, Papatoetoe and am considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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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Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 4:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Mark Self

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Full name of person making a further submission: Mark Self

Organisation name:

Full name of your agent:

Email address: gripper24@hotmail.com

Contact phone number: 021721527

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Kāinga Ora
Homes and Communities
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 300

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) under PC78 replacing the current Mixed Housing Suburban Zone at 1 Selfs Road is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Kainga Ora's Submission seeking the land be re-zoned to Mixed Housing Urban Zone better aligns with these higher order planning documents.

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:
Point 300 seeking deletion of the Low Density Residential Zone and re-zoning to Mixed Housing Urban Zone.

Submission date: 19 January 2023

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:
I reside at 1 Selfs Road, Papatoetoe and am considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 4:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Mark Self

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

Contact details

Full name of person making a further submission: Mark Self

Organisation name:

Full name of your agent:

Email address: gripper24@hotmail.com

Contact phone number: 021721527

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Board of Airline Representatives New Zealand Inc:
Cath O'Brien
Executive Director
BARNZ
P O Box 2779
Auckland 1140

Submission number: 1083

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

Specific parts of the original submission that your submission relates to:
Point number .35
Point number .38

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Noise effects can be mitigated through construction and other methods and development and subdivision should not be reduced or precluded by inclusion of the Low Density Residential Zone.

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

Specify the parts of the original submission you want to allow or disallow:
Points 0.35 and 0.38 of Submission 1083 regarding retaining the proposed PC78 Low Density Residential Zone in relation to the MANA overlay.

Submission date: 19 January 2023

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:
I reside at 1 Selfs Road and am considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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
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Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 3:46 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - John Owen Self

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

Contact details

Full name of person making a further submission: John Owen Self

Organisation name:

Full name of your agent:

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Auckland International Airport
C/ Taylor Mitchell
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Submission number: 870

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

Specific parts of the original submission that your submission relates to:
Point number .35

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021.

Noise effects can be mitigated through construction and other methods without needing to reduce or preclude development and subdivision.

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

Specify the parts of the original submission you want to allow or disallow:
Point 0.35 of Submission 870

Submission date: 19 January 2023

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:
I own land at 1 Selfs Road Papatoetoe and am considering developing and subdividing this under the operative Mixed Housing Suburban Zone.

I declare that:

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Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 4:01 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - John Owen Self

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

Contact details

Full name of person making a further submission: John Owen Self

Organisation name:

Full name of your agent: Lance Hessell

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
BOARD OF AIRLINE REPRESENTATIVES NEW ZEALAND INC:
Cath O'Brien
Executive Director
BARNZ
P O Box 2779
Auckland 1140

Submission number: 1083

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

Specific parts of the original submission that your submission relates to:
Point number .35
Point number .38

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Noise effects can be mitigated through construction and other methods and development and subdivision should not be reduced or precluded by applying the Low Density Residential Zone.

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

Specify the parts of the original submission you want to allow or disallow:
Points 0.35 and 0.38 of Submission 1083 regarding retaining the proposed PC78 Low Density Residential Zone in relation to the MANA overlay.

Submission date: 19 January 2023

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

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Specify upon which grounds you come within this category:
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Organisation name:

Full name of your agent: Lance Hessell

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
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Papatoetoe
Auckland 2025

Submission details

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BARNZ
P O Box 2779
Auckland 1140

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

Specify the parts of the original submission you want to allow or disallow:
Points 0.35 and 0.38 of Submission 1083 regarding retaining the proposed PC78 Low Density Residential Zone in relation to the MANA overlay.

Submission date: 19 January 2023

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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

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I declare that:

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Alice Zhou

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Sent: Thursday, 19 January 2023 4:16 pm
To: Unitary Plan
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Full name of person making a further submission: John Owen Self

Organisation name:

Full name of your agent:

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Kainga Ora

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 .300

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) under PC78 replacing the current Mixed Housing Suburban Zone at 1 Selfs Road is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Kainga Ora's Submission seeking the land be re-zoned to Mixed Housing Urban Zone better aligns with these higher order planning documents.

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:
Point 300 seeking deletion of the Low Density Residential Zone and re-zoning to Mixed Housing Urban Zone.

Submission date: 19 January 2023

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:
I own land at 1 Selfs Road and am considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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
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Alice Zhou

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Sent: Thursday, 19 January 2023 3:31 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - John Self

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

Contact details

Full name of person making a further submission: John Self

Organisation name: Beachlea Trust

Full name of your agent:

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Self Road
Papatoetoe
Auckland 2025

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:
Auckland International Airport
C/- Taylor Mitchell
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
P.O. Box 8/DX CX10085
Auckland 1140

Submission number: 870

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Specific parts of the original submission that your submission relates to:
Point number .35

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021.

Noise effects can be properly mitigated through assessment and construction and other methods without needing to reduce or preclude development and subdivision.

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

Specify the parts of the original submission you want to allow or disallow:
Point 0.35 of Submission 870

Submission date: 19 January 2023

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:
I own land at 1 Selfs Road, Papatoetoe and am considering developing and subdividing this under the operative Mixed Housing Suburban Zone provisions.

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
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Alice Zhou

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Contact details

Full name of person making a further submission: John Self

Organisation name: Beachlea Trust

Full name of your agent: Lance Hessell

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Cath O'Brien
Executive Director
BARNZ
P O Box 2779
Auckland 1140

Submission number: 1083

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

Specific parts of the original submission that your submission relates to:
Point number .35
Point number .38

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) replacing the current Mixed Housing Suburban Zone is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Noise effects can be mitigated through construction and other methods and development and subdivision should not be reduced or precluded by downzoning to the Low Density Residential Zone.

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

Specify the parts of the original submission you want to allow or disallow:
Points 0.35 and 0.38 of Submission 1083 regarding retaining the proposed PC78 Low Density Residential Zone in relation to the MANA overlay.

Submission date: 19 January 2023

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:
Beachlea Trust owns land at 1 Selfs Road and is considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 4:16 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - John Owen Self

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

Contact details

Full name of person making a further submission: John Owen Self

Organisation name: Beachlea Trust

Full name of your agent:

Email address: johndeannaself@yahoo.co.nz

Contact phone number: 0274733730

Postal address:
1 Selfs Road
Papatoetoe
Auckland 2025

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:
Kāinga Ora – Homes and Communities
PO Box 74598
Greenlane, Auckland 1051.
C/- Brendon Liggett

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 300

The reasons for my or our support or opposition are:
The inclusion of the Low Density Residential Zone (LDR) under PC78 replacing the current Mixed Housing Suburban Zone at 1 Selfs Road is not appropriate and does not align with the outcomes intended under the National Policy Statement for Urban Development or the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021. Kainga Ora's Submission seeking the land be re-zoned to Mixed Housing Urban Zone better aligns with these higher order planning documents.

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:
Point 300 seeking deletion of the Low Density Residential Zone and re-zoning to Mixed Housing Urban Zone.

Submission date: 19 January 2023

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:
Beachlea Trust owns land at 1 Selfs Road and is considering developing and subdividing the site under the operative Mixed Housing Suburban Zone.

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.

Alice Zhou

From: Gyanendra Datt <g.datt@avantplanning.co.nz>
Sent: Thursday, 19 January 2023 4:13 pm
To: Unitary Plan
Cc: Mike Yu
Subject: Further submissions relating to Plan Change 78
Attachments: 49BDE10A4A464A40AD082CE44EE33640.jpg; pc-78-form-6_30 Bramley Drive.pdf; Avant Further Submission PC78 - 30 Bramley Drive.pdf

Kia ora,

Please find the attached further submission relating to the Auckland Unitary Plan Change 78.

This email serves as formal lodgement of the further submissions with Auckland Council.

Kind regards,

--

Gyanendra Datt
Consultant Planner
M 021 106 4274 | E g.datt@avantplanning.co.nz
W www.avantplanning.co.nz
A 224a Dominion Road, Mount Eden, Auckland 1024

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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

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

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

Address for service of Further Submitter

C/- Gyanendra Datt, Avant Planning and Urban Design - 224a Dominion Road

Mount Eden Auckland 1024

Telephone: | Fax/Email: g.datt@avantplanning.co.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☒ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Please see attached further submission.

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Please see attached further submission.

(continue on a separate sheet if necessary)

I seek that:

the whole : ☒

or part ☐ (describe precisely which part) _____

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 ☒

Gyanendra Datt
Signature of Further Submitter
(or person authorised to sign on behalf of further submitter)

01/20/2023
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)**

Please see attached further submission.

_____

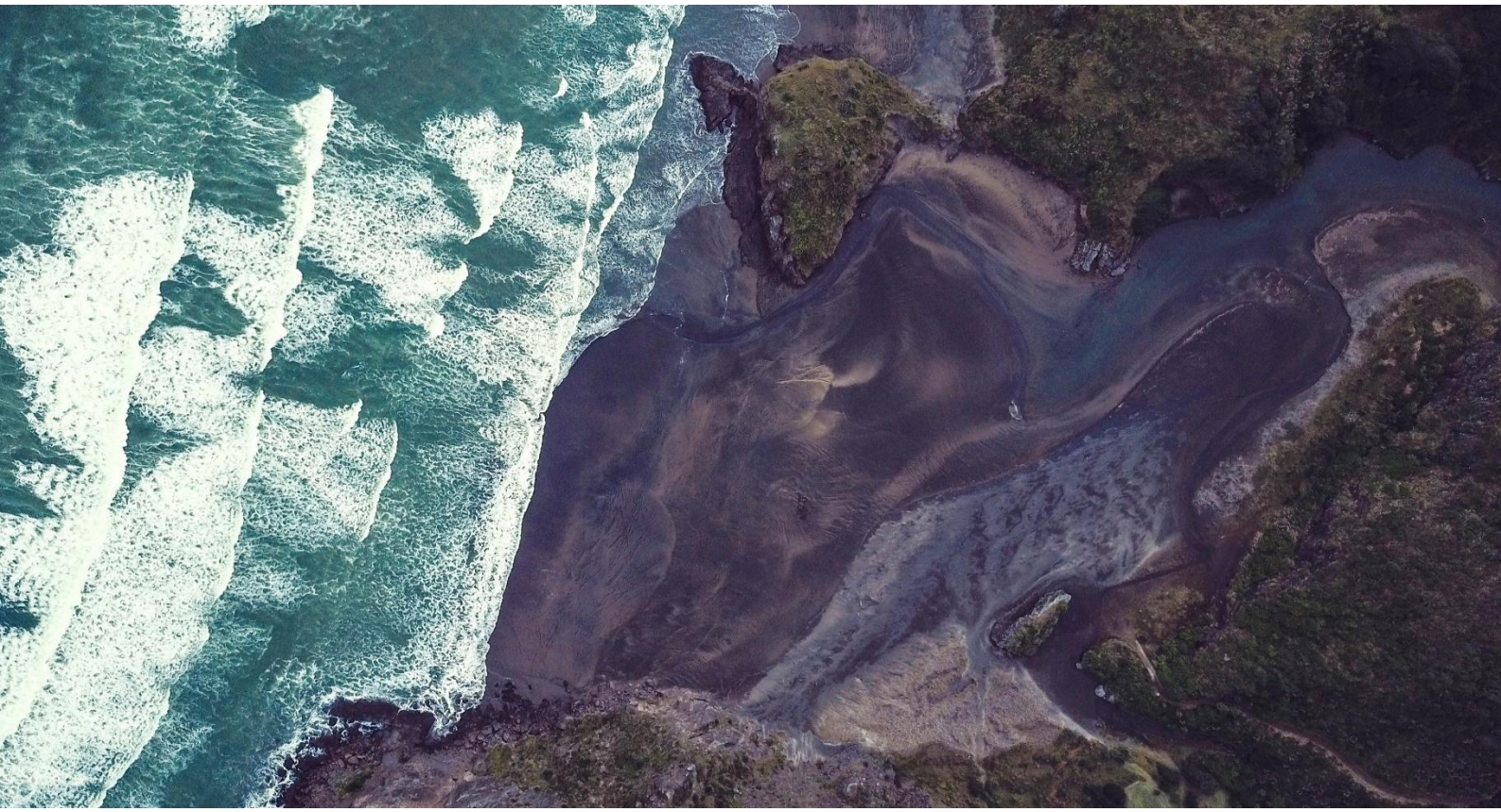
Notes to person making submission:

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.

AVANT
PLANNING | URBAN DESIGN

FURTHER SUBMISSIONS IN RELATION TO Proposed Plan Change 78: Intensification



To: Auckland Council - Plans and Places
Via email: unitaryplan@aucklandcouncil.govt.nz

Submitter: Terry Zeng

Address for Service: Avant Planning and Urban Design
224a Dominion Road
Mount Eden
Auckland 1024

Attention: Gyanendra Datt
Email: g.datt@avantplanning.co.nz

Date: **20 January 2023**

1) This is a further submission on Plan Change 78 ("PC78") to the Auckland Unitary Plan (Operative in Part) 2016 ("Plan").

2) The submitter is a person who has an interest in the plan change that is greater than the interest the general public has, as they are an original submitter on the plan change and own and occupy land that is directly affected by the plan change.

3) The submitter supports the submissions identified in Attachment 1 (below) of this further submission because the decisions sought in those original submissions:

a) Will achieve the purpose of the RMA;
b) Are the most appropriate means of achieving the Plan's objectives and exercising the Council's functions;
c) Are consistent with both the intent and wording of the National Policy Statement on Urban Development 2020, the Medium Density Residential Standards as set out in the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, and the tests required for Qualifying Matters;
d) Are, without limiting the generality of the above, appropriate for the reasons identified in Attachment 1.

4) The submitter seeks the following:
a) The decisions identified in Attachment 1.
b) Any consequential and/or other relief necessary to give effect to the relief sought in Attachment 1.

5) The submitter wishes to be heard in relation to their submission. If others make a similar submission, the submitter will consider presenting a joint case with them at a hearing.

6) The submitter would consider presenting a joint case with others making similar submissions.

Signed on behalf of the Submitter,

Gyanendra Datt

Gyanendra Datt
Planning Consultant

Attachment 1

	Submission Number / Point	Original Submitter	Decision Sought	Reasons for Support (in addition to those identified in the main body of the Further Submission	Decision Sought by Further Submitter
1	873.232	Kāinga Ora	"Rezone Residential - Low Density Residential Zone to Residential - Mixed Housing Urban Zone in Eastern Beach and Mellons Bay. Rezone Residential - Mixed Housing Urban Zone to Residential - Terrace Housing and Apartment Buildings Zone in parts of Half Moon Bay, Farm Cove, Howick and Highland Park. Refer to Appendix 2, Map 084 of the submission. [Inferred: proposes to rezone some or all of the properties in these streets from Residential - Low Density Residential Zone to Residential - Mixed Housing Urban Zone, includes: Bleakhouse Road, Bretton Lane, Burford Place, Charles Dickens Drive, Haseler Crescent, Page Point, and Pickwick Parade, Mellons Bay] [Inferred: proposes to rezone some or all of the properties in these streets from Residential - Mixed Housing Urban Zone to Residential - Terrace Housing and Apartment Buildings Zone, includes: Bucklands Beach Road, Bucklands Beach; Askew Place, Butley Drive, Driscoll Place, Dunn Place, Galloway Crescent, and Skilling Place, Farm Cove; Adonis Place, Argo Drive, Compass Point Way, Endymion Place, Ganymede Place, Half Moon Rise, Indus Place, Majesty Place, Pegasus Place, Pigeon Mountain Road, Poseidon Place, Prince Regent Drive, Raddock Place, Sunderlands Road, Tuscan Place, and Tyrian Close, Half Moon Bay; Baronie Court, Benygloe Place, Blanche Way, Bradbury Road, Casuarina Road, Cherry Road, Chesley Place, Clunie Place, Cranberry Place, Dalwhinnie Parade, Damson Place, Darren Crescent, Fiesta Drive, Fortunes Road, Hayes Place, Hazelmay Place, Highland Park Drive, Hutchinsons Road, Kereru Place, Liam Place, Lyren Place, Malvina Place, Mandarin Place, Marendellas Drive, Medina Place, Minaret Drive, Nassau Court, Pakuranga Road, Sheralee Place, Tate Grove, and Tromie Place, Highland Park; Angelo Avenue, Botany Road, Broadview Place, Dell Way, Elliot Street, Finnerty Avenue, Freyberg Place, Howe Street, JaeDee Court, Jeff Place, Juliet Avenue, Landop Terrace, Libby Lane, Moore Street, Nelson Street, O'Halloran Road, Patons Road, Pegler Drive, Picton Street, Ridge Road, Sherie Place, The Link, Union Road, Vida Place, Vincent Street, Waterloo Street, Wellington Street, Willoughby Avenue, and Wynn Place, Howick; Bleakhouse Road, Castleton Drive, Cheriton Road, Chilton Place, Mellons Bay Road, Montressor Place, and Towbridge Place, Mellons Bay; Pakuranga Road, Pakuranga; Hedge Row, Rothwell Place, and Stanniland Street, Sunnyhills.]"	For the reasons outlined in the original submission.	Allow the original submission point.
2	1304.10	Janette Jiayi Yan and Mark	Amend to remove coastal inundation and coastal erosion as a qualifying matter because E36 already manage significant risks from natural hazards and lacks site-specific analysis.	For the reasons outlined in the original submission.	Allow the original submission point.
3	1469.2	Bedford Properties Ltd	Remove the Coastal Inundation QM from the list of Qualifying Matters, and specifically from 30 West End Road, Herne Bay as these matters can be addressed by the RMA, AUP and relevant Engineering Standards.	For the reasons outlined in the original submission. These reasons can apply to the QM overall across the region	Allow the original submission point.
4	1726.5	Xudong Wang	That the council abandon the use of the Two Storey Single Dwelling Residential Area (TSSDRA) and Two Storey Medium Density Residential Area (TSMDRA) zones to accommodate the Coastal Inundation Layer qualifying matter and instead accommodate it in a manner that does not curtail development unnecessarily, such as by using overlay rules that are applicable only to the areas of land that are subject to the overlay and not entire sites.	For the reasons outlined in the original submission. These reasons can apply to the QM overall across the region	Allow the original submission point.
5	1962.14	Aedifice Property Group	Delete the QM relating to Coastal Inundation.	For the reasons outlined in the original submission.	Allow the original submission point.

Alice Zhou

From: Cordelia Woodhouse <CWoodhouse@ellisgould.co.nz>
Sent: Thursday, 19 January 2023 4:03 pm
To: Unitary Plan
Cc: Douglas Allan
Subject: PC78 - Foodstuffs Further Submission
Attachments: Foodstuffs PC78 Further Submission .pdf

Kia ora

Please find attached Foodstuff North Island's further submission on PC78.

Ngā mihi | Kind regards

Cordelia Woodhouse SOLICITOR
phone. +64 9 307 2172 fax. +64 9 309 9449 email. cwoodhouse@ellisgould.co.nz

Level 31, Vero Centre , 48 Shortland Street
PO Box 1509, Auckland, New Zealand
DX CP 22003
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www.ellisgould.co.nz

FURTHER SUBMISSIONS ON PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN – OPERATIVE IN PART

Clause 8 of Schedule 1 of the Resource Management Act 1991

Foodstuffs North Island Ltd
Further Submissions

To: Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Foodstuffs North Island Limited ("Foodstuffs") at the address for service set out below ("**the Submitter**") makes the following further submissions in support of and opposition to relief sought in original submissions ("**Original Submissions**") on Plan Change 78: Intensification ("**PC 78**") to the Auckland Unitary Plan.

1. The Submitter has an interest in PC78 that is greater than the interest the general public has because:

   (a) It has lodged submissions on PC78;

   (b) It owns or occupies land that is subject to PC78; and

   (c) It owns or occupies land that is affected by the relief sought in the Original Submissions.

2. The Submitter could not gain an advantage in trade competition through this submission.

3. **Annexure A** to this submission comprises a schedule summarising the parts of the Original Submissions that the Submitter supports or opposes, any reasons for that position in addition to those set out in paragraph 4 below, and the decisions sought.

4. The reasons for this submission are as follows:

   (a) The relief sought in the Original Submissions that are supported by the Submitter:

      (i) Promotes the sustainable management of natural and physical resources and is consistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");

(ii) Is appropriate in terms of section 32 of the RMA; and

(iii) Gives effect to the NPS – Urban Development 2020 ("**NPS-UD**").

(b) The relief sought in the Original Submissions that are opposed by the Submitter:

(i) Does not promote the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;

(ii) Is inappropriate in terms of section 32 of the RMA; and

(iii) Does not give effect to the NPS – UD.

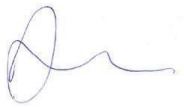
(c) The reasons set out in the Submitter's submissions on PC78.

(d) Any additional reasons identified in respect of each of the Original Submissions specified in **Annexure A**.

5. The Submitter wishes to be heard in support of its further submissions. If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.

DATED this 19th day of January 2023

Foodstuffs North Island Limited by its solicitors and duly authorised agents, Ellis Gould



D A Allan / D J Sadlier / A K Devine

ADDRESS FOR SERVICE: The offices of Ellis Gould, Solicitors, Level 31, Vero Centre, 48 Shortland Street, PO Box 1509. Auckland 1140, DX CP22003, Auckland. Telephone: (09) 307-2172, Facsimile: (09) 358-5215. **Attention**: Douglas Allan (dallan@ellisgould.co.nz) / Daniel Sadlier (dsadlier@ellisgould.co.nz) / Alex Devine (adevine@ellisgould.co.nz)

ANNEXURE A

ORIGINAL SUBMISSIONS OPPOSED OR SUPPORTED BY FOODSTUFFS NORTH ISLAND LIMITED

Original Submission number	Original Submitter Name & Address for service	Topic	Support / Oppose	Any additional reasons for Support / Opposition	Decision Sought
580.1	**Yuva Adhikary** yuva53@hotmail.com	Staged intensification strategy.	Support.	This relief is consistent with and complementary to that sought by Foodstuffs which seeks to prioritise intensification around centres given the lack of infrastructure capacity.	Allow the submission point.
780.1 & 2	**Reydon Place Residents Society Inc** sel-1@xtra.co.nz	Approve plan change in City and Metropolitan Centres and target future intensification to locations already identified in the AUP.	Support.	This relief is consistent with and complementary to that sought by Foodstuffs which seeks to prioritise intensification around centres given the lack of infrastructure capacity.	Allow the submission points.
840.16	**Auckland City Centre Residents Group** nbuckland@xtra.co.nz	Incorporate the Auckland Light Rail corridor into PC78.	Support.		Allow the submission point.
871.3	**Property Council NZ** Logan@propertynz.co.nz	Greater intensification in Centres.	Support.		Allow the submission point
871.9	**Property Council NZ** Logan@propertynz.co.nz	Infrastructure as a qualifying matter.	Oppose to the extent the submission is contrary to Foodstuffs submission 941.	Foodstuffs and PCNZ have both identified that infrastructure capacity issues are critical to intensification but propose different approaches to the issue. Foodstuffs supports addressing these matters comprehensively including through mediation in the first instance.	Disallow the submission to the extent it is inconsistent with the relief sought by Foodstuffs.
871.12	**Property Council NZ** Logan@propertynz.co.nz	Increased height along transport corridors and adjacent to amenities such as railway stations.	Support.		Allow the submission point.
871.1, 2, 4-8, 10, 11, 13-25	**Property Council NZ** Logan@propertynz.co.nz	All matters raised in the submission other than in 871.3, 9 and 12.	Support to the extent the relief is consistent with Foodstuffs submission 941.		Allow submission points to the extent they are consistent with Foodstuffs submission 941.

873.22	**Kainga Ora** developmentplanning@kaingaora.govt.nz	Unlimited building height standard in Metropolitan Centres.	Support.		Allow the submission point.
873.23 and 24	**Kāinga Ora** Developmentplanning@kaingaora.govt.nz	Increased height standards and HVC standards in the Town Centre and Local Centre Zones.	Support.		Allow the submission points.
873.30	**Kāinga Ora** Developmentplanning@kaingaora.govt.nz	Application of PC78 to the Light Rail corridor.	Support.		Allow the submission point.
873.145 (Hobsonville Mixed Use zone) **873.215, 216 & 217 (Mt Albert)** **873.219 (Dominion Rd north – Balmoral site + Prospect Tce)** **873.254 (Mt Wellington proposed PnS site)**	**Kāinga Ora** Developmentplanning@kaingaora.govt.nz	Specific urban environment rezonings and increased height standards.	Support.		Allow the submission points.
901.122, 123, 124 and 125	**Metlifecare Limited** bianca.tree@minterellison.co.nz	Provisions relating to 7 St Vincent Avenue, Remuera including notably height.	Support.		Allow the submission points.
903.2-8, 14 & 15	**Franco Belgiorno-Nettis** franco.nettis@xtra.co.nz	Provisions relating to Takapuna Centre and environs.	Oppose.		Disallow the submission points.
938.137, 139 and 141	**NZ Housing Foundation** michael@campbellbrown.co.nz	Unlimited building height standard in Metropolitan Centres, 32.5m height standard in Town Centre Zones, 24m height standard in Local Centre zones.	Support.		Allow the submission points.

1077 (whole submission)	**Next Gen Places Ltd** dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Provisions relating to Eastridge Centre and environs.	Support.		Allow the submission.
1132 (whole submission)	**Michael Savage** michael.savage@parkchambers.co.nz	Provisions relating to Devonport Centre and environs.	Oppose to the extent inconsistent with Foodstuffs submission 941.		Disallow the submission points to the extent they are inconsistent with Foodstuffs submission 941.
1487.1, 2, 3 & 20	**Takapuna Residents Association** takapunaresidentsassoc@gmail.com	Provisions relating to Takapuna Centre and environs.	Oppose to the extent inconsistent with Foodstuffs submission 941.		Disallow the submission points to the extent they are inconsistent with Foodstuffs submission 941.
1593.3, 4 and 5	**Logan Paul O'Callahan** o'callahanl@wsc.school.nz	Qualifying Matters - Special Character with reference to Devonport.	Support to the extent consistent with Foodstuffs submission 941. Otherwise oppose.		Allow the submission points to the extent they are consistent with Foodstuffs submission 941. Otherwise disallow.
1655.6 and 7	**Masfen Holdings** micheal@campbellbrown.co.nz	Provisions relating to Kepa Road (Eastridge) Centre.	Support.		Allow the submission points.
1744.1-3	**Fiona Moran** Fiona@moran.kiwi.nz	Intensification around centres and infrastructure limitations.	Support to the extent the submissions are consistent with Foodstuffs' submission 941. Otherwise oppose.	Foodstuffs and Ms Moran have both identified that development should be focussed around centres and that infrastructure capacity issues are critical to intensification. Foodstuffs supports addressing these matters comprehensively including through mediation in the first instance.	Allow the submission points to the extent they are consistent with the relief sought by Foodstuffs. Otherwise disallow.
1877 (whole submission)	**Trevor Weaver**	Intensification at Rocklands Ave,	Oppose.		Disallow the submission.

	tskb@xtra.co.nz	Balmoral.			
2049	**Waka Kotahi** evan.keating@nzta.govt.nz	All matters raised in the submission.	Oppose to the extent the relief is not consistent with Foodstuffs submission 941.	The Waka Kotahi submission is wide ranging and has the potential to significantly amend the AUP and adversely affect Foodstuffs interests.	Disallow submission points to the extent they are not consistent with Foodstuffs submission 941.
2082 (whole submission)	**Te Waihanga, New Zealand Infrastructure Commission** geoff.cooper@tewaihanga.govt.nz	Infrastructure.	Oppose to the extent the submission is contrary to Foodstuffs submission 941.	Foodstuffs and NZIC have both identified that infrastructure capacity issues are critical to intensification but propose different approaches to the issue. Foodstuffs supports addressing these matters comprehensively including through mediation in the first instance.	Disallow the submission to the extent it is inconsistent with the relief sought by Foodstuffs.
2083.127, 129 and 131	**Universal Homes** Michael@campbellbrown.co.nz	Unlimited building height standard in Metropolitan Centres, 32.5m height standard in Town Centre Zones, 24m height standard in Local Centre zones.	Support.		Allow the submission points.
2226.3 & 4	**Scentre (New Zealand) Limited** cmcgarr@bentley.co.nz	Increase the maximum height standard in Metropolitan Centre zones to 100m.	Support.		Allow the submission points.

Alice Zhou

From: Cordelia Woodhouse <CWoodhouse@ellisgould.co.nz>
Sent: Thursday, 19 January 2023 4:18 pm
To: Unitary Plan
Cc: Douglas Allan
Subject: PC78 - Tram Lease Ltd Further Submission
Attachments: Tram Lease Ltd - PC78 Further Submission .pdf

Kia ora

Please find attached Tram Lease Ltd's further submission on PC78.

Ngā mihi | Kind regards

Cordelia Woodhouse SOLICITOR
phone. +64 9 307 2172 fax. +64 9 309 9449 email. cwoodhouse@ellisgould.co.nz

Level 31, Vero Centre , 48 Shortland Street
PO Box 1509, Auckland, New Zealand
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FURTHER SUBMISSIONS ON PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN – OPERATIVE IN PART

Clause 8 of Schedule 1 of the Resource Management Act 1991

Tram Lease Limited
Further Submissions

To: Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Tram Lease Limited at the address for service set out below ("**the Submitter**") makes the following further submissions in support of and opposition to relief sought in original submissions ("**Original Submissions**") on Plan Change 78: Intensification ("**PC 78**") to the Auckland Unitary Plan.

1. The Submitter has an interest in PC78 that is greater than the interest the general public has because:

   (a) It has lodged submissions on PC78;

   (b) It owns or occupies land that is subject to PC78; and

   (c) It owns or occupies land that is affected by the relief sought in the Original Submissions.

2. The Submitter could not gain an advantage in trade competition through this submission.

3. **Annexure A** to this submission comprises a schedule summarising the parts of the Original Submissions that the Submitter supports and opposes, and the decisions sought.

4. The reasons for this submission are as follows:

   (a) The relief sought in the Original Submissions that are supported by the Submitter:

      (i) Promotes the sustainable management of natural and physical resources and is consistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");

      (ii) Is appropriate in terms of section 32 of the RMA; and

      (iii) Gives effect to the NPS – Urban Development 2020 ("**NPS-UD**").

   (b) The relief sought in the Original Submissions that are opposed by the Submitter:

      (i) Does not promote the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;

(ii) Is inappropriate in terms of section 32 of the RMA; and

(iii) Does not give effect to the NPS – UD.

(c) With respect to submission 2069 by KiwiRail:

(i) The proposed provisions wrongly and inappropriately impose constraints on owners and occupiers of land adjacent to rail in order to mitigate effects generated by the rail operator.

(ii) Noise issues adjacent to rail:

- Ought to appropriately allocate responsibility between the rail operator and adjacent landowners and occupiers.
- Need to be addressed and resolved at a national level and not through imposing provisions haphazardly through individual plan changes such as PC78.

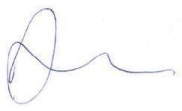
(iii) There is no evidential basis for imposing any constraints on neighbouring landowners and occupiers (as opposed to the rail operator) with respect to vibration effects generated by rail.

(d) The reasons set out in the Submitter's submissions on PC78.

5. The Submitter wishes to be heard in support of its further submissions. If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.

DATED this 19th day of January 2023

Tram Lease Limited by its solicitors and duly authorised agents, Ellis Gould



_____

D A Allan / A K Devine

ADDRESS FOR SERVICE: The offices of Ellis Gould, Solicitors, Level 31, Vero Centre, 48 Shortland Street, PO Box 1509. Auckland 1140, DX CP22003, Auckland. Telephone: (09) 307-2172, Facsimile: (09) 358-5215. **Attention**: Douglas Allan (dallan@ellisgould.co.nz) / Alex Devine (adevine@ellisgould.co.nz)

ANNEXURE A

ORIGINAL SUBMISSIONS SUPPORTED OR OPPOSED BY TRAM LEASE LIMITED

Original Submission number	Original Submitter Name & address for service	Topic	Support / Oppose	Decision Sought
873.23 and 24	**Kāinga Ora** developmentplanning@kaingaora.govt.nz	Increased height standards and HVC standards in the Town Centre and Local Centre Zones.	Support.	Allow the submission points.
873.216	**Kāinga Ora** developmentplanning@kaingaora.govt.nz	Increase height standard in Mt Albert Town Centre.	Support.	Allow the submission point.
938.139 and 141	**NZ Housing Foundation** michael@campbellbrown.co.nz	32.5m height standard in Town Centre Zones, 24m height standard in Local Centre zones.	Support.	Allow the submission points.
1079.40	**The Coalition for More Homes** morehomesnz@gmail.com	Increase height limits in highly accessible Town Centres, like those with a station on the rapid transit network, such as Mt Albert.	Support.	Allow the submission point.
2069	**KiwiRail** michelle.grinlinton-hancock@kiwirail.co.nz	Provisions relating to railway corridor as a qualifying matter (re noise and vibration).	Oppose.	Disallow the submission.

Alice Zhou

From: Cordelia Woodhouse <CWoodhouse@ellisgould.co.nz>
Sent: Thursday, 19 January 2023 4:20 pm
To: Unitary Plan
Cc: Douglas Allan
Subject: PC78 - Waiwera Properties Ltd Further Submission
Attachments: Waiwera Properties Ltd - PC78 Further Submission .pdf

Kia ora

Please find attached Waiwera Properties Ltd's further submission on PC78.

Ngā mihi | Kind regards

Cordelia Woodhouse SOLICITOR
phone. +64 9 307 2172 fax. +64 9 309 9449 email. cwoodhouse@ellisgould.co.nz

Level 31, Vero Centre , 48 Shortland Street
PO Box 1509, Auckland, New Zealand
DX CP 22003
Download parking map and instructions here - A4 PDF

www.ellisgould.co.nz

FURTHER SUBMISSIONS ON PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN – OPERATIVE IN PART

Clause 8 of Schedule 1 of the Resource Management Act 1991

Waiwera Properties Limited
Further Submissions

To: Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Waiwera Properties Limited ("**the Submitter**" or "**WPL**") at the address for service set out below makes the following further submissions in support of and opposition to relief sought in original submissions ("**Original Submissions**") on Plan Change 78: Intensification ("**PC 78**") to the Auckland Unitary Plan.

1. The Submitter has an interest in PC78 that is greater than the interest the general public has because:

   (a) It owns or occupies land that is subject to PC78; and

   (b) It owns or occupies land that is affected by the relief sought in the Original Submissions.

2. The Submitter could not gain an advantage in trade competition through this submission.

3. **Annexure A** to this submission comprises a schedule summarising the parts of the Original Submissions that the Submitter supports or opposes, and the decisions sought.

4. The reasons for this submission are as follows:

   (a) The relief sought in the Original Submissions that are supported by the Submitter:

      (i) Promotes the sustainable management of natural and physical resources and is consistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");

      (ii) Is appropriate in terms of section 32 of the RMA; and

(iii) Gives effect to the NPS – Urban Development 2020 ("**NPS-UD**").

(b) The relief sought in the Original Submission that is opposed by the Submitter:

(i) Does not promote the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;

(ii) Is inappropriate in terms of section 32 of the RMA; and

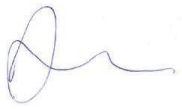
(iii) Does not give effect to the NPS – UD.

(c) The reasons set out in the Original Submissions that are supported.

5. The Submitter wishes to be heard in support of its further submissions. If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.

DATED this 19th day of January 2023

Waiwera Properties Limited by its solicitors and duly authorised agents, Ellis Gould



D A Allan / J G Goodyer

ADDRESS FOR SERVICE: The offices of Ellis Gould, Solicitors, Level 31, Vero Centre, 48 Shortland Street, PO Box 1509. Auckland 1140, DX CP22003, Auckland. Telephone: (09) 307-2172, Facsimile: (09) 358-5215. **Attention**: Douglas Allan (dallan@ellisgould.co.nz) / Julie Goodyer jgoodyer@ellisgould.co.nz)

ANNEXURE A

ORIGINAL SUBMISSIONS OPPOSED OR SUPPORTED BY WAIWERA PROPERTIES LIMITED

Original Submission number	Original Submitter Name & address for service	Topic	Support / Oppose	Decision Sought
942.3	**Drive Holdings Limited** dallan@ellisgould.co.nz	Inundation information layer.	Support.	Allow the submission point.
1088.19 **1088.20**	**Viaduct Harbour Holdings Limited** dallan@ellisgould.co.nz	Inundation information layer.	Support.	Allow the submission points.
1304.10	**Janette Jiayi Yan** mark@planco.co.nz	Inundation information layer.	Support.	Allow the submission point.
1404.9	**Birkenhead Residents Association** akgoatley@gmail.com	Inundation information layer.	Oppose.	Disallow the submission point.
1469.2	**Bedford Properties Ltd** kelsie.tuck@ckl.co.nz	Inundation information layer.	Support.	Allow the submission point.
1726.5	**Xudong Wang** gerard@sentinelplanning.co.nz	Inundation information layer.	Support in part.	Allow the submission point to the extent the inundation layer is abandoned.
1771.3	**Terry Zeng** g.datt@avantplanning.co.nz	Inundation information layer.	Support.	Allow the submission point.
1962.14	**Aedifice Property Group** jessica@civix.co.nz	Inundation information layer.	Support.	Allow the submission point.

Alice Zhou

From: Zoe Lee La Selle <ZLeeLaSelle@bentley.co.nz>
Sent: Thursday, 19 January 2023 4:59 pm
To: Unitary Plan
Subject: AUP Plan Change 78 - Further Submissions by Scentre (New Zealand) Limited on Submissions 2049 and 2069
Attachments: PC78 Scentre - Further Submission_Waka Kotahi 190123.pdf; PC78 Scentre - Further Submission_KiwiRail 190123.pdf

Afternoon,

Please see **attached** the further submissions in opposition to submissions #2049 (Waka Kotahi) and #2069 (KiwiRail) in relation to Proposed Plan Change 78 of the Auckland Unitary Plan, on behalf of Scentre (New Zealand) Limited.

Many thanks,

Zoe Lee La Selle
Resource Management Planner

BENTLEY&Co
Resource Management Consultants

Level 12, 23 Customs Street East, Auckland CBD
PO Box 4492, Shortland Street, Auckland 1140

Mobile: 021 0855 5196

Form 6
Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: Scentre (New Zealand) Limited ("**Scentre**")

1. This is a further submission in opposition to Waka Kotahi's submission (submission number 2049) on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Scentre made an original submission on PC78 (submission number 2226). Defined terms in that original submission have been used in this further submission.

2. Scentre could not gain an advantage in trade competition through this further submission.

3. Scentre is a person with an interest in the plan change and the identified primary submission that is greater than the interest the general public has, as Scentre made a submission on PC78, and owns properties in Newmarket that are affected by PC78 and the relief sought by submissions.

Submission opposed

4. Scentre further submits in opposition to Waka Kotahi's original submission (submission number 2049).

5. The particular part of Waka Kotahi's submission Scentre opposes is:

   - The inclusion of a new overlay to require sensitive activities within 100m of a state highway to provide mitigation for noise in accordance with Waka Kotahi standards (set out in Appendix 1 of its submission).

6. The relief sought by the Submitter is in effect consistent with the 'High Land Transport Noise overlay' which was previously included in the Proposed Auckland Unitary Plan (in 2013). In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this overlay was deleted. The Panel's recommendation report stated:[1]

   The Panel was concerned with proceeding with the extensive application of this overlay in the absence of a rigorous cost benefit assessment, including no

[1] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.2.

assessment of who should appropriately bear the costs involved. In the absence of that assessment the Panel recommends this overlay be deleted.

7. Scentre opposes the relief sought by the Submitter for the following reasons:
   - The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD.
   - The relief sought will impose all costs of mitigating noise effects and perceived reverse sensitivity effects on to individual property owners and residents.
   - It is incumbent on Waka Kotahi, both in terms of construction and operation of the state highway network, to manage the acoustic effects generated to a reasonable level.
   - The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the (much smaller) High Land Transport Noise overlay in the Proposed Auckland Unitary Plan.
   - The relief sought will not promote the sustainable management of resources, achieve the purpose of the Resource Management Act 1991 (RMA), or give effect to Part 2 and other provisions of the RMA.

Decision sought

8. Scentre seeks the following relief:

   - Waka Kotahi's submission 2049.28 (specifically, the inclusion of a new overlay to require internal noise and ventilation standards for noise sensitive activities within 100m of a state highway) be disallowed.
   - Such further, alternative or other consequential amendments as may be necessary to fully address Scentre's further submission as set out above.

Hearing

9. Scentre wishes to be heard in support of this further submission.

10. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

Scentre (New Zealand) Limited
By its planning and resource management consultants Bentley & Co. Ltd



Craig McGarr

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140
Attention: Craig McGarr

Mobile: 021741418
Email: cmcgarr@bentley.co.nz

Note for submitters:

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.

Form 6
Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: Scentre (New Zealand) Limited ("**Scentre**")

1. This is a further submission in opposition to KiwiRail's submission (submission number 2069) on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Scentre made an original submission on PC78 (submission number 2226). Defined terms in that original submission have been used in this further submission.

2. Scentre could not gain an advantage in trade competition through this further submission.

3. Scentre is a person with an interest in the plan change and the identified primary submission that is greater than the interest the general public has, as Scentre made a submission on PC78, and owns properties in Newmarket that are affected by PC78 and the relief sought by submissions.

Submission opposed

4. Scentre further submits in opposition to KiwiRail's original submission (submission number 2069).

5. The particular parts of KiwiRail's submission Scentre opposes are:

    - The following proposed provisions:
        - A new 5m setback requirement to be applied to buildings and structures on all sites adjoining the rail corridor (submissions 2069.7 to 2069.24);
        - A new standard requiring noise insulation and ventilation to apply to all new and altered 'activities sensitive to noise' within a zone adjacent to the Strategic Transport Corridor Zone (submission 2069.3).
        - A new vibration standard to be applied to new and altered activities sensitive to noise within 60m of the rail corridor (submission 2069.4).
        - A corresponding suite of assessment matters and criteria to assess infringements to these standards (submissions 2069.5 and 2069.6).

A new 5m Yard Standard

6. The relief sought by the Submitter is similar to relief that was sought (also by KiwiRail) on the Proposed Auckland Unitary Plan (2013). However, at that time, KiwiRail sought a 2.25m yard on all land adjoining the railway corridor.

7. In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this standard was not included in the Auckland Unitary Plan. The Panel's recommendation report stated: [1]

> *The Panel was concerned that these provisions would apply in a blanket fashion along the rail corridor whether needed or not, that it is an issue that could be addressed through the application of KiwiRail's designation powers if needed, and that the costs of the Overlay would fall entirely on property owners with insufficient evidence that such an approach would lead to an efficient outcome. In this context the Panel recommends that the building setback from the rail corridor provisions not be included in the plan.*

8. The reasons for Scentre's opposition to KiwiRail's submission include:
   - The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD, particularly being land which is in close proximity to a train station (a rapid transit service).
   - The Submitter has previously sought a 2.25m wide yard standard to apply to land adjoining the railway corridor in the Proposed Auckland Unitary Plan, which was rejected by the Independent Hearings Panel. The Submitter now seeks (in its submission on PC78) a yard setback of 5m.
   - The reasons why the Independent Hearings Panel rejected the submission of KiwiRail on the Proposed Auckland Unitary Plan continue to apply to the relief sought by KiwiRail in its submission on PC78, namely:
     - A 'blanket' 5m yard control is a blunt and inefficient mechanism to address a perceived issue which has not been reasonably justified by the Submitter to be necessary in the first instance.
     - The yard standard will result in all costs being borne by private landowners. Such costs involve the cost of the foregone use of land within the requested yard, and the costs of making a resource consent application to develop that land.
     - There has been no analysis of the necessity for such a standard in the first instance, including the width of the standard.
   - The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the relief sought by KiwiRail in its submission on the Proposed Auckland Unitary Plan.

[1] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.4.

Noise, Ventilation and Vibration Standards for Noise Sensitive Activities

9. The Submitter seeks a new overlay to apply internal noise and ventilation mitigation requirements for noise sensitive activities within zones adjoining the Strategic Transport Corridor Zone, and vibration mitigation requirements for sensitive activities within 60m of the Strategic Transport Corridor Zone.

10. The nature of the relief sought by the Submitter is in effect consistent with the 'High Land Transport Noise overlay' which was previously included in the Proposed Auckland Unitary Plan (in 2013). In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this overlay was deleted. The Panel's recommendation report stated:[2]

> *The Panel was concerned with proceeding with the extensive application of this overlay in the absence of a rigorous cost benefit assessment, including no assessment of who should appropriately bear the costs involved. In the absence of that assessment the Panel recommends this overlay be deleted.*

11. The reasons for Scentre's opposition to KiwiRail's submission include:
    - The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD.
    - The relief sought will impose all costs of mitigating acoustic effects and perceived reverse sensitivity effects on to individual property owners and residents.
    - It is incumbent on KiwiRail, both in terms of construction and operation of the railway network, to manage the acoustic and vibration effects generated to a reasonable level.
    - The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the (much smaller) High Land Transport Noise overlay in the Proposed Auckland Unitary Plan.

Decision sought

12. Scentre seeks the following relief:

    - KiwiRail's submission (specifically, the proposed building setback standard, noise and vibration standards, and corresponding suite of provisions) be disallowed.
    - Such further, alternative or other consequential amendments as may be necessary to fully address Scentre's further submission as set out above.

[2] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.2.

Hearing

13. Scentre wishes to be heard in support of this further submission.

14. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

Scentre (New Zealand) Limited
By its planning and resource management consultants Bentley & Co. Ltd



Craig McGarr

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140
Attention: Craig McGarr

Mobile: 021741418
Email: cmcgarr@bentley.co.nz

Note for submitters:

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.

Alice Zhou

From: Zoe Lee La Selle <ZLeeLaSelle@bentley.co.nz>
Sent: Thursday, 19 January 2023 4:49 pm
To: Unitary Plan
Cc: Craig Mcgarr; Anthony Blomfield
Subject: AUP Plan Change 78 - Further Submissions by Summerset Villages (Parnell) Limited on Submissions 873 and 2069
Attachments: PC78 Summerset Parnell - Further Submission_Kainga Ora 190123.pdf; PC78 Summerset Parnell - Further Submission_KiwiRail 190123.pdf

Afternoon,

Please see **attached** the further submissions in support of submission #873 (Kāinga Ora) and in opposition to submission #2069 (KiwiRail) in relation to Proposed Plan Change 78 of the Auckland Unitary Plan, on behalf of Summerset Villages (Parnell) Limited.

Many thanks,

Zoe Lee La Selle
Resource Management Planner

BENTLEY&Co
Resource Management Consultants

Level 12, 23 Customs Street East, Auckland CBD
PO Box 4492, Shortland Street, Auckland 1140

Mobile: 021 0855 5196

Form 6
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Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: Summerset Villages (Parnell) Limited ("**Summerset**")

Level 2
10 Viaduct Harbour Avenue
Auckland 1010

1. This is a further submission in support of Kāinga Ora's submission (submission number 873) on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Summerset made an original submission on PC78 (submission number 1111). Defined terms in that original submission have been used in this further submission.

2. Summerset could not gain an advantage in trade competition through this further submission.

3. Summerset is a person with an interest in the plan change and the identified primary submission that is greater than the interest the general public has, as Summerset made a submission on PC78 and owns properties in Parnell that are affected by PC78 and the relief sought by submissions.

Submission supported

4. Summerset further submits in support of Kāinga Ora's original submission (submission number 873).

5. The particular parts of Kāinga Ora's submission that Summerset supports are:

    - The application of a Height Variation Control ("**HVC**") to 23 and 41 Cheshire Street and the surrounding area to enable a building height of up to 43m as a permitted activity.

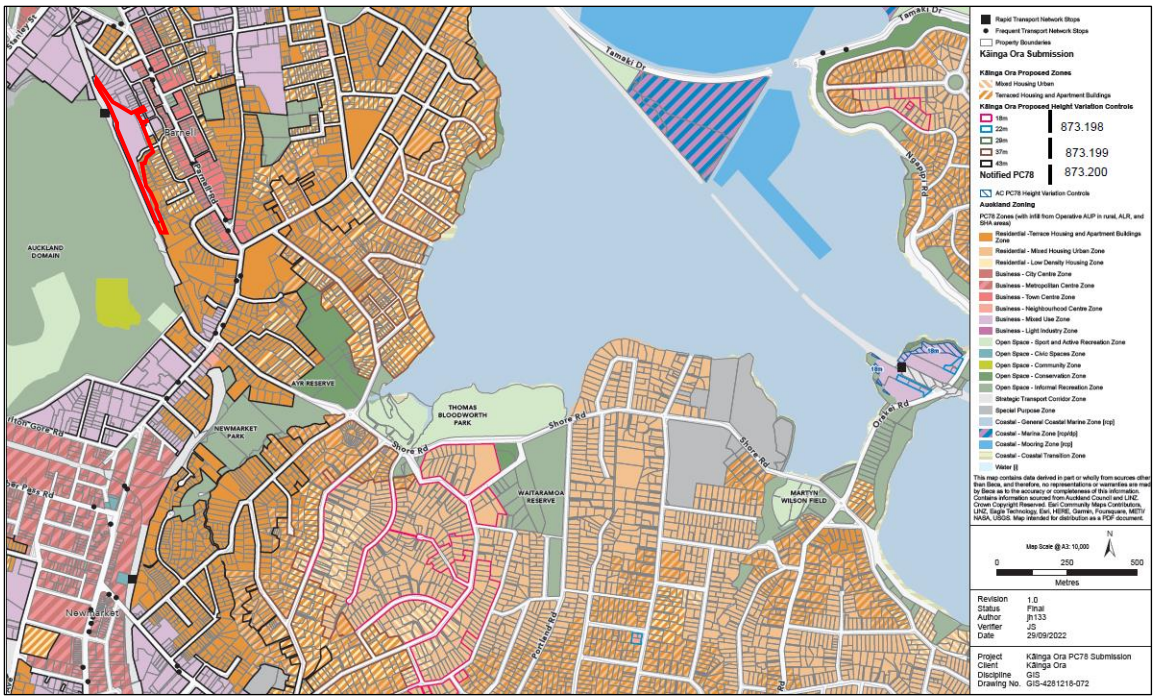


Figure 1: Kāinga Ora proposed rezoning - Map 72 – showing 23 Cheshire Street outlined in red

6. The reasons for support include:

- Under the existing provisions of the Unitary Plan, there is no HVC provided at 23 Cheshire Street, and there are no amendments proposed by PC78 to apply a HVC at the property or the surrounding area. As set out in Summerset's primary submission (1111.1), in relation to the land at 23 Cheshire Street, it is evident from the site's context and its relationship with similarly zoned land with a HVC provision of 27-32.5m, and the recently approved resource consent for the development of the land, that it is appropriate to enable additional height greater than six storeys. Kāinga Ora's submission proposes the application of a HVC to 23 and 41 Cheshire Street and the surrounding area to enable a permitted building height of up to 43m.
- The site and surrounding land is within the walkable catchment of the Parnell Town Centre and the Parnell Train Station, which provides connections to the CBD and other centres.
- While the land is subject to the Auckland War Memorial Museum Overlay, this should not be determinative of the appropriate 'underlying' height opportunity that is otherwise enabled.
- There is high demand for urban intensification in this market attractive location, and the outcome sought would contribute to development capacity.
- The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to enabling people to live and work in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment.

- The nature and range of activities, and the form of development that is enabled by the Mixed Use zone, together with the height sought by the Submitter, will contribute to housing choice by providing typologies that meet the needs of different households.
- The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- The outcome sought will promote the sustainable management of resources, achieve the purpose of the Resource Management Act 1991 (RMA) and give effect to Part 2 and other provisions of the RMA.

7. As such, Summerset requests the submission be allowed, and also considers that the HVC at this location should provide for an even greater height as a permitted activity.

Decision sought

8. Summerset seeks the following relief:

- Kāinga Ora's submission be allowed as it relates to the application of a HVC of 43m at 23 and 41 Cheshire Street, Parnell.
- Such further, alternative or other consequential amendments as may be necessary to fully address Summerset's further submission as set out above.

Hearing

9. Summerset wishes to be heard in support of this further submission.

10. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

Summerset Villages (Parnell) Limited
By its planning and resource management consultants Bentley & Co. Ltd



Craig McGarr

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140

Attention: Craig McGarr

Mobile: 021741418
Email: cmcgarr@bentley.co.nz

Note for submitters:

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.

Form 6
Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To: The Planning Technician
unitaryplan@aucklandcouncil.govt.nz
Auckland Council
Level 4, 135 Albert Street
Private Bag 92300
Auckland 1142

Name of submitter: Summerset Villages (Parnell) Limited ("**Summerset**")

Level 2
10 Viaduct Harbour Avenue
Auckland 1010

1. This is a further submission in opposition to KiwiRail's submission (submission number 2069) on Proposed Plan Change 78 (Intensification) to the Auckland Unitary Plan ("**PC78**"). Summerset made an original submission on PC78 (submission number 1111). Defined terms in that original submission have been used in this further submission.

2. Summerset could not gain an advantage in trade competition through this further submission.

3. Summerset is a person with an interest in the plan change and the identified primary submission that is greater than the interest the general public has, as Summerset made a submission on PC78, and owns properties in Parnell that are affected by PC78 and the relief sought by submissions.

Submission opposed

4. Summerset further submits in opposition to KiwiRail's original submission (submission number 2069).

5. The particular parts of KiwiRail's submission Summerset opposes are:

   - The following proposed provisions:
     - A new 5m setback requirement to be applied to buildings and structures on all sites adjoining the rail corridor (submissions 2069.7 to 2069.24);
     - A new standard requiring noise insulation and ventilation to apply to all new and altered 'activities sensitive to noise' within a zone adjacent to the Strategic Transport Corridor Zone (submission 2069.3).
     - A new vibration standard to be applied to new and altered activities sensitive to noise within 60m of the rail corridor (submission 2069.4).
     - A corresponding suite of assessment matters and criteria to assess infringements to these standards (submissions 2069.5 and 2069.6).

A new 5m Yard Standard

6. The relief sought by the Submitter is similar to relief that was sought (also by KiwiRail) on the Proposed Auckland Unitary Plan (2013). However, at that time, KiwiRail sought a 2.25m yard on all land adjoining the railway corridor.

7. In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this standard was not included in the Auckland Unitary Plan. The Panel's recommendation report stated: [1]

> *The Panel was concerned that these provisions would apply in a blanket fashion along the rail corridor whether needed or not, that it is an issue that could be addressed through the application of KiwiRail's designation powers if needed, and that the costs of the Overlay would fall entirely on property owners with insufficient evidence that such an approach would lead to an efficient outcome. In this context the Panel recommends that the building setback from the rail corridor provisions not be included in the plan.*

8. The reasons for Summerset's opposition to KiwiRail's submission include:
   - The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD, particularly being land which is in close proximity to a train station (a rapid transit service).
   - The Submitter has previously sought a 2.25m wide yard standard to apply to land adjoining the railway corridor in the Proposed Auckland Unitary Plan, which was rejected by the Independent Hearings Panel. The Submitter now seeks (in its submission on PC78) a yard setback of 5m.
   - The reasons why the Independent Hearings Panel rejected the submission of KiwiRail on the Proposed Auckland Unitary Plan continue to apply to the relief sought by KiwiRail in its submission on PC78, namely:
     - A 'blanket' 5m yard control is a blunt and inefficient mechanism to address a perceived issue which has not been reasonably justified by the Submitter to be necessary in the first instance.
     - The yard standard will result in all costs being borne by private landowners. Such costs involve the cost of the foregone use of land within the requested yard, and the costs of making a resource consent application to develop that land.
     - There has been no analysis of the necessity for such a standard in the first instance, including the width of the standard.
   - The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the relief sought by KiwiRail in its submission on the Proposed Auckland Unitary Plan.

[1] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.4.

Noise, Ventilation and Vibration Standards for Noise Sensitive Activities

9. The Submitter seeks a new overlay to apply internal noise and ventilation mitigation requirements for noise sensitive activities within zones adjoining the Strategic Transport Corridor Zone, and vibration mitigation requirements for sensitive activities within 60m of the Strategic Transport Corridor Zone.

10. The nature of the relief sought by the Submitter is in effect consistent with the 'High Land Transport Noise overlay' which was previously included in the Proposed Auckland Unitary Plan (in 2013). In its' recommendations to Auckland Council, the Independent Hearings Panel recommended that this overlay was deleted. The Panel's recommendation report stated:[2]

> *The Panel was concerned with proceeding with the extensive application of this overlay in the absence of a rigorous cost benefit assessment, including no assessment of who should appropriately bear the costs involved. In the absence of that assessment the Panel recommends this overlay be deleted.*

11. The reasons for Summerset's opposition to KiwiRail's submission include:
    - The overlay will impose a significant constraint on the development of land which is otherwise suitable for significant intensification in accordance with the outcomes that are intended by the NPS-UD.
    - The relief sought will impose all costs of mitigating acoustic effects and perceived reverse sensitivity effects on to individual property owners and residents.
    - It is incumbent on KiwiRail, both in terms of construction and operation of the railway network, to manage the acoustic and vibration effects generated to a reasonable level.
    - The relief sought is a new matter and has not been evaluated pursuant to s32 or s32AA of the Resource Management 1991, and there has been no assessment of who should appropriately bear the costs of mitigating noise effects or perceived reverse sensitivity effects. This was the primary concern of the Independent Hearings Panel when considering the appropriateness of the (much smaller) High Land Transport Noise overlay in the Proposed Auckland Unitary Plan.

Decision sought

12. Summerset seeks the following relief:

    - KiwiRail's submission (specifically, the proposed building setback standard, noise and vibration standards, and corresponding suite of provisions) be disallowed.
    - Such further, alternative or other consequential amendments as may be necessary to fully address Summerset's further submission as set out above.

[2] Report to Auckland Council Hearing topics 043 and 044 Transport, July 2016, Section 5.2.

Hearing

13. Summerset wishes to be heard in support of this further submission.

14. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 19 January 2023

Summerset Villages (Parnell) Limited
By its planning and resource management consultants Bentley & Co. Ltd



Craig McGarr

Address for Service:
Bentley & Co. Ltd
PO Box 4492
Shortland Street
Auckland 1140
Attention: Craig McGarr

Mobile: 021741418
Email: cmcgarr@bentley.co.nz

Note for submitters:

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.

Alice Zhou

From: Philip Brown <philip@campbellbrown.co.nz>
Sent: Thursday, 19 January 2023 4:41 pm
To: Unitary Plan
Subject: Further submission on Plan Change 78 - Shane Stoneman
Attachments: Further Submission - Plan Change 78 - Shane Stoneman.pdf

Please find attached a further submission by **Shane Stoneman** in relation to Plan Change 78. I have served a copy on the primary submitters that this further submission supports.

Kind regards

Philip Brown | Director
Campbell Brown Planning Limited
Level 2, 46 Brown Street, Ponsonby | PO Box 147001, Ponsonby, Auckland 1144
DDI 09 394 1694 | 021 845 327 | philip@campbellbrown.co.nz | www.campbellbrown.co.nz

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Please consider the environment before printing this email.

FORM 3

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 78 – INTENSIFICATION

AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

Name of Further Submitter: Shane Stoneman

This is a further submission in support of submissions on proposed Plan Change 78.

The Further Submitter has an interest in the proposal that is greater than the interest the general public has, as the Further Submitter is a property owner of land that is proposed to be rezoned under Plan Change 78 to enable more intensification.

The Further Submitter supports the following submissions:

Plan Change 78 – Intensification Summary of Decisions Requested					
Sub#/ Point	Submitter Name	Address for Service	Summary of Decision Requested	Topic	Subtopic
873.10	Kāinga Ora	developmentplanning@kainga ora.govt.nz	Application of the THAB Zone within a 1200m (approx. 15 minutes) walkable catchment from the edge of any Metropolitan Centre Zone.	Urban Environment	Larger Rezoning Proposal
873.11	Kāinga Ora	developmentplanning@kainga ora.govt.nz	Application of the THAB Zone within a 1200m (approx. 15 minutes) walkable catchment from a Rapid Transit Stop.	Urban Environment	Larger Rezoning Proposal
2083.6	Universal Homes	michael@campbellbrown.co.nz	That the Auckland Council reviews all OLFP's, flood plain and SEA areas identified as Qualifying Matters on the planning maps within Plan Change 78, and any areas that have been downzoned to a Low Density Residential Zone due to the flood plain, OLFP or SEA overlay, are rezoned to a zoning that is based on the most appropriate zone based on accepted land use principles.	Qualifying Matters A-I	Significant Natural Hazards

The Further Submitter supports in particular those parts of submission points 873.10 and 873.11 that seek the rezoning to THAB, where land is located close to a Metropolitan Centre Zone and/or a Rapid Transit Stop. The Further Submitter also supports in particular those parts of submission point 2083.6 that seek to prevent qualifying matters from being used to influence zoning of a site to a less intensive zone.

The reasons for the Further Submitter's support are set out below:

- While it is acknowledged that the Further Submitter's site (1 Lavelle Road, Henderson), contains the Qualifying Matter of natural hazards such as 'flood plains' and 'Water and/or Wastewater Constraints Control', intensified development can be achieved in a manner that does not alter the extent or scale of the hazards. Especially, when the hazard poses minimal restriction to development options or can be resolved with engineering solutions;
- Appropriately rezoning the Residential – Single House zone site to a THAB zone within the walkable catchment of the Henderson Train Station will give effect to the NPS-UD (particularly Objective 3) and MDRS by supporting the objective of enabling a greater housing supply; and
- Whilst also being consistent with Part 2 of the Resource Management Act 1991 through promoting the sustainable management of natural and physical resources.

The Further Submitter seeks that the identified submission points of Kāinga Ora and Universal Homes be allowed.

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



Philip Brown
Campbell Brown Planning Limited
For and on behalf of Shane Stoneman as his duly authorised agent.

19 January 2023

Address for service of Further Submitter:

C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
AUCKLAND 1144

Attention: Philip Brown

Telephone: (09) 394 1694
Mobile: 021845327
Email: philip@campbellbrown.co.nz

Alice Zhou

From: Cordelia Woodhouse <CWoodhouse@ellisgould.co.nz>
Sent: Thursday, 19 January 2023 4:40 pm
To: Unitary Plan
Cc: Douglas Allan
Subject: PC78 - Drive Holdings Ltd Further Submission
Attachments: DHL - PC78 Further Submission .pdf

Kia ora

Please find attached Drive Holdings Ltd's further submission on PC78.

Ngā mihi | Kind regards

Cordelia Woodhouse SOLICITOR
phone. +64 9 307 2172 fax. +64 9 309 9449 email. cwoodhouse@ellisgould.co.nz

Level 31, Vero Centre , 48 Shortland Street
PO Box 1509, Auckland, New Zealand
DX CP 22003
Download parking map and instructions here - A4 PDF

www.ellisgould.co.nz

FURTHER SUBMISSIONS ON PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN – OPERATIVE IN PART

Clause 8 of Schedule 1 of the Resource Management Act 1991

Drive Holdings Limited
Further Submissions

To: Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Drive Holdings Limited ("**the Submitter**" or "**DHL**") at the address for service set out below makes the following further submissions in support of and opposition to relief sought in original submissions ("**Original Submissions**") on Plan Change 78: Intensification ("**PC 78**") to the Auckland Unitary Plan.

1. The Submitter has an interest in PC78 that is greater than the interest the general public has because:

   (a) It has lodged submissions on PC78;

   (b) It owns or occupies land that is subject to PC78; and

   (c) It owns or occupies land that is affected by the relief sought in the Original Submissions.

2. The Submitter could not gain an advantage in trade competition through this submission.

3. **Annexure A** to this submission comprises a schedule summarising the parts of the Original Submissions that the Submitter supports or opposes, any reasons for that position in addition to those set out in paragraph 4 below, and the decisions sought.

4. The reasons for this submission are as follows:

   (a) The relief sought in the Original Submissions that are supported by the Submitter:

      (i) Promotes the sustainable management of natural and physical resources and is consistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");

(ii) Is appropriate in terms of section 32 of the RMA; and

(iii) Gives effect to the NPS – Urban Development 2020 ("**NPS-UD**").

(b) The relief sought in the Original Submissions that are opposed by the Submitter:

(i) Does not promote the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;

(ii) Is inappropriate in terms of section 32 of the RMA; and

(iii) Does not give effect to the NPS – UD.

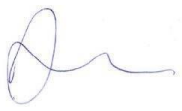
(c) The reasons set out in the Submitter's submissions on PC78.

(d) Any additional reasons identified in respect of each of the Original Submissions specified in **Annexure A**.

5. The Submitter wishes to be heard in support of its further submissions. If others make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.

DATED this 19th day of January 2023

Drive Holdings Limited by its solicitors and duly authorised agents, Ellis Gould



D A Allan / J G Goodyer

ADDRESS FOR SERVICE: The offices of Ellis Gould, Solicitors, Level 31, Vero Centre, 48 Shortland Street, PO Box 1509. Auckland 1140, DX CP22003, Auckland. Telephone: (09) 307-2172, Facsimile: (09) 358-5215. **Attention**: Douglas Allan (dallan@ellisgould.co.nz) / Julie Goodyer (jgoodyer@ellisgould.co.nz).

ANNEXURE A

ORIGINAL SUBMISSIONS OPPOSED OR SUPPORTED BY DRIVE HOLDINGS LIMITED

Original Submission number	Original Submitter Name & address for service	Topic	Support / Oppose	Any additional reasons for Support / Opposition	Decision Sought
580.1	**Yuva Adhikary** yuva53@hotmail.com	Staged intensification strategy.	Support.	This relief is consistent with and complementary to that sought by DHL which seeks to prioritise intensification around centres given the lack of infrastructure capacity.	Allow the submission point.
871.3	**Property Council NZ** Logan@propertynz.co.nz	Greater intensification in Centres.	Support.		Allow the submission point.
871.9	**Property Council NZ** Logan@propertynz.co.nz	Infrastructure as a qualifying matter	Oppose to the extent the submission is contrary to DHL submission 942.	DHL and PCNZ have both identified that infrastructure capacity issues are critical to intensification but propose different approaches to the issue. DHL supports addressing these matters comprehensively including through mediation in the first instance.	Disallow the submission to the extent it is inconsistent with the relief sought by DHL.
871.12	**Property Council NZ** Logan@propertynz.co.nz	Increased height along transport corridors and adjacent to amenities such as railway stations.	Support.		Allow the submission point.
871.1, 2, 4-8, 10, 11, 13-25	**Property Council NZ** Logan@propertynz.co.nz	All matters raised in the submission other than in 871.3, 9 and 12.	Support to the extent the relief is consistent with DHL's submission 942.		Allow submission points to the extent they are consistent with DHL's submission 942.
873.23 and 24	**Kāinga Ora** Developmentplanning@kaingaora.govt.nz	Increased height standards and HVC standards in the Town Centre and Local Centre Zones.	Support.		Allow the submission points.
873.180 **873.181** **873.201**	**Kainga Ora** developmentplanning@kaingaora.govt.nz	Mission Bay zoning and height standards.	Support		Allow the submission points.

873.202 **873.385**					
938.141	**NZ Housing Foundation** michael@campbellbrown.co.nz	24m height standard in Local Centre Zones.	Support.		Allow the submission point.
984.2	**Jamie Baker** jamiebaker@outlook.com	Mission Bay zoning.	Support.		Allow the submission point.
1088.19 **1088.20**	**Viaduct Harbour Holdings Limited** dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Inundation information layer.	Support.		Allow the submission points.
1304.10	**Janette Jiayi Yan** mark@planco.co.nz	Inundation information layer.	Support.		Allow the submission point.
1404.9	**Birkenhead Residents Association** akgoatley@gmail.com	Inundation information layer.	Oppose.		Disallow the submission point.
1469.2	**Bedford Properties Ltd** kelsie.tuck@ckl.co.nz	Inundation information layer.	Support.		Allow the submission point.
1726.5	**Xudong Wang** gerard@sentinelplanning.co.nz	Inundation information layer.	Support in part.		Allow the submission point to the extent the inundation layer is abandoned.
1771.3	**Terry Zeng** g.datt@avantplanning.co.nz	Inundation information layer	Support.		Allow the submission point.
1962.14	**Aedifice Property Group** jessica@civix.co.nz	Inundation information layer.	Support.		Allow the submission point.
2049	**Waka Kotahi** evan.keating@nzta.govt.nz	All matters raised in the submission.	Oppose to the extent the relief is not consistent with DHL's submission 942.	The Waka Kotahi submission is wide ranging and has the potential to significantly amend the AUP and adversely affect DHL's interests.	Disallow submission points to the extent they are not consistent with DHL's submission 942.
2082	**Te Waihanga, New Zealand Infrastructure Commission** geoff.cooper@tewaihanga.govt.nz	Infrastructure	Oppose to the extent the submission is contrary to DHL submission 942.	DHL and NZIC have both identified that infrastructure capacity issues are critical to intensification but propose different	Disallow the submission to the extent it is inconsistent with the relief sought by DHL.

				approaches to the issue. DHL supports addressing these matters comprehensively including through mediation in the first instance.	
2083.131	**Universal Homes** Michael@campbellbrown.co.nz	24m height standard in Local Centre zones.	Support.		Allow the submission points.

Alice Zhou

From: LOUISE LYNCH <chrislouiselynch@yahoo.com.au>
Sent: Thursday, 19 January 2023 4:47 pm
To: Unitary Plan
Cc: AAA Chris Lynch
Subject: PC78 Further Submission
Attachments: PC-78-Further-Submission1.pdf

Dear Sir/Madam,

Please find my further submission to Plan Change 78 attached.

Regards
Chris Lynch

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Christopher Lynch

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz

941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Date:
19/1/23

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)
Chris.lynch@fidelitylife.co.nz

Telephone:
021912302

Postal address:
PO Box 1043, Shortland St, Auckland 1011

Contact person:
(*name and designation, if applicable*)
Chris Lynch

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

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- 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.

Alice Zhou

From: Wendy Moffett <wendymof@xtra.co.nz>
Sent: Thursday, 19 January 2023 4:54 pm
To: Unitary Plan
Cc: Wendy Moffett
Subject: PC78 Further Submission
Attachments: PC-78-Further-Submission (1).pdf

Dear Sir/Madam

Please find attached my further submissin to Plan Change 78.

Regards,

Wendy Moffett

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Wendy Ann Moffett

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

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6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
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636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz

941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Wendy Moffett

Date:

19 January 2023

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)

wendymof@xtra.co.nz

Telephone:

021649369

Postal address:

5 Swift Ave, St Mary's Bay, Auckland 1011

Contact person:
(*name and designation, if applicable*)

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

Alice Zhou

From: LOUISE LYNCH <chrislouiselynch@yahoo.com.au>
Sent: Thursday, 19 January 2023 4:50 pm
To: Unitary Plan
Cc: Louise Lynch
Subject: Re: PC78 Further Submission
Attachments: PC-78-Further-Submission2.pdf

Dear Sir/Madam,

Please find my further submission to Plan Change 78 attached.

Regards
Louise Lynch

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Tina Louise Lynch

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz

941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Date:
19/1/23

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)
chrislouiselynch@yahoo.com.au

Telephone:
021765060

Postal address:
PO Box 1043, Shortland St, Auckland 1011

Contact person:
(*name and designation, if applicable*)
Louise Lynch

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 5:01 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Boezo Limited
Attachments: PC78 Further Submission - Boezo Limited.pdf

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

Contact details

Full name of person making a further submission: Boezo Limited

Organisation name: Boezo Limited

Full name of your agent: Alvin Jung

Email address: alvin@civix.co.nz

Contact phone number: 0277006043

Postal address:
8 Whale Bay Rise
Hobbs Bay
Auckland 0930

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:
Boezo limited

8 Whale Bay Rise and 32 Ta Moko Drive Hobbs Bay, Auckland

Submission number: 1832

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 1832.1
Point number 1832.2

The reasons for my or our support or opposition are:
refer to attachment

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

Submission date: 19 January 2023

Supporting documents
PC78 Further Submission - Boezo Limited.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:
This is a further submission on behalf of BOEZO LIMITED, who have an interest greater than the general public. In this case, BOEZO LIMITED owns the property at No 32 Ta Moko Drive and 8 Whale Bay Rise in Hobbs Bay.

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.

Alice Zhou

From: Alvin Jung <alvin@civix.co.nz>
Sent: Thursday, 19 January 2023 5:32 pm
To: Unitary Plan
Subject: RE: Unitary Plan further submission - Plan Change 78 - Boezo Limited
Attachments: PC78 Further Submission - Boezo Limited.pdf

Hi Unitary Plan Team,

Please find the updated attachment for the further submission for Boezo Limited.

Thanks,

Alvin

Alvin Jung | CIVIX **| Senior Planner | M** +64 27 700 6043 **| W** www.civix.co.nz

---

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz <UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz>
Sent: Thursday, 19 January 2023 4:47 pm
To: Alvin Jung <alvin@civix.co.nz>
Subject: Unitary Plan further submission - Plan Change 78 - Boezo Limited

Thank you for your submission.

You should receive an acknowledgement within 10 working days. Retain this email as your copy.

If you do not receive acknowledgement within 10 working days, email unitaryplan@aucklandcouncil.govt.nz or phone 09 301 0101.

Contact details

Full name of person making a further submission: Boezo Limited

Organisation name: Boezo Limited

Full name of your agent: Alvin Jung

Email address: alvin@civix.co.nz

Contact phone number: 0277006043

Postal address:
8 Whale Bay Rise
Hobbs Bay
Auckland 0930

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:
Boezo limited

8 Whale Bay Rise and 32 Ta Moko Drive Hobbs Bay, Auckland

Submission number: 1832

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 1832.1
Point number 1832.2

The reasons for my or our support or opposition are:
refer to attachment

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

Submission date: 19 January 2023

Supporting documents
PC78 Further Submission - Boezo Limited.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

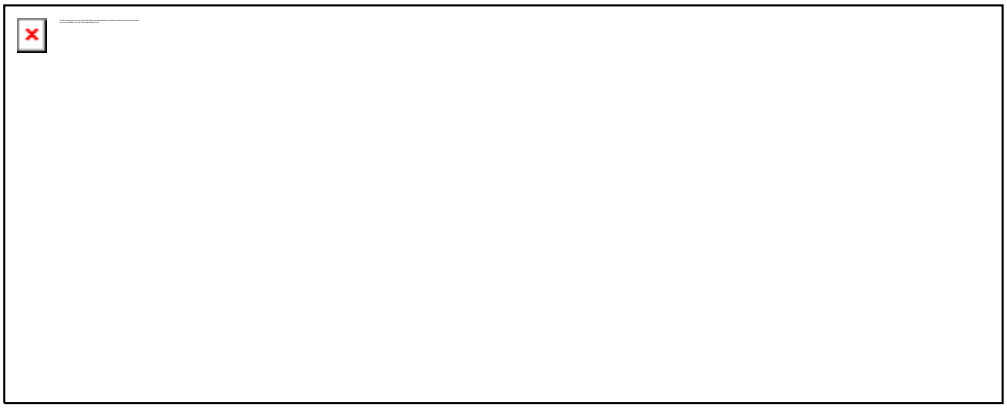
Declaration

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:
This is a further submission on behalf of BOEZO LIMITED, who have an interest greater than the general public. In this case, BOEZO LIMITED owns the property at No 32 Ta Moko Drive and 8 Whale Bay Rise in Hobbs Bay.

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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+64 9 303 1113
www.civix.co.nz
Level 1, 87 Albert Street, Auckland
PO Box 5204 Wellesley St, Auckland 1141

Auckland Council
Attn: Plans and Places
unitaryplan@aucklandcouncil.govt.nz

19 January 2023

Further Submission on behalf of Boezo Limited in Support and Opposition of Submissions on Notified Proposed Plan Change 78

Original Submission

Civix made a submission on the notified *Proposed Plan Change 78* ("**PC78**") to the *Auckland Unitary Plan (Operative in Part)* ("**AUP**"), on behalf of Boezo Limited referred to as submission #1832.

Scope

This is a further submission on behalf of BOEZO LIMITED, who have an interest greater than the general public. In this case, BOEZO LIMITED owns the property at No 32 Ta Moko Drive and 8 Whale Bay Rise in Hobbs Bay.

Submissions Supported

BOEZO LIMITED, **support**s the following submissions:

Submission No.	Submitter Name
873	Kāinga Ora

The above submissions are supported in their entirety.

Submissions Opposed

BOEZO LIMITED, **opposes** the following submissions:

Submission No.	Submitter Name
136	Peter Crook
313	Rodney and Karyn Klarwill
353	Gary and Pam Bonham

The above submissions are opposed in their entirety.

Reasoning and Decisions Sought

BOEZO LIMITED seeks that the submission 873 be allowed. In addition to reasoning provided in the original submission, these supported submissions include relief which will ensure planning outcomes consistent with planning documents including the National Policy Statement of Urban Development 2020 ("NPS-UD"), and represent the most appropriate way to achieve the objectives of the RMA, including the development objectives of the Medium Density Residential Standards ("MDRS").

BOEZO LIMITED submissions 136, 313, & 353 be disallowed. The relief sought by these submissions does not represent the most appropriate way to achieve the objectives of the RMA, the objectives of the NPS-UD, and development objectives of the MDRS, and in many instances is contrary to mandatory requirements of these frameworks.

BOEZO LIMITED wish to be heard in support of this further submission. If others make a similar submission, BOEZO LIMITED will consider presenting a joint case with them at a hearing.

Kind Regards,



Alvin Jung
Senior Planner
Civix Limited – Planning, Engineering and Surveying
M: 027 700 6043
E: alvin@civix.co.nz

CIVIX LIMITED

ON BEHALF OF BOEZO LIMITED

Alice Zhou

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 19 January 2023 5:01 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - James Hu
Attachments: PC78 Further Submission - James Hu.pdf

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

Contact details

Full name of person making a further submission: James Hu

Organisation name:

Full name of your agent: Alvin Jung

Email address: alvin@civix.co.nz

Contact phone number: 0277006043

Postal address:
116 Bassett Road
Remuera
Auckland 1050

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:
James Hu

116 Bassett Road

Submission number: 1850

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 1850.1
Point number 1850.2
Point number 1850.3
Point number 1850.4
Point number 1850.5

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

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

Submission date: 19 January 2023

Supporting documents
PC78 Further Submission - James Hu.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:
This is a further submission on behalf of James Hu, who have an interest greater than the general public. In this case, JAMES HU owns the property at No 116 Bassett Road in Remuera.

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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Level 1, 87 Albert Street, Auckland
PO Box 5204 Wellesley St, Auckland 1141

Auckland Council
Attn: Plans and Places
unitaryplan@aucklandcouncil.govt.nz

19 January 2023

Further Submission on behalf of James Hu in Support and Opposition of Submissions on Notified Proposed Plan Change 78

Original Submission

Civix made a submission on the notified *Proposed Plan Change 78* ("**PC78**") to the *Auckland Unitary Plan (Operative in Part)* ("**AUP**"), on behalf of James Hu ("**JAMES HU"**) referred to as submission #1850.

Scope

This is a further submission on behalf of James Hu, who have an interest greater than the general public. In this case, JAMES HU owns the property at No 116 Bassett Road in Remuera.

Submissions Supported

James Hu, **support**s the following submissions:

Submission No.	Submitter Name
873	Kāinga Ora

The above submissions are supported in their entirety.

Submissions Opposed

James Hu, **opposes** the following submissions:

Submission No.	Submitter Name
156	Theresa van der Wel and VinodBhaga
948	Remuera Heritage Inc
2021	Character Coalition Incorporated

The above submissions are opposed in their entirety.

Decisions Sought

James Hu seeks that the submission 873 be allowed and submissions 156, 948 & 2021 be disallowed.

James Hu wish to be heard in support of this further submission. If others make a similar submission, James Hu will consider presenting a joint case with them at a hearing.

Kind Regards,



Alvin Jung
Senior Planner
Civix Limited – Planning, Engineering and Surveying
M: 027 700 6043
E: alvin@civix.co.nz

CIVIX LIMITED

ON BEHALF OF JAMES HU

Sarah El Karamany

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Friday, 20 January 2023 5:01 pm
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Simon O'Connor
Attachments: Submission.pdf

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

Contact details

Full name of person making a further submission: Simon O'Connor

Organisation name: 125-139 West Coast Road Limited

Full name of your agent: Sentinel Planning Ltd

Email address: simon@sentinelplanning.co.nz

Contact phone number: 09 5516205

Postal address:
PO Box 33995
Takapuna 0740
Auckland
Auckland 0622

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:
KiwiRail
Private Bag 92138
Auckland 1142

Submission number: 2069

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

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

The reasons for my or our support or opposition are:
Detailed in the attached further submission

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

Submission date: 20 January 2023

Supporting documents
Submission.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:
The content of the original submitter (KiwiRail's) submission affects my clients land. In addition we consider that the KiwiRail submission has extensive effects on the form and development opportunities of the city.

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.

SENTINEL PLANNING

+64 9 551 6205
Level 1, 150 Hurstmere Road, Takapuna, Auckland
PO Box 33995, Takapuna, Auckland 0740

Further submission on Proposed Plan Change 78 to the Auckland Unitary Plan (Operative in Part)

Clause 8 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: 125-139 West Coast Road Limited

This is a submission opposing submission #2069 prepared by KiwiRail that sought changes to the following plan (the **Proposal**):

- Auckland Unitary Plan – Operative in Part (the **Unitary Plan**)
- Plan Change 78: Intensification (**PC78**)

The submitter could not gain an advantage in trade competition through this submission.

1. The Submitter has an interest in PC78 that is greater than the interest the general public has because:

   (a) The submissions relate to land that is subject to PC78 in which they have an interest; and

   (b) That land in which they have an interest is affected by the relief sought in the Original Submissions.

2. The Submitter could not gain an advantage in trade competition through this submission.

3. The reasons for this submission are as follows:

   (a) The KiwiRail Submission is opposed in its entirety by the Submitter because:

      (i) There are questions for the hearing panel as to whether the submission is within scope of the Plan Change;

(ii) It does not promote the sustainable management of natural and physical resources and is inconsistent with the purpose and principles of the RMA;

(iii) The Strategic Transport Corridor Zone (STCZ) should not be qualifying matter as the effects of the proximity relationship of development to the STCZ has always been able to be addressed through existing planning provisions and can remain to be done so.

(iv) That the inappropriate in terms of section 32 of the RMA in that KiwiRail in their submission seeking a minimum 5m yard setback from the edge of a Strategic Transport Corridor Zone and additional acoustic and vibration controls has not demonstrated that they have:

- Identified other reasonably practical options for achieving its objectives;
- Assessed the efficiency and effectiveness of the provisions sought in achieving their objectives;
- Provided any detail that corresponds to the scale and significance of the economic costs that are anticipated from the implementation of the changes sought with regard to the loss of developable floor area, as well as the costs associated with the sought after acoustic and vibration report and their implementation. Such costs relate across the spectrum of consents and would include unreasonable costs imposed on a family adding a single bedroom to an existing property right through to the those associated with multi-unit developments.
- Provided any detail with the regard to the loss of development capacity on any site, centre or city-wide scale that the changes sought would result in with regard to giving effect to the NPS- UD.

(v) KiwiRail's concerns appear to be limited to a relatively fanciful situation that a maximum sized eave of 750mm in association with use of the minimum 1m setback would be added to any development creates a safety issue for KiwiRail. This scenario would only appear to come to

fruition if people cleaning their gutters or replacing spouting potentially extend a body part of a short period of time over land within KiwiRail's Designation. However, in almost all situations there is a significant slope and or vegetation buffer within the designation which would imply that KiwiRail's concerns are highly unlikely to ever eventuate.

KiwiRail has not provided any detail in their submission as to why they are seeking relief by way of a 5m yard setback rather than any other practical options that could include a restriction on eave size or a significantly lesser setback or even that construction next to a STCZ could simply be subject to a construction management plan to the satisfaction of Council.

(vi) Assessment Criteria

We fail to see with respect to E25.8.2 Assessment Criteria how the use of and activities on the neighbouring sites unduly affects the operations of KiwiRail. It almost appears that the reverse should be the concern here in that KiwiRail are seeking to upgrade existing activities so close to the designation boundary that they may end up overhanging boundaries during maintenance periods.

We also fail to see why adjacent land owners should need to consult with KiwiRail as a matter of discretion.

4. That with particular regard to the submitters site being 125 – 139 West Coast Road, the relief sought by the submitted would result in a loss of 24% of the sites usable area. Being a narrow triangular shaped site the loss of such land in terms of building footprint, design and gross floor area over with its existing 27m height overlay controls is hugely significant and could result in limiting future development to a single row of units rather than units either side of a central corridor all in an apartment format as anticipated by the AUP. AS such the impact of overall yield would have a significant on the site's overall viability.

SENTINEL PLANNING



(i) The ethos of KiwiRail's appear more to be about a quasi-extension of their designation by imposing a greater buffer area for their activities which has the effect of adding significant additional costs onto adjacent sites whilst also limiting those sites development potential.

(ii) Whilst a strong rail network that supports a city is important to its form, function and viability, it should not be at the expense of every adjacent neighbour and site. KiwiRail in their submission has not provided sufficient assessment or detail to justify their relief sought, nor have they considered alternative options. Notwithstanding that their relief sought with regard to yard setbacks along with acoustic and vibration controls imposes unreasonable outcomes and costs on adjacent land owners.

SENTINEL PLANNING

5. The Submitter wishes to be heard in support of his further submissions. If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.

DATED this 20th day of January 2023

125 – 139 West Coast Road Limited by their duly authorised agent Sentinel Planning Limited

Simon O'Connor

ADDRESS FOR SERVICE: PO Box 33995, Takapuna, Auckland 0740

Contact person: Simon O'Connor

Telephone: 09 551 6205

Email: simon@sentinelplanning.co.nz

From: lynneb1@xtra.co.nz
To: Unitary Plan
Subject: Further submission PC78
Date: Friday, 20 January 2023 3:19:22 pm
Attachments: Butler Lynne Diane -Further Submission PC78.pdf

Dear Unitary Plan Team,

Please receive attached Further Submission - PC78 of Lynne Diane **Butler.**

Please acknowledge receipt.

Regards

Lynne Butler

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

   Lynne Diane **Butler**

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and/or live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
504	Charles H Levin	patrick@mulliganlegal.co.nz
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	mariankohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz
2031	Paul Gunn	paulgunn416@gmail.com

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz

1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowrie.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz

2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of Freemans Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

…….
Date:

20th Jan 2023

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:
lynneb1@xtra.co.nz

Telephone:
021 459 633

Postal address:
P O Box 554
Warkworth 0941

From:	Allan Matson
To:	Unitary Plan
Cc:	Civic Trust Auckland
Subject:	Further Submission on Plan Change 78 by Civic Trust Auckland
Date:	Friday, 20 January 2023 11:59:09 pm
Attachments:	23 01 20 - Civic Trust Akld - Further Submissions on PC78.pdf

Please find attached the Further Submission of Civic Trust Auckland (CTA) on Auckland Council's proposed Plan Change 78.

Please note: CTA's Primary submission number is 2286

for and on behalf of Civic Trust Auckland
--

Allan Matson

phone: (021) 777 967
email: allan.matson1@gmail.com

To: Auckland Council

emailed to: unitaryplan@aucklandcouncil.govt.nz

Further Submissions in support of and in opposition to submissions made on notified Plan Change 78

To Auckland Council –

1. Name of person making this further submission:

   Civic Trust Auckland ("**CTA**") – Primary Submitter No. 2286

2. This is a further submission in support of and also in opposition to submissions on proposed Plan Change 78 (**the Proposal**), as set out respectively in paragraphs 4 and 7 below .

3. CTA has an interest in the proposal that is greater than the interest the general public has on account of its long-standing existence and operation as a regional environment group in Auckland, representing interests in the natural and built environment of behalf of its members across the region for over 50 years, and of more recent relevance having been engaged contiguously through various plan changes associated with the restructuring of Auckland into a single Unitary Authority in 2010, and subsequently through the Unitary Plan process.

4. CTA **supports** the submissions of:

Sub.#	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
937	Devonport Heritage	mmcrae@xtra.co.nz
948	Remuera Heritage	suecoopernz@gmail.com
1395	Mount St John Residents Group	msjresidents@gmail.com
1441	Jeffrey Lane Fearon	jeff@fearonhay.com

1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Assn	mariankohler03@gmail.com
1979	Ruth & Douglas Allan	drrn.allan@hotmail.co.nz
1893	South Epsom Planning Group	chrisandpipmules@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2179	Seaview Road Residents Croup	christine.caughey@gmail.com
2193	St Mary's Bay Assn	brian@metroplanning.co.nz
2201	Freemans Bay Residents Assn	bartlett@shortlandchambers.co.nz
951	Eden Epsom Residential Protection Society	Suzanne@speer.co.nz
1260	Howick Ratepayers & Residents Assn	janet@dickson.co.nz
2215	Rebecca Macky	rebecca.macky@envirocounsel.co.nz
2298	Richard Brabant	richard@brabant.co.nz

5. CTA **supports** the above submissions in their entirety or particular submission points in a manner that support CTA's points of submission.

6. The reasons for the CTA's **support** are that these submissions in whole or in part support appropriate recognition and protection of the historic heritage and special character of Auckland to the extent it was protected under the operative Auckland Unitary Plan prior to notification of the Proposal.

7. CTA **opposes** the submissions of:

Sub.#	Submitter Name	Address for Service
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
899	Te Tūāpapa Kura Kāinga - Ministry of Housing & Urban Development	ngrala@harrisongrierson.com
1079	The Coalition for More Homes	morehomesnz@gmail.com
1961	Oscar Sims	oscar@oscarsims.co.nz

8. CTA **opposes** the above submissions in their entirety. It opposes all submissions with a contrary view to that of CTA on the issues it has raised.

9. The reasons for the **opposition** are that these submissions in whole or in part do not support the appropriate recognition and protection of the historic heritage and special character of Auckland as it was protected under the Auckland Unitary Plan prior to notification of 'the Proposal', and should in CTA's submission continue to be. In particular, these submissions are opposed, but not limited to , the reasons listed below:

    - Failure to achieve sustainable management outcome for the residents of Auckland as anticipated by Part 2, RMA.
    - Failure to assess the limitations of the existing 19th century infrastructure to sustain intensification.
    - Ignoring the historic heritage and historical character of Auckland which requires protection under s6 & s7 RMA.
    - Overall failure to acknowledge that the NPS-UD and the MDRS RMA amendments remain subject to Part 2 RMA.

10. CTA seeks that the whole or relevant part of any identified submission be disallowed.

11. CTA wishes to be heard in support of this further submission. If others make a similar submission, we would consider presenting a joint case with them at a hearing.

Signature of person making submission:



Date 20 January, 2023

Electronic address for service of person making further submission:
cta@civictrustauckland.org.nz

Contact name: Audrey van Ryn (Secretary, Civic Trust Auckland)

Telephone (021) 035 4431

Postal address: PO Box 74 049 Greenlane 1546

Note to person making further 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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

To: Auckland Council

emailed to: unitaryplan@aucklandcouncil.govt.nz

Further Submissions in support of and in opposition to submissions made on notified Plan Change 78

To Auckland Council –

1. Name of person making this further submission:

   Civic Trust Auckland ("**CTA**") – Primary Submitter No. 2286

2. This is a further submission in support of and also in opposition to submissions on proposed Plan Change 78 (**the Proposal**), as set out respectively in paragraphs 4 and 7 below .

3. CTA has an interest in the proposal that is greater than the interest the general public has on account of its long-standing existence and operation as a regional environment group in Auckland, representing interests in the natural and built environment of behalf of its members across the region for over 50 years, and of more recent relevance having been engaged contiguously through various plan changes associated with the restructuring of Auckland into a single Unitary Authority in 2010, and subsequently through the Unitary Plan process.

4. CTA **supports** the submissions of:

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1441	Jeffrey Lane Fearon	jeff@fearonhay.com

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1950	Herne Bay Residents Assn	mariankohler03@gmail.com
1979	Ruth & Douglas Allan	drrn.allan@hotmail.co.nz
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2179	Seaview Road Residents Croup	christine.caughey@gmail.com
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2201	Freemans Bay Residents Assn	bartlett@shortlandchambers.co.nz
951	Eden Epsom Residential Protection Society	Suzanne@speer.co.nz
1260	Howick Ratepayers & Residents Assn	janet@dickson.co.nz
2215	Rebecca Macky	rebecca.macky@envirocounsel.co.nz
2298	Richard Brabant	richard@brabant.co.nz

5. CTA **supports** the above submissions in their entirety or particular submission points in a manner that support CTA's points of submission.

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897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
899	Te Tūāpapa Kura Kāinga - Ministry of Housing & Urban Development	ngrala@harrisongrierson.com
1079	The Coalition for More Homes	morehomesnz@gmail.com
1961	Oscar Sims	oscar@oscarsims.co.nz

8. CTA **opposes** the above submissions in their entirety. It opposes all submissions with a contrary view to that of CTA on the issues it has raised.

9. The reasons for the **opposition** are that these submissions in whole or in part do not support the appropriate recognition and protection of the historic heritage and special character of Auckland as it was protected under the Auckland Unitary Plan prior to notification of 'the Proposal', and should in CTA's submission continue to be. In particular, these submissions are opposed, but not limited to , the reasons listed below:

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    - Failure to assess the limitations of the existing 19th century infrastructure to sustain intensification.

    - Ignoring the historic heritage and historical character of Auckland which requires protection under s6 & s7 RMA.

    - Overall failure to acknowledge that the NPS-UD and the MDRS RMA amendments remain subject to Part 2 RMA.

10. CTA seeks that the whole or relevant part of any identified submission be disallowed.

11. CTA wishes to be heard in support of this further submission. If others make a similar submission, we would consider presenting a joint case with them at a hearing.

Signature of person making submission:



Date 20 January, 2023

Electronic address for service of person making further submission:
cta@civictrustauckland.org.nz

Contact name: Audrey van Ryn (Secretary, Civic Trust Auckland)

Telephone (021) 035 4431

Postal address: PO Box 74 049 Greenlane 1546

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

From:	Luke Paanakker
To:	Unitary Plan
Cc:	Sukhi Singh; Rayya Ali
Subject:	Further submissions on Proposed Plan Change 78 - Intensification
Date:	Friday, 20 January 2023 3:28:50 pm
Attachments:	image001.png image002.png PC 78_Further submission form_Craigieburn Range Trust.pdf PC 78_Further submission form_Euroclass Limited.pdf PC 78_Further submission form_Highbrook Living Limited.pdf PC 78_Further submission form_NZ Storage Holdings Limited.pdf PC 78_Further submission form_Rock Solid Holdings Limited.pdf PC 78_Further submission form_Stonehill Trustee Limited.pdf

Kia ora,

Please find attached further submissions on **AUP Plan Change 78 – Intensification** made on behalf of the following companies:

- Euroclass Limited
- Stonehill Trustee Limited
- Rock Solid Holdings Limited
- NZ Storage Holdings Limited
- Craigieburn Range Trust
- Highbrook Living Limited

Please email all correspondence to **Sukhi Singh** (Technical Director - Planning) of Babbage Consultants Limited on sukhi.singh@babbage.co.nz. She can also be contacted at 021 801 904.

Ngā mihi | Kind regards,

Luke Paanakker
Stu.NZPI
Student Planner

Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
Our Values: Sustainability, Team Work, Innovation, Professionalism, Respect.

CAUTION: This email message and accompanying data may contain information that is confidential and subject to legal privilege. If received in error, please notify us immediately, do not distribute the information to any party and erase all copies of the message and attachments. Thank you. ***Please consider the environment before printing this E-mail.***

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.
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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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☒ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

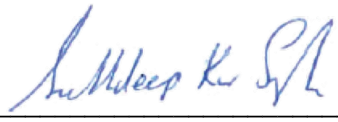
of the original submission be **allowed** ☐

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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

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.

Appendix A

AUP-OP: Plan Change 78 – Intensification

Sub#	Sub Point	Submitter Name	Address for Service	Support/ oppose
873	28	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	29	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	52	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support

From:	Luke Paanakker
To:	Unitary Plan
Cc:	Sukhi Singh; Rayya Ali
Subject:	Further submissions on Proposed Plan Change 78 - Intensification
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Kia ora,

Please find attached further submissions on **AUP Plan Change 78 – Intensification** made on behalf of the following companies:

- Euroclass Limited
- Stonehill Trustee Limited
- Rock Solid Holdings Limited
- NZ Storage Holdings Limited
- Craigieburn Range Trust
- Highbrook Living Limited

Please email all correspondence to **Sukhi Singh** (Technical Director - Planning) of Babbage Consultants Limited on sukhi.singh@babbage.co.nz. She can also be contacted at 021 801 904.

Ngā mihi | Kind regards,

Luke Paanakker
Stu.NZPI
Student Planner

Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
Our Values: Sustainability, Team Work, Innovation, Professionalism, Respect.

CAUTION: This email message and accompanying data may contain information that is confidential and subject to legal privilege. If received in error, please notify us immediately, do not distribute the information to any party and erase all copies of the message and attachments. Thank you. ***Please consider the environment before printing this E-mail.***

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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):

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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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

Attn: Planning Technician
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For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

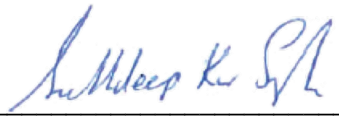
of the original submission be **allowed** ☐

disallowed ☐

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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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

Notes to person making submission:

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Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
Our Values: Sustainability, Team Work, Innovation, Professionalism, Respect.

CAUTION: This email message and accompanying data may contain information that is confidential and subject to legal privilege. If received in error, please notify us immediately, do not distribute the information to any party and erase all copies of the message and attachments. Thank you. ***Please consider the environment before printing this E-mail.***

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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

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.

Appendix A

AUP-OP: Plan Change 78 – Intensification

Sub#	Sub Point	Submitter Name	Address for Service	Support/ oppose
873	28	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	29	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	52	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support

From: Jessica Andrews
To: Unitary Plan
Cc: Diana Bell; joeglucina@hotmail.com
Subject: Further Submission PC78 - Submitter # 1788 and PC79 - Submitter # 81
Date: Friday, 20 January 2023 3:12:36 pm
Attachments: image002.png
image004.png
image006.png
image008.png
Form 6 Further Submission - J&S West Trading Ltd - 115 McKinney Rd, WW_FINAL.pdf

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Good afternoon,
Please find attached a further submission relating to the above on behalf of J&S West Trading Limited.
A copy will be sent to the Submitter's that the further submission relates to next week and within 5 working days as required.
Ngā mihi / Kind regards

Jessica Andrews
Planner BPlan and MNZPI
M: +64-21-422-713 W: www.thepc.co.nz E: jessica@thepc.co.nz

THE PLANNING COLLECTIVE

Form 6

Further Submission on a notified proposal for policy statement or plan changes or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: J&S West Trading Limited, owners of 115 McKinney Road, Warkworth (Lot 2 DP 138409).

This is a further submission on behalf of J&S West Trading Limited in support of, and in opposition to, submissions made to Auckland Council on the Proposed Plan Change 78: Intensification and Proposed Plan Change 79: Amendments to the Transport provisions.

Introduction and Scope of Further Submission

Auckland Council notified Proposed Plan Change 78 (PC78) and Proposed Plan Change 79 (PC79) on 18 August 2022 and the Summary of Decisions Requested was notified on 5 December 2022. An errata to the Summary of Decisions Requested was notified on the 12 December 2022. The period for making further submissions closes on 20 January 2023. A second errata to the Summary of Decisions Requested was notified on the 16 January 2023 and the period for making a further submission to these missed submission points closes on the 30 January 2023.

J&S West Trading Limited lodged a submission to Auckland Council on PC78 (submitter number: 1788) and PC79 (submitter number: 81) which sought the following relief from Auckland Council:

PC78:

- The land at 115 McKinney Road, Warkworth retain the Residential - Mixed Housing Urban Zone within PC78.
- That the flooding qualifying matters is removed from the site remains free from any other qualifying matters.
- Any other relief required to achieve the outcomes sought in this submission.

PC79:

- Amend Rule E38.4.2 (A30) to change the activity status to RD – Restricted Discretionary from D – Discretionary.
- Amend Rule E38.4.2 (A31) to change the activity status to RD – Restricted Discretionary from D – Discretionary
- Add matters of discretion and assessment criteria to E38.12 and E38.12.1 to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.
- Any other relief required to achieve the outcomes sought in this submission.

J&S West Trading Limited have an interest in PC78 and PC79 that is greater than the interest the general public has because J&S West Trading Limited lodged an original submission to PC78 and PC79.

J&S West Trading Limited could not gain an advantage in trade competition through this submission.

Further Submission

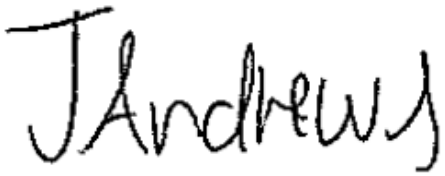
Attachment 1 to this further submission contains the submission points on PC78 and PC79 that are supported and opposed by J&S West Trading Limited and the reasons for the further submission. These tables set out the decisions sought and reasons.

Decision Sought

In addition to the specific decisions sought as set out in Attachment 1, J&S West Trading Limited seeks any other relief required to achieve the outcomes sought in this further submission.

Hearing of Submission

J&S West Trading Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



Jessica Andrews (Agent)
Planner
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date: 20 January 2023

Address for Service:
J&S West Trading Limited
C/- The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: Jessica Andrews
E: jessica@thepc.co.nz
Ph: 021-422-713

Attachments:
1: Further Submission Tables

Attachment 1:

Further Submission Tables

Plan Change 78: Intensification Further Submission Table

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	J&S West Trading Limited position	Decision Sought (and Reasons)
1	39.1	Aaron Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
2	40.1	Ngahine Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
3	42.1	SLD Family Trust	Plan making and Procedural	General	Exempt Warkworth from the plan change.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
4	70.1	Barbara Larsen	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Decline the plan change relating to Warkworth due to existing infrastructure not being able to cope with increase in dwellings. Present AUP allows for growth.	OPPOSE	There is sufficient planned infrastructure for urban growth in Warkworth. Warkworth has been planned as a growth area since the Auckland Plan was Adopted by Auckland Council in March 2012. Intensifying areas closer to existing infrastructure, particularly larger vacant sites and older housing stock where it is likely to be more economic to provide for intensification in a cost effective and quality way, is more efficient. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
5	165.1	Susan Elizabeth Stevens	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Concerns relating to public transport infrastructure, neighbourhood well being associated with intensification. The plan change does not recognise the identity and needs of Warkworth. Warkworth is already experiencing huge growth.	OPPOSE	Warkworth has several planned and under construction roading projects, including planned extensions to public transport links. For example, the Puhoi to Warkworth extension of SH1 and the Supporting Growth arterial network. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	J&S West Trading Limited position	Decision Sought (and Reasons)
6	171.1	Carl James Larcombe	Qualifying Matters - Additional	Qualifying Matters - Additional	Reject Warkworth being included in the plan change due to its unique character and lifestyle being reduced with intensification.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Lifestyle is not a Qualifying Matter. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
7	384.1	Roger Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Identify Warkworth as having the same qualifying matter of Transport Infrastructure constraint as Beachlands.	OPPOSE	Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Warkworth does not have a Transport Infrastructure constraint as Beachlands does. Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
8	422.1	Glyn Evan Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Add new qualifying matter for Transport in Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
9	422.2	Glyn Evan Williams	Qualifying Matters - Additional	Infrastructure - Water and wastewater constraints	Add qualifying matters for Wastewater in Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	J&S West Trading Limited position	Decision Sought (and Reasons)
10	593.1	Gail Lorraine Stratton	Qualifying Matters - Additional	Qualifying Matters - Additional	Apply Transport as a QM to reduce impact of MDRS in Warkworth, as applies to (operative) Single House zoned sites.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
11	593.2	Gail Lorraine Stratton	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Apply Infrastructure as a QM to reduce impact of MDRS in Warkworth as applies to (operative) Single House zoned sites.	OPPOSE	Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has various planned infrastructure upgrades, some of which are under construction. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
12	595.1	Gordon Loughnan	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Decline the plan change: Warkworth needs infrastructure upgrades to cope with growth.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
13	595.2	Gordon Loughnan	Plan making and procedural	General	Decline the plan change: Warkworth does not have a transport hub commensurate with MDRS of PC78.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
14	675.1	Warkworth Area 7iaison Group [WALG]	Qualifying Matters – Infrastructure	Infrastructure – Water and wastewater constraints	Add wastewater QM for Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	J&S West Trading Limited position	Decision Sought (and Reasons)
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
15	675.2	Warkworth Area 8iaison Group [WALG]	Qualifying Matters – Additional	Qualifying Matters – Additional	Add a Transport QM for Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
16	978.2	Noeline Walsh	Urban Environment	Larger rezoning proposal	Reject the proposed housing intensification of Warkworth Central area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
17	1769.30	Anne Perratt	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR	Include Warkworth as a Special Character Area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
18	538.3	Yash Idnani and Divya Verma	Qualifying Matters A-I	Significant Natural Hazards	Remove the flood plain QM and enable MDRS provisions to apply on sites where flooding applies on a case by case scenario.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain. It is more appropriate for a case by case assessment of flooding risk to be undertaken during the consenting stage of a site development to ensure that natural hazard risks can be appropriately managed.
19	1090.9	Steven Wang and Shirley Wang	Qualifying Matters A-I	Significant Natural Hazards	Delete the 'Flood plains (i)' as a 'spatially qualifying matter' (which is opposed) applying to any land in the Auckland Region through the plan change.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain. The presence of a floodplain over a site does not inherently limit application of the MDRS. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards.
20	1230.2	Melia Development Ltd	Qualifying Matters A-I	Significant Natural Hazards	Remove natural hazards, in particular flood plains, as qualifying matters and instead rely on the existing rules within the AUP to manage intensification.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	J&S West Trading Limited position	Decision Sought (and Reasons)
							The presence of a floodplain over a site does not inherently limit application of the MDRS. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards.
21	1270.1	Orewa Developments Ltd	Qualifying Matters A-I	Significant Natural Hazards	Remove Flood Plains as a qualifying matter.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain. The presence of a floodplain over a site does not inherently limit application of the MDRS. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards.
22	1470.9	Apec Equity Ltd	Qualifying Matters A-I	Significant Natural Hazards	Remove Flood Plains as a Qualifying Matter as it does not give effect to section 77I RMA and the restrictions to density standards provided in this section (site by site analysis). Hazards, specifically flooding, are not listed under section 77I.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain. The presence of a floodplain over a site does not inherently limit application of the MDRS. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards.
23	1803.6	The One Longhorn Limited	Qualifying Matters A-I	Appropriateness of QMs (Other)	Reject the inclusion of natural hazards, in particular flood plains as a qualifying matter and rely on the existing AUP standards to manage intensification in these areas.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter and enable MDRS to apply to site subject to a flood plain. The presence of a floodplain over a site does not inherently limit application of the MDRS. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards.
24	1862.8	Mingo Alexander Innes	Qualifying Matters A-I	Appropriateness of QMs (A-I)	Approve Flood Plains as a QM.	OPPOSE	Decision sought is to remove flood plain as a qualifying matter. There is insufficient technical reasoning to justify applying a flood plain as a qualifying matter to limit the application of the MDRS for sites covered by a flood plain.
25	1962.16	Aedifice Property Group	Qualifying Matters A-I	Significant Natural Hazards	Delete the QM relating to flood plains.	SUPPORT	Decision sought is to remove flood plain as a qualifying matter. The natural hazard provisions in Chapter E36 of the AUP-OP appropriately manage development of land affected by natural hazards. For this reason, there is no justification to warrant a zoning change or application as a qualifying matter for site that are affected by a floodplain.
26	939.73	Auckland Council	Qualifying Matters A-I	Significant Natural Hazards	Refine the application of Residential Low Density Residential Zone for flooding QM based on the flooding (i) dataset available on Auckland Council's publicly available geomaps.	SUPPORT	This submission is supported to the extent that the application of the Residential - Low Density Residential Zone should be reconsidered on any site where the qualifying matter does not warrant a zoning response to address the qualifying matter. In these instances, the site should be at least zoned Residential - Mixed Housing Urban.
27	939.75	Auckland Council	Qualifying Matters A-I	Significant Natural Hazards	Amend maps to re-zone land from Residential Low Density Residential Zone to Residential MHU Zone, or where the land is either within a walkable catchment or a Policy 3d location, to Residential THAB Zone, where a zoning response for flood QM is not required.	SUPPORT	As above, the application of the Residential - Low Density Residential zoning should be reconsidered where a zoning response is not warranted to address a qualifying matter.

Plan Change 79: Transportation Further Submission Table

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Summary of Decisions Requested	J&S West Trading Ltd position	Decision sought (and Reasons)
1	101	8	Auckland Council	Approve the plan change with the amendments requested	Amend the notified provisions to ensure consistency between related provisions in Chapters E27 and E38 to achieve the purpose of the plan change including to E38.8.1.2 Access to rear sites, as follows: (3) Accessways serving four to ten ~~six or more rear sites must provide separated pedestrian access, which may be located within the formed driveway except that E38.8.1.2.3 does not apply when E27.6.6.3(a) and Table E27.6.6.3 do not require pedestrian access~~ adjacent to the vehicle access.	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites at a minimum. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4.
2	122	29	Clare Steel	Approve the plan change with the amendments requested	Approve E38.8.1.2 Access to rear sites.	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites should at retained at a minimum. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4.
3	123	29	Jack van de Water	Approve the plan change with the amendments requested	Approve E38.8.1.2 Access to rear sites.	OPPOSE	The decision sought is that the current Standards relate to accessways serving six or more rear sites at a minimum. There is no suitable technical reason or justification for reducing the number of sites obtaining access to 4.
4	102	33	Kainga Ora	Approve the plan change with the amendments requested	Delete standard E38.8.1.2.	SUPPORT	Decision sought is to amend the table as sought in the Kainga Ora submission which seeks to at a minimum retain the current standards relating to access to rear sites. NOTE: We note the Council table is incorrect. Original submission does not seek to delete the standard, rather make amendments – we have submitted based on the wording in the original submissions
5	92	5	10x10 Architecture Limited	Decline the plan change, but if approved, make the amendments requested	Reject Table E38.1.2.1 Access to rear site as the 6.975m wide requirement is not practical or achievable.	SUPPORT	The decision sought is to retain the existing Standard at a minimum. Insufficient reasoning is provided to demonstrate the need and benefit of the changes sought.
6	79	1	Charles and Nancy Liu	Approve the plan change with the amendments requested	Amend E38.4.2 (A13F) (which is proposed through PC 78) to change the activity status to RD - Restricted Discretionary from D - Discretionary.	SUPPORT	The decision sought is to amend E38.4.2(A13F) (which is proposed through PC78) to change the activity status to RD - Restricted Discretionary from D - Discretionary. The RD activity status provides a clearer consenting pathway with supporting matters of discretion and assessment criteria. This will also enable better environmental outcomes to be achieved for developments where the rear site access standards are not complied with and it can be evidenced that each lot can achieve safe and efficient access.

Further submission point	Sub #/Point	Sub Point #	Submitter Name	Theme	Summary of Decisions Requested	J&S West Trading Ltd position	Decision sought (and Reasons)
7	79	2	Charles and Nancy Liu	Approve the plan change with the amendments requested	Amend E38.12.1 and E38.12.2 to add matters of discretion and related assessment criteria to provide for infringements to the Access to rear sites standards.	SUPPORT	The decision sought is to amend E38.12.1 and E38.12.2 to include matters of discretion and assessment criteria for applications to infringe access to rear site standards. The provision of clear and concise matters of discretion and assessment criteria will enable a clearer consenting pathway where is can be evidenced that a more than 10 rear sites can safely and efficiently utilise a single access. With the removal of carparking minimums, the RD matters of discretion and assessment criteria should have a greater focus on traffic numbers utilising the access than number of carparking spaces.

End of Report

From: Hamish Hey
To: Unitary Plan
Cc: Darrin Johannink
Subject: [#CLC21433-155 & 157 Jervois Road] Further Submissions PC 78
Date: Friday, 20 January 2023 3:21:03 pm
Attachments: image001.png
image002.png
image003.png
PC78 FurtherSub_2224_JL Trust.PDF
PC78 FurtherSub_2225_Zanj Ltd.PDF

Afternoon

Please find attached the further submissions of our clients:

- JL Trust - Submitter Ref 2224, and
- Zanj Limited - Submitter Ref 2225.

I can confirm that a copy of these further submissions has been sent those parties whose submissions are referenced.

If you have any questions, please do not hesitate to contact me.

Kind Regards,

Hamish Hey Resource Management Planning Manager

e. hamish@clcgroup.co.nz
p. 021 433 531
ddi. 09 576 1978
w. clcgroup.co.nz
a. 4 Johns Lane, Auckland, 2010

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PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission: JL Trust (Submission No. 2224)

2. This is a further submission in support of and in *opposition* to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
2225	Zanj Ltd	hamish@clcgroup.co.nz
2146	Henderson Enterprises Ltd	Nick@civix.co.nz
1582	Jervois Properties Ltd	philip@campbellbrown.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part is that:
   a) They acknowledge the planning framework and amenity conflicts of the Business Local Centre Zone with the Special Character area Overlay Residential.

PO Box 51547, Pakuranga, Auckland 2140
+64 95763276
www.clcgroup.co.nz

b) They note the commercial/business character of the street scape of Jervois Road – one that is not residential and the existing lawfully established non-residential (i.e. business uses) of the properties from 155-163 Jervois Rd.

c) They identify the separate visual catchment of Jervois Road from the neighbouring Residential Zone.

d) They note the disparity of amenity outcomes along Jervois Road with neighbouring blocks by imposing the Residential SCA over a Business Zone and the opportunities for development in accordance with the Zone rules and standards.

e) They concur the application of the Residential SCA is inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.

7. I **support** the following submissions in part:

Submission No.	Submitter Name & Address for Service	Paragraph Reference	Comment
872	Heritage New Zealand bparslow@heritage.org.nz	11.4-11.10	Support/Oppose - Support the notion that the flawed assessment process has skewed results.
1441	Jeffrey Lane Fearon jeff@fearonhay.com	13a	Support - subjective assessment process, lacking rigour of other matters pertinent to an assessment.
	Jeffrey Lane Fearon jeff@fearonhay.com	27	Support - use of business zones to provide a mix of commercial and multi-level residential living.
	Jeffrey Lane Fearon jeff@fearonhay.com	36	Support - intensification of the inner city fringe.

8. I **oppose** the following submissions of:

Submission No.	Submitter Name	Paragraph Reference	Comment
872	Heritage New Zealand	23.1	Oppose the inference that all pre PC-78 SCA's should be retained. This is

	bparslow@heritage.org.nz		contrary to the Policies 1(b, 3(d), 6(b), 6(c), of the NPS-UD and does not allow for anomalies such as 155-163 Jervois Road where there is conflict between the Zoning and the SCA that results in a non-enabling Planning Framework that is Contrary to Part II of the Act.

9. I **oppose** the above submission in part.

10. The reasons for my **opposition** in part is as detailed above (Para 8). Further we comment:
    - the blanket retention of the pre-PC78 SCA's does not take into the consideration zoning conflicts (either existing or under the Plan Change), and

    - results in a planning framework that is not enabling of either land use or development.

    The blanket roll over of all SCA's, is there for inappropriate resulting in a confused and non-enabling planning framework where anomalies of zoning exist i.e. where the intended underlying Zoning is not residential. Hence for the reasons outlined in our original submission the residential SCA should not be applied over the Business -Local Centre Zone land at 155-163 Jervois Rd.

11. I seek that the part of the identified submission be disallowed.

12. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:



pp

gent for JL Trust

Date: 20 January 2023

Electronic address for service of person making further submission:

hamish@clcgroup.co.nz

Telephone:

(09) 576 1978 or Mobile +64 21 433 531

Postal address:

C/- CLC Consulting Group Ltd
PO Box 51 547
Pakuranga
AUCKLAND 2140

Contact person: Hamish Hey

From:	Holly-Marie Noone
To:	Unitary Plan
Cc:	Bianca Tree
Subject:	Further submission on Plan Change 78 - Metlifecare [MERWNZ-MERWLIB.FID681738]
Date:	Friday, 20 January 2023 3:44:06 pm
Attachments:	image003696.jpg Further submission on PC78 - Metlifecare Ltd 20 January 2023(900946097.1).pdf

Good afternoon
Please find **attached** for filing a further submission on Plan Change 78 on behalf of Metlifecare Ltd.
Kind regards

Holly-Marie Noone
Senior Solicitor
T +64 9 353 9807M +64212011113
holly-marie.noone@minterellison.co.nz
MinterEllisonRuddWatts
minterellison.co.nz | LinkedIn

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FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 78 UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Metlifecare Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
Auckland 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Email: bianca.tree@minterellison.co.nz

INTRODUCTION

1. Metlifecare Limited (**Metlifecare**) is a submitter on Proposed Plan Change 78 (**Plan Change**).

2. This is a further submission on behalf of Metlifecare in support of, and in opposition to, primary submissions on the Plan Change.

3. Metlifecare is a person who has an interest in the proposal that is greater than the interest of the general public. Metlifecare made a primary submission on the Proposed Plan due to the implications that it has on the ability to establish and develop retirement villages in Auckland.

FURTHER SUBMISSION

4. The submissions supported and opposed by Metlifecare are set out in the table **attached** as Schedule 1 to this further submission.

5. The reasons for Metlifecare's further submission include that the amendments sought ensure that the Plan Change:

   (a) will give effect to the objectives and policies of the NPS UD;

   (b) will contribute to well-functioning urban environments;

   (c) promote the sustainable management of physical resources and the purpose and principles of the RMA;

   (d) is consistent and clear;

(e) recognises the crucial role that retirement and aged care facilities have in providing for the health and wellbeing of the New Zealand community and the provision of housing for elderly residents;

(f) will meet the requirements to satisfy the criteria of section 32 of the RMA;

(g) recognises and provides for the differing functional and operational needs of retirement villages;

(h) will meet the reasonably foreseeable needs of future generations; and

(i) represent good resource management practice.

6. Further, without derogating form the generality of the above, the specific reasons why Metlifecare supports each submission is set out in the **attached** Schedule 1.

RELIEF / DECISION SOUGHT AND HEARING

7. The relief sought by Metlifecare is set out in Schedule 1 below. Metlifecare also seeks such other additional or consequential relief to give effect to the matters raised in this further submission.

8. Metlifecare wishes to be heard in support of its primary and further submission. If others wish to make a similar submission, Metlifecare will consider presenting a joint case with them at the hearing.

DATED this 20th day of January 2023

Metlifecare Limited by its solicitors and duly authorised agents MinterEllisonRuddWatts



Bianca Tree

Address for service
Metlifecare Limited
c/- MinterEllisonRuddWatts
PO Box 105 249
AUCKLAND 1143

Attention: Bianca Tree

Telephone No: (09) 353 9700

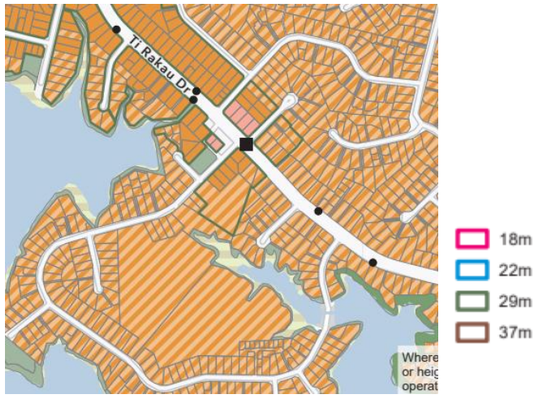
Fax No. (09) 353 9701

Email: bianca.tree@minterellison.co.nz

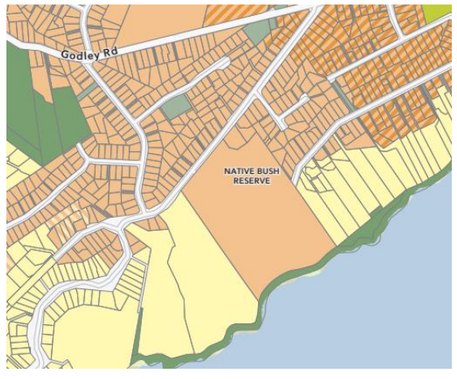
SCHEDULE 1: Metlifecare's further submission on Plan Change 78 to the Auckland Unitary Plan

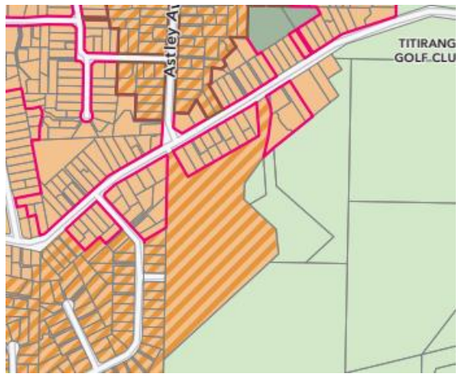
Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Retirement Villages Association of New Zealand Incorporated - Submission 947	-	Entire submission 947.	Support	Metlifecare supports the Retirement Villages Association of New Zealand Incorporated's primary submission on Plan Change 78 relating to the use and development of retirement villages and associated infrastructure in the district in full, to the extent it is not inconsistent with the relief sought by Metlifecare. This is because the submission recognises the importance and practical realities of developing land for retirement villages and associated infrastructure in the district. The amendments sought also ensure that the Proposed Plan achieves the outcomes required by the Amendment Act and NPS UD.
Oceania – Submission 1056.3	Definitions	Delete the definition of dwelling or amend the definition of dwelling to exclude retirement village units.	Support in part	Metlifecare supports making it clear that not all provisions that apply to dwellings apply to integrated residential developments or retirement village units.
Aedifice Property Group – Submission 1962.198	Walkable catchments	Provide THAB zoning within a 1200m walking catchment of all rapid transit stations [Pakuranga].	Support	Metlifecare supports this relief on the basis that 1,200m should be considered within the walkable catchment of rapid transit stations, including in Pakuranga where the area is generally flat and easily accessible.
Philip Malcom Granger – Submission 200.3	Qualifying Matters - Infrastructure	Support all changes made to the Unitary Plan that strengthen provisions limiting growth in the Beachlands and/or Maraetai areas until such time as a comprehensive review of transport (roading/ferry) capacity and fully worked construction programs are in place [inferred the relief sought relates to the Beachlands area and includes seeking approval of relevant qualifying matter provisions identified, that being Activities (A29C) and (A29D) from Table E38.4.2].	Oppose	The Beachlands 1 Precinct applies to sites in Beachlands and requires updating to reflect the Amendment Act. Metlifecare therefore does not support limitations being placed on the provisions that should be applied to reflect the Amendment Act as the area is within a relevant residential zone, and seeks that this submission is not allowed.
Aedifice Property Group – Submission 1962.177	Walkable Catchments	Provide THAB zoning within a 1200m walking catchment of all rapid transit stations [Ellerslie]	Support	Metlifecare supports extending the walkable catchment on the basis that the Ellerslie area has a high level of accessibility to multiple transport and employment options which makes more intensive development necessary and appropriate.
Kāinga Ora – Submission 873.28	Qualifying matters – additional	Kāinga Ora request that all qualifying matters be controlled by overlays (except for flooding as explained in reasons for the submission).	Support	Metlifecare considers that the approach taken to qualifying matters is inconsistent with the Amendment Act which intends to apply qualifying matters on a discretionary basis, where appropriate. Metlifecare supports the relief sought by Kainga Ora, with the exception of flooding which should be considered outside of the Plan framework.
Motu Design - 1745.9	Qualifying matters - additional	Add a new qualifying matter for "Volcanic Landscape and landscape amenity supporting areas" in addition to existing volcanic provisions. Limiting building heights to respect topography and unique landforms.	Oppose in part	Metlifecare is unclear what specific relief the submitter is seeking and the area that could be affected.
Kāinga Ora – Submission 873.36	D9- Significant Ecological Areas – Terrestrial (SEA – T)	Retain the Significant Ecological Areas – Terrestrial (SEA-T) overlay however delete the proposed application of the Low Density Residential Zone on properties subject to this overlay. The underlying zoning should be either Mixed Housing Urban or THAB Zone, as consistent with mapping relief sought and submitted as Appendix 2.	Support	Metlifecare supports Kainga Ora's view that the presence of an SEA should not influence the zoning provisions that apply, it should be reflected as an overlay. Metlifecare seeks that the SEA be applied as an overlay rather than as justification for applying less intensive zoning provisions to a site. As set out in the Amendment Act, qualifying matters are intended to be discretionary and are therefore better applied as overlays.
Kāinga Ora – Submission 873.61	I433 – Pukekohe Hill Precinct	Delete qualifying matters pertaining to 'Notable Trees' and 'Flooding' from the Pukekohe Hill Precinct framework where these matters have been applied beyond the spatial extent of the identifying overlay / control.	Support	Metlifecare supports Kāinga Ora view that qualifying matters should not be applied beyond the spatial extent of the relevant feature or area (i.e. should not be applied to entire sites where only a portion of the site is subject to an overlay / control and / or applying qualifying matter).
Te Ākitai Waiohua Waka Taua Incorporated Society - 1084.15	I433 – Pukekohe Hill Precinct	Investigate and apply additional viewshafts with the same controls as apply to the current volcanic viewshafts.	Support in part / Oppose in part	Metlifecare is unclear what specific relief the submitter is seeking and the area that could be affected.
Ngāti Tamaoho Te Tai Ao Unit - 1905.21	I433 – Pukekohe Hill Precinct	That Council give urgent attention to engaging appropriate review of the Pukekohe Hill area which will include a landscape / character analysis and further consultation with Ngāti Tamaoho.	Support in part / Oppose in part	Metlifecare is unclear what specific relief the submitter is seeking and the area that could be affected.

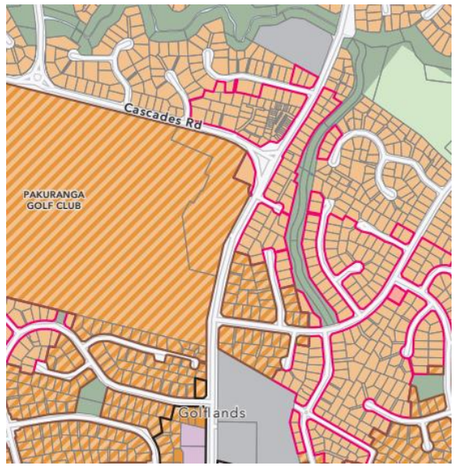
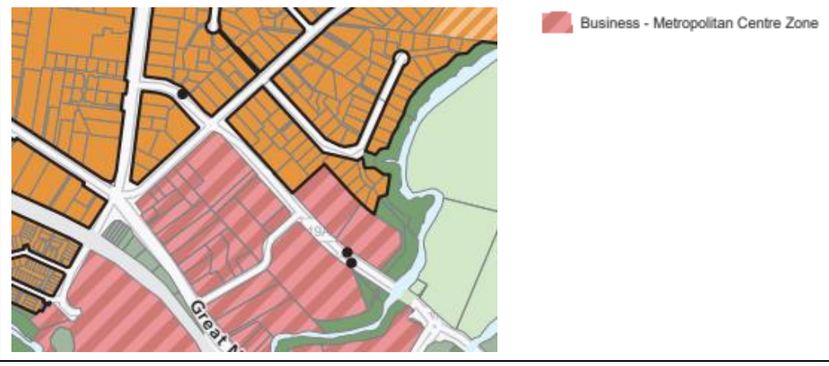
Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Denis Schweder - 1969.2	I433 – Pukekohe Hill Precinct	Delete sub-precinct A from Pukekohe Hill Precinct and apply underlying zone rules including higher building height and impervious area coverage.	Oppose	As set out in Metlifecare's original submission, the role of the Pukekohe Hill Precinct primarily relates to ensuring appropriate groundwater recharge of aquifers. Sub-precinct A must be retained to ensure that outcome.
Denis Schweder - 1969.3	I433 – Pukekohe Hill Precinct	Delete provisions of sub-precinct A from Pukekohe Hill Precinct relating to minimum net site area, building coverage, impervious area coverage, maximum number of dwellings on site, stormwater management and other provisions which are more restrictive than the underlying zone and references to QMs	Support in part	As set out in Metlifecare's original submission, the role of the Pukekohe Hill Precinct primarily relates to ensuring appropriate groundwater recharge of aquifers. Limitations on impervious area that relate to that function should be retained. Otherwise, the level of development enabled within Sub-precinct A should rely on proposed underlying MHU zone provisions.
Ngāti Te Ata Waiohua – 2392.19	Single or small area rezoning - Pukekohe Hill	Rezone land adjacent to Pukekohe Hill to new LDRZ. Seeks that Council give urgent attention to engaging an appropriate review of this area, including a landscape / character analysis and further consultation with Ngāti Te Ata Waiohua.	Support in part / Oppose in part	Metlifecare is unclear what specific relief the submitter is seeking and the area that could be affected.
Kāinga Ora – Submission 873.64	I533 – Red Beach Precinct	Delete the identification of a 'precinct interface' as a qualifying matter within the Red Beach Precinct framework.	Support	Metlifecare supports Kainga Ora's concern that development on the boundary of a precinct is not a justified qualifying matter – it unnecessarily restricts the application of Policy 3 of the NPS UD within this precinct.
Kāinga Ora – Submission 873.159	SHA Precincts	Rezone Residential - Single House Zone and Residential - Mixed Housing Suburban Zone to Residential - Mixed Housing Urban Zone in Hobsonville. Refer to Appendix 2, Maps 051 and 052 of the submission.	Support in part	Metlifecare supports rezoning the SHA Precinct at Hobsonville, which includes Orion Point, as Mixed Housing Urban in accordance with Map 45 and 51, provided that it is clear that Orion Point is to be rezoned as Mixed Housing Urban.
Kāinga Ora – Submission 873.43	Volcanic viewshaft	Retain the Maunga Volcanic Viewshafts as a qualifying matter but delete all Height and Building Sensitive Areas entirely and their use as a Qualifying Matter. Retain or delete text as set out in Appendix 1, Table 1, Rows 18, 19, 20 and 21 of the submission.	Support	Metlifecare supports the proposed approach on the basis that height sensitivities have been taking into account when applying Height Variation Controls to certain sites and should not be dealt with through a more restrictive building coverage standard. It is not considered that restricting the density of residential sites within this overlay is an appropriate response to managing the issue.
Kāinga Ora – Submissions 873.325, 873.327 and 873.328	Urban Environment and Height	Rezone Youngs Road from Mixed Housing Urban to Residential - Terrace Housing and Apartment Buildings with a height variation control of 43 metres and 37m along Youngs Road  	Support	Metlifecare supports the proposed up-zoning of sites along Youngs Road in Papakura on the basis that it is consistent with Policy 3(c) of the NPS UD as an alternative to the relief sought by Metlifecare.
Greater Auckland – Submissions 2025.6 and 2025.7		Amend walkable catchment for Papakura Metropolitan Centre to 1600m.	Support	Policy 3(c) of the NPS UD requires Tier 1 authorities to enable a minimum of at least 6 storeys within walkable catchments from the edge of Metropolitan Centres. There are factors that warrant a larger walkable catchment around the Papakura Metropolitan Centre as it is generally a flat and easy walk. Metlifecare therefore supports the relief sought.

Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Kāinga Ora - Submission 873.256	Urban Environment	Kāinga Ora are proposing to rezone parts of Ti Rakau Drive and Edgewater Drive as Residential - Terrace Housing and Apartment Buildings Zone 	Support	Auckland Council has identified Pakuranga Town Centre as a large town centre with a high population, frequent public transportation, and a large employment catchment. Accordingly, it is appropriate to apply the Residential-Terrace Housing and Apartment Building zone to this site.
Kāinga Ora – Submission 873.258	Height	Kāinga Ora are proposing Height Variation Controls of 29m in various residential and business zones on Ti Rakau Drive and Edgewater Drive. 	Support	Metlifecare supports the relief sought as an alternative to the relief that Metlifecare is seeking on the basis that the approach is consistent with the NPS UD and Amendment Act and would provide for residential development in appropriate locations.

Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Kāinga Ora – Submission 873.221	Urban Environment	Kainga Ora proposes to rezone some properties on St Vincent Ave, Remuera to Residential – Terrace Housing and Apartment Buildings Zone 	Support	Metlifecare supports the relief sought because the area has a high level of accessibility to multiple transport and employment options, which is consistent with development of this proposed intensity.
Kāinga Ora - Submissions 873.222 and 223	Height	Kāinga Ora proposes to insert a height variation control of 22m and 29m to business parts of St Vincent Avenue. 	Support	Metlifecare supports enabling additional height up to 29m on St Vincent Avenue, and in particular its village at 7 St Vincent Ave, because this area can accommodate additional height and it has a high level of accessibility.
Kāinga Ora submissions 873.278 and 279	Urban Environment and Height	Kainga Ora propose to insert a height variation control of 43m for the THAB zone on Matarangi Road, East Tamaki, adjacent to the Botany Metropolitan Centre. 	Support	Metlifecare supports the proposed relief on the basis that this area is adjacent to the Botany Metropolitan Centre and can support this level of residential intensification, including for the Dannemora Gardens retirement village.

Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Kāinga Ora – Submission 873.101	Urban Environment	Kainga Ora proposes to rezone part of Symes Drive, Red Beach from Residential – Mixed Housing Urban to Residential – Terraced Housing and Apartment Buildings  Terraced Housing and Apartment Buildings	Support	Metlifecare supports the submission to provide for THAB zone in appropriate parts of Red Beach as alternative to the relief sought by Metlifecare.
Kāinga Ora – Submission 873.265	Urban Environment	Kainga Ora proposes to rezone some parts of Avonleigh Road, Green Bay from Residential – Mixed housing Urban Zone to Residential – Terrace Housing and Apartment Buildings Zone. 	Support	Metlifecare supports the relief sought on the basis that it provides for the most efficient use of these sites, which offer high amenity.

Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
Kāinga Ora – Submission 873.318	Urban Environment	Kainga Ora proposes to rezone part of Longford Drive Mt Wellington from Residential – Mixed Housing Urban Zone to Residential – Terraced Housing and Apartment Buildings. 	Support	Metlifecare supports the submission to rezone these residential sites to THAB as this housing typology is appropriate for this location.
Kāinga Ora – Submission 873.242	Urban Environment	Kainga Ora proposes to rezone parts of Golf Road (New Lynn) from Residential – Mixed Housing Urban Zone to Residential – Terraced Housing and Apartment Buildings. 	Support	Metlifecare supports the submission as an alternative to the relief sought by Metlifecare on the basis that the approach is consistent with the purpose and requirements of the NPS-UD and the Amendment Act.
Kāinga Ora – Submission 873.245	Urban Environment	Kāinga Ora proposes to rezone parts of Dominion Road Ext, Mount Roskill from Residential - Low Density Residential Zone to Residential - Mixed Housing Urban Zone.	Support in part	Metlifecare supports the submission to the extent that it applies to the Dominion Road Extension as it is appropriate to provide for the Mixed Housing Urban zone in this location.
Kāinga Ora – Submission 873.149	Urban Environment	Kāinga Ora proposes to rezone part of Stanley Road and Kaipatiki Road, Glenfield from Residential – Mixed Housing Urban Zone to Residential – Terraced Housing and Apartment Buildings.	Support	Metlifecare supports the up-zoning of these sites and the relief sought by Kainga Ora (including as an alternative to the relief sought by Metlifecare. Metlifecare sought that the Orchards Village at 60 Kaipatiki Road and 123 Stanley Road retain the MHU zoning proposed in Plan Change 78).

Submitter and submission point	Specific provision / matter	Submission	Position	Decisions requested / relief sought
		 Terraced Housing and Apartment Buildings		
Kāinga Ora – Submissions 873.259 and 261	Urban Environment	Kāinga Ora proposes to rezone some or all of the properties on Botany Road from Residential - Mixed Housing Urban Zone to Residential - Terrace Housing and Apartment Buildings Zone. Kainga ora also proposes a Height Variation Control of 18m, 22m, 37m and 43m for parts of Botany Road.  Terraced Housing and Apartment Buildings	Support	Metlifecare supports the THAB zone and height control applying to these sites as they can appropriately support greater intensification. Metlifecare supports this relief (including as an alternative to the relief sought by Metlifecare to retain the MHU zoning of its Fairway Garden Village at 197 Botany Road).
Kāinga Ora – Submission 873.190	Height	Kāinga Ora proposes Height Variation Controls of 43m for parts of Sel Peacock Drive, Henderson 	Support	Metlifecare supports the proposed height variation control on the basis that the adjacent area is a Metropolitan Centre and this location can support greater intensification.

Sarah El Karamany

From: kathy.davies38@gmail.com
Sent: Friday, 20 January 2023 2:58 pm
To: Unitary Plan
Cc: committee@missionbaykohi.co.nz
Subject: Further Submissions to Plan Change 78 & 80 by Mission Bay Kohimarama Residents Association
Attachments: Form 6 Further Submission MKBRA.pdf; Appendix One - MBKRA further submissions PC78 80 AUP.pdf

Please find attached Form 6 and Appendix 1 as further submissions to AUP Plan Change 78 & 80 made by Mission Bay Kohimarama Residents Association.

Regards
Kathy Davies

Form 6 (Resource Management (Forms, Fees and Procedure) Regulations 2003

FURTHER SUBMISSIONS BY
MISSION BAY KOHIMARAMA RESIDENTS ASSOCIATION Inc ("MKBRA")
IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSIONS ON PROPOSED CHANGES 78 AND 80 TO THE AUCKLAND UNITARY PLAN

TO: AUCKLAND COUNCIL

These further submissions are made by the Mission Bay Kohimarama Residents Association Incorporated ("MKBRA") in support of or in opposition to submissions on the proposed Changes 78 and 80 to the Auckland Unitary Plan ("AUP").

As an incorporated society representing the residents of Mission Bay and Kohimarama MKBRA is an entity that represents a relevant aspect of the public interest. MKBRA has a membership of approximately 850 members and a Facebook Group with 2200 members. MBKRA regularly participates in regulatory planning issues affecting its community, particularly those affecting public spaces and Local Centers within our area.

MKBRA's further submissions in support of, or in opposition to various original submissions, the relevant provisions of Plan Changes 78 and 80 to the AUP, the particular parts of the submissions it supports or opposes, its reasons and relief are set out in Appendix One to this form.

MKBRA wishes to be heard in support of its further submissions.

If others make similar submissions or further submissions MKBRA will consider presenting a joint case with them at any hearing.

Dated this 19th day of January 2023

_____

Kathy Davies
Membership Coordinator on behalf of Committee

Mission Bay Kohimarama Residents Association Inc

Contact details:
Address for service of submitter:

Post: PO Box 55 265, Eastridge, Auckland 1146
Telephone: 021 671 797
Email: chair@missionbaykohi.co.nz

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
938.144	Housing New Zealand Foundation michael@campbellbrown.co.nz	Amend to increase the walkable catchment of the Local Centres Zone to 400 metres and up zone those sites within the walkable catchment to provide for at least six storeys.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
938.151 938.152	Housing New Zealand Foundation michael@campbellbrown.co.nz	Amend where six storeys is ascribed a 24 metre height allowance (as a minimum) as part of any walkable catchment provisions. Refer to full submission for more details.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
942.1	Drive Holdings Limited dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Include a Height Variation Control of 21m for the Mission Bay Local Centre zone.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at this specific location. It fails to take into account the cultural and natural history of the immediate surrounds and appears to be seeking to benefit only the property owner. The question of the height at this location has been the subject of a Resource Consent which was declined after Hearing. An appeal to the Environment Court also declined a proposal for development in the Mission Bay Local Centre Zone based on the proposed building height which exceeded the 16+2m height standard. This decision was subsequently appealed further and recently upheld in the High Court. Three entitities have agreed after detailed review that over the existing permitted height in this location is inappropriate.
942.2	Drive Holdings Limited dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Include a walkable catchment around the Mission Bay Local Centre.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations subject to flooding and coastal inundation such as Mission

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
					Bay and Kohimarama. Council and the Environment Court have issued decisions in recent years (supported after High Court appeal) that excess height in this coastal location is not appropriate.
942.4	Drive Holdings Limited dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Amend PC 78 to include infrastructure capacity constraints as qualifying matters that constrain the extent which intensification may occur outside the existing City Centre, Metropolitan Centre, Town Centre and Local Centre zones. [Refer to full submission for examples of how this could be accomplished including zoning extent, conditional rezonings or additional infrastructure capacity standard (paragraph 4(b)(i-iii) pages 9 and 10].	Support in part	Allow the submission in part.	The relief sought is supported to the extent that MKBRA agrees that there is a mismatch between development expectations implied by the zonings proposed in PC78 and the limited infrastructural capacity that will, in practice, prevent much of that zoned development occurring. For the avoidance of doubt, to the extent that the submitter seeks increased intensification of Mission Bay, the submission is not supported.
947.246	Retirement Villages Association of New Zealand Incorporated (RVA) Luke.Hinchey@chapmantripp.com marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz	Amend the Height Variation Control to consider another method of incorporating bespoke Height Variation Controls that enable greater flexibility to respond to the changing environment over time, particularly for those sites where the maximum height limit is set below the MDRS.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. The plan provisions provide for the bespoke consideration of additional height through a resource consent process or by way of a plan change in a way that provides more certainty to the surrounding community than the relief sought.
984.1	Jamie Baker jamiebaker@outlook.com	Rezone the upper Patteson Avenue (near Kepa Rd), Mission Bay and adjacent area to Mixed Housing Urban zone	Support	Allow the complete submission	The relief sought is appropriate and will ensure that sporadic development is avoided. Road width/traffic at upper Patteson Avenue does not support the extent of intensification proposed.
984.2	Jamie Baker	Rezone the area around the Mission Bay local centre on Tamaki Drive [rather than around the Kepa	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. The existing Tamaki Drive area already has a Local

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
	jamiebaker@outlook.com	Road/Eastridge local centre] as it is the true local centre for Mission Bay.			Centre and Business Mixed Use Zoning allowing for considerable further intensification. Flood and coastal inundation zoning along with infrastructure issues should restrict too much intensification beyond the current proposal. Recent Resource Consent Hearing, Environment Court, and High Court decisions have declined a proposal for greater than the 16m+2m allowed height as inappropriate height for this location.
1066.118	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK') mark.vinall@tattico.co.nz	Enable at least six-storey development across in H6.6.5 Height Standards the zone.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1066.170 1066.176	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK') mark.vinall@tattico.co.nz	Enable six-storey development across the zone, regardless of position inside or outside walkable catchments in H13.1. Zone description	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1066.172	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK') mark.vinall@tattico.co.nz	Enable six-storey development across the zone, regardless of position inside or outside walkable catchments in H13.2. objectives.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1066.174	Avant Group Limited ('Avant') and Ngā	Enable six-storey development across the zone, regardless of position inside or outside walkable	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
	Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK') mark.vinall@tattico.co.nz	catchments in H13.3. policies.			associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1066.174	Oyster Capital nickr@barker.co.nz rebeccas@barker.co.nz	Amend height strategy (which is not justified) to provide for at least 8 storeys inside and outside walkable catchments.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1066.158	Oyster Capital nickr@barker.co.nz rebeccas@barker.co.nz	Delete the different height limits of the THAB zone that apply inside and outside walkable catchments.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1077.1	Next Gen Places Ltd dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Rezone Eastridge Local Centre to Town Centre Zone	Oppose	Disallow the submission in it's entirety	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification. The site in question is currently only a single level development so there is significant intensification allowed for under the proposed changes.
1077.2	Next Gen Places Ltd dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Apply a walkable catchment around the Eastridge Local / Town centre, extending along both sides of the Kepa Road ridge between Dudley Road and Nehu Street/Reihana Street.	Oppose	Disallow the submission in it's entirety	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification and appears to be seeking to benefit an individual property owner. There is already a newly proposed (PC78) walkable catchment around this Local Centre and the remainder of this ridge zoned THAB. We have seen good intensification using the existing THAB zoning on this ridge.
1077.3	Next Gen Places Ltd	Merge Eastridge (Local Centre) walkable	Oppose	Disallow the submission	The relief sought is unnecessary and inappropriate.

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
	dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	catchment with notified proposed catchments around Meadowbank train station and Ōrākei train station		in it's entirety	It fails to take into account the area specific effects associated with enabling the proposed intensification. The distance from the Eastridge Local Centre to either of the proposed train stations is well beyond the limits set as "walkable". The proposal does not take into account that the proposed "walk" crosses SEA bush clad areas and significant a body of water. It should not be considered until such time as an applicant proposes to build infrastructure to make this location walkable from a train station
1077.4	Next Gen Places Ltd dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Merge Eastridge (Local Centre) walkable catchment with notified proposed catchments around Meadowbank train station and Ōrākei train station.	Oppose	Disallow the submission in it's entirety	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification. The distance from the Local Centre to either of the proposed train stations is well beyond the limits set as "walkable". The proposal does not take into account that the proposed "walk" crosses SEA bush clad area and significant body of water. It should not be considered until such time as an applicant proposes to build infrastructure to make this location walkable from a train station
1077.5	Next Gen Places Ltd dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Implement a HVC of 32.5m for the Terrace Housing and Apartment Building, Local / Town Centre, Business Mixed Use, and Neighbourhood Centre zoned land along both sides of Kepa Road and Coates Avenue between Dudley Road and Nehu Street / Reihana Street [see diagram within attachment].	Oppose	Disallow the submission in it's entirety	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification. There is already capacity for significant intensification in the AUP and PC 78 proposed changes. Several developments already completed on Kepa Road in THAB zone are good examples of the intensification enabled and being achieved.
1077.6	Next Gen Places Ltd dallan@ellisgould.co.nz jgoodyer@ellisgould.co.nz	Implement a HVC of 32.5m for the Terrace Housing and Apartment Building, Local / Town Centre, Business Mixed Use, and Neighbourhood Centre zoned land along both sides of Kepa Road and Coates Avenue between Dudley Road and Nehu Street / Reihana Street [see diagram	Oppose	Disallow the submission in it's entirety	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification. There is already capacity for significant

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
		within attachment].			intensification in the AUP and PC 78 proposed changes. Several developments already completed on Kepa Road in THAB zone are good examples of the intensification enabled and being achieved.
1486.1	Matthew Prasad vignesh@mhg,co.nz	Increase the height enabled at 33-35 Tamaki Drive, Mission Bay to 27m with a Height Variation Control.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama. It fails to take into account the cultural and natural history of the immediate surrounds and appears to be seeking to benefit only the property owner.
1655.7	Masfen Holdings Ltd Michael@campbellbrown.co.nz	Increase the maximum height for 209 - 215 Kepa Road, Mission Bay to 50m.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification and appears to benefit only the property owner. Site is currently single level development and would benefit from the expansion as allowed by current zoning. Any additional height to that proposed should be subject to review by the consenting process.
2083.141	Universal Homes Michael@campbellbrown.co.nz	Amend the plan change to ascribe a height of 24 to 6 storeys rather than 21m.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1962.55	Aedifice Property Group jessica@civix.co.nz	Amend the maximum building height limit to 27m within rapid transit walkable catchments that are a 15 minute journey of the City Centre and are a 5 minute journey from Metropolitan Centres [to allow for more than 6 storeys].	Oppose	Disallow the whole of the submission.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
1717.4	Sarah C greenredblueblack@gmail.com	Amend the plan by removing height restrictions.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
1998.4	Loraine Dorothy Walsh lorainewalsh7@gmail.com	Retain the use of height in relation to boundary controls to minimise loss of light and sun.	Support	Allow the complete submission	The relief sought is appropriate and will ensure that adverse effects on adjoining properties are sustainably managed.
2057.1	Simon Terry simont@actrix.co.nz	Any increase in height limits is staged, such that these are changed for certain areas to meet short term demand and priorities for redevelopment, and other areas have height limits changed only as additional development capacity is proven to be needed.	Support	Allow the complete submission	The relief sought is appropriate and will ensure that sporadic development is avoided, together with the requirement for inefficient infrastructure upgrades.
2025.20	Greater Auckland Lowrie.matt@gmail.com	Amend to provide greater heights for residential zones in walkable catchments, rather than just a blanket 6 storey height limit. Amend to heights of 8-12 storeys across most of the Isthmus walkable catchments.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
2025.21	Greater Auckland Lowrie.matt@gmail.com	Amend to provide greater heights for business zones in walkable catchments, rather than just a blanket 6 storey height limit. Amend to heights of 8-12 storeys across most of the Isthmus walkable catchments.	Oppose	Disallow the submission in it's entirety.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
2273.29	Aaron Grey aaronjgrey@gmail.com	Ensure Policy 3(d) intensification areas are subject to a maximum height limit that is not less than the height limit of the adjacent Local Centre zone and Town Centre zone, applying Height Variation Control is necessary.	Oppose	Disallow the whole of the submission.	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
305.3	Kathryn E Davies kathy.davies38@gmail.com	Reject high rise developments as inappropriate in Mission Bay.	Support	Allow all of the submission	The relief sought is appropriate. Greater density has been enabled by the plan change and no further intensification is required to meet the projected housing demands in the isthmus / region.
873.4	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Residential - Mixed Housing Urban Zone provisions to: 1) Improve consistency across development standards applying to up to three dwellings and those applying to four or more dwellings; 2) Enable up to five storey development in identified	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	To the extent that this relief might increase residential intensification or would remove consideration of matters such as residential character and the surrounding residential areas within the MHU zone, the relief sought is inappropriate and unnecessary. This would have

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
		locations where adjacent to land zoned for ten storey Terrace Housing and Apartment Buildings, to allow for a 'stepping down' of building heights; and 3) Simplify and streamline matters of discretion and associated assessment criteria. Make amendments to H5 as set out in Appendix 1, Table 2, Rows 138 to 163 of the submission. Refer to Appendices 2 and 3 for building heights. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.			potentially significant effects on the wider community.
873.6	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Residential - Terrace Housing and Apartment Buildings Zone to enable higher densities and building heights with fewer restrictions. Make deletions or amendments to the H6 zone provisions to that effect as set out in Appendix 1 of the submission, Table 1, Rows 46 to 75 of the submission. Refer to Appendices 2 and 3 of the submission for building heights. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	To the extent that this relief might increase residential intensification or would remove consideration of matters such as residential character and the surrounding residential areas within the MHU zone, the relief sought is inappropriate and unnecessary. This would have potentially significant effects on the wider community.
873.8	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Height Variation Control for the Residential - Terrace Housing and Apartment Buildings Zone as set out in Appendices 2 and 3 of the submission. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number..	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	To the extent that this relief might increase residential intensification or would remove consideration of matters such as residential character and the surrounding residential areas within the MHU zone, the relief sought is inappropriate and unnecessary. This would have potentially significant effects on the wider community.
873.15	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend to apply the Residential - Terrace Housing and Apartment Buildings Zone within 400m (approx. 5 minute walk) from the edge of the Business - Local Centre Zone except in identified settlements, as set out in Appendix 2 of the submission. Zone mapping changes are set out in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	To the extent that this relief might increase residential intensification or would remove consideration of matters such as residential character and the surrounding residential areas within the MHU zone, the relief sought is inappropriate and unnecessary. This would have potentially significant effects on the wider community.

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
873.18	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Height Variation Control to provide for heights of up to 8 storeys within a smaller walkable catchment where: 1) a RTS [Assumed to mean an RTN station] is located in the Business - Town Centre Zone or the Business - Local Centre Zone; 2) a RTS does not directly overlap with (but is within 100m of) the Business - Town Centre Zone and the Business - Local Centre Zone.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.19	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Height Variation Control to provide for 5 storeys (18m) within those parts of the Residential - Mixed Housing Urban Zone that adjoin the 10 storey Residential - Terrace Housing and Apartment Buildings Zone as set out in Appendices 2 and 3 of the submission. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.24	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Business - Local Centre Zone and Height Variation Control to: 1) Enable a 6-storey base zone height of 22m. 2) Provide additional height in the Height Variation Control above the 6-storey base. 3) Delete any height restrictions in the operative Height Variation Control that below the 6-storey base zone height; 4) Amend the Height in Relation to Boundary Control to enable the increased base height. Amend or delete H11 provisions as set out in Appendix 1, Table 1, Rows 91, 92 and 93 of the submission. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. Refer to Appendix 3 of the submission for building height.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.25	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Business - Neighbourhood Centre Zone and Height Variation Control to Enable a 6-storey height of 22m either generally or where the Business - Neighbourhood Centre Zone adjoins or abuts the Residential - Terrace Housing and Apartment	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
		Buildings Zone. Amend the Height in Relation to Boundary Control to enable the additional height. Amend or delete H12 provisions as set out in Appendix 1, Table 1, Rows 94, 95 and 96 of the submission. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number. Refer to Appendix 3 of the submission for building height.		Bay and Kohimarama	
873.26	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the Business - Mixed Use Zone and Height Variation Control to enable a 6-storey base zone height of 22m either generally or where the Business - Neighbourhood Centre Zone adjoins or abuts the Residential - Terrace Housing and Apartment Buildings Zone. Amend the Height in Relation to Boundary Control to enable the additional height. Refer to Appendix 3 for building height. Amend or delete H13 provisions as set out in Appendix 1, Table 1, Rows 97, 98 and 99 of the submission. Height Variation Control mapping changes are summarised in separate submission points by suburb and Appendix 2 map number.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.28	Kāinga Ora developmentplanning@kaingaora.govt.nz	Amend the majority of the qualifying matters to be applied by overlays rather than zones or precincts. An example of where this is not requested is for the flooding qualifying matter. See also Appendix 1, Table 1, Row 3 of the submission.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
873.180	Kāinga Ora developmentplanning@kaingaora.govt.nz	Rezone Residential - Low Density Residential Zone to Residential - Mixed Housing Urban Zone and Residential - Terrace Housing and Apartment Buildings Zone in parts of Mission Bay and Devonport. Rezone Residential - Mixed Housing Urban Zone to Residential - Terrace Housing and Apartment Buildings Zone in parts of Mission Bay. Refer to Appendix 2, Map 064 of the submission.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.181	Kāinga Ora	Insert a Height Variation Control of 22m for the Business - Mixed Use Zone in parts of Mission Bay.	Oppose	Disallow those parts of the submission that	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
	developmentplanning@kaingaora.govt.nz	Refer to Appendix 2 Map 064 of the submission.		would potentially affect development on land located within Mission Bay and Kohimarama	associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama. A similar site on Tamaki Drive zoned Local Center has been the subject of hearings at Council RC, Environment Court and High Court Appeal and has after due consideration been declined by all 3 authorities permission to build over existing height controls.
873.201	Kāinga Ora developmentplanning@kaingaora.govt.nz	Rezone Residential - Low Density Residential Zone to Residential - Mixed Housing Urban Zone and Residential - Terrace Housing and Apartment Buildings Zone in Orakei, Mission Bay, Kohimarama, Meadowbank, and Remuera. Rezone Residential - Mixed Housing Urban Zone to Residential - Terrace Housing and Apartment Buildings Zone in parts of Ōrākei, Mission Bay, Kohimarama, and Meadowbank . Refer to Appendix 2, Map 073 of the submission.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.202	Kāinga Ora developmentplanning@kaingaora.govt.nz	Insert a Height Variation Control of 22m for various business zones in parts of Ōrākei, Mission Bay, Kohimarama and Meadowbank. Refer to Appendix 2 Map 073 of the submission.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
873.385	Kāinga Ora developmentplanning@kaingaora.govt.nz	Insert a Height Variation Control of 29m for various residential zones in parts of Ōrākei, Mission Bay, Kohimarama and Meadowbank. Refer to Appendix 2 Map 073 of the submission.	Oppose	Disallow those parts of the submission that would potentially affect development on land located within Mission Bay and Kohimarama	The relief sought is unnecessary and inappropriate. It fails to take into account the area specific effects associated with enabling the proposed intensification at coastal locations such as Mission Bay and Kohimarama.
2297.7	Squirrel Trust gillian@chappell.nz	Provide planning certainty for residential areas by making it clear that the height standard is not to be exceeded so that it cannot be argued that the standards are a "starting point".	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.15	Squirrel Trust gillian@chappell.nz	Ensure that height is only a matter to which the normal tests for notification apply if it is related to the qualifying matter that changes the activity status from permitted.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.

Sub No.	Submitter name and address for service	Submitter's relief	Support/ Oppose	Decision sought by MBKRA:	Reasons:
2297.16	Squirrel Trust gillian@chappell.nz	Insert policy H3A3 (18) in the list of assessment criteria for building height in clause H3A8.2(2).	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.18	Squirrel Trust gillian@chappell.nz	Make the notification provisions of the residential zones in the plan consistent.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.19	Squirrel Trust gillian@chappell.nz	Requests that height is only a matter which the normal tests for notification apply if it is related to the qualifying matter that changes the activity status from permitted.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.20	Squirrel Trust gillian@chappell.nz	Insert new policy H5.3(18) "Building height is limited to three storeys"; and / or insert a new policy H5.3(6A) (j) as follows: "managing height to achieve the planned urban built character of predominantly three storeys".	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.27	Squirrel Trust gillian@chappell.nz	Amend H5.8.1 and H5.8.2 to better address neighbouring amenity including by revising (ia) C to refer to the amenity experienced from adjacent sites.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
2297.28	Squirrel Trust gillian@chappell.nz	Amend the H5.8 criteria relating to Character and Visual amenity so that consideration is given to how buildings with extra height are viewed from adjacent properties as well as the street or public places.	Support	Allow the submission	The relief sought is appropriate and will ensure the consistent administration of the plan provisions.
PC80					
11.1 11.2 11.3 11.4	Royal Forest and Bird Protection Society of New Zealand Inc c.morgan@forestandbird.org.nz	Approve the plan change without any amendments	Support	Allow the submissions	The relief sought is appropriate and reasonable for the reasons set out in the submitter's submission.

From:	Luke Paanakker
To:	Unitary Plan
Cc:	Sukhi Singh; Rayya Ali
Subject:	Further submissions on Proposed Plan Change 78 - Intensification
Date:	Friday, 20 January 2023 3:28:50 pm
Attachments:	image001.png image002.png PC 78_Further submission form_Craigieburn Range Trust.pdf PC 78_Further submission form_Euroclass Limited.pdf PC 78_Further submission form_Highbrook Living Limited.pdf PC 78_Further submission form_NZ Storage Holdings Limited.pdf PC 78_Further submission form_Rock Solid Holdings Limited.pdf PC 78_Further submission form_Stonehill Trustee Limited.pdf

Kia ora,

Please find attached further submissions on **AUP Plan Change 78 – Intensification** made on behalf of the following companies:

- Euroclass Limited
- Stonehill Trustee Limited
- Rock Solid Holdings Limited
- NZ Storage Holdings Limited
- Craigieburn Range Trust
- Highbrook Living Limited

Please email all correspondence to **Sukhi Singh** (Technical Director - Planning) of Babbage Consultants Limited on sukhi.singh@babbage.co.nz. She can also be contacted at 021 801 904.

Ngā mihi | Kind regards,

Luke Paanakker
Stu.NZPI
Student Planner

Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
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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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

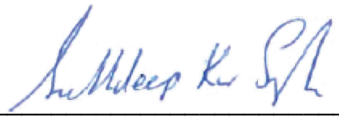
of the original submission be **allowed** ☐

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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

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.

Appendix A

AUP-OP: Plan Change 78 – Intensification

Sub#	Sub Point	Submitter Name	Address for Service	Support/ oppose
873	28	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	29	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	52	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support

From:	Jessica Andrews
To:	Unitary Plan
Cc:	Burnette O"Connor
Subject:	Further Submission to PC78 - Submitter # 1102
Date:	Friday, 20 January 2023 3:50:17 pm
Attachments:	image009.png image010.png image011.png image012.png Form 6 Further Submission - OGC2 Ltd - McKinney Rd, WW_FINAL.pdf

Good afternoon,

Please find attached a further submission relating to the above on behalf of OGC2 Limited.

A copy will be sent to the Submitter's that the further submission relates to next week and within 5 working days as required.

Ngā mihi / Kind regards

Jessica Andrews

Planner BPlan and MNZPI

M: +64-21-422-713 W: www.thepc.co.nz E: jessica@thepc.co.nz

THE PLANNING COLLECTIVE

Form 6

Further Submission on a notified proposal for policy statement or plan changes or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: OGC2 Limited owner of Lot 2 DP 510787 McKinney Road, Warkworth.

This is a further submission on behalf of OGC2 Limited in opposition to submissions made to Auckland Council on the Proposed Plan Change 78: Intensification

Introduction and Scope of Further Submission

Auckland Council notified Proposed Plan Change 78 (PC78) on 18 August 2022 and the Summary of Decisions Requested was notified on 5 December 2022. An errata to the Summary of Decisions Requested was notified on the 12 December 2022. The period for making further submissions closes on 20 January 2023. A second errata to the Summary of Decisions Requested was notified on the 16 January 2023 and the period for making a further submission to these missed submission points closes on the 30 January 2023.

OGC2 Limited lodged a submission to Auckland Council on PC78 (submitter number: 1102) which sought the following relief from Auckland Council:

- To zone the land at Lot 2 DP 510787 and all remaining Future Urban zoned land to the north as Residential – Mixed Housing Urban.

OGC2 Limited has an interest in PC78 that is greater than the interest the general public has because OGC2 lodged an original submission to PC78.

OGC2 Limited could not gain an advantage in trade competition through this submission.

Further Submission

The PC78 submission points that are opposed by OGC2 Limited are set out in the table provided in **Attachment 1** to this further submission. This table sets out the reasoning for opposing the submission points and the decision sought.

Decision Sought

In addition to the specific decisions sought as set out in **Attachment 1,** OGC2 Limited seeks any other relief required to achieve the outcomes sought in this further submission.

Hearing of Submission

OGC2 Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



Jessica Andrews (Agent)
Planner
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date: 20 January 2023

Address for Service:

OGC2 Limited
C/- The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: Jessica Andrews
E: jessica@thepc.co.nz
Ph: 021-422-713

Attachments:

1: Further Submission Table

Attachment 1:

Further Submission Table

Plan Change 78: Intensification Further Submission Table

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	OGC2 Limited position	Decision sought (and reasons)
1	39.1	Aaron Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
2	40.1	Ngahine Rodgers	Plan making and Procedural	General	Add Warkworth as an exempt town.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
3	42.1	SLD Family Trust	Plan making and Procedural	General	Exempt Warkworth from the plan change.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
4	70.1	Barbara Larsen	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Decline the plan change relating to Warkworth due to existing infrastructure not being able to cope with increase in dwellings. Present AUP allows for growth.	OPPOSE	There is sufficient planned infrastructure for urban growth in Warkworth. Warkworth has been planned as a growth area since the Auckland Plan was Adopted by Auckland Council in March 2012. Intensifying areas closer to existing infrastructure, particularly larger vacant sites and older housing stock where it is likely to be more economic to provide for intensification in a cost effective and quality way, is more efficient. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
5	165.1	Susan Elizabeth Stevens	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	Concerns relating to public transport infrastructure, neighbourhood well being associated with intensification. The plan change does not recognise the identity and needs of Warkworth. Warkworth is already experiencing huge growth.	OPPOSE	Warkworth has several planned and under construction roading projects, including planned extensions to public transport links. For example, the Puhoi to Warkworth extension of SH1 and the Supporting Growth arterial network. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
6	171.1	Carl James Larcombe	Qualifying Matters - Additional	Qualifying Matters - Additional	Reject Warkworth being included in the plan change due to its unique character and lifestyle being reduced with intensification.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments.

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	OGC2 Limited position	Decision sought (and reasons)
							Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Lifestyle is not a Qualifying Matter. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
7	384.1	Roger Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Identify Warkworth as having the same qualifying matter of Transport Infrastructure constraint as Beachlands.	OPPOSE	Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Warkworth does not have a Transport Infrastructure constraint as Beachlands does. Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
8	422.1	Glyn Evan Williams	Qualifying Matters - Additional	Qualifying Matters - Additional	Add new qualifying matter for Transport in Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
9	422.2	Glyn Evan Williams	Qualifying Matters - Additional	Infrastructure - Water and wastewater constraints	Add qualifying matters for Wastewater in Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
10	593.1	Gail Lorraine Stratton	Qualifying Matters - Additional	Qualifying Matters - Additional	Apply Transport as a QM to reduce impact of MDRS in Warkworth, as applies to (operative) Single House zoned sites.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has planned transport infrastructure upgrades, some of which are under construction. There is an existing public transport network with planned extensions. Do not apply Transport as a Qualifying Matter

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	OGC2 Limited position	Decision sought (and reasons)
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
11	593.2	Gail Lorraine Stratton	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Apply Infrastructure as a QM to reduce impact of MDRS in Warkworth as applies to (operative) Single House zoned sites.	OPPOSE	Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Warkworth has various planned infrastructure upgrades, some of which are under construction. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
12	595.1	Gordon Loughnan	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	Decline the plan change: Warkworth needs infrastructure upgrades to cope with growth.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Applying Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
13	595.2	Gordon Loughnan	Plan making and procedural	General	Decline the plan change: Warkworth does not have a transport hub commensurate with MDRS of PC78.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
14	675.1	Warkworth Area Liaison Group [WALG]	Qualifying Matters – Infrastructure	Infrastructure – Water and wastewater constraints	Add wastewater QM for Warkworth.	OPPOSE	Warkworth has planned and under construction upgrades to the wastewater network. Applying Wastewater Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Wastewater as a Qualifying Matter Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
15	675.2	Warkworth Area Liaison Group [WALG]	Qualifying Matters – Additional	Qualifying Matters – Additional	Add a Transport QM for Warkworth.	OPPOSE	Applying Transport Infrastructure as a Qualifying Matter in Warkworth would not pass the legal tests for applying a Qualifying Matters specified in the legislation. Do not apply Transport as a Qualifying Matter

Further submission point	Sub #/Point	Submitter Name	Topic	Sub Topic	Summary of Decisions Requested	OGC2 Limited position	Decision sought (and reasons)
							Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
16	978.2	Noeline Walsh	Urban Environment	Larger rezoning proposal	Reject the proposed housing intensification of Warkworth Central area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
17	1769.30	Anne Perratt	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR	Include Warkworth as a Special Character Area.	OPPOSE	The legislation is clear that towns such as Warkworth must be included. Warkworth contains Relevant Residential zones and is part of the Urban Environment as defined in the legislation. The changes sought are also appropriate because the Council Structure Plan for Warkworth did not look at land use in the existing urban areas where it is appropriate to have higher density residential development in proximity to the Town Centre and within walkable catchments. Previous studies of the Warkworth Town Centre have established that Warkworth does not have a particular character in relation to built form. Retain Residential – Mixed Housing Urban zoning in Warkworth and other changes sought and supported for higher density residential zones in specific locations.
18	2392.13	Ngāti Te Ata Waiohua	Outside Urban Environment	Future Urban Land Proposals - Excluded from IPI PC	Support no rezoning of either Future Urban Zone land or other non-residential sites through the NPS-UD.	OPPOSE	The legislation clearly enables Future Urban Zoned land to be considered as part of PC78 through the creation of 'new residential zones'. The site-specific rezoning of Future Urban zoned land through PC78 will result in a more efficient use of the land and will contribute to a well-functioning urban environment. This is particularly relevant where Future Urban zoned land has been developed for residential purposes or has an approved resource consent to develop the land for residential purposes. In these instances, the residential development of the Future Urban zoned land occurs prior to the live zoning of the Future Urban land through the Unitary Plan process. Rezone Future Urban zoned land (including land such as Lot 2 DP 510787 McKinney Road, Warkworth) that has been or is in the process of being developed for residential purposes to Residential - Mixed Housing Urban with no qualifying matters.

End of Report

Sarah El Karamany

From: Mark Arbuthnot <marbuthnot@bentley.co.nz>
Sent: Friday, 20 January 2023 3:31 pm
To: Unitary Plan
Cc: Alistair Kirk
Subject: PC78: Intensification
Attachments: PC78 further submission 20 January 2023.pdf

Please find **attached** a further submission made on behalf of Ports of Auckland Ltd on PC78: Intensification.

I would be grateful if you could acknowledge receipt.

Regards,

Mark Arbuthnot

BENTLEY&Co
Resource Management Consultants

Level 12, 23 Customs Street East, Auckland CBD
PO Box 4492, Shortland Street, Auckland 1140

Mobile: 029 200 4896

Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: **Auckland Council**
Private Bag 92300
Auckland 1142

Name: Ports of Auckland Limited ("**POAL**")
PO Box 1281, Auckland 1140

Scope of further submission

1. This is a further submission in support and opposition to a submission on a change to the following plan (the **proposal**):
   - Plan Change 78 Intensification to the Auckland Unitary Plan (Operative in part).

2. POAL has an interest in the proposal that is greater than the interest that the general public has because POAL owns land within the Auckland region which is potentially affected by the relevant submissions either directly or indirectly.

3. This further submission responds to points raised in other submissions that relate to POAL's land, or may have implications for POAL's assets and operations.

Submissions supported and opposed

4. The submissions supported and opposed are set out in the table **attached** as **Schedule 1** to this further submission.

Reasons for further submission

5. For the submissions set out in **Schedule 1** that POAL supports (either in full or in part), those submissions should be allowed (either in full or in part) so as to:

   (a) promote sustainable management of resources, achieve the purpose of the Resource Management Act 1991 ("**RMA**") and give effect to Part 2 and other provisions of the RMA;
   (b) enable the social and economic well-being of the community in the Auckland region;
   (c) sustain the potential physical resource represented by POAL's assets and operations in Auckland for the future;
   (d) adequately protect POAL's operations in the Auckland region generally;
   (e) have sufficient regard to the national and regional significance of the Port of Auckland as identified within the Regional Policy Statement;
   (f) have sufficient regard to the efficient use and development of POAL's port infrastructure and of those resources which are dependent on, or benefit from, POAL's infrastructure and operations;
   (g) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;

(h) ensure the proposal is otherwise most appropriate in terms of section 32 of the RMA.

6. For the submissions set out in **Schedule 1** that POAL opposes (either in full or in part), those submissions should be disallowed (either in full or in part) so as to:

(a) promote sustainable management of resources, achieve the purpose of the Resource Management Act 1991 ("**RMA**") and give effect to Part 2 and other provisions of the RMA;
(b) enable the social and economic well-being of the community in the Auckland region;
(c) sustain the potential physical resource represented by POAL's assets and operations in Auckland for the future;
(d) adequately protect POAL's operations in the Auckland region generally;
(e) have sufficient regard to the national and regional significance of the Port of Auckland as identified within the Regional Policy Statement;
(f) have sufficient regard to the efficient use and development of POAL's port infrastructure and of those resources which are dependent on, or benefit from, POAL's infrastructure and operations;
(g) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
(h) ensure the proposal is otherwise most appropriate in terms of section 32 of the RMA.

7. Without limiting the generality of the above, the additional reasons why POAL opposes each submission are set out in **Schedule 1**.

Decisions sought

8. POAL seeks the following relief:

(a) That the submissions supported in **Schedule 1** be allowed (either in full or in part).
(b) That the submissions opposed in **Schedule 1** be disallowed (either in full or in part).
(c) Such further, alternative or other consequential amendments as may be necessary to fully address POAL's further submissions set out above and in **Schedule 1**.

9. POAL wishes to be heard in support of its further submission.

Dated 20 January 2023

Signature by its planning and resource management consultants and authorised agents Bentley & Co. Ltd.



Mark Arbuthnot

Address for Service: Ports of Auckland Limited
c/- Bentley & Co. Ltd
PO Box 4492, Shortland Street
Auckland 1140
Attn: Mark Arbuthnot

Mobile: 029 200 4896
Email: marbuthnot@bentley.co.nz

Submitter	Sub #	Submission	Support / Oppose	Reasons	Decision Sought
Golden Bay Cement	801.1	Implementation of an additional 'Qualifying Matter', in relation to reverse sensitivity for residential activities that adjoin industrial activities within the Business – City Centre Zone as detailed in Appendix B and C.	Support	POAL supports the relief sought by the Submitter, which operates from the Port of Auckland, and agrees that reverse sensitivity issues need to be taken into account in relation to residential activities within the Business – City Centre Zone.	Allow the submission
Golden Bay Cement	801.2	Amend policy within the Business – City Centre zone addressing reverse sensitivity as detailed in Appendix B.	Support	POAL supports the relief sought by the Submitter, which operates from the Port of Auckland, and agrees that reverse sensitivity issues need to be taken into account in relation to residential activities within the Business – City Centre Zone.	Allow the submission
KiwiRail	2069.2 2069.15	KiwiRail supports the identification of the STCZ and Chapter K Designations (including the rail corridor) as a qualifying matter with Table A1.4.8.1. However, KiwiRail is concerned that the application of this qualifying matter is overly constrained in the table to just activities occurring within the STCZ and rail corridor designation. It therefore seeks the addition of reference to land surrounding the rail corridor as an area subject to a qualifying matter to ensure the rules and standards sought below are appropriately recognised / provided for in Chapter A.	Oppose	POAL opposes the relief sought by the Submitter to the extent it has the potential to affect the efficient use and development of POAL's assets and operations.	Disallow the submission sought
KiwiRail	2069.9 2069.10 2069.11 2069.19 2069.20 2069.21	KiwiRail seeks a new standard requiring buildings and structures to be setback 5m from a boundary with a rail corridor be added to the setback rules for all zones adjoining the STCZ. As alternative relief, KiwiRail seeks similar setback provisions apply on a region-wide basis through	Oppose	POAL opposes the relief sought by the Submitter as it relates to "Chapter H – Business and other Zones and Precincts adjoining the rail corridor" to the extent it has the potential to affect the efficient use and development of POAL's assets and operations.	Disallow the submission sought

Submitter	Sub #	Submission	Support / Oppose	Reasons	Decision Sought
		inclusion within Chapter E27 – Transport.			
KiwiRail	2069.12 2069.13 2069.14 2069.22 2069.23 2069.24	KiwiRail seeks a new matter of discretion be added to the zones for activities that do not comply with the new permitted activity rule requiring buildings and structures to be setback at least 5m from the rail corridor. As alternative relief, KiwiRail seeks similar matters of discretion apply on a region-wide basis through inclusion within Chapter E27 – Transport.	Oppose	POAL opposes the relief sought by the Submitter as it relates to "Chapter H – Business and other Zones and Precincts adjoining the rail corridor" to the extent it has the potential to affect the efficient use and development of POAL's assets and operations.	Disallow the submission sought
Civic Trust Auckland	2286.5	Proposes the view from Emily Place Reserve in the City Centre, including the glimpse from that reserve to the harbour, be considered for formal recognition as a local view in the AUP.	Oppose	POAL opposes the relief sought by the Submitter to the extent that it may impose restrictions on activities in the Port Precinct, General Coastal Marine Zone, and/or Waitemata Navigation Channel Precinct. The relief sought does not have sufficient regard to the national and regional significance of the Port of Auckland as identified within the Regional Policy Statement or to the efficient use and development of POAL's port infrastructure and of those resources which are dependent on, or benefit from, POAL's infrastructure and operations.	Disallow the submission sought

Sarah El Karamany

From: Marika Williams <Marika.Williams@chapmantripp.com>
Sent: Friday, 20 January 2023 5:06 pm
To: Unitary Plan
Cc: Luke Hinchey; Alice Hall; Jake Meyers
Subject: RVA - Further Submission PC 78 and 79
Attachments: RVA Further Submission form Auckland PC 79.pdf; RVA Further Submission Form Auckland PC 78.pdf; RVA - further submission PC78 and 79.pdf

Good afternoon
Please find **attached** a further submission from the Retirement Villages Association of New Zealand on PCs 78 and 79, along with the accompanying forms.
Kind regards
Marika

MARIKA WILLIAMS (she/her)
SOLICITOR

Chapman Tripp

D: +64 9 358 9847

LEGAL ADMINISTRATOR: Paula Norman | D: +64 9 357 2732

www.chapmantripp.com

Disclaimer

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you receive this email in error please immediately notify the sender and delete the email.

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.

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@aucklandcouncil.govt.nz or post to :

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mr Luke Hinchey

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

Retirement Villages Association of New Zealand Incorporated

Address for service of Further Submitter

c/o Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206 Auckland

Telephone: 6493572709 Fax/Email: luke.hinchey@chapmantripp.com /marika.williams@chapmantripp.com

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Please see attached submission

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Please see attached submission

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

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 ☒

_____ 01/20/2023

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

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)**

Please see attached submission

_____

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.

Clause 8 of Schedule 1, Resource Management Act 1991

20 January 2023

To Auckland City Council (*Council*)

Name of submitter: Retirement Villages Association of New Zealand Incorporated (*RVA*)

1 This document contains further submissions on Council's proposed amendments to the Auckland Unitary Plan (*AUP*):

1.1 Proposed Plan Change 78: Intensification (*PC78*); and

1.2 Proposed Plan Change 79: Amendments to the transport provisions (*PC79*).

Interests in the submissions

2 The RVA represents a relevant aspect of the public interest and has an interest in PC78 and PC79 greater than the general public for a number of reasons, including (without limitation):

2.1 The RVA represents the interests of the owners, developers and managers of retirement villages throughout Auckland. The RVA, on behalf of its members, has a significant interest in how the AUP, including amendments proposed by PC78, provides for retirement village and aged care provision in the Auckland, given the existing and predicted demand by our members for such accommodation.

2.2 Retirement villages make a substantial contribution to housing and healthcare for older people in the region, providing for the social and economic wellbeing of communities. The ability of RVA members to provide villages that contribute to the social and economic wellbeing of Auckland will depend on the reasonableness and appropriateness of the AUP provisions, including amendments proposed by PC78 and PC79.

2.3 Given the RVA's broad membership, history and representation in Auckland, the RVA has specialist experience and expertise relevant to determining the merits of the AUP, including amendments proposed by PC78 and PC79.

2.4 The RVA made a submission on PC78 and PC79.

Decisions sought

3 The decisions sought are detailed in the table **attached** to this form as **Appendix 1**.

4 The RVA has not referenced all original submissions it supports or opposes on the basis that its own submission is clear as to what the RVA seeks for retirement villages in the region. To the extent that other submissions seek relief which "challenges the relief sought" in the RVA's primary submission (i.e. new or amended provisions that are inconsistent with or in conflict with the RVA's submission), the RVA generally opposes those submissions. To the extent that other submissions seek relief which aligns with the RVA's primary submission, the RVA supports those submissions.

Request to be heard in support of further submission

5 The RVA wishes to be heard in support of its further submission.

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

John Collyns

Executive Director

Address for service of submitter:
Retirement Villages Association of New Zealand Incorporated
c/- Luke Hinchey
Chapman Tripp
Level 34
15 Customs Street West
PO Box 2206
Auckland 1140

Email address: luke.hinchey@chapmantripp.com / marika.williams@chapmantripp.com / alice.hall@chapmantripp.com

APPENDIX 1 - FURTHER SUBMISSION ON BEHALF OF THE RVA

PC 78 - Intensification

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Scott Macarthur scott@urbanplan.co.nz	338	338.7	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
		338.21	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
		338.35, 338.36, 335.37	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
Peter George Watts and Stephanie Joyce Lees peter@peterwattsqc.com	443	443.14	Oppose	The RVA opposes the consideration of qualifying matters being extended beyond the boundary of the site containing the qualifying matter.	Disallow the submission point.
Cockle Bay Residents and Ratepayers Association Inc. lauriesleenz@gmail.com	717	717.6	Oppose	The RVA opposes the relief sought in this submission point as this is inconsistent with the RVA's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
Fire and Emergency New Zealand	837	837.1	Oppose in part	The RVA opposes the relief sought in this submission point as retirement villages have unique layouts and	Disallow submission point and exclude

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Nola.Smart@beca.com hmcgrouther@propertygroup.co.nz				functional and operational needs that are different to typical residential developments. The RVA therefore seeks for retirement villages to be excluded from any provisions related to wayfinding. Furthermore, matters relating to fire-fighting servicing are already provided for under the Building Act and it is inappropriate to duplicate controls under the Plan Change.	retirement villages from any provisions related to wayfinding.
Kāinga Ora developmentplanning@kaingaora.govt.nz	873	873.1, 873.2	Support in part	The RVA does not oppose the relief sought but seeks any relief granted is consistent with the RVA's primary submission, i.e. by including retirement village-specific policies and rules in any rezoning.	Allow submission point subject to the relief sought in the RVA's primary submission.
		873.3	Support in part	The RVA does not oppose the relief sought but seeks any relief granted is consistent with the RVA's primary submission, i.e. by including retirement village-specific policies and rules in any rezoning.	Allow submission point, subject to the relief sought in the RVA's primary submission.
Winstone Wallboards Limited Jacqui.hewson@rmgroup.co.nz	917	917.4	Oppose	The RVA acknowledges that acoustic insulation may be appropriate in some areas located within high noise areas with a purpose of providing protection/amenity to residents in such areas. However, the RVA considers that such requirements need to be determined on a case-by-case basis, with consideration given to the distance of noise sensitive activities from high noise areas. A blanket 'avoid' objective is inappropriate.	Disallow submission point.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Grey Lynn Residents Association hello@greylynnresidents.org.nz	954	954.7	Oppose	The RVA opposes the relief sought in this submission point as this is inconsistent with the RVA's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
		954.8	Oppose	The RVA opposes the relief sought in this submission point as this is inconsistent with the RVA's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
The Coalition for More Homes morehomesnz@gmail.com	1079	1079.18	Oppose	While the relief sought is unclear, the RVA generally opposes statutory design guidance to the extent it applies to retirement villages as it may not provide for their unique functional and operational needs. The RVA therefore seek for retirement villages to be excluded from any statutory design guidance.	Disallow submission point or exclude retirement villages from relief sought.
St Heliers & Glendowie Residents Association Laurenra2022@gmail.com	1343	1343.9	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS and the direction of both the NPSUD and Enabling Housing Act.	Disallow submission point or exclude retirement villages from relief sought.
Character Coalition Incorporated	2021	2021.27	Oppose	The RVA opposes the consideration of qualifying matters being extended beyond the boundary of the site containing the qualifying matter.	Disallow submission point.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
jaburns@xtra.co.nz		2021.28	Oppose	The RVA opposes the extension of qualifying matters relating to special character areas, given the desirable location of these areas, the growing needs of the community and the scarcity of land.	Disallow submission point.
Waka Kotahi evan.keating@nzta.govt.nz	2049	2049.76	Support in part	The RVA does not oppose this submission point in principle. However the RVA seeks that any relief granted recognises the unique functional and operational needs of retirement villages, whose residents have different transport demands/needs.	Allow submission point, subject to excluding retirement villages from the application of any new provisions related to this submission point.
KiwiRail michelle.grinlintonhancock@kiwirail.co.nz	2069	2069.3	Oppose	The RVA acknowledges that acoustic insulation may be appropriate in some areas located within or adjacent to high noise areas with a purpose of providing protection / amenity to residents in such areas. The RVA considers however that such requirements need to be determined on a case-by-case basis, with consideration given to the distance of noise sensitive activities from high noise areas.	Disallow submission point.
		2069.4	Oppose	The RVA acknowledges that acoustic insulation may be appropriate in some areas located within or adjacent to high noise areas with a purpose of providing protection / amenity to residents in such areas. The RVA considers however that such requirements need to be determined on a case-by-case basis, with consideration	Disallow submission point.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
				given to the distance of noise sensitive activities from high noise areas.	
Urban Auckland Graeme.Scott@ascarchitects.co.nz	2084	2084.1, 2084.2, 2084.3	Oppose	While the relief sought is not entirely clear, the RVA opposes the relief sought in as it has the potential to slow down development and is an unnecessary addition. The Plan Change enables a well-functioning urban environment through other provisions.	Disallow submission point.
		2084.7	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the purpose of the NPSUD and the MDRS, as it will slow down, not speed up development. The relief sought is also inconsistent with the RVA's primary submission.	Disallow submission point.
Enviro Waste Service Ltd kaaren.rosser@environz.co.nz	2380	2380.8, 2380.19	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS. The RVA considers that the nature of the retirement village activity requires for comprehensive waste storage and therefore this standard is not relevant.	Disallow submission point or exclude retirement villages from this standard.
		2380.25, 2380.26, 2380.27	Oppose	The RVA opposes the relief sought in this submission point as it is inconsistent with the MDRS. The RVA considers that the nature of the retirement village activity requires for comprehensive waste storage and therefore this standard is not relevant.	Disallow submission point or exclude retirement villages from this standard.

PC 79 – TRANSPORT PROVISIONS

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Traffic Planning Consultants Limited anatole@trafficplanning.co.nz	6	6.1	Oppose	The RVA opposes the relief sought as it is unnecessary to duplicate Building Code requirements in the Plan Change.	Disallow the submission point.
Founders Development Limited simone.h@foundersgroup.co.nz	11	11.2	Oppose	While it is unclear what the submitter considers to be 'concerns over accessways', there is no detail provided regarding how the design guidelines and/or development incentives may be applied in practice. The RVA seeks clarity on the relief sought and opposes to the extent that it is inconsistent with the RVA's primary submission.	Disallow the submission point.
Urban Planning Consultants scott@urbanplan.co.nz	44	44.9	Oppose	The RVA opposes the relief sought as it is appropriate for separate requirements to be established for retirement villages due to their unique functional and operational needs.	Disallow the submission point.
Greater Auckland lowrie.matt@gmail.com	61	61.2	Oppose	The RVA opposes the relief sought to the extent that it is inconsistent with the outcomes sought in the RVA's primary submission. In some circumstances, parking will be required to meet the community's needs. Matters relating to quality compact urban form can be overcome through innovative design.	Disallow the submission point.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Aedifice Property Group blair@civix.co.nz	91	91.19	Oppose	The RVA opposes the relief sought to the extent that it is inconsistent with the outcomes sought in the RVA's primary submission. In some circumstances, parking will be required to meet the community's needs. Matters relating to quality compact urban form can be overcome through innovative design.	Disallow the submission point.
Michael Lowe art@michaellowe.co.nz	18	18.1	Oppose	While the relief sought is not clear, the RVA opposes any relief that does not account for the unique trip generation and car parking requirements of retirement villages.	Disallow the submission point.
		18.3	Oppose		Disallow the submission point.

From:	Luke Paanakker
To:	Unitary Plan
Cc:	Sukhi Singh; Rayya Ali
Subject:	Further submissions on Proposed Plan Change 78 - Intensification
Date:	Friday, 20 January 2023 3:28:50 pm
Attachments:	image001.png image002.png PC 78_Further submission form_Craigieburn Range Trust.pdf PC 78_Further submission form_Euroclass Limited.pdf PC 78_Further submission form_Highbrook Living Limited.pdf PC 78_Further submission form_NZ Storage Holdings Limited.pdf PC 78_Further submission form_Rock Solid Holdings Limited.pdf PC 78_Further submission form_Stonehill Trustee Limited.pdf

Kia ora,

Please find attached further submissions on **AUP Plan Change 78 – Intensification** made on behalf of the following companies:

- Euroclass Limited
- Stonehill Trustee Limited
- Rock Solid Holdings Limited
- NZ Storage Holdings Limited
- Craigieburn Range Trust
- Highbrook Living Limited

Please email all correspondence to **Sukhi Singh** (Technical Director - Planning) of Babbage Consultants Limited on sukhi.singh@babbage.co.nz. She can also be contacted at 021 801 904.

Ngā mihi | Kind regards,

Luke Paanakker
Stu.NZPI
Student Planner

Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
Our Values: Sustainability, Team Work, Innovation, Professionalism, Respect.

CAUTION: This email message and accompanying data may contain information that is confidential and subject to legal privilege. If received in error, please notify us immediately, do not distribute the information to any party and erase all copies of the message and attachments. Thank you. ***Please consider the environment before printing this E-mail.***

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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

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.

Appendix A

AUP-OP: Plan Change 78 – Intensification

Sub#	Sub Point	Submitter Name	Address for Service	Support/ oppose
873	28	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	29	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	52	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support

Sarah El Karamany

From: Marika Williams <Marika.Williams@chapmantripp.com>
Sent: Friday, 20 January 2023 5:07 pm
To: Unitary Plan
Cc: Luke Hinchey; Alice Hall; Jake Meyers
Subject: Ryman - Further Submission PC 78 and 79
Attachments: Ryman Further Submission Form Auckland PC 79.pdf; Ryman Further Submission Form Auckland PC 78.pdf; Ryman - further submission PC78 and 79.pdf

Good afternoon
Please find **attached** a further submission from Ryman Healthcare Limited on PCs 78 and 79, along with the accompanying forms.
Kind regards
Marika

MARIKA WILLIAMS (she/her)
SOLICITOR

Chapman Tripp

D: +64 9 358 9847

LEGAL ADMINISTRATOR: Paula Norman | D: +64 9 357 2732

www.chapmantripp.com

Disclaimer

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you receive this email in error please immediately notify the sender and delete the email.

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.

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@aucklandcouncil.govt.nz or post to :

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mr Luke Hinchey

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

Ryman Healthcare Limited

Address for service of Further Submitter

c/o Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206 Auckland

Telephone: 6493572709 Fax/Email: luke.hinchey@chapmantripp.com marika.williams@chapmantripp.com

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Please see attached submission

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Please see attached submission

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

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 ☒

_____ 01/20/2023

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

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)**

Please see attached submission

_____

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.

Form 6

Clause 8 of Schedule 1, Resource Management Act 1991

20 January 2023

To Auckland Council (*Council*)

Further submitter details:
Ryman Healthcare Limited (*Ryman*)

Introduction

1 These are further submissions on Council's proposed amendments to the Auckland Unitary Plan (*AUP*):

1.1 Proposed Plan Change 78: Intensification (*PC78*); and

1.2 Proposed Plan Change 79: Amendments to the transport provisions (*PC79*).

Interest in the submissions

2 Ryman represents a relevant aspect of the public interest and has an interest in PC78 and PC79 greater than the general public for a number of reasons, including (without limitation):

2.1 Ryman has a significant interest in how the AUP, including the amendments proposed by PC78 and PC79, provides for retirement village and aged care provision in the Auckland, given the existing and predicted demand for such accommodation in the region.

2.2 Ryman wishes to ensure that the AUP, and the amendments proposed by PC78 and PC79, appropriately provide for retirement villages and all related activities so that the AUP enables proportionate, flexible, efficient and effective consenting processes.

2.3 Retirement villages make a substantial contribution to housing and healthcare for older people in the region, providing for the social and economic wellbeing of communities. Ryman's ability to provide villages that contribute to the social and economic wellbeing of Auckland will depend on the reasonableness and appropriateness of the AUP, including amendments proposed by PC78 and PC79.

2.4 Given Ryman's history, operations and current activities, Ryman has specialist experience and expertise relevant to determining the merits of the AUP provisions, including amendments proposed by PC78 and PC79.

2.5 Ryman made a submission on PC78 and PC79.

Decisions sought

3 The decisions sought are detailed in the table **attached** to this form as **Appendix 1**.

4 Ryman has not referenced all original submissions it supports or opposes on the basis that its own submission is clear as to what Ryman seeks for retirement villages in the region. To the extent that other submissions seek relief which "challenges the relief sought" in Ryman's primary submission (i.e. new or amended provisions that are inconsistent with or in conflict with Ryman's submission), Ryman generally opposes those submissions. To the extent that other submissions seek relief which aligns with Ryman's primary submission, Ryman supports those submissions.

Request to be heard in support of further submission

5 Ryman wishes to be heard in support of its further submission.

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

Matthew Brown
General Manager - Development NZ
Ryman Healthcare Limited
matthew.brown@rymanhealthcare.com

Address for service of submitter:
Ryman Healthcare Limited
c/- Luke Hinchey
Chapman Tripp
Level 34
15 Customs Street West
PO Box 2206
Auckland 1140

Email address: luke.hinchey@chapmantripp.com / marika.williams@chapmantripp.com / alice.hall@chapmantripp.com

APPENDIX 1 - FURTHER SUBMISSION ON BEHALF OF RYMAN

PC 78- Intensification

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Scott Macarthur scott@urbanplan.co.nz	338	338.7	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
		338.21	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
		338.35, 338.36, 335.37	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS.	Disallow submission point.
Peter George Watts and Stephanie Joyce Lees peter@peterwattsqc.com	443	443.14	Oppose	Ryman opposes the consideration of qualifying matters being extended beyond the boundary of the site containing the qualifying matter.	Disallow the submission point.
Cockle Bay Residents and Ratepayers Association Inc. lauriesleenz@gmail.com	717	717.6	Oppose	Ryman opposes the relief sought in this submission point as this is inconsistent with Ryman's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
Fire and Emergency New Zealand Nola.Smart@beca.com hmcgrouther@propertygroup.co.nz	837	837.1	Oppose in part	Ryman opposes the relief sought in this submission point as retirement villages have unique layouts and functional and operational needs that are different to typical residential developments. Ryman therefore seeks for retirement villages to be excluded from any provisions related to wayfinding. Furthermore, matters relating to fire-fighting servicing are already provided for under the Building Act and it is inappropriate to duplicate controls under the Plan Change.	Disallow submission point and exclude retirement villages from any provisions related to wayfinding.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Kāinga Ora developmentplanning@kaingaora.govt.nz	873	873.1, 873.2	Support in part	Ryman does not oppose the relief sought but seeks any relief granted is consistent with Ryman's primary submission, i.e. by including retirement village-specific policies and rules in any rezoning.	Allow submission point subject to the relief sought in Ryman's primary submission.
		873.3	Support in part	Ryman does not oppose the relief sought but seeks any relief granted is consistent with Ryman's primary submission, i.e. by including retirement village-specific policies and rules in any rezoning.	Allow submission point, subject to the relief sought in Ryman's primary submission.
Winstone Wallboards Limited Jacqui.hewson@rmgroup.co.nz	917	917.4	Oppose	Ryman acknowledges that acoustic insulation may be appropriate in some areas located within high noise areas with a purpose of providing protection/amenity to residents in such areas. However, Ryman considers that such requirements need to be determined on a case-by-case basis, with consideration given to the distance of noise sensitive activities from high noise areas. A blanket 'avoid' objective is inappropriate.	Disallow submission point.
Grey Lynn Residents Association hello@greylynnresidents.org.nz	954	954.7	Oppose	Ryman opposes the relief sought in this submission point as this is inconsistent with Ryman's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
		954.8	Oppose	Ryman opposes the relief sought in this submission point as this is inconsistent with Ryman's primary submission to further reduce the coverage of special character maps in order to service the growing needs of the community and the scarcity of land.	Disallow submission point.
The Coalition for More Homes morehomesnz@gmail.com	1079	1079.18	Oppose	While the relief sought is unclear, Ryman generally opposes statutory design guidance to the extent it applies to retirement villages as it may not provide for their unique functional and operational needs. Ryman therefore seek for retirement villages to be excluded from any statutory design guidance.	Disallow submission point or exclude retirement villages from relief sought.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
St Heliers & Glendowie Residents Association Laurenra2022@gmail.com	1343	1343.9	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS and the direction of both the NPSUD and Enabling Housing Act.	Disallow submission point or exclude retirement villages from relief sought.
Character Coalition Incorporated jaburns@xtra.co.nz	2021	2021.27	Oppose	Ryman opposes the consideration of qualifying matters being extended beyond the boundary of the site containing the qualifying matter.	Disallow submission point.
		2021.28	Oppose	Ryman opposes the extension of qualifying matters relating to special character areas, given the desirable location of these areas, the growing needs of the community and the scarcity of land.	Disallow submission point.
Waka Kotahi evan.keating@nzta.govt.nz	2049	2049.76	Support in part	Ryman does not oppose this submission point in principle. However Ryman seeks that any relief granted recognises the unique functional and operational needs of retirement villages, whose residents have different transport demands/needs.	Allow submission point, subject to excluding retirement villages from the application of any new provisions related to this submission point.
KiwiRail michelle.grinlintonhancock@kiwirail.co.nz	2069	2069.3	Oppose	Ryman acknowledges that acoustic insulation may be appropriate in some areas located within or adjacent to high noise areas with a purpose of providing protection / amenity to residents in such areas. Ryman considers however that such requirements need to be determined on a case-by-case basis, with consideration given to the distance of noise sensitive activities from high noise areas.	Disallow submission point.
		2069.4	Oppose	Ryman acknowledges that acoustic insulation may be appropriate in some areas located within or adjacent to high noise areas with a purpose of providing protection / amenity to residents in such areas. Ryman considers however that such requirements need to be determined on a case-by-case basis, with consideration given to the distance of noise sensitive activities from high noise areas.	Disallow submission point.
Urban Auckland	2084	2084.1, 2084.2,	Oppose	While the relief sought is not entirely clear, Ryman opposes the relief sought in as it has the potential to slow	Disallow submission point.

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Graeme.Scott@ascarchitects.co.nz		2084.3		down development and is an unnecessary addition. The Plan Change enables a well-functioning urban environment through other provisions.	
		2084.7	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the purpose of the NPSUD and the MDRS, as it will slow down, not speed up development. The relief sought is also inconsistent with Ryman's primary submission.	Disallow submission point.
Enviro Waste Service Ltd kaaren.rosser@environz.co.nz	2380	2380.8, 2380.19	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS. Ryman considers that the nature of the retirement village activity requires for comprehensive waste storage and therefore this standard is not relevant.	Disallow submission point or exclude retirement villages from this standard.
		2380.25, 2380.26, 2380.27	Oppose	Ryman opposes the relief sought in this submission point as it is inconsistent with the MDRS. Ryman considers that the nature of the retirement village activity requires for comprehensive waste storage and therefore this standard is not relevant.	Disallow submission point or exclude retirement villages from this standard.

PC 79 – Transport Provisions

Name and address of original submitter	Original Submitter number	Original submission point number/s	Support or Oppose	Reasons for my support or opposition are	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) *Give precise details*
Traffic Planning Consultants Limited anatole@trafficplanning.co.nz	6	6.1	Oppose	Ryman opposes the relief sought as it is unnecessary to duplicate Building Code requirements in the Plan Change.	Disallow the submission point.
Founders Development Limited simone.h@foundersgroup.co.nz	11	11.2	Oppose	While it is unclear what the submitter considers to be 'concerns over accessways', there is no detail provided regarding how the design guidelines and/or development incentives may be applied in practice. Ryman seeks clarity on the relief sought and opposes to the extent that it is inconsistent with Ryman's primary submission.	Disallow the submission point.
Urban Planning Consultants scott@urbanplan.co.nz	44	44.9	Oppose	Ryman opposes the relief sought as it is appropriate for separate requirements to be established for retirement villages due to their unique functional and operational needs.	Disallow the submission point.
Greater Auckland lowrie.matt@gmail.com	61	61.2	Oppose	Ryman opposes the relief sought to the extent that it is inconsistent with the outcomes sought in Ryman's primary submission. In some circumstances, parking will be required to meet the community's needs. Matters relating to quality compact urban form can be overcome through innovative design.	Disallow the submission point.
Aedifice Property Group blair@civix.co.nz	91	91.19	Oppose	Ryman opposes the relief sought to the extent that it is inconsistent with the outcomes sought in Ryman's primary submission. In some circumstances, parking will be required to meet the community's needs. Matters relating to quality compact urban form can be overcome through innovative design.	Disallow the submission point.
Michael Lowe art@michaellowe.co.nz	18	18.1	Oppose	While the relief sought is not clear, Ryman opposes any relief that does not account for the unique trip generation and car parking requirements of retirement villages.	Disallow the submission point.
		18.3	Oppose		Disallow the submission point.

Sarah El Karamany

From: Pam Shearer <pam@insidetrack.co.nz>
Sent: Friday, 20 January 2023 5:02 pm
To: Unitary Plan
Cc: Pam Shearer
Subject: PC78 Further Submission
Attachments: Microsoft Word - PC-78-Further-Submission 17 01 2023.docx.pdf

Begin forwarded message:

From: Pam Shearer <intrack@xtra.co.nz>
Subject: PC78 Further Submission
Date: 20 January 2023 at 4:57:06 PM NZDT
To: unitaryplan@aucklandcouncil.govt.nz
Cc: Pam Shearer <pam@insidetrack.co.nz>

Dear Sir/Madam,

Please find my further submission to Plan Change 78 attached.

Regards,

P. Shearer

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Pam Shearer

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

Submission No.	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz

941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

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10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

Date:
17/01/2023

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)
pam@insidetrack.co.nz

Telephone:
027 6986862

Postal address:
P.O. Box 46-196, Jervois Rd, Auckland 1147

Contact person:
(*name and designation, if applicable*)
P. Shearer

Note to person making further 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.
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.
Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:

Pam Shearer

2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

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703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
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855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
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1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com
1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com

1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
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2041	Neilston Homes	michael@campbellbrown.co.nz
2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

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10. I seek that the whole of each identified submission be disallowed.

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Signature of person making further submission:

Date:
17/01/2023

(A signature is not required if you make your submission by electronic means)

Email address:
(*for service of person making further submission*)
pam@insidetrack.co.nz

Telephone:
027 6986862

Postal address:
P.O. Box 46-196, Jervois Rd, Auckland 1147

Contact person:
(*name and designation, if applicable*)
P. Shearer

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- 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.

Sarah El Karamany

From: Unitary Plan
Sent: Friday, 20 January 2023 5:09 pm
To: Unitary Plan
Subject: FW: Southern Cross Healthcare Limited - further submission on Plan Change 78 to the Auckland Unitary Plan
Attachments: Southern Cross Healthcare Limited - further submission on Plan Change 78 to the Auckland Unitary Plan(900946105.1).pdf

Regards
Therese

Therese Strickland | Team Leader Planning Technicians
Auckland-wide planning unit
Plans and Places Department
Phone 021 943 497

Auckland Council, Level 24, 135 Albert Street, Auckland

Visit our website: : www.aucklandcouncil.govt.nz

From: Amy Dresser <Amy.Dresser@minterellison.co.nz>
Sent: Friday, 20 January 2023 4:53 PM
To: Unitary Plan <unitaryplan@aucklandcouncil.govt.nz>
Cc: Bianca Tree <Bianca.Tree@minterellison.co.nz>
Subject: Southern Cross Healthcare Limited - further submission on Plan Change 78 to the Auckland Unitary Plan [MERWNZ-MERWLIB.FID640142]

Good afternoon

Please see **attached** a submission on behalf of Southern Cross Healthcare Limited on Plan Change 78 to the Auckland Unitary Plan.

We would be grateful if you could please confirm receipt of this submission.

Ngā mihi
Amy

Amy Dresser (she/her)
Solicitor
T +64 9 353 9852M +64211479760
amy.dresser@minterellison.co.nz
MinterEllisonRuddWatts
minterellison.co.nz | LinkedIn

Important information
This email and any attachments are confidential and may be legally privileged (in which case neither is waived or lost by mistaken delivery). Please notify us if you have received this message in error, and remove both emails from your system. Any unauthorised use is expressly prohibited. MinterEllisonRuddWatts collects personal information to provide and market our services (see our privacy policy at minterellison.co.nz for more information about use, disclosure and access). MinterEllisonRuddWatts' liability in connection with transmitting, unauthorised access to, or viruses in this message and its attachments, is limited to re-supplying this message and its attachments.

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN

To: Auckland Council
Attn: Senior Policy Planner
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Names of Submitter: Southern Cross Healthcare Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz
amy.dresser@minterellison.co.nz

Introduction

1. Southern Cross Healthcare Limited (**Southern Cross**) is a submitter on Plan Change 78 (**PC 78**) to the Auckland Unitary Plan.

2. This is a further submission on behalf of Southern Cross on various submissions.

3. Southern Cross has an interest in the proposals that are greater than the interest of the general public.

4. An overview of Southern Cross' interests in Auckland and PC 78 is set out in Southern Cross' primary submission.

Further submission

5. Southern Cross' further submission points and reasons are set out in the table at **Appendix A** to this submission.

6. In addition to the specific reasons identified in Appendix A, the reasons for Southern Cross's further submission are to ensure that PC 78:

   (a) will recognise that hospitals and healthcare facilities contribute to well-functioning urban environments;

(b) will give effect to the objectives and policies of the National Policy Statement on Urban Development 2020;

(c) will contribute to well-functioning urban environments;

(d) will implement the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021;

(e) be consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);

(f) will meet the requirements to satisfy the criteria of section 32 of the RMA;

(g) will meet the reasonably foreseeable needs of future generations; and

(h) is consistent with sound resource management practice.

Relief sought

7. The relief sought by Southern Cross is set out in the table at **Appendix A** to this submission.

8. Southern Cross also seeks such other additional or consequential relief to give effect to the matters raised in this submission.

9. Southern Cross wishes to be heard in support of its submission. If others make a similar submission, Southern Cross will consider presenting a joint case with them at a hearing.

DATED this 20th day of January 2023

Southern Cross Healthcare Limited by its solicitors and duly authorised agents MinterEllisonRuddWatts



Bianca Tree

Address for service of submitter

c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Fax No. (09) 353 9701
Email: bianca.tree@minterellison.co.nz
amy.dresser@minterellison.co.nz

Appendix A – Further submission of Southern Cross Healthcare Limited (**Southern Cross**) on Proposed Plan Change 78 (**PC 78**) to the Auckland Unitary Plan

Submitter	Sub no./ point no.	Support/ oppose	Reasons for support / opposition	Decision sought
Kāinga Ora – Homes and Communities	873.4	Support	Southern Cross supports enabling up to five storey development in identified locations in the Mixed Housing Urban zone which are adjacent to land in the Terrace Housing and Apartment Buildings zone, to allow for a 'stepping down' of building heights.	Allow
	873.218 873.219 873.220	Support	Southern Cross generally supports enabling greater intensification in Epsom, as shown in Map 80. In particular, Southern Cross supports rezoning 149, 151 and 153 Gillies Ave, 156-160 Gillies Ave, and the surrounding area to the Terrace Housing and Apartment Building zone.	Allow
Eden Epsom Residential Protection Society Incorporated	951.7 951.8 951.9 951.10	Oppose	Southern Cross opposes expanding the extent of the Special Character Areas Overlay and Low-Density Residential zone in North Epsom, including: (a) 57, 55 and 51 Owens Road; and (b) 56, 54, 48A and 48 Owens Road.	Disallow
	951.11	Oppose	Southern Cross opposes zoning the rear sites on Shipherds Ave and Marama Ave to the Low Density Residential zone. The National Policy Statement on Urban Development 2020 (**NPS-UD**) is very directive in requiring greater residential intensification to be enabled, in order to provide well-functioning urban environments. To give effect to the NPS-UD it is appropriate to rezone these sites to the Mixed Housing Urban zone as they are in a location in close proximity to Newmarket Metropolitan Centre, and no qualifying matters apply.	Disallow
	951 – no submission point number	Oppose	Southern Cross opposes the submission to amend the walkable catchment of the Newmarket Metropolitan Centre to remove specified properties from the Terrace Housing and Apartment Building zone, including 30, 30A, 32 and 32A Owens Road and 147 Gillies Avenue As noted above, the NPS-UD is directive. Auckland Council is required to enable building heights of at least six storeys within a walkable catchment of the edge of	Disallow

Submitter	Sub no./ point no.	Support/ oppose	Reasons for support / opposition	Decision sought
			a metropolitan centre. A walkable catchment of a metropolitan centre is at least 800m, and the Council cannot remove these sites from the walkable catchment.	
The Coalition for More Homes	1079.6	Support	Southern Cross supports increasing the maximum building height within the walkable catchment surrounding Newmarket Metropolitan Centre to at least 35m / 10 storeys, because Newmarket has the amenities to support increased residential intensification, as discussed in Southern Cross' primary submission.	Allow
	1079.10 1079.11	Support	Southern Cross supports increasing the walkable catchment surrounding the Newmarket Metropolitan Centre to 1,600m. This is appropriate to recognise that people will walk further to access greater amenities, and the Newmarket Metropolitan Centre offers a range of amenities, as discussed in Southern Cross' primary submission.	Allow
Retirement Villages Association of New Zealand Incorporated	947.196 947.197 947.198 947.199 947.200	Oppose in part / support in part	This submitter is seeking to enable retirement villages in the Special Purpose – Healthcare Facility and Hospital zone. While it may be appropriate on some sites in this zone to enable retirement villages, this use will not be appropriate on all sites as it is important to provide sufficient capacity for hospital activities.	Allow in part
OneSixOne Medical Group Limited	1269.1 1269.2	Support	Southern Cross supports OneSixOne's submission seeking to delete the Special Character Areas Overlay from 159 and 161 Gillies Ave and the balance of this block, and to rezone these properties. This is because this block is well-located in its proximity to Gillies Ave and Newmarket Metropolitan Centre and is appropriate for a more intensive use and development.	Allow
Carolina Patricia Boyle	1978.1	Oppose	Southern Cross opposes the Gillies Ave Special Character Area around the Southern Cross Brightside Hospital site being retained, for the reasons set out in Southern Cross' primary submission.	Disallow
	1978.5	Oppose	Southern Cross opposes the walkable catchment boundary being shifted to the north side of Owens Road. This would be inconsistent with the requirements of the NPS-UD to enable building heights of at least six storeys within a walkable catchment of the edge of a metropolitan centre.	Disallow

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 78: INTENSIFICATION TO THE AUCKLAND UNITARY PLAN

To: Auckland Council
Attn: Senior Policy Planner
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Names of Submitter: Southern Cross Healthcare Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz
amy.dresser@minterellison.co.nz

Introduction

1. Southern Cross Healthcare Limited (**Southern Cross**) is a submitter and further submitter on Plan Change 78 (**PC 78**) to the Auckland Unitary Plan.

2. This is an additional further submission on behalf of Southern Cross on submission points by Eden Epsom Residential Protection Society Incorporated that were notified on 3 March 2023.

3. Southern Cross has an interest in the proposals that are greater than the interest of the general public. An overview of Southern Cross' interests in Auckland and PC 78 is set out in Southern Cross' primary submission.

Further submission

4. Southern Cross' further submission points and reasons are set out in the table at **Appendix A** to this submission.

5. In addition to the specific reasons identified in Appendix A, the reasons for this submission are to ensure that PC 78:

   (a) will recognise that hospitals and healthcare facilities contribute to well-functioning urban environments;

(b) will give effect to the objectives and policies of the National Policy Statement on Urban Development 2020;

(c) will contribute to well-functioning urban environments;

(d) will implement the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021;

(e) be consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);

(f) will meet the requirements to satisfy the criteria of section 32 of the RMA;

(g) will meet the reasonably foreseeable needs of future generations; and

(h) is consistent with sound resource management practice.

Relief sought

6. The relief sought by Southern Cross is set out in the table at **Appendix A** to this submission.

7. Southern Cross also seeks such other additional or consequential relief to give effect to the matters raised in this submission.

8. Southern Cross wishes to be heard in support of its submission. If others make a similar submission, Southern Cross will consider presenting a joint case with them at a hearing.

DATED this 17th day of March 2023

Southern Cross Healthcare Limited by its solicitors and duly authorised agents MinterEllisonRuddWatts



Bianca Tree

Address for service of submitter

c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Fax No. (09) 353 9701
Email: bianca.tree@minterellison.co.nz
amy.dresser@minterellison.co.nz

Appendix A – Further submission of Southern Cross Healthcare Limited (**Southern Cross**) on Proposed Plan Change 78 to the Auckland Unitary Plan (**PC 78**)

Submitter	Sub no./ point no.	Support/ oppose	Reasons for support / opposition	Decision sought
Eden Epsom Residential Protection Society Incorporated	951.14 951.15	Oppose	Southern Cross opposes retaining the planning provisions and controls as they relate to residential special character of Chapter D18 Special Character Areas Overlay and the Residential - Low Density Residential Zone as notified in PC 78. This is because the National Policy Statement on Urban Development 2020 (**NPS-UD**) is highly directive and requires a reassessment of special character to determine whether it meets the criteria of a qualifying matter.	Disallow
	951.16 951.17	Oppose	Southern Cross opposes amending the walkable catchment of the Newmarket Metropolitan Centre as proposed. A walkable catchment of a metropolitan centre should be at least 800m, and as set out Southern Cross' primary submission, the walkable catchment at Newmarket should be greater to reflect the amenities provided in this centre. Removing these sites from the walkable catchment would not give effect to the NPS-UD.	Disallow
	951.18 951.19 951.20	Oppose	Southern Cross opposes the submission points to remove specified properties from the Terrace Housing and Apartment Building zone. As noted above, the NPS-UD is directive. Auckland Council is required to enable building heights of at least six storeys within at least a walkable catchment of the edge of a metropolitan centre. To give effect to the NPS-UD it is appropriate to rezone these sites as they are in a location in close proximity to Newmarket Metropolitan Centre, and no qualifying matters apply. (Note submission point 951.18 was also opposed in Southern Cross' further submission dated 20 January 2023, but no point number had been allocated to this point at that time.)	Disallow
	951.21	Oppose in part	Southern Cross opposes the relief sought to retain the notified provisions for Chapter H25 Special Purpose – Healthcare and Hospital zone. Southern Cross considers that it may be appropriate to amend these provisions and extend this zone to include its Brightside Hospital and surrounding land, in order to support a well-functioning urban environment in Epsom.	Disallow

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.

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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Sukhi Singh (Babbage Consultants Limited)

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

Craigieburn Range Trust

Address for service of Further Submitter

Agent: Babbage Consultants Limited, Level 4, 68 Beach Road, Auckland 1010

Telephone: 21801904 Fax/Email: sukhi.singh@babbage.co,nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (*or* opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 78
Plan Change/Variation Name	Intensification

I support : ☐ **Oppose** ☐ (tick one) **the submission of:**

(Original Submitters Name and Address)

Refer to Appendix A

(Please identify the specific parts of the original submission)

Submission Number	**Point-Number**

The reasons for my support / opposition are:

Refer to Appendix A

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐

or part ☐ (describe precisely which part) _____

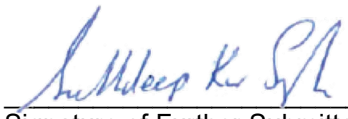
of the original submission be **allowed** ☐

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)

01/20/2023
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)**

As a property owner and developer, my properties have potential to be adverselely affected by this plan change.

_____

_____

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.

Appendix A

AUP-OP: Plan Change 78 – Intensification

Sub#	Sub Point	Submitter Name	Address for Service	Support/ oppose
873	28	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	29	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support
873	52	Kāinga Ora – Homes and Communities	developmentplanning@kaingaora.govt.nz	Support

From:	Luke Paanakker
To:	Unitary Plan
Cc:	Sukhi Singh; Rayya Ali
Subject:	Further submissions on Proposed Plan Change 78 - Intensification
Date:	Friday, 20 January 2023 3:28:50 pm
Attachments:	image001.png image002.png PC 78_Further submission form_Craigieburn Range Trust.pdf PC 78_Further submission form_Euroclass Limited.pdf PC 78_Further submission form_Highbrook Living Limited.pdf PC 78_Further submission form_NZ Storage Holdings Limited.pdf PC 78_Further submission form_Rock Solid Holdings Limited.pdf PC 78_Further submission form_Stonehill Trustee Limited.pdf

Kia ora,

Please find attached further submissions on **AUP Plan Change 78 – Intensification** made on behalf of the following companies:

- Euroclass Limited
- Stonehill Trustee Limited
- Rock Solid Holdings Limited
- NZ Storage Holdings Limited
- Craigieburn Range Trust
- Highbrook Living Limited

Please email all correspondence to **Sukhi Singh** (Technical Director - Planning) of Babbage Consultants Limited on sukhi.singh@babbage.co.nz. She can also be contacted at 021 801 904.

Ngā mihi | Kind regards,

Luke Paanakker
Stu.NZPI
Student Planner

Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street, Auckland 1140, New Zealand
T +64 9 3799980 **DDI** +64 9 3675246 **M** 0211484566 **E** joy@babbage.co.nz **W** babbage.co.nz
Our Values: Sustainability, Team Work, Innovation, Professionalism, Respect.

CAUTION: This email message and accompanying data may contain information that is confidential and subject to legal privilege. If received in error, please notify us immediately, do not distribute the information to any party and erase all copies of the message and attachments. Thank you. ***Please consider the environment before printing this E-mail.***

Sarah El Karamany

From: tania@richmondplanning.co.nz
Sent: Friday, 20 January 2023 3:20 pm
To: Unitary Plan
Cc: Maunga Authority
Subject: Plan change 78: Intensfication. Further Submission
Attachments: FS PC78 TMA_20230120.pdf

Tēnā koe

Please find attached a further submission on **Plan Change 78** from the Tūpuna Maunga o Tāmaki Makaurau Authority (Maunga Authority).

Regards, Tania Richmond

RICHMOND PLANNING LTD
Telephone **09 521 4639** Mobile **027 681 7799** **tania@richmondplanning.co.nz**
PO Box 25734, St Heliers, Auckland 1740
13 Godfrey Place, Kohimarama, Auckland 1071

Tūpuna Maunga Authority

Form 6

Further submission on Proposed Plan Change 78: Intensification to the Auckland Unitary Plan (Operative Part)

Clause 8 of Schedule 1, Resource Management Act 1991

To:
Attention: Planning Technician
Plans and Places
Auckland Council
Private Bag 92300
AUCKLAND 1142
By email: unitaryplan@aucklandcouncil.govt.nz

Name of submitter:
Tūpuna Maunga o Tāmaki Makaurau Authority (**Maunga Authority**)

1. The Maunga Authority makes this further submission on Proposed Plan Change 78 to the Auckland Unitary Plan (Operative Part) in opposition to the original submissions to the plan change as set out in Attachment A.

2. The Maunga Authority is a submitter to Proposed Plan Change 78: Intensification (number 1991). The Maunga Authority is also a person who has an interest in the proposal that is greater than the interest the general public as:

    a. governance and administration of the Tūpuna Maunga is undertaken by the Maunga Authority, which is a co-governance body with equal representation from Mana Whenua and Auckland Council (together with a non-voting Crown representative);

    b. in exercising its powers and carrying out its functions under the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014, the Maunga Authority must have regard to the spiritual, ancestral, cultural, customary, and historical significance of the Tūpuna Maunga to Ngā Mana Whenua;

    c. the Tūpuna Maunga are among the most significant spiritual, cultural, historical, archaeological and geological landscapes in the Auckland region;

Tūpuna Maunga Authority

d. the Tūpuna Maunga are sacred to Mana Whenua as taonga tuku iho (treasures handed down the generations). The Tūpuna Maunga Authority has a direct interest in protecting views to, from and between the Tūpuna Maunga; and

e. the provisions the subject of the plan change directly impact on Tūpuna Maunga.

3. The Maunga Authority opposes those submissions or parts of submissions set out in Attachment A. The Maunga Authority requests that the submissions or parts of submissions be disallowed in whole or part for the reasons set out in Attachment A.

4. The Maunga Authority wishes to be heard in support of this submission.

5. If others make a similar submission, the Maunga Authority will consider presenting a joint case with them at the hearing.

20 January 2023



Dominic Wilson
Head of Co-governance / Te Pou Mana Whakahaere
Tūpuna Maunga o Tāmaki Makaurau Authority

Address for service of submitter:

Tūpuna Maunga o Tāmaki Makaurau Authority
C/- Dominic Wilson
Private Bag 92300
Victoria Street West
Auckland 1142
dominic.wilson@aucklandcouncil.govt.nz

Tūpuna Maunga Authority

Attachment A

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
873	43	Kāinga Ora	Retain the Maunga Volcanic Viewshafts as a qualifying matter but delete all Height and Building Sensitive Areas entirely and their use as a Qualifying Matter.	Oppose that part seeking to delete all Height and Building Sensitive Areas entirely and their use as a Qualifying Matter	Disallow that part seeking to delete all Height and Building Sensitive Areas entirely	While regulatory approaches have varied since 1976, viewshafts and height controls to manage development on the slopes and margins of the maunga have been integral in protecting Auckland's iconic maunga. Regionally Significant Maunga Viewshafts and the Height and Building Sensitive Areas are a qualifying matter pursuant to sections 77I(a) and (h) and 77O(a) and (h) of the RMA.
	53	Kāinga Ora	Delete the proposed provisions seeking to further restrict land disturbance within the Height Sensitive Areas overlay.	Oppose	Disallow	Amendments are to existing Height Sensitive Areas provisions are necessary if the underlying zoning enables intensification around the slopes of the Maunga. In the absence of these amendments, existing provisions fail to protect the unique visual character, identity, physical integrity and form of the Maunga from intensification and in particular, that enabled by MDRS.
952	4	The Ascot Hospital and Clinics Limited	Clarify in Activity Table D14.4 where a site is subject to both a Maunga Viewshaft and Building Sensitive Area, and where the height limit of the Maunga Viewshaft is lower than the height limit of the Height and Building Sensitive Area, Rules D14.4.1(A1) to (A6) do not apply, and Rules D14.4.1(A7) to (A11) apply.	Oppose	Disallow	The Maunga Authority's position on the application of Activity Table D14.4 is set out in evidence and submissions in respect of ENV-2018-AKL-000276.

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
	5	The Ascot Hospital and Clinics Limited	Amend D14.4.1(A6) to remove non-compliance with Standard D14.6.4.	Oppose	Disallow	Buildings and structures intruding into viewshafts or beyond the scale permitted in the Height and Building Sensitive Area impact on the visual character, identity, and form of the Tūpuna Maunga. Temporary construction and safety structures can have a similar impact. The Maunga Authority accepts that it is not always possible to comply with the 30-day limit for temporary infringements during construction. The Maunga Authority supports increasing the duration temporary activities up to 24 months for construction activities, subject to the introduction of standards to mitigate effects of the structures on the Maunga. This can be achieved by a modification to Standard D14.6.4. The proposed amendment to the text is detailed in submission point 952.7 below. The activity status of non-complying for temporary activities beyond 24 months and the mandatory notification is commensurate with the purpose of the overlay, which is to protect Maunga that contribute to Auckland's unique landscape and which are intrinsically part of the identity of Mana Whenua.
	6	The Ascot Hospital and Clinics Limited	Amend D14.4.1(A11) to remove non-compliance with Standard D14.6.4.	Oppose	Disallow	Refer to the reasons detailed above.
	7	The Ascot Hospital and Clinics Limited	Delete Standard D14.6.4.	Oppose	Disallow in part	To address submission points 952.5 and 952.6 above, amend Standard D14.6.4.

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
						Temporary construction and safety structures. Amendments are shown in strike through, underline and red text. **D14.6.4. Temporary construction and safety structures** (1) Temporary construction and safety structures must be removed within ~~30 days~~ 24 months or upon completion of the construction works, whichever is the lesser. (2) Temporary construction and safety structures intruding into Maunga Viewshafts or Height and Building Sensitive Areas greater than 30 days: a. Must not display advertising, including logos, signage and flags. b. Any lighting is limited to that necessary to comply with safety or civil aviation requirements. c. Be non-reflective and painted in a muted or recessive colour.
1655	6	Masfen Holdings Ltd	Delete the Volcanic viewshaft controls as they relate to the Newmarket Metropolitan Centre.	Oppose	Disallow	Newmarket Metropolitan Centre is within 800m of Maungawhau. Multiple Regionally Significant Maunga Viewshaft

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
						to Maungawhau traverse Newmarket Metropolitan Centre. The regional and national value of this Maunga is recognised in Schedule 20 of the AUP(OP). The Council's section 32 clearly sets out Regionally Significant Maunga Viewshaft are a qualifying matter and it has been demonstrated that development above the floor of the viewshaft is incompatible with the level of development directed by Policy 3 for Metropolitan Centre.
1976	1	Susan King and Abe King	Delete the Regional Maunga Viewshafts and Height and Building Sensitive Areas overlay as a QM.	Oppose	Disallow in part	Regional Maunga Viewshafts and Height and Building Sensitive Areas are qualifying matters. The submission supports retaining Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay, but like similar submissions, seeks the ability to apply MDRS where development does not trigger consent under Chapter D14. The Maunga Authority does not oppose the use of MDRS where the floor of the Regionally Significant Maunga Viewshaft is above the maximum permitted MDRS height and a development complies with the Height and Building Sensitive Area standards (where applicable).
1984	3	The Surveying Company Ltd	Confirm the Volcanic Viewshafts and Height Sensitive Areas Overlay qualifying matter applies only where development on a site within this overlay will	Oppose	Allow in part	The Maunga Authority supports providing certainty that the qualifying matter applies where a development requires consent for restricted discretionary activity or non-complying activity under Activity Table D14.4.1. This is subject to the Council addressing the Maunga Authority's

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
			infringe the viewshaft, by amending D14.1 as follows: "This overlay contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant ~~volcanic~~ ~~cones~~ maunga. This overlay has been identified as a qualifying matter in accordance with section 77I(a) and (h) and section 77O(a) and (h) of the RMA, *and is only applicable as a qualifying matter area where the viewshaft co-ordinates within this overlay are infringed*."			overarching concern that an analysis be undertaken of any consequential effects of intensification on the Maunga. The amendment proposed by the submitter does not address the height and building sensitive area overlay, which is also an integral part of the overlay. The Maunga Authority's amendments are shown in strike through, underline and red text. "This overlay contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant ~~volcanic~~ ~~cones~~ maunga. This overlay has been identified as a qualifying matter in accordance with section 77I(a) and (h) and section 77O(a) and (h) of the RMA, and is only applicable as a qualifying matter area where resource consent is required for a restricted discretionary activity or non-complying activity under Activity Table D14.4.1.
2226	5	Scentre (New Zealand) Limited ("Scentre")	Amend the Volcanic Viewshafts and Height Sensitive Areas Overlay to provide for the exclusion of temporary crane activities.	Oppose	Disallow in part	Buildings and structures intruding into viewshafts or beyond the scale permitted in the Height and Building Sensitive Area impact on the visual character, identity, and form of the Tūpuna Maunga. Temporary construction and safety structures can have a similar impact. The

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
						Maunga Authority accepts that it is not always possible to comply with the 30-day limit for temporary infringements during construction. The Maunga Authority supports increasing the duration temporary activities up to 24 months for construction activities, subject to the introduction of standards. The Maunga Authority's amendments are shown in strike through, underline and red text. **D14.6.4. Temporary construction and safety structures** (1) Temporary construction and safety structures must be removed within ~~30 days~~ 24 months or upon completion of the construction works, whichever is the lesser. (2) Temporary construction and safety structures intruding into Maunga Viewshafts or Height and Building Sensitive Areas greater than 30 days: d. Must not display advertising, including logos, signage and flags.

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
						e. Any lighting is limited to that necessary to comply with safety or civil aviation requirements. f. Be non-reflective and painted in a muted or recessive colour. The activity status of non-complying for temporary activities beyond 24 months and the mandatorily notification is commensurate with the purpose of the overlay, which is to protect Maunga that contribute to Auckland's unique landscape and which are intrinsically part of the identity of Mana Whenua.
	42	Aaron Grey	Delete viewshaft E10 from Schedule 9 and the AUP maps.	Oppose	Disallow	Viewshaft E10 to Maungawhau is the key entranceway to central Auckland from the north. The regional and national value of this Maunga is recognised in Schedule 20 of the AUP(OP) as well as Treaty Settlement documents. The section 32 clearly sets out Regionally Significant Maunga Viewshaft are a qualifying matter and it has been demonstrated that development above the floor of the viewshaft is incompatible with the level of development directed by Policy 3 for the City Centre. There is ample opportunity for virtually limited intensification in the City Centre outside of E10.

Auckland Unitary Plan (Operative in part) - Proposed Plan Change 78: Intensification						
Summary of Decisions Requested						
No.	**Point**	**Submitter name**	**Decision requested**	**Support or Oppose**	**Allow / Disallow**	**Reasons**
	43	Aaron Grey	Delete any other viewshafts that unduly restrict development capacity anticipated by Policy 3 of the NPS-UD.	Oppose	Oppose	This submission fails to acknowledge that viewshafts are qualifying matter and the AUP(OP) provides ample plan enabled capacity outside of the viewshafts and below the floor of the viewshafts.

Sarah El Karamany

From: Henry Sullivan <Henry.Sullivan@minterellison.co.nz>
Sent: Friday, 20 January 2023 3:50 pm
To: Unitary Plan
Cc: Bianca Tree
Subject: Viaduct Harbour Bodies Corporate - Further submission on Plan Change 78 [MERWNZ-MERWLIB.FID642228]
Attachments: Viaduct Harbour Bodies Corporate - Further submission on Plan Change 78(900944654.1).pdf

Kia ora

Please see **attached** a further submission on behalf of the Viaduct Harbour Bodies Corporate on Plan Change 78 to the Auckland Unitary Plan.

We would appreciate if you can please confirm receipt of this submission.

Ngā mihi
Henry

Henry Sullivan
Solicitor
T +64 9 353 9942M +64275550829
henry.sullivan@minterellison.co.nz
MinterEllisonRuddWatts
minterellison.co.nz | LinkedIn

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FURTHER SUBMISSION ON PLAN CHANGE 78 TO THE AUCKLAND UNITARY PLAN UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: Auckland Council
Attn: Senior Policy Planner
Unitary Plan Private Bag 92300
AUCKLAND 1142

unitaryplan@aucklandcouncil.govt.nz

Names of Submitters: The Parc Bodies Corporate
The Point Body Corporate
Lighter Quay North Body Corporate
Lighter Quay Halsey Body Corporate
Lighter Quay Stratis Body Corporate
The Quays Body Corporate
Sebel Body Corporate

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz
henry.sullivan@minterellison.co.nz

Introduction

1. The Parc Bodies Corporate, The Point Body Corporate, Lighter Quay North Body Corporate, Lighter Quay Halsey Body Corporate, Lighter Quay Stratis Body Corporate, The Quays Body Corporate, and Sebel Body Corporate (**Bodies Corporate**) were submitters on Plan Change 78 (**PC 78**) to the Auckland Unitary Plan. Details of the Bodies Corporate are included at **Appendix A** to this submission.

2. This is a further submission on behalf of the Bodies Corporate on various submissions.

3. The Bodies Corporate are persons who have an interest in the proposals that is greater than the interest of the general public.

4. An overview of the Bodies Corporate interests in the Viaduct Harbour Precinct and PC 78 are set out in the Bodies Corporate primary submission.

Further submission

5. The Bodies Corporate further submission points are set out in the table at **Appendix B** to this submission.

Relief sought

6. The relief sought by the Bodies Corporate is set out in the table at **Appendix B** to this submission.

7. The Bodies Corporate also seek such other additional or consequential relief to give effect to the matters raised in this submission.

8. The Bodies Corporate wish to be heard in support of their submission. If others make a similar submission, the Bodies Corporate will consider presenting a joint case with them at a hearing.

DATED this 20th day of January 2023

The Bodies Corporate by their solicitors and duly authorised agents MinterEllisonRuddWatts



Bianca Tree

Address for service of submitter
c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Fax No. (09) 353 9701
Email: bianca.tree@minterellison.co.nz
henry.sullivan@minterellison.co.nz

Appendix A – Details of Bodies Corporate

Body Corporate name	Body Corporate number	Body Corporate Address
The Parc	BC 336460	128 Customs Street West
	BC 321390	124 Customs St West
	BC 321391	120 Customs St West
	BC 336459	132 Customs Street West
	BC 383524	11-15 Pakenham Street East
	BC 378969	16 Market Place
	BC 323876	20 Market Place
	BC 321393	24 Market Place
	BC 321389	28 Market Place
The Point	BC 199318	101-121 Customs Street West
Lighter Quay North	BC 326496	87 - 89 Halsey Street
Lighter Quay Halsey	BC 358939	81 Halsey Street
Lighter Quay Stratis	BC 343562	83 Halsey Street
The Quays	BC 198900	99 Customs Street West
Sebel	BC 199380	85-89 Customs Street West

Appendix B – Bodies Corporate further submission on PC 78

Submitter	Original submission point	Bodies Corporate further submission	Relief sought
Viaduct Harbour Holdings Limited	1088.1 – 1088.3 Delete all provisions restricting height of development in the Viaduct Harbour Precinct and the Wynyard Precinct and replace them with: • New maximum height of 72.5m in the Viaduct Harbour Precinct and the Wynyard Precinct; • Site-specific maximum height standards for marker buildings on certain sites (as shown in Attachment 2 to the submission); and • Changes to precinct rules to implement these height standards.	Oppose. It is important to retain the provisions restricting height in the Viaduct Harbour Precinct and the Wynyard Precinct because the building height limits ensure that the open spaces and public views in the Precincts are maintained. The height limits give effect to the direction in the National Policy Statement on Urban Development 2020 (**NPS-UD**) to provide for well-functioning urban environments.	Reject submission points 1088.1 – 1088.3
	1088.4 – 1088.6 If the relief at 1088.1 – 1088.3 is not granted, delete all provisions restricting height of development in the Viaduct Harbour Precinct and the Wynyard Precinct and replace them with: • Maximum height standards in Attachment 3 to the submission; and • Changes to precinct rules to implement these height standards.	Oppose. It is important to retain the provisions restricting height in the Viaduct Harbour Precinct and the Wynyard Precinct because the building height limits ensure that the open spaces and public views in the Precincts are maintained. The height limits give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Reject submission points 1088.4 – 1088.6
	1088.7 and 1088.8 Delete all provisions governing or constraining the intensity of development on sites in the Viaduct Harbour Precinct and the Wynyard Precinct, including standards and requirements regarding maximum floor area ratios, related precinct plans, requirements for resource consent to exceed such standards, matters of discretion, and criteria for assessment.	Oppose. It is important to retain the provisions relating to intensity of development in the Viaduct Harbour Precinct and the Wynyard Precinct because the provisions ensure that the open spaces and public views in the Precincts are maintained. The provisions relating to intensity of development give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Reject submission points 1088.7 and 1088.8

	1088.10 Amend the Viaduct Harbour Precinct provisions to make dairies, restaurants and cafes, hairdressers, drycleaning agents, retail, and healthcare facilities within Area A of Sub-precinct C permitted activities (these activities currently require resource consent as a restricted discretionary activity).	Oppose. These activities should be required to obtain consent as restricted discretionary activities in the Viaduct Harbour Precinct to ensure that the Precinct continues to be a well-functioning urban environment.	Reject submission point 1088.10
	1088.12 Delete the proposed sunlight admission control rule relation to Victoria Park which requires sunlight to be allowed to reach Victoria Park.	Oppose. The rule relating to admission of sunlight to Victoria Park should be retained to ensure that the benefit of open spaces are maintained.	Reject submission point 1088.12
	1088.13 Delete maximum car parking ratios for the Viaduct Harbour Precinct.	Oppose. The maximum car parking ratios for the Viaduct Harbour Precinct should be retained because the current road infrastructure will not be able to accommodate higher traffic volumes.	Reject submission point 1088.13
	1088.17, 1088.18, and 1088.22 Delete all special character notations in the City Centre Zone and the Viaduct Harbour Precinct and the Wynyard Precinct that are not assessed to be essential in the context of the National Policy Statement for Urban Development (**NPS-UD**) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Oppose. Valuable Special Character notations in the City Centre Zone and the Viaduct Harbour Precinct should be retained.	Reject submission points 1088.17, 1088.18, and 1088.22.
	1088.19 and 1088.20 Delete the Coastal Inundation layer in the PC 78 planning maps.	Oppose. The Coastal Inundation layer should be included in the PC 78 planning maps because coastal inundation is one of the reasons why it is appropriate to restrict further development in the Viaduct Harbour Precinct).	Reject submission points 1088.19 and 1088.20
Stratis Body Corporate	2240.1 Support the current Viaduct Harbour Precinct provisions (subject to some amendments) as the provisions meet Objective 1 of the NPS-UD to provide	Support in part.	Accept submission point 2240.1, subject to amendments proposed in the

	well-functioning urban environments that enable communities to provide for their social, economic, and cultural wellbeing.	The Viaduct Harbour Precinct provisions proposed in PC 78 should be retained, subject to the amendments proposed in the Bodies Corporate original submission.	Bodies Corporate original submission.
	2240.2 Retain the height limit and maximum floor area ratio applying to Sub-precinct C of the Viaduct Harbour Precinct.	Support. It is important to retain the height limits and maximum floor area ratios in the Viaduct Harbour Precinct because the building height limits ensure that the open spaces and public views in the Precinct are maintained. The height limits and maximum floor area ratios give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Accept submission point 2240.2
	2240.3 Generally retain the provisions in PC 78 because it: • Gives effect to the sustainable management purpose of the RMA; • Maintains public access to the coastal marine area; • Manages the risks of coastal inundation; • Recognises amenity values of the coastal environment and the "human scale" and high quality built form; • Satisfies the requirements of s32 of the RMA; • Gives effect to the Regional Policy Statement which is intended to achieve a quality compact urban environment while avoiding, remedying, and mitigating adverse effects of natural hazards; • Gives effect to the NPS-UD; • Avoids, remedies, and mitigates potential adverse environmental, social, and cultural effects of greater building height and intensity in the Viaduct; and • Enables residents in the Viaduct to provide for their wellbeing, health, and safety.	Support. The Viaduct Harbour Precinct provisions proposed in PC 78 should be retained, subject to the amendments proposed in the Bodies Corporate original submission.	Accept submission point 2240.3, subject to amendments proposed in the Bodies Corporate original submission.
	2240.4	Support. Where there is a conflict between the Viaduct Harbour Precinct provisions and the City Centre Zone provisions,	Accept submission point 2240.4

	Support the modification of the City Centre Zone provisions by the precinct provisions.	the Viaduct Harbour Precinct provisions should take precedence because those provisions provide for a well-functioning urban environment in the Viaduct Harbour Precinct.	
	2240.5 Oppose any increase in building heights and floor area ratios in the Viaduct Harbour Precinct.	Support. It is important to retain the height limits and maximum floor area ratios in the Viaduct Harbour Precinct because those provisions ensure that the open spaces and public views in the Precinct are maintained. The height limits and maximum floor area ratios give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Accept submission point 2240.5
	2240.6 Seeks that there is no increase in height, coverage, building intensity, floor area ratios for Sub-precinct C of the Viaduct Harbour Precinct.	Support. It is important to retain the height limits, coverage, building intensity, and maximum floor area ratios in the Viaduct Harbour Precinct because the building height limits ensure that the open spaces and public views in the Precinct are maintained. The height limits, coverage, building intensity, and maximum floor area ratios give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Accept submission point 2240.6
	2240.7 Retain the amendment to the Viaduct Harbour Precinct description I211.1 (i.e. The precinct is characterised by its enclosed water space, interesting water edge, proximity to the city core, and areas of low-rise character buildings <u>close to the water edge and public spaces</u>.)	Support.	Accept submission point 2240.7
	2240.8 Reject the proposed amendment to Objective I211.2(2), which would only recognise “identified significant viewshafts”.	Support Objective I211.2(2) should not refer to “identified significant views” because viewshafts should be maintained whether or not they are identified in the Precinct or planning maps. Furthermore, the viewshafts over the Hobson Wharf Extension have not yet been	Accept submission point 2240.8

	Proposes a new objective that supports the policies relating to amenity, scale, and views etc.	identified as the plan change required as a result of the Hobson Wharf Extension has not yet been notified. Limiting Objective I211.2(2) to "identified viewshafts" could be used to avoid any viewshafts over the Hobson Wharf Extension.	
	2440.9 Reject the proposed amendments to Policy 1211.3(4)(b) and Policy 1211.3(4)(c), which relate to complementing height in the Viaduct Harbour Precinct and surrounding areas).	Support.	Accept submission point 2240.9
	2240.10 and 2240.11 Add coastal inundation as a qualifying matter.	Support. Coastal inundation should be a qualifying matter because it is inappropriate to provide for greater building height and density in the area that is subject to coastal inundation.	Accept submission points 2240.10 and 2240.11
	2240.12 Opposes any submissions that seek an increase in building height and floor area ratios in the Viaduct Harbour Precinct.	Support. It is important to retain the height limits and maximum floor area ratios in the Viaduct Harbour Precinct because those provisions ensure that the open spaces and public views in the Precinct are maintained. The height limits and maximum floor area ratios give effect to the direction in the NPS-UD to provide for well-functioning urban environments.	Accept submission point 2240.12
	2240.13 Reject any 'up-zoning' sought be other parties.	Support.	Accept submission point 2240.13
Latitude 37 Bodies Corporate	196.2 Supports the proposed Viaduct Harbour Precinct provisions and the qualifying matters that apply.	Support in part. Oppose to the extent that the Bodies Corporate propose amendments to the Viaduct Harbour Precinct provisions.	Accept submission point 196.2, subject to amendments proposed in the Bodies Corporate original submission.

From: Hamish Hey
To: Unitary Plan
Cc: Darrin Johannink
Subject: [#CLC21433-155 & 157 Jervois Road] Further Submissions PC 78
Date: Friday, 20 January 2023 3:21:03 pm
Attachments: image001.png
image002.png
image003.png
PC78 FurtherSub_2224_JL Trust.PDF
PC78 FurtherSub_2225_Zanj Ltd.PDF

Afternoon

Please find attached the further submissions of our clients:

- JL Trust - Submitter Ref 2224, and
- Zanj Limited - Submitter Ref 2225.

I can confirm that a copy of these further submissions has been sent those parties whose submissions are referenced.

If you have any questions, please do not hesitate to contact me.

Kind Regards,

Hamish Hey Resource Management Planning Manager

e. hamish@clcgroup.co.nz
p. 021 433 531
ddi. 09 576 1978
w. clcgroup.co.nz
a. 4 Johns Lane, Auckland, 2010

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PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission: Zanj Ltd (Submission No. 2225)

2. This is a further submission in support of and in *opposition* to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
2224	JL Tust	hamish@clcgroup.co.nz
2146	Henderson Enterprises Ltd	Nick@civix.co.nz
1582	Jervois Properties Ltd	philip@campbellbrown.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part is that:
   a) They acknowledge the planning framework and amenity conflicts of the Business Local Centre Zone with the Special Character area Overlay Residential.

   b) They note the commercial/business character of the street scape of Jervois Road – one that is not residential and the existing lawfully established non-residential (i.e. business

PO Box 51547, Pakuranga, Auckland 2140
+64 95763276
www.clcgroup.co.nz

uses) of the properties from 155-163 Jervois Rd.

c) They identify the separate visual catchment of Jervois Road from the neighbouring Residential Zone.

d) They note the disparity of amenity outcomes along Jervois Road with neighbouring blocks by imposing the Residential SCA over a Business Zone and the opportunities for development in accordance with the Zone rules and standards.

e) They concur the application of the Residential SCA is inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.

7. I **support** the following submissions in part:

Submission No.	Submitter Name & Address for Service	Paragraph Reference	Comment
872	Heritage New Zealand bparslow@heritage.org.nz	11.4-11.10	Support the notion that the flawed assessment process has skewed results.
1441	Jeffrey Lane Fearon jeff@fearonhay.com	13a	Support - subjective assessment process, lacking rigour of other matters pertinent to an assessment.
	Jeffrey Lane Fearon jeff@fearonhay.com	27	Support - use of business zones to provide a mix of commercial and multi-level residential living.
	Jeffrey Lane Fearon jeff@fearonhay.com	36	Support - intensification of the inner city fringe.

8. I **oppose** the following submissions of:

Submission No.	Submitter Name	Paragraph Reference	Comment
872	Heritage New Zealand bparslow@heritage.org.nz	23.1	Oppose the inference that all pre PC-78 SCA's should be retained. This is contrary to the Policies 1(b, 3(d), 6(b), 6(c), of the NPS-UD and does not allow for anomalies such as 155-163 Jervois Road where there is conflict between the Zoning and the SCA that results in a non-enabling Planning Framework that is Contrary to Part II of the Act.

9. I **oppose** the above submission in part.

10. The reasons for my **opposition** in part is as detailed above (Para 8). Further we comment:
    - the blanket retention of the pre-PC78 SCA's does not take into the consideration zoning conflicts (either existing or under the Plan Change), and

    - results in a planning framework that is not enabling of either land use or development.

    The blanket roll over of all SCA's, is there for inappropriate resulting in a confused and non-enabling planning framework where anomalies of zoning exist i.e. where the intended underlying Zoning is not residential. Hence for the reasons outlined in our original submission the residential SCA should not be applied over the Business -Local Centre Zone land at 155-163 Jervois Rd.

11. I seek that the part of the identified submission be disallowed.

12. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:



pp

Agent for Zanj Ltd

Date: 20 January 2023

Electronic address for service of person making further submission:

hamish@clcgroup.co.nz

Telephone:

(09) 576 1978 or Mobile +64 21 433 531

Postal address:

C/- CLC Consulting Group Ltd
PO Box 51 547
Pakuranga
AUCKLAND 2140

Contact person: Hamish Hey

Therese Strickland

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Friday, 20 January 2023 10:46 PM
To: Unitary Plan
Subject: Unitary Plan further submission - Plan Change 78 - Aedifice Property Group
Attachments: PC78 Further Submission - Aedifice Property Group.pdf; PC78 Further Submission - Aedifice Property Group - Table 1.pdf

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

Contact details

Full name of person making a further submission: Aedifice Property Group

Organisation name:

Full name of your agent: Jessica Esquilant

Email address: jessica@civix.co.nz

Contact phone number: 0212585170

Postal address:
PO Box 5204
Victoria Street West
Auckland
Auckland 1142

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:
Various - Refer to Letter

Submission number: Various - Refer to Letter

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

Specific parts of the original submission that your submission relates to:
Point number Various - Refer to Letter

The reasons for my or our support or opposition are:
Various - Refer to Letter

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

Specify the parts of the original submission you want to allow or disallow:
Various - Refer to Letter

Submission date: 20 January 2023

Supporting documents
PC78 Further Submission - Aedifice Property Group.pdf
PC78 Further Submission - Aedifice Property Group - Table 1.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:
This is a further submission on behalf of APG, who have an interest greater than the general public. In this case, APG owns residentially zoned properties across the Auckland Region and is currently undertaking a number of medium to large format developments.

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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Table 1 – Further Submission Points

Submissions Supported				
Submission No.	**Submitter Name**	**Submission Point**	**Reason for Support**	**Decision Sought**
873	Kāinga Ora	873.2	Concur with the deletion of the *Low Density Residential Zone* ("LDRZ"). Its inclusion is not necessary to avoid, remedy or mitigate the adverse effects of the proposed activity and will constrain positive environmental effects and outcomes which align with the NPS-UD.	Allow the submission
		873.4	The proposed amendments to the *Mixed Housing Urban* ("MHU") Zone to remove reference to QM, and other wording amendments result in a more efficient and consistent interpretation, relative to other AUP provisions and aligning with the MDRS.	Allow the submission
		873.6	Concur with the proposed amendments to the *Terrace Housing and Apartment Building* ("THAB") Zone to remove reference to QM, and other wording amendments result in a more efficient and consistent interpretation, relative to other AUP provisions and aligning with the MDRS.	Allow the submission
		873.11 873.12	The application of THAB zoning within 1200m of all rapid transit stations is supported, as it will achieve Policy 3(c) of the NPS-UD.	Allow the submission
		873.13	The application of THAB zoning within 400m of all Frequent Transit Network ("FTN") routes is supported, as it will achieve Policy 3(c) of the NPS-UD.	Allow the submission
		873.14	The application of THAB zoning within 800m of the edge of Town Centre Zones is supported, as it will achieve Policy 3(d) of the NPS-UD.	Allow the submission
		873.28	The use of overlays as a tool to introduce provisions for QM is supported. This approach represents the most appropriate way to achieve the objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	Allow the submission
		873.29	The proposed approach of excluding QM from zone provisions is supported. This approach represents the most appropriate way to achieve the objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	Allow the submission
		873.32	The submission seeks to rezone all sites shown as LDRZ, to MHU or THAB, with any features shown as QM to be spatially mapped and managed via overlays. This approach is supported, as it represents the most appropriate way to achieve the	Allow the submission

			objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	
		873.48 873.49 873.50	Concur with the opposition of the infrastructure controls, and their identification as QM as the approach is contrary to the requirements of the RMA (particularly section 77I).	Allow the submission
		873.51 873.52	Concur with the opposition of the LDRZ where natural hazards are identified as a QM. The suggested alternate approach of spatially mapping these instead is supported. This approach represents the most appropriate way to achieve the objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	Allow the submission
		873.72 873.74 873.77 873.81	The proposed deletion of definitions of: *Canopy Tree, Deep Soil Area* and *Urban Heat Island,* and reverting to the previous AUP text for the definition of *landscaped area* is supported. These provisions are contrary to the MDRS.	Allow the submission
938	New Zealand Housing Foundation	938.21 938.22	Concur with the deletion of additional standards within the MHU Zone, as these provisions are contrary to the MDRS.	Allow the submission
		938.33 938.34 938.35 938.36 938.37 938.38 938.39 938.40	The amendments sought to the MHU zone are supported, and will ensure a consistent approach within the context of the NPS-UD and other AUP chapters.	Allow the submission
2303	Templeton Group	2303.8 2303.9	Concur with the opposition of natural hazards as a QM, and agree that provisions identified should be deleted. This approach represents the most appropriate way to achieve the objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	Allow the submission

		2303.10 2303.11 2303.12 2303.13 2303.14 2303.15	The submission seeks proposed amendments to Chapter E38 Subdivision – Urban to remove reference to QM, noting these are dealt with elsewhere in the plan. The changes as sought are supported, as they will result in a more efficient and consistent interpretation, relative to other AUP provisions and better aligns with the MDRS.	Allow the submission
		2303.24	Concur with the opposition of the LDRZ, and agree that provisions identified should be deleted. Its inclusion is not necessary to avoid, remedy or mitigate the adverse effects of the proposed activity and will constrain positive environmental effects and outcomes which align with the NPS-UD.	Allow the submission
		2303.31 2303.34 2303.35 2303.46 2303.47 2303.48 2303.50 2303.79	The amendments sought to the MHU zone are supported, and will ensure a consistent approach within the context of the NPS-UD and other AUP chapters.	Allow the submission
		2303.86 2303.87 2303.89 2303.90 2303.91 2303.96 2303.97 2303.98 2303.100 2303.101 2303.102	The amendments sought to the THAB zone are supported, and will ensure a consistent approach within the context of the NPS-UD and other AUP chapters.	Allow the submission
		2303.190	Concur with opposition to the approach to QM under PC78, and agree that the AUP already includes mechanisms such as overlays, precincts and Auckland-wide controls to address such matters. This approach represents the most appropriate	Allow the submission

			way to achieve the objectives of the RMA and the objectives of the Auckland Unitary Plan ("AUP") while still enabling development under the MDRS, as sought by the objectives of the NPS-UD.	
		2303.191	Concur with the opposition of Council identified QM and the resulting lower intensity zoning. The suggested deletion of the QM identified under Chapter 77I(j) is supported, and will insure a consistent approach for the implementation of the RMA and NPS-UD.	Allow the submission

Submissions Opposed				
Submission No.	**Submitter Name**	**Submission Point**	**Reason for Opposition**	**Decision Sought**
		939.3	The proposed deletion expands the scope of the provision, and would introduce requirements for footpath or road upgrades for all developments. This change is opposed as the outcome would be overly onerous for developments of 1-3 dwellings, and does not represent the most appropriate way to achieve the objectives of the RMA, the objectives of the NPS-UD or development objectives of the MDRS.	Disallow the submission
		939.4	The change sought is opposed, as it alters the application of the objective. Seeking the ability to review all transport, not just public transport, as a potential constraint prohibiting intensification, is contrary to the outcomes sought by the NPS-UD and therefore the proposed change is opposed.	Disallow the submission
		939.13	The proposed deletion expands the scope of the provision in an attempt to further restrict development, in a manner which is contrary to the outcomes sought by the NPS-UD and therefore the proposed change is opposed.	Disallow the submission
		939.18 939.19	The introduction of new text into the outlook space provisions for the THAB and MHU as proposed will change the application of this standard. The AUP provisions and the MDRS do not require outlook spaces to be taken from the edge of balconies, which would in practice expand the specified areas required for dwellings. The introduction of this approach is strongly opposed, as it is contrary to the existing and required provisions of the AUP and MDRS. Inflation of the outlook spaces in residential zones is not necessary to avoid, remedy or mitigate the adverse effects	Disallow the submission

			of the proposed activity and will constrain positive environmental effects and outcomes.	
		939.20	The amendment from 1.5m to 1m wide pathways within the definition will change the application of the landscaped area standards within the AUP. The introduction of this approach is strongly opposed, as it is contrary to the existing and required provisions of the AUP and MDRS. Reducing the pathway width which can be included as landscaped area is not necessary to avoid, remedy or mitigate the adverse effects of the proposed activity, and will instead constrain positive environmental effects and outcomes, by discouraging the inclusion of wider pathways through developments.	Disallow the submission

+64 9 303 1113
www.civix.co.nz
Level 1, 87 Albert Street, Auckland
PO Box 5204 Wellesley St, Auckland 1141

Auckland Council
Attn: Plans and Places
unitaryplan@aucklandcouncil.govt.nz

20 January 2023

Further Submission on behalf of Aedifice Property Group in Support and Opposition of Submissions on Notified Proposed Plan Change 78

Original Submission

Civix made a submission on the notified *Proposed Plan Change 78* ("**PC78**") to the *Auckland Unitary Plan (Operative in Part)* ("**AUP**"), on behalf of Aedifice Property Group ("APG") referred to as submission #1962.

Scope

This is a further submission on behalf of APG, who have an interest greater than the general public. In this case, APG owns residentially zoned properties across the Auckland Region and is currently undertaking a number of medium to large format developments.

Submissions Supported

APG, **support**s the following submissions:

Submission No.	Submission Point(s)	Submitter Name
873	• 873.2 • 873.4 • 873.6 • 873.11 • 873.12 • 873.13 • 873.14 • 873.28 • 873.29 • 873.32 • 873.48 • 873.49 • 873.50 • 873.51 • 873.52 • 873.72 • 873.74 • 873.77 • 873.81	Kāinga Ora
938	• 938.21 • 938.22 • 938.33 • 938.34 • 938.35 • 938.36 • 938.37 • 938.38	New Zealand Housing Foundation

	• 938.39 • 938.40	
2303	• 2303.8 • 2303.9 • 2303.10 • 2303.11 • 2303.12 • 2303.13 • 2303.14 • 2303.15 • 2303.24 • 2303.31 • 2303.34 • 2303.35 • 2303.46 • 2303.47 • 2303.48 • 2303.50 • 2303.79 • 2303.86 • 2303.87 • 2303.89 • 2303.90 • 2303.91 • 2303.96 • 2303.97 • 2303.98 • 2303.100 • 2303.101 • 2303.102 • 2303.190 • 2303.191	Templeton Group

The specific submission points supported are detailed in the attached table (refer Table 1). The above submissions are supported in relation to each identified submission point, which align with the matters presented within APG's primary submission (reference #1962).

Submissions Opposed

APG **oppose** the following submission:

Submission No.	Submission Point(s)	Submitter Name
989	• 939.3 • 939.4 • 939.13 • 939.18 • 939.19 • 939.20	Auckland Council

The specific submission points opposed are detailed in the attached table (refer Table 1). These matters introduce updates to provisions which alter their application, rather than relating to inconsequential corrections to errors. The Auckland Council utilising a submission on PC78 as a mechanism to update the provisions in such a way (that is, beyond minor corrections where there is a clear error), should be disallowed and instead, any changes seeking changes to the rules should be subject to re-notification to the public in accordance with Schedule 1 of the RMA.

Decisions Sought

APG seeks that specific submission points relating to submissions #873, #938 and #2303 be allowed. These supported submissions include relief which will ensure outcomes consistent with planning documents including the National Policy Statement of Urban Development 2020 ("NPS-UD"), and represent the most appropriate way to achieve the objectives of the RMA, including the development objectives of the Medium Density Residential Standards ("MDRS").

APG also seeks that specific submission points relating to submission #989 be disallowed. The relief sought by these submissions does not represent the most appropriate way to achieve the objectives of the RMA, the objectives of the NPS-UD, and development objectives of the MDRS, and in many instances is contrary to mandatory requirements of these frameworks.

APG wish to be heard in support of this further submission. If others make a similar submission, APG will consider presenting a joint case with them at a hearing.

Kind Regards,



Jessica Esquilant
Senior Planner
Civix Limited – Planning, Engineering and Surveying
M: 021 258 5170
E: jessica@civix.co.nz

CIVIX LIMITED
ON BEHALF OF AEDIFICE PROPERTY GROUP

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:
Dawn Bertasius
……
2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

Submission No.	Submitter Name	Address for Service
872	Heritage New Zealand	bparslow@heritage.org.nz
954	Grey Lynn Residents Association	hello@greylynnresidents.org.nz
1441	Jeffrey Lane Fearon	jeff@fearonhay.com
1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
2201	Freemans Bay Residents Association	bartlett@shortlandchambers.co.nz

5. I **support** the above submissions in their entirety.

6. The reasons for my **support** are that these submissions in whole or in part consistently support the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

7. I **oppose** the following submissions of:

rajm@isolutionsnz.com

	Submitter Name	Address for Service
351	iSolutions	rajm@isolutionsnz.com
636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com

1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz

2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

……
Date:20/01/2023

……

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:
……

Telephone: 0212224449
……

Postal address: 10 Melford St Saint Marys Bay
……

Contact person: [*name and designation, if applicable*]
……

Note to person making further 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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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.

PROPOSED PLAN CHANGE 78, AUCKLAND UNITARY PLAN

My Further Submission in support of and opposition to submissions on notified proposed Plan Change 78.

Clause 8 of Schedule 1, Resource Management Act 1991

To Auckland Council –

1. Name of person making this further submission:
Roma Bertasius
……
2. This is a further submission in support of and in opposition to submissions on proposed Plan Change 78 (the **proposal**).

3. I am a person who has an interest in the proposal that is greater than the interest the general public has because I own a property and live in the area affected by the Proposal.

4. I **support** the following submissions of:

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1823	Parnell Heritage	enquiries@parnellheritage.org.nz
1950	Herne Bay Residents Association	marionkohler03@gmail.com
2021	Character Coalition	jaburns@xtra.co.nz
2193	St Marys Bay Association	brian@metroplanning.co.nz
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rajm@isolutionsnz.com

	Submitter Name	Address for Service
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636	Glenbrook Beach Residents & Ratepayers Association	gbresidentsandratepayersass@gmail.com
665	Bosnyak Investments Ltd	matthew@positiveplanning.co.nz
703	Rutherford Rede Ltd	david@davidwren.co.nz
812	Iain McManus	iain@civitas.co.nz
836	North Eastern Investments Ltd	amanda@proarch.co.nz
839	Russell Property Group	Vijay.lala@tattico.co.nz
840	Auckland City Residents Group	nbuckland@xtra.co.nz
841	Villages of New Zealand Ltd	Tom.Morgan@tattico.co.nz
855	MHE Ltd	michael@campbellbrown.co.nz
871	Property Council NZ	Logan@propertynz.co.nz
873	Kainga Ora	developmentplanning@kaingaora.govt.nz
894	Independent Maori Statutory Board	helen.atkins@ahmlaw.nz
897	Catholic Diocese of Auckland	michael@campbellbrown.co.nz
934	John Mackay	john@urbs.co.nz
938	NZ Housing Foundation	michael@campbellbrown.co.nz
941	Foodstuffs NZ	dallan@ellisgould.co.nz
949	Piper Properties Consultants Ltd	Tom.morgan@tattico.co.nz
971	RTJ Property Professionals Ltd	russell@rtjproperty.co.nz
1066	Avant Group Ltd	mark.vinall@tattico.co.nz
1073	Fulton Hogan Land Development Ltd	nickr@barker.co.nz
1079	Coalition for More Homes	morehomesnz@gmail.com

1980	Fletcher Residential Ltd	kbergin@frl.co.nz
086	Sonn Group	Mark.Vinall@tattico.co.nz
1175	S D Patel Family Trust	vignesh@mhg.co.nz
1182	Body Corporate 128255	vignesh@mhg.co.nz
1359	Hugh Green Ltd	emma@civilplan.co.nz
1380	Synergy Planning	yu.yi@synergyplanningassociates.com
1430	Hanno Willers	hwillers@gmail.com
1442	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz
1543	Winton Land Ltd	ross.cooper@tattico.co.nz
1582	Jervois Properties Ltd	Philip@campbellbrown.co.nz
1585	Gibbonsco Management Ltd	ross.cooper@tattico.co.nz
1586	Shundi Tamaki Village Ltd	ross.cooper@tattico.co.nz
1717	SarahC	greenredblueblack@gmail.com
1729	Scott M Winton	scottwinton@hotmail.com
1747	Harry Platt	harryplatt555@icloud.com
1765	Samson Corporation Ltd & Stirling Nominees Ltd	office@brownandcompany.co.nz
1962	Aedifice Property Group	jessica@civix.co.nz
1992	Te Aitutaki Whanau Trust	david@whitburngroup.co.nz
2025	Greater Auckland	Lowri.matt@gmail.com
2036	Evans Randall Investors Ltd	michael@campbellbrown.co.nz
2040	Mike Greer Developments	michael@campbellbrown.co.nz
2041	Neilston Homes	michael@campbellbrown.co.nz

2083	Universal Homes	michael@campbellbrown.co.nz
2238	Beachlands South Ltd Partnership	bill.loutit@simpsongrierson.com
2248	Stuart P.C. Ltd	mark.vinall@tattico.co.nz
2273	Aaron Grey	aaronjgrey@gmail.com

8. I **oppose** the above submissions in their entirety.

9. The reasons for my **opposition** are that these submissions in whole or in part adversely affect the historic heritage and special character of St Mary's Bay at present protected under the Auckland Unitary Plan.

10. I seek that the whole of each identified submission be disallowed.

11. I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person making further submission:

……
Date:20/01/2023

……

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:
……

Telephone: 021759991
……

Postal address: 870 Woodcocks Rd, Warkworth, Auckland 0891
……

Contact person: [*name and designation, if applicable*]
……

Note to person making further 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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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

Auckland Council
Te Kaunihera o Tāmaki Makaurau

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Patrick Howard Castle

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

Address for service of Submitter

6 Bridgewater Road

Parnell, Auckland

Telephone: 21871821 Fax/Email: drawbridge6@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 78

Plan Change/Variation Name: Intensification

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)*

Application of Policy 3 of NPS-UD to Parnell
Application of Policy 3 of NPS-UD to Parnell

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:

Please refer to submission attached.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

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

Decline the proposed plan change / variation ☐

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

Please refer to submission attached.

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)

20/01/2023
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.

FURTHER SUBMISSION ON PROPOSAL FOR PLAN CHANGE 78 PURSUANT TO CLAUSE 6(3) OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991

TO: Auckland Council ("**Council**")

SUBMITTER: Patrick Howard Castle ("**I**")

Introduction

1. I reside at 6 Bridgewater Road, Parnell, that is subject to Proposed Plan Change 78 ("**PC78**") PC78.

2. I am not a trade competitor.

3. I support the application of policy 3 of the National Policy Statement on Urban Development (**"NPS-UD")** to the land West of St Stephens Avenue to Gladstone Road Parnell upscaling of land west of St Stephens Avenue to Gladstone Road, Parnell, with the exception of properties of properties of special character at 104-112 and 118-130 St Stephens Avenue, 2 Judge Street, 4 Judge Street, and 6 Judge Street, Parnell.

Further submissions ("**NPS-UD**")

1. **NPS-UD** is a forward-looking document. It recognizes that urban environments change over time in response to changing needs of people, communities, and future generations (Objectives 1, 3 and 4 NPS-UD May 2022).

2. As a forward-looking policy the NPS-UD also recognizes reasonably foreseeable future changes, which in the context of these further submissions include:

   (a) The movement of Auckland's city centre towards the harbour edge

   (b) The limited capacity for further development of land to the west of Queen Street adjacent to the harbour edge

   (c) Recognition of the eventual return of land occupied by the Ports of Auckland to public use

   (d) The redevelopment of the built environment adjacent to Beach Road and the Quay Park precinct as a consequence of increased pedestrian traffic entering the city centre along Beach Road and

   (e) Eastward development of the city centre.

Walkable Catchment

3. I support the distinction between east and west of Parnell St Stephens Avenue bisects the isthmus from the junction with Gladstone Road in the south to Point Resolution in the north and recognises the topographical orientation of the area west of St Stephens Avenue towards the city centre zone including the land currently occupied by Ports of Auckland.

4. I strongly support the Council's entrance points to the city's centre zone adjacent to Parnell at the beginning of Tamaki Drive, the Tamaki Drive/Quay Street intersection and The Strand/Beach Road intersection.

5. I submit it is incorrect to claim that:

   (a) **the land currently occupied by the Ports of Auckland should be excluded by the walkable catchment on the grounds of lack of public access.** Ports of Auckland is a significant employer which, according to its website, directly employs more than 600 people based at and around its headquarters adjacent to Fergusson Wharf. Access to employment being a key objective of NPS-UD;

   (b) **the entrance point to the eastern edge of the city should be Spark Arena.** In addition to the level of employment provided by Ports of Auckland there is also the presence of the retail precinct at 8 Quay Street that provides a range of retail services including dentistry, food, motor vehicle servicing and dry cleaning adjacent to the city zone entrance to Quay street at the junction of the Strand and Quay Street.

   (c) **there are significant barriers to pedestrian connectivity between Parnell and the boundary of the walkable catchment**. The Strand contains pedestrian crossing points at (i) the intersection of Tamaki Drive/Quay Street, (ii) Coatsmore Way and (iii) at the intersection with Beach Road. Nor is it correct to claim that the central rail network obstructs access to the city centre, or that it is unsafe for pedestrians.
   The built environment of Beach Road and parts of Quay Park await updating or redevelopment. Consistent with the economic principle that supply responds to demand, it is foreseeable that greater pedestrian traffic will stimulate improvements in the area. In the meantime Quay Park Health Centre at 68 Beach Road continues to provide pharmacy, dental, physiotherapy, chiropractic a specialist day hospital and other professional service accommodation.

   (d) **the edge of the city centre zone containing Quay Park and the port precinct is not in itself a destination for pedestrians and does not reflect the city centre**.
   According to clause 3.2.4 of Council's PC78 Evaluation Report, Ministry for the Environment ("**MfE**") guidance states that the "edge" is the **outside edge** of the parcels zoned as city centre zone and is not a destination for pedestrians as claimed.
   Although a busy intersection, the entrance to Quay Street is controlled by traffic lights and is safe for pedestrians entering the city centre zone.
   Nor is it accurate to describe Gladstone Road as a steep slope inhibiting walkability when compared to Franklin Road and College Hill providing access to Freemans Bay and Symonds Street and Upper Queen Street providing access to Grafton, two suburbs adjacent to the city centre zone with a higher proportion of persons walking to the city centre zone than Parnell.
   Auckland Unitary Plan 1209.1 recognises the future redevelopment of Quay Park precinct and "the role this precinct plays as the eastern gateway to the city centre" and that its "redevelopment must also respond innovatively to potential adverse noise and amenity affects generated by the port and the strategic transport network."

   (e) **that the typography of the area severely constrains the extent of pedestrian connectivity.** While it is true that the typography of Auckland surrounding the city centre zone is undulating, in the case of Parnell, access to the suburb is no more difficult than that of Ponsonby, Freemans Bay, Eden Terrace and Grafton, where in the case of Freemans Bay and Grafton, at least, higher percentages of people chose to walk to the city centre than Parnell.

6. I submit inclusion of the port within the city centre zone remains appropriate because of its role as a major employer and because it is reasonably foreseeable that the port will be relocated in future.

7. It is also appropriate that the Quay Park precinct not be excluded from any measurements of the walkable catchment given it is designated as the eastern gateway to the city centre.

8. The distance from 1 Bridgewater Road to the eastern most entrance point of the city centre at the beginning of Tamaki Drive and to the second most easterly entrance point at the junction of the Strand and Quay Street are within the 1200m walkable catchment as the crow flies.

9. In addition to Council's entrance points to the city centre zone, pedestrian access to the Quay Park precinct is also provided from the Strand to Ngaoho Place and Ronanye Steet.

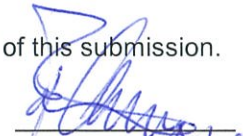
10. Council's PC78 Evaluation Point at 6.6.1.6 notes "the Auckland city centre has a large surrounding area in which a high proportion of people walk to their city centre work destination" and five suburbs around the city centre have a "walk to work" percentages over 30%, including Parnell.
"The areas with the higher percentages of people who walk to work in the city centre are around 1km (as the crow flies) from the edge of the city centre zone, Therefore, in reality some of the distances walked are likely to be closer to 2km once the actual walking route is considered. In addition, many walking destinations will be beyond the edge of the city centre zone, and therefore the walking distance will be even greater."
Council also acknowledges at 6.5.2.3 " there are many matters that impact the distance people will walk. Trying to account for every minor instance often is unrealistic. It is firstly very difficult to estimate the exact extent to which they impact the walkability. Secondly studying, measuring, and applying those to every street within every catchment is simply not feasible in the timeframes required to implement the NPS-UD. Finally, the purpose behind the walkable catchments is to identify areas for **long term land use/change/intensification**, so it is not logical to determine these areas based on short term maintenance conditions at a granular level" (emphasis added).

11. It is submitted that the conclusions referred in 6.5.2.3 apply and include the area between Judges Bay Road and St Stephens Avenue and that the gradients in that area are no greater than access to and from Parnell station from Cheshire and Falcon Streets and are considered acceptable. Persons in the area also have alternative access to the entrance point at the beginning of Tamaki Drive via the road adjacent to Judges Bay or via St Stephens Avenue to Point Resolution. In the event Council does not accept that argument, it is submitted that the boundary should be moved inward from the intersection of Rota Place and Bridgewater Road to Taurarua Terrace and Judges Bay Road to the west, being a proportionate distance that reflects the gradient and length of the relevant section in question (Appendix 4, Council's Evaluation Report).

12. I consider a walkable catchment of 1500 metres better fulfills purpose of the NPS-UD by anticipating an increase in the number of people electing to walk to the city centre in future as access to it by private motor vehicle diminishes.

13. I support proposals to remove properties at 104-112 and 118-130 St Stephens Avenue and numbers 2,4 and 6 Judge Street from the THAB.

14. I wish to be heard in support of this submission.

Signature: 

Patrick Howard Castle

Date: 20 January 2023

Address for Service: 6 Bridgewater Road, Parnell

Pats document

Telephone: 021 871 821

Email: drawbridge6@gmail.com

Therese Strickland

From: catha21 <catha21@inovay.co.nz>
Sent: Friday, 20 January 2023 11:29 PM
To: Unitary Plan
Subject: Further Submission by Catha21 Submission # 1918
Attachments: Sub Point Survey PF17012023.xlsx; CATHA Further Submissions on PC80.xlsx; CATHA21 Further Submissions on PC78-2.xlsx

Kia ora

Our further submission is contained within the attached spreadsheet CATHA21 Further Submissions on PC78-2.

Additionally we have an interest in the outcome of PC80 for which we also have an attached submission on original submissions.

Again we advise there was insufficient time to consider all 2398 submissions and make reasonable comment regarding their efficacy for the benefit of the present and future communities of Auckland.

The extension of just one week for such a wide ranging extensive process, one that is clearly contrary to the well-being of the Auckland community as a whole, was a breach of our rights to due process and, in our opinion, our rights to natural justice as defined by the Bill of Rights Act Section 27 (1),

"27 Right to justice (1) Every person has the right to the observance of the principles of natural justice by any tribunal or other public authority, which has the power to make a determination in respect of that person's rights, obligations, or interests protected or recognised by law."

Given the above this then further obligates the Council to act on our behalf on these matters, and on behalf of all Auckland residents potentially exposed to the negative effects of this legislation. It is wrong residents are left to fend for themselves against both Council and very well resourced vested interests who do not have what's right, fair and reasonable for the resident community at the core of their submissions. This very process of residents having to object to vested interests and the 'horse trading' self-serving, is cynical and wrong. This is the job of Council.

We restate here we oppose the entire process, which, in our opinion, is a sham, and we are reluctant participants left with no other choice. As you are well aware the key destructive elements, particularly contained within the MDRS, has been dictated by central government, and the Council machinery (i.e. PC78) is legally unable to protect the community from this, in the normal course of events.

It remains a complete embarrassment for the Auckland Council to continue to acquiesce to this needless and draconian legislation, while for example the Christchurch City Council have quite rightly simply rejected it, and are prepared to live with the consequence in order to protect its citizens.

In doggedly proceeding with PC 78 the Auckland Council has become complicit. **We again call on the Auckland Council to put a stop to this train wreck.**

One key element of the stupidity of PC78 is worth mentioning here. The NPS-UD and the Housing Enabling Act are seeking contrary things and therefore it is not possible to amend the Plan Change to meet both. Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions as the NPS-UD is seeking to focus development around centres and transport corridors whereas the

Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl which will have adverse effects on infrastructure; and the NPS-UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore provide for their social wellbeing and health.

Hindrances' to the Process

While we have already expressed our deep concern regarding point (i) below, further issues were struck by those who helped compile this submission. We want to express concern at the level of hindrances we have experienced in seeking to participate in the further submission process. These have included:

(i) The appalling timing of further submission process (a result of Central Govt timing) over the Christmas holiday break when most people are away and Council Offices are closed and Council staff are on leave. This will mean fewer people making further submissions on the mammoth number of original submissions - around 2400, with 740 pages of submission summaries and all the associated submission documents - sheer volume of information is overwhelming and the timing and length of time given for review means insufficient time given for meaningful public engagement of issues that are going to affect Aucklanders for years to come.

(ii) Confusing communication sent to all submitters regarding an errata and three submissions not correctly notified, with an extension to the close of further submissions for those three submitters. But no mention in the public notice of which three submitters that applies to (would need to know where to go within Council website to find this out). When raised with Council, staff were not available to help get to the bottom of this enquiry. This communication could potentially mislead submitters in terms of the date for the close of further submissions (they may think they have an extra 10 days (until 30 Jan) to get their further submission in). Why was this letter sent to all submitters if it only applies to three? It could confuse submitters and cause them to miss the 20 Jan deadline for further submissions.

(iii) Difficulties with cutting and pasting from Council's summary of submissions spreadsheet. The way the information has been entered means that you cannot do a simple cut and paste of a whole line of a submitter entry. Rather, it would grab a whole lot of other cells and so this would mean having to cut and paste cell entries individually into our own spreadsheet, making the whole process cumbersome and time consuming. This directly affects the speed with which we can prepare further submissions and therefore affects our ability to get through the sheer volume of info.

(iv) Difficulties with word search in Council's summary of submissions spreadsheet not working making locating submissions difficult and time-consuming. Again, this directly affects the speed with which we can prepare further submissions and therefore affects our ability to get through the sheer volume of info.

(v) Email addresses in Council's summary of submissions spreadsheet - a lot of these have errors in the way these have been entered. E.g. most have a gap in the address which means this could affect service of further submissions on submitters as it will cause emails to bounce back - potential for persons to be caught and miss the 5 WD statutory deadline for service of further submissions.

(vi) Access to information on Council website. We found this to be un-user friendly. For example, the records of the Council Planning Committee minutes were not able to be copied and so it prevents people from sending extracts onto others.

(vii) Also note that some crucial pieces of information have not been made publicly available:
E.g.
Agenda of Planning Committee - Thursday, 4 August 2022 (aucklandcouncil.govt.nz)
Refer Attachment C1

Planning Committee Record:
31 March 2022: PLA/2022/31
C1 Confidential - Council's Preliminary Response - Endorsement For Public Engagement

States in minutes:

Restatement:
m) agree that the report, attachments and the resolutions of the Planning Committee remain confidential until public engagement begins on the council's preliminary response to the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

However, despite the public engagement on the NPS:UD and RM EHSAA being well underway, we could not locate a copy of the attachments and resolutions of the Planning Committee. These do not appear to have been made available to the public.

Survey

Despite the time deficiency one of our members conducted a small survey of sub points and has made the following noteworthy comments and conclusions.
There were a number of issues that became obvious, even with the limited number of sub points looked at. The main issues are;

1) The number of requested changes is indicative of the gap between what the people of Auckland want and the regulations being imposed on the community.
2) The people who are requesting changes are predominantly from the upper socio-economic suburbs.
3) From random sample taken of 75 submission points (ref "Sub Point Survey PF17012023), 69.33% were from businesses or groups.

Survey commentary

A) There should always be a small proportion of people who do not agree with the majority and one would expect that they should be heard and their disagreements settled with logical argument from a majority standpoint. The number of submissions for change would indicate that there is a large majority that are not satisfied with PC78 as it stands and therefore, as there is no immediacy for this issue, the process should be held in abeyance until all matters can be addressed with respect for the communities that will live under them.
B) When making sweeping rules that affect all Aucklanders the council should be representing all Aucklanders. It is apparent from the submissions analysed that the process is geared towards listening to the better educated, more organised groups and people that have time and ability to learn the ways of council. Completely opposite to how a functioning democracy should work.
C) Of the 75 samples taken from the submissions, there was only two submissions from a personal as opposed to group or business sector from the lower socio-economic area, and they were from the same person. Total personal submissions were 30.67%. This means that the process will listen to 69.33% made up of groups and businesses who in the most part are there to please short term shareholders and group interests that are not universal to majority of Aucklanders. This is a skewed process that will create problems for the city for generations and should not be allowed to proceed until the inequalities have been remedied.

Should there be any questions regarding our further submission please do not hesitate to contact us.

Ngā manaakitanga

Michael Kampkes
Founder of 'Citizens Against the Housing Act 2021'
021674314
https://www.facebook.com/groups/1071945533581901

78 - Intensification Decisions Requested					
Sub#/ Point	**Submitter Name**	**Address for Service**	**Summary of Decisions Requested**	**Topic**	**Subtopic**
2383.1	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Amend I605.6.4 (Mixed Housing Urban) as notified to exclude the following rules: H5.6.19, H5.6.20 and H5.6.21.	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct
2383.2	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Amend I605.6.5 (Terraced Housing) as notified to exclude the following rules: H5.6.19, H5.6.20 and H5.6.21.	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct
2383.3	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Amend I605.8.2.2 by deleting (4) as notified, and adding (6) The extent to which any tower building in 8 Launch Road has exceptional design quality suitable for this landmark location.	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct
2383.4	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Add the Height Variation Control to the sites identified in the submission on Marlborough Crescent and Hudson Bay Road, and Hudson Bay Road Extension, Hobsonville Point [refer to submission for detail].	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct
2383.5	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Rezone the identified portion of 8 Launch Road, Hobsonville Point, from Mixed Use to THAB to be consistent with the remainder of the site [refer to submission for detail].	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct
2384.1	Caroline Chapman and Mark Stachurski	cdm.chapman@xtra.co.nz	Reject intensification in Glendowie, in particular the area around Vista Crescent, Vanessa Crescent, Calder Place and California Place, and Roberta Avenue. Rezone Glendowie to the Low Density Residential zone.	Urban Environment	Larger rezoning proposal
2384.2	Caroline Chapman and Mark Stachurski	cdm.chapman@xtra.co.nz	Prioritise intensification to land within and adjacent to centres and corridors, or in close proximity to public transport.	Plan making and procedural	General
2385.1	Stewart Jeffrey Adams	stewadams@icloud.com	Amend the extent of the Morningside train station walkable catchment to exclude 81 Western Springs Road, 83 Western Springs Road, 87 Western Springs Road and 89 Western Springs Road, Western Springs.	Walkable Catchments	WC RTN Morningside
2385.1	Stewart Jeffrey Adams	stewadams@icloud.com	Rezone 81 Western Springs Road, 83 Western Springs Road, 87 Western Springs Road and 89 Western Springs Road, Western Springs to Mixed Housing Urban zone.	Urban Environment	Single or small area rezoning proposal
2386.1	Zeo Limited	david@whitburngroup.co.nz	Should the plan change be approved, upzoning for the Light Rail corridor must be available by 21 February 2023.	Plan making and procedural	General
2386.2	Zeo Limited	david@whitburngroup.co.nz	Should the plan change be approved, upzoning for the Light Rail corridor must be available by 21 February 2023.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC
2386.3	Zeo Limited	david@whitburngroup.co.nz	Delete all references to special character from the plan, including Chapter D18, all overlay maps, schedules and appendices relating to special character.	Qualifying Matters - Special Character	Special Character Residential - provisions
2386.4	Zeo Limited	david@whitburngroup.co.nz	Remove the Market Road Special Character Area [refer to submission for further details].	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR
2386.5	Zeo Limited	david@whitburngroup.co.nz	Rezone the Market Road area [refer to submission for area description] to THAB zoning.	Urban Environment	Single or small area rezoning proposal
2387.1	Kristina Ferguson	robert.kris@xtra.co.nz	Retain the Low Density Residential zone for 1 Seaview Road, 3 Seaview Road, 5 Seaview Road, 7 Seaview Road, 9 Seaview Road, 9A Seaview Road, 9B Seaview Road, 10 Seaview Road, 11 Seaview Road, 12 Seaview Road, 13 Seaview Road, 15 Seaview Road, 16 Seaview Road, 18 Seaview Road, 19 Seaview Road, 20 Seaview Road, 21 Seaview Road, 22 Seaview Road, 22A Seaview Road, 23 Seaview Road, 23A Seaview Road, 24 Seaview Road, 25 Seaview Road, 26 Seaview Road, 28 Seaview Road, 28A Seaview Road, 29 Seaview Road, 30 Seaview Road, 31 Seaview Road, 32 Seaview Road, 33 Seaview Road, 34 Seaview Road, 35 Seaview Road, 35A Seaview Road, 36 Seaview Road, 37 Seaview Road, 38 Seaview Road, 39 Seaview Road, 40 Seaview Road, 41 Seaview Road, 42 Seaview Road, 43 Seaview Road, 44 Seaview Road, 45 Seaview Road, 46 Seaview Road, 47 Seaview Road, 48	Urban Environment	Larger rezoning proposal

2387.2	Kristina Ferguson	robert.kris@xtra.co.nz	Rezone 2 Seaview Road, 4 Seaview Road, 8 Seaview Road, 12A Seaview Road, 14 Seaview Road, 14A Seaview Road, 56 Seaview Road, 56B Seaview Road, 58 Seaview Road, 60 Seaview Road, 61A Seaview Road, 62 Seaview Road, 64 Seaview Road, 66 Seaview Road, 66A Seaview Road, 66B Seaview Road, 68 Seaview Road, 70 Seaview Road, 72A Seaview Road, 72 Seaview Road, 85 Seaview Road, 87 Seaview Road, 89 Seaview Road, 89A Seaview Road, 91 Seaview Road, 93 Seaview Road, 93A Seaview Road, 95 Seaview Road, 97 Seaview Road, 97A Seaview Road, 99 Seaview Road, 101 Seaview Road, 103 Seaview Road, 105 Seaview Road, 107 Seaview Road, 117 Seaview Road, and 119 Seaview Road, Remuera to the Low Density Residential zone.	Urban Environment	Larger rezoning proposal
2387.3	Kristina Ferguson	robert.kris@xtra.co.nz	Retain the Special Character Overlay for 1 Seaview Road, 3 Seaview Road, 5 Seaview Road, 7 Seaview Road, 9 Seaview Road, 9A Seaview Road, 9B Seaview Road, 10 Seaview Road, 11 Seaview Road, 12 Seaview Road, 13 Seaview Road, 15 Seaview Road, 16 Seaview Road, 18 Seaview Road, 19 Seaview Road, 20 Seaview Road, 21 Seaview Road, 22 Seaview Road, 22A Seaview Road, 23 Seaview Road, 23A Seaview Road, 24 Seaview Road, 25 Seaview Road, 26 Seaview Road, 28 Seaview Road, 28A Seaview Road, 29 Seaview Road, 30 Seaview Road, 31 Seaview Road, 32 Seaview Road, 33 Seaview Road, 34 Seaview Road, 35 Seaview Road, 35A Seaview Road, 36 Seaview Road, 37 Seaview Road, 38 Seaview Road, 39 Seaview Road, 40 Seaview Road, 41 Seaview Road, 42 Seaview Road, 43 Seaview Road, 44 Seaview Road, 45 Seaview Road, 46 Seaview Road, 47 Seaview Road, 48	Qualifying Matters - Special Character	Special Character Residential - support property/area in SCAR as notified
2387.4	Kristina Ferguson	robert.kris@xtra.co.nz	Extend the Special Character Overlay so that it includes 2 Seaview Road, 4 Seaview Road, 8 Seaview Road, 12A Seaview Road, 14 Seaview Road, 14A Seaview Road, 56 Seaview Road, 56B Seaview Road, 58 Seaview Road, 60 Seaview Road, 61A Seaview Road, 62 Seaview Road, 64 Seaview Road, 66 Seaview Road, 66A Seaview Road, 66B Seaview Road, 68 Seaview Road, 70 Seaview Road, 72A Seaview Road, 72 Seaview Road, 85 Seaview Road, 87 Seaview Road, 89 Seaview Road, 89A Seaview Road, 91 Seaview Road, 93 Seaview Road, 93A Seaview Road, 95 Seaview Road, 97 Seaview Road, 97A Seaview Road, 99 Seaview Road, 101 Seaview Road, 103 Seaview Road, 105 Seaview Road, 107 Seaview Road, 117 Seaview Road, and 119 Seaview Road, Remuera.	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR
2388.1	Robert Ferguson	robert.kris@xtra.co.nz	Retain the Low Density Residential zone for 1 Seaview Road, 3 Seaview Road, 5 Seaview Road, 7 Seaview Road, 9 Seaview Road, 9A Seaview Road, 9B Seaview Road, 10 Seaview Road, 11 Seaview Road, 12 Seaview Road, 13 Seaview Road, 15 Seaview Road, 16 Seaview Road, 18 Seaview Road, 19 Seaview Road, 20 Seaview Road, 21 Seaview Road, 22 Seaview Road, 22A Seaview Road, 23 Seaview Road, 23A Seaview Road, 24 Seaview Road, 25 Seaview Road, 26 Seaview Road, 28 Seaview Road, 28A Seaview Road, 29 Seaview Road, 30 Seaview Road, 31 Seaview Road, 32 Seaview Road, 33 Seaview Road, 34 Seaview Road, 35 Seaview Road, 35A Seaview Road, 36 Seaview Road, 37 Seaview Road, 38 Seaview Road, 39 Seaview Road, 40 Seaview Road, 41 Seaview Road, 42 Seaview Road, 43 Seaview Road, 44 Seaview Road, 45 Seaview Road, 46 Seaview Road, 47 Seaview Road, 48	Urban Environment	Larger rezoning proposal
2388.2	Robert Ferguson	robert.kris@xtra.co.nz	Rezone 2 Seaview Road, 4 Seaview Road, 8 Seaview Road, 12A Seaview Road, 14 Seaview Road, 14A Seaview Road, 56 Seaview Road, 56B Seaview Road, 58 Seaview Road, 60 Seaview Road, 61A Seaview Road, 62 Seaview Road, 64 Seaview Road, 66 Seaview Road, 66A Seaview Road, 66B Seaview Road, 68 Seaview Road, 70 Seaview Road, 72A Seaview Road, 72 Seaview Road, 85 Seaview Road, 87 Seaview Road, 89 Seaview Road, 89A Seaview Road, 91 Seaview Road, 93 Seaview Road, 93A Seaview Road, 95 Seaview Road, 97 Seaview Road, 97A Seaview Road, 99 Seaview Road, 101 Seaview Road, 103 Seaview Road, 105 Seaview Road, 107 Seaview Road, 117 Seaview Road, and 119 Seaview Road, Remuera to the Low Density Residential zone.	Urban Environment	Larger rezoning proposal
2388.3	Robert Ferguson	robert.kris@xtra.co.nz	Retain the Special Character Overlay for 1 Seaview Road, 3 Seaview Road, 5 Seaview Road, 7 Seaview Road, 9 Seaview Road, 9A Seaview Road, 9B Seaview Road, 10 Seaview Road, 11 Seaview Road, 12 Seaview Road, 13 Seaview Road, 15 Seaview Road, 16 Seaview Road, 18 Seaview Road, 19 Seaview Road, 20 Seaview Road, 21 Seaview Road, 22 Seaview Road, 22A Seaview Road, 23 Seaview Road, 23A Seaview Road, 24 Seaview Road, 25 Seaview Road, 26 Seaview Road, 28 Seaview Road, 28A Seaview Road, 29 Seaview Road, 30 Seaview Road, 31 Seaview Road, 32 Seaview Road, 33 Seaview Road, 34 Seaview Road, 35 Seaview Road, 35A Seaview Road, 36 Seaview Road, 37 Seaview Road, 38 Seaview Road, 39 Seaview Road, 40 Seaview Road, 41 Seaview Road, 42 Seaview Road, 43 Seaview Road, 44 Seaview Road, 45 Seaview Road, 46 Seaview Road, 47 Seaview Road, 48	Qualifying Matters - Special Character	Special Character Residential - support property/area in SCAR as notified

2388.4	Robert Ferguson	robert.kris@xtra.co.nz	Extend the Special Character Overlay so that it includes 2 Seaview Road, 4 Seaview Road, 8 Seaview Road, 12A Seaview Road, 14 Seaview Road, 14A Seaview Road, 56 Seaview Road, 56B Seaview Road, 58 Seaview Road, 60 Seaview Road, 61A Seaview Road, 62 Seaview Road, 64 Seaview Road, 66 Seaview Road, 66A Seaview Road, 66B Seaview Road, 68 Seaview Road, 70 Seaview Road, 72A Seaview Road, 72 Seaview Road, 85 Seaview Road, 87 Seaview Road, 89 Seaview Road, 89A Seaview Road, 91 Seaview Road, 93 Seaview Road, 93A Seaview Road, 95 Seaview Road, 97 Seaview Road, 97A Seaview Road, 99 Seaview Road, 101 Seaview Road, 103 Seaview Road, 105 Seaview Road, 107 Seaview Road, 117 Seaview Road, and 119 Seaview Road, Remuera.	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR
2389.1	Elizabeth Knox Home and Hospital	cmcgarr@bentley.co.nz	Delete all changes proposed to Chapter D14.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)
2389.2	Elizabeth Knox Home and Hospital	cmcgarr@bentley.co.nz	Rezone the land at 2 Ranfurly Road, 4 Ranfurly Road, 6 Ranfurly Road, 10 Ranfurly Road, 10 Market Road, and 8 Griffin Avenue and 10 Griffin Ave, Epsom to THAB zone.	Urban Environment	Single or small area rezoning proposal
2390.1	Society of Mary Trust Board	iain@civitas.co.nz	Remove the Special Character Areas Overlay – Residential from the properties at 2 Hopetoun Street, 4 Hopetoun Street, 6 Hopetoun Street, 8 Hopetoun Street, 10 Hopetoun Street and 12 Hopetoun Street, Freemans Bay, or, in the alternative, from the submitter's properties at 10 Hopetoun Street and 12 Hopetoun Street only. [Refer to figures 1 and 3 of submission for extent].	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR
2390.2	Society of Mary Trust Board	iain@civitas.co.nz	Rezone the properties at 2 Hopetoun Street, 4 Hopetoun Street, 6 Hopetoun Street, 8 Hopetoun Street, 10 Hopetoun Street and 12 Hopetoun Street, Freemans Bay to Business – Mixed Use [from proposed LDRZ] or, in the alternative, the rezoning of the submitter's properties at 10 Hopetoun Street and 12 Hopetoun Street only to Business – Mixed Use. [Refer to figures 1 and 3 of submission for extent.].	Urban Environment	Single or small area rezoning proposal
2390.3	Society of Mary Trust Board	iain@civitas.co.nz	The retention of all other provisions proposed in PC78 for the Special Character Areas Overlay – Residential without modification intended to reduce development potential or flexibility.	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.4	Society of Mary Trust Board	iain@civitas.co.nz	Approve rule D18.4(3) as notified.	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.5	Society of Mary Trust Board	iain@civitas.co.nz	Delete the standards listed in the "Standards to be complied with" column for activity D18.4(A1) within activity table D18.4.	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.6	Society of Mary Trust Board	iain@civitas.co.nz	Amend standard D18.6.1.2(1) as follows: (1) Buildings in the Special Character Areas Overlay – Residential must not project above a ~~45~~ 60 degree recession plane measured from a point ~~3m~~ 4m above the ground level along any boundary of the site.	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.7	Society of Mary Trust Board	iain@civitas.co.nz	Amend Figure D18.6.1.3.1 [standard D18.6.1.3(2) (Yards)] to show one of the rear sites with 3m yards to the long boundaries and 1.2m yards to the short boundaries (or other arrangement that is different to the arrangement shown for the other rear site within the notified figure). Requested to illustrate the freedom provided by notified standard.	Qualifying Matters - Special Character	Special Character Residential - provisions

2390.8	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.4.1 [standard D18.6.1.4 Building coverage] as set out on page 16 of the submission to apply MDRS building coverage standard.	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.9	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.5.1. [standard D18.6.1.5 Landscaped area] consequentially to reflect the higher building coverage permitted on sites greater than 200m2 within the relief sought on standard D18.6.1.4 [submission point 2930.].	Qualifying Matters - Special Character	Special Character Residential - provisions
2390.10	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.6.1. [standard D18.6.1.6 Maximum impervious area] consequentially to reflect the higher building coverage permitted on sites greater than 200m2 within the relief sought on standard D18.6.1.4 [submission point 2930.].	Qualifying Matters - Special Character	Special Character Residential - provisions
2391.1	Robyn Floyd	robyn.floyd@arc.govt.nz	Concerns relating to whether the Council could oppose the unsuitable aspects of the government's amendments to the RMA.	Plan making and procedural	Central Government process - mandatory requirements
2391.2	Robyn Floyd	robyn.floyd@arc.govt.nz	Approve changes to the MDRS to take into account impacts on sunlight on adjoining properties; standards to provide for daylight; retain the height in relation to boundary of 45 degrees at 2.5m where the neighbouring house is located less than 3m from the adjoining site boundary; and already approved inadequate setbacks.	MDRS response	MDRS - request change to MDRS (out of scope)
2391.3	Robyn Floyd	robyn.floyd@arc.govt.nz	Exempt all of the heritage housing areas like Remuera, Ponsonby, Grey Lynn, Kingsland, Parnell etc. where significant intensification has already occurred and resulting lot sizes are already significantly undersized/compromised, from MDRS provisions.	Plan making and procedural	General

2391.4	Robyn Floyd	robyn.floyd@arc.govt.nz	Amend the plan change so that the MDRS provisions in terms of the height to boundary limitations of 60° at 4m or rights to build more than 2 storeys should not apply where any adjoining residential lot is less than 600m2 in size.	Plan making and procedural	General
2391.5	Robyn Floyd	robyn.floyd@arc.govt.nz	Amend the plan change to provide adjoining owners with adversely affected party status, and requirements for the developer to then undertake measures to avoid or mitigate adverse effects or obtain written consent in such circumstances.	Plan making and procedural	General
2391.6	Robyn Floyd	robyn.floyd@arc.govt.nz	Amend the plan change where intensification is provided for, there should be corresponding requirements for maximum protection of existing trees in and surrounding all new development sites.	Plan making and procedural	General
2391.7	Robyn Floyd	robyn.floyd@arc.govt.nz	Amend the plan change where there are multiple apartments/terrace houses on a lot (e.g. more than 2 units), pavements should be double their current minimum widths.	Residential Zones	Residential Zones (General or other)
2392.1	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Approve and support precincts that recognise and protect Māori cultural values being treated as Qualifying Matters.	Precincts - NPSUD MDRS Response	Chapter I Precincts - General (Other)
2392.2	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Approve and support precincts that recognise and protect Māori cultural values being treated as Qualifying Matters.	Qualifying Matters Other	Appropriateness of QMs (Other)

2392.3	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Retain and support all volcanic viewshafts at current locations and heights.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)
2392.4	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Retain and support all height sensitive areas in current locations with new density controls (coverage and landscape).	Height	Height response - other zones
2392.5	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support the retention of the Outstanding Natural Feature Overlay [and all mapped areas] as a Qualifying Matter.	Qualifying Matters A-I	ONL and ONF (D10)
2392.6	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support no intensification of public open space and no public open space to be affected by intensification.	Qualifying Matters A-I	Open Space zones
2392.7	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support the retention of the Sites and Places of Significance Overlay as a Qualifying Matter.	Qualifying Matters A-I	Relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga (D21)
2392.8	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support the requirement for a resource consent process for intensification in residential areas with limited water and wastewater capacity.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints

2392.9	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Maintain the current maximum impervious area controls. [inference is submitter opposes any amendments proposed to these standards].	Residential Zones	Residential Zones (General or other)
2392.10	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Maintain the current maximum impervious area controls. [infers submitter opposes where these have been amended in notified standards].	Business Zones provisions	Business Zones (General or other)
2392.11	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support additional controls to ensure stormwater is discharged. appropriately, including areas where a connection to the public stormwater line is not available and ground soakage is poor.	Plan making and procedural	General
2392.12	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support the retention of the SEA overlay as a Qualifying Matter and no mapping is proposed to change.	Qualifying Matters A-I	SEAs (D9)
2392.13	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support no rezoning of either Future Urban Zone land or other non-residential sites through the NPS-UD.	Outside Urban Environment	Future Urban Land Proposals - Excluded from IPI PC
2392.14	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Support the identification of three scheduled urupā sites in residential zones to be subject to a more stringent activity status of Non-Complying Activity for any new buildings and structures and building alterations and additions where the building footprint is increased.	Qualifying Matters Other	Māori Cultural Heritage - Pukekiwiriki Pā and Pararēkau Island

2392.15	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Rezone proposed MHU zoned land adjacent to Pukekiwiriki Pā, given potential effects on character and views of the pā, as well as the significant geological and ecological resources existing within that area to Low Density Residential zone (not HVC within MHU zoning). With reference to RMA Section 6(e) submitter considers the area of concern has an important "relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga" and should be included by Council as a qualifying matter in this area. [Refer to map on page 5 of submission for extent].	Urban Environment	Single or small area rezoning proposal
2392.16	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Rezone proposed MHU zoned land adjacent to Pukekiwiriki Pā, given potential effects on character and views of the pā, as well as the significant geological and ecological resources existing within that area to Low Density Residential zone (not HVC within MHU zoning). With reference to RMA Section 6(e) submitter considers the area of concern has an important "relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga" and should be included by Council as a qualifying matter in this area. [Refer to map on page 5 of submission for extent].	Qualifying Matters Other	Māori Cultural Heritage - Pukekiwiriki Pā and Pararēkau Island
2392.17	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Supports proposed Low Density zoning for Pararēkau Island. As a qualifying matter RMA Section 6(e) is relevant, as well as the current basis of coastal erosion.	Plan making and procedural	General
2392.18	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Supports proposed Low Density zoning for Pararēkau Island. As a qualifying matter RMA Section 6(e) is relevant, as well as the current basis of coastal erosion.	Qualifying Matters Other	Māori Cultural Heritage - Pukekiwiriki Pā and Pararēkau Island
2392.19	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Rezone land adjacent to Pukekohe Hill from MHU to new Low Density Residential Zone [refer to map on page 6 of submission for extent]. Seeks that Council give urgent attention to engaging an appropriate review of this area, including a landscape / character analysis and further consultation with Ngāti Te Ata Waiohua.	Urban Environment	Single or small area rezoning proposal
2392.20	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Rezone land adjacent to Pukekohe Hill from MHU to new Low Density Residential Zone [refer to map on page 6 of submission for extent]. Seeks that Council give urgent attention to engaging an appropriate review of this area, including a landscape / character analysis and further consultation with Ngāti Te Ata Waiohua.	Qualifying Matters Other	Māori Cultural Heritage - Pukekiwiriki Pā and Pararēkau Island

2392.21	Ngāti Te Ata Waiohua	karl_flavell@hotmail.com	Rezone land adjacent to Pukekohe Hill from MHU to new Low Density Residential Zone [refer to map on page 6 of submission for extent]. Seeks that Council give urgent attention to engaging an appropriate review of this area, including a landscape / character analysis and further consultation with Ngāti Te Ata Waiohua.	Plan making and procedural	Consultation and engagement - general
2393.1	Katherine Anne Mason	katherinemason1@gmail.com	[Inferred: Retain the operative Special Character Areas Residential overlay over all of Devonport]. [Inferred] includes some or all of the properties on streets including Abbotsford Terrace, Albert Road, Allenby Avenue, Anne Street, Arawa Avenue, Ariho Terrace, Ascot Avenue, Bartley Terrace, Bath Street, Beaconsfield Street, Buchanan Street, Bulwer Street, Burgess Road, Calliope Road, Cambria Road, Cambridge Terrace, Cautley Street, Cheltenham Road, Church Street, Clarence Street, Cowper Street, Cracroft Street, Derby Street, Domain Street, Duders Avenue, Empire Road, Eton Avenue, Everest Street, Ewen Alison Avenue, First Avenue, Flagstaff Terrace, Fleet Street, Garden Terrace, Glen Road, Grahame Street, Grove Road, Hastings Parade, High Street, Huia Street, Jim Titchener Parade, Jubilee Avenue, Kapai Road, Kerr Street, King Edward Parade, Kiwi Road, Lake Road, Lytton Street, Macky	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR
2393.2	Katherine Anne Mason	katherinemason1@gmail.com	[Inferred: Retain the operative Special Character Areas Business overlay over all of Devonport]. [Inferred] includes some or all of the properties on streets including Fleet Street, Anne Street, Bartley Terrace, Rattray Street, Clarence Street, Victoria Road, Queens Parade, Wynyard Street, Devon Lane, Flagstaff Terrace, Kerr Street, King Edward Parade and Marine Square, Devonport.	Qualifying Matters - Special Character	Special Character Business - add new property/area to SCAB
2393.3	Katherine Anne Mason	katherinemason1@gmail.com	Amend to apply a Historic Heritage Area over Victoria Road in Devonport.	Qualifying Matters A-I	Historic Heritage (D17)
2394.1	Peter James Neighbours	p-neighbours@xtra.co.nz	Retain the Special Character Areas in Freemans Bay. [Inferred] includes some or all of the properties on streets including College Hill, Victoria Street West, Franklin Road, Scotland Street, Ireland Street, Spring Street, Cascade Street, Runnell Street, Middle Street, England Street, Wood Street, Georgina Street, Costley Street, Renall Street, Russell Street, Elizabeth Street, Arthur Street, Margaret Street, Pember Reeves Street, Ponsonby Road, Collingwood Street, Heke Street, Anglesea Street, Winn Road, Paget Street, Picton Street, Barrie Street, Hepburn Street, Smith Street, Tahuna Street, Beresford Street West, Hopetoun Street, Howe Street, Beresford Street Central, Wellington Street, Pratt Street, Gwilliam Place, Napier Street, Napier Lane, Foundries Lane, Sheridan Lane, Grattan Place, Weld Street and Wilkins Street, Freemans Bay.	Qualifying Matters - Special Character	Special Character Residential - support property/area in SCAR as notified
2394.2	Peter James Neighbours	p-neighbours@xtra.co.nz	Retain the Low Density Residential Zone in Freemans Bay. [Inferred] includes some or all of the properties on streets including College Hill, Victoria Street West, Franklin Road, Scotland Street, Ireland Street, Spring Street, Cascade Street, Runnell Street, Middle Street, England Street, Wood Street, Georgina Street, Costley Street, Renall Street, Russell Street, Elizabeth Street, Arthur Street, Margaret Street, Pember Reeves Street, Ponsonby Road, Collingwood Street, Heke Street, Anglesea Street, Winn Road, Paget Street, Picton Street, Barrie Street, Hepburn Street, Smith Street, Tahuna Street, Beresford Street West, Hopetoun Street, Howe Street, Beresford Street Central, Wellington Street, Pratt Street, Gwilliam Place, Napier Street, Napier Lane, Foundries Lane, Sheridan Lane, Grattan Place, Weld Street and Wilkins Street, Freemans Bay.	Urban Environment	Larger rezoning proposal

2394.3	Peter James Neighbours	p-neighbours@xtra.co.nz	Amend the Special Character Overlay in Freemans Bay to include the entire area previously covered by the AUP Operative overlay. [Inferred] includes some or all of the properties on streets including College Hill, Victoria Street West, Franklin Road, Scotland Street, Ireland Street, Spring Street, Cascade Street, Runnell Street, Middle Street, England Street, Wood Street, Georgina Street, Costley Street, Renall Street, Russell Street, Elizabeth Street, Arthur Street, Margaret Street, Pember Reeves Street, Ponsonby Road, Collingwood Street, Heke Street, Anglesea Street, Winn Road, Paget Street, Picton Street, Barrie Street, Hepburn Street, Smith Street, Tahuna Street, Beresford Street West, Hopetoun Street, Howe Street, Beresford Street Central, Wellington Street, Pratt Street, Gwilliam Place, Napier Street, Napier Lane, Foundries Lane, Sheridan Lane, Grattan Place, Weld Street and Wilkins Street,	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR
2394.4	Peter James Neighbours	p-neighbours@xtra.co.nz	Reject rezoning of 2-8 Ryle Street, 32 Wood Street and 34 Wood Street, Freemans Bay.	Urban Environment	Single or small area rezoning proposal
2394.5	Peter James Neighbours	p-neighbours@xtra.co.nz	Rezone 2-8 Ryle Street, 32 Wood Street and 34 Wood Street, Freemans Bay to Low Density Residential Zone.	Urban Environment	Single or small area rezoning proposal
2394.6	Peter James Neighbours	p-neighbours@xtra.co.nz	Retain the Special Character Areas Overlay on 2-8 Ryle Street, 32 Wood Street and 34 Wood Street, Freemans Bay.	Qualifying Matters - Special Character	Special Character Residential - support property/area in SCAR as notified
2394.7	Peter James Neighbours	p-neighbours@xtra.co.nz	Reject what has been imposed by central government upon the Auckland Council to prepare a Plan Change as it is anti-democratic.	Plan making and procedural	Central Government process - mandatory requirements
2395.1	Matt Lowrie	Lowrie.matt@gmail.com	Rezone area around Russett Grove, Henderson (in particular 5 Russett Grove) to THAB zone like the rest of the areas nearby within walking distance of a rapid transit station.	Urban Environment	Single or small area rezoning proposal
2395.2	Matt Lowrie	Lowrie.matt@gmail.com	Reject use of coarse flood plain modelling that doesn't property take into account local geography or structures. Sections on Russett Grove, Henderson are higher than those on Hillwell Drive, Henderson and separated by a retaining wall.	Qualifying Matters A-I	Significant Natural Hazards
2396.1	Grant Dunn	grant.dunn@buddlefindlay.com	Rezone 9 Ewenson Avenue and 1 Ewenson Avenue, Ellerslie to THAB zone.	Urban Environment	Single or small area rezoning proposal

2397.1	Patrick John Reddington and Letitia Maude Reddington	megan@foleyhughes.co.nz	Amend setback for foreshore yard at 58 Rawene Road, Birkenhead, to be zero metres, instead of 1.2 metres (see submission for details).	Low Density Residential Zone provisions	H3A Standards Low Density Residential Zone
2397.2	Patrick John Reddington and Letitia Maude Reddington	megan@foleyhughes.co.nz	Amend setback for foreshore yard at 58 Rawene Road, Birkenhead, to be zero metres, instead of 1.2 metres (see submission for details).	Qualifying Matters A-I	Significant Natural Hazards
2398.1	Scott Lamason	scott@engineous.co.nz	Remove the Wastewater and Water Supply qualifying matter from 22 Fairway Avenue, Red Beach.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints
2398.2	Scott Lamason	scott@engineous.co.nz	Remove the Wastewater and Water Supply qualifying matter from all of Orewa and Whangaparāoa.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints
841.45	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed changes to Assessment criteria at H5.8.2(10) for maximum impervious areas [refer to page 4 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Assessment MHU Zone

Sub#/ Point	Submitter Name	Address for Service	Summary of Decisions Requested	Topic	Subtopic	Support (S) Oppose (O), (Neutral N)	Reasons For
5.1	John Jung	john@jhdandc.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
7.1	Karel Peeters	karel.peeters97@icloud.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
17.1	Tim Cantlon	cantlontim@gmail.com	Proposed additional housing capacity exceeds projected demand.	Plan making and Procedural	Development Capacity Analysis	S	
20.1	Samuel Cormack	sam.cormack@gmail.com	Remove Special Character as a Qualifying Matter.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

33.1	Oliver Moss	oliver.moss7@gmail.com	Reject the plan change as has not had a genuine or acceptable plan consultation process. Requires practical detail on how transport, schools and parks will be provided and work.	Plan making and Procedural	Consultation and engagement - general	S	
33.4	Oliver Moss	oliver.moss7@gmail.com	Concern that new tall development close to boundaries will block natural light and sun, which will create mental and physical health problems, require more energy use, and reduce quality of life.	Residential Zones	Residential Zones (General or other)	S	The changes being brought about by the MDRS standards (One size fits all) have no regard to site circumstances such as topography, orientation, lot size, etc. The standards disregard such considerations as the angle of the sun in winter (33 degrees). Even if new development under the MDRS standards is designed to maximise access to the sun, this will often be at the cost of sites to the south, especially, and there is no guarantee that the site to the north won't then be developed down the track and obliterate sunlight access within the said development. While the amended AUP plan provisions refer to sunlight access within the site and effects on adjoining sites, it is not clear how this will be achieved, especially when using the new permitted baseline created by the MDRS standards. Developers will seek to use this as a permitted baseline and seek to fit more on a site. Because the baseline will have such a significant adverse effect on adjoining sites especially those located to the south (it has the potential to obliterate sunlight for most of the year except Summer when the sun is high enough to clear the buildings) this will make justifying a more intensive scheme a lot easier. There are also no provisions within the plan that require developments to be designed for energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will mean increased energy costs and reliance on fossil fuels. With the cost of living crisis this will only add to strain within our communities and mental health issues. There is also a direct link between mental health and quality housing design. Design that ensures access to sunlight, space for trees, birdlife etc. Without access to sun, this will result in cold homes, subject to mould growth and associated physical health issues and costs associated with heating cold homes. Without access to sun, residents will not be able to enjoy their homes, grow plants, etc all of which affects quality of life.
34.4	Julia Neville	jneville71@gmail.com	Concern that new tall development close to boundaries will block natural light and sun, which will create mental and physical health problems, require more energy use, and reduce quality of life.	Residential Zones	Residential Zones (General or other)	S	The changes being brought about by the MDRS standards (One size fits all) have no regard to site circumstances such as topography, orientation, lot size, etc. The standards disregard such considerations as the angle of the sun in winter (33 degrees). Even if new development under the MDRS standards is designed to maximise access to the sun, this will often be at the cost of sites to the south, especially, and there is no guarantee that the site to the north won't then be developed down the track and obliterate sunlight access within the said development. While the amended AUP plan provisions refer to sunlight access within the site and effects on adjoining sites, it is not clear how this will be achieved, especially when using the new permitted baseline created by the MDRS standards. Developers will seek to use this as a permitted baseline and seek to fit more on a site. Because the baseline will have such a significant adverse effect on adjoining sites especially those located to the south (it has the potential to obliterate sunlight for most of the year except Summer when the sun is high enough to clear the buildings) this will make justifying a more intensive scheme a lot easier. There are also no provisions within the plan that require developments to be designed for energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will mean increased energy costs and reliance on fossil fuels. With the cost of living crisis this will only add to strain within our communities and mental health issues. There is also a direct link between mental health and quality housing design. Design that ensures access to sunlight, space for trees, birdlife etc. Without access to sun, this will result in cold homes, subject to mould growth and associated physical health issues and costs associated with heating cold homes. Without access to sun, residents will not be able to enjoy their homes, grow plants, etc all of which affects quality of life.
37.1	Abbie Reynolds	abbie_reynolds@yahoo.co.uk	Approve the plan change without amendments. Support densification regardless of SCAR.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
38.4	Jeffrey Robertson	jeffrey.robertson92@gmail.com	Concern that new tall development close to boundaries will block natural light and sun, which will create mental and physical health problems, require more energy use, and reduce quality of life.	Residential Zones	Residential Zones (General or other)	S	The changes being brought about by the MDRS standards (One size fits all) have no regard to site circumstances such as topography, orientation, lot size, etc. The standards disregard such considerations as the angle of the sun in winter (33 degrees). Even if new development under the MDRS standards is designed to maximise access to the sun, this will often be at the cost of sites to the south, especially, and there is no guarantee that the site to the north won't then be developed down the track and obliterate sunlight access within the said development. While the amended AUP plan provisions refer to sunlight access within the site and effects on adjoining sites, it is not clear how this will be achieved, especially when using the new permitted baseline created by the MDRS standards. Developers will seek to use this as a permitted baseline and seek to fit more on a site. Because the baseline will have such a significant adverse effect on adjoining sites especially those located to the south (it has the potential to obliterate sunlight for most of the year except Summer when the sun is high enough to clear the buildings) this will make justifying a more intensive scheme a lot easier. There are also no provisions within the plan that require developments to be designed for energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will mean increased energy costs and reliance on fossil fuels. With the cost of living crisis this will only add to strain within our communities and mental health issues. There is also a direct link between mental health and quality housing design. Design that ensures access to sunlight, space for trees, birdlife etc. Without access to sun, this will result in cold, dark and damp homes, subject to mould growth and associated physical health issues and costs associated with heating cold homes. Without access to sun, residents will not be able to enjoy their homes, grow plants, etc all of which affects quality of life.

51.1	Jeffrey You	jeffyou@gmail.com	Happy with plan.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
55.1	Simon Garner	no1@xtra.co.nz	Building too dense, heights too high for sun, not enough outdoor living space. Building poor living environments and not enough parking.	MDRS response	MDRS - request change to MDRS (out of scope)	S	Changes to the AUP arising from the MDRS are inconsistent with the objectives and policies of the NPS:UD (i.e. well-functioning urban environment, social, economic and cultural wellbeing for all people and communities now and in the future, health and safety, resilience to effects of climate change). Also the changes enabled by the MDRS are inconsistent with the AUP objectives of achieving a quality built environment, high quality amenity (onsite, for adjoining sites and the street), resilience to effects of climate change. NPS:UD Objective 4 and Policy 6 are inconsistent with Objective 1 (well-functioning urban environment that enables social wellbeing for all people in our communities now and in the future). MDRS will not deliver quality outcomes for the residents of Auckland.
56.2	Stephen John Carey	stevecarey282@gmail.com	New height to boundary rules will affect mental health and wellbeing.	Residential Zones	Residential Zones (General or other)	S	The changes being brought about by the MDRS standards (One size fits all) have no regard to site circumstances such as topography, orientation, lot size, etc. The standards disregard such considerations as the angle of the sun in winter (33 degrees). Even if new development under the MDRS standards is designed to maximise access to the sun, this will often be at the cost of sites to the south, especially, and there is no guarantee that the site to the north won't then be developed down the track and obliterate sunlight access within the said development. While the amended AUP plan provisions refer to sunlight access within the site and effects on adjoining sites, it is not clear how this will be achieved, especially when using the new permitted baseline created by the MDRS standards. Developers will seek to use this as a permitted baseline and seek to fit more on a site. Because the baseline will have such a significant adverse effect on adjoining sites especially those located to the south (it has the potential to obliterate sunlight for most of the year except Summer when the sun is high enough to clear the buildings) this will make justifying a more intensive scheme a lot easier. There are also no provisions within the plan that require developments to be designed for energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will mean increased energy costs and reliance on fossil fuels. With the cost of living crisis this will only add to strain within our communities and mental health issues. There is also a direct link between mental health and quality housing design. Design that ensures access to sunlight, space for trees, birdlife etc
63.1	Krista Holtz	kholtz@studygroup.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

73.1	Hardik Panchal	hardikkpanchal@gmail.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
74.1	Dipen Patel	dpatel_79@yahoo.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
86.1	Nathaniel Brown	nathaniel.brown@xtra.co.nz	Approve the plan change without any amendments. We should unambiguously support further intensification. Plans should go further.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

87.2	Hanging Gardens	leigh@hanginggardens.co.nz	Reject the plan change as it does not contribute to well functioning urban environments, or improve the resilience to climate change.	Plan making and Procedural	General	S	The changes to the RMA brought about by the Housing Enabling Act and the MDRS provisions are contrary to the objectives and policies of the NPS:UD (as well as the objectives and Policies of the AUP RPS and the Auckland Council Climate Plan 2020). Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions. The NPS:UD is seeking to focus development around centres and transport corridors (ensuring quality compact urban form through keeping people and places proximate) whereas the Housing Enabling Act through the City wide MDRS standards is perpetuating urban sprawl which will have adverse effects in terms of sustainability both in terms of the built and the natural environment (e.g. inefficient provision of infrastructure). Furthermore the NPS:UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore will adversely affect their social and economic wellbeing, health and safety.
90.1	Linda Knox	linda_knox@ymail.com	Support the plan change.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
96.1	Grant Knox	grant.knox@me.com	Support for the plan change.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

109.1	David Kosoof	dk03harbour@gmail.com	Approve MDRS without amendment.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
113.1	Iain Butler	iaintbutler@gmail.com	Remove all Special Character Areas and provisions; do not have this 'exemption' to MDRS. If the provisions are to remain, council needs to do more work to justify the 'character' being preserved.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
114.1	David Cooper	dwcooper@xtra.co.nz	Approve plan change without amendments: Intensification is great for our city.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

116.1	Thomas Dodd	tompipdodd@gmail.com	Amend Special Character Areas so that more affluent suburbs also carry the load of three storey intensification.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
127.1	Joshua Sean Marshall	joshua.marshall.nz@gmail.com	Implement the MDRS and Policy 3 of the NPS UD in the Auckland Light Rail Corridor area (area excluded from the plan change).	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
129.1	Soren Moller	sorenchooying@ovensam.co.nz	Decline the plan change as intensification everywhere (beyond the AUP) will not allow infrastructure to develop to cope with the growth in multiple directions at the same time.	Qualifying Matters - Infrastructure	Infrastructure - Areas with long-term infrastructure constraints	S	When it comes to infrastructure, the NPS:UD and the Enabling Housing Act including the MDRS standards are seeking contrary things. The NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl. This is not sustainable and will have adverse effects on infrastructure (both in terms of existing and the planning, delivery and cost of providing new infrastructure). While some thought has been given to those areas with insufficient wastewater and stormwater servicing and included these as qualifying matters, this is not enough given the pressures likely to come from the development being permitted through the MDRS standards. Furthermore, no thought has been given to other infrastructure such as schools, parks, community facilities and zoning for these and then there is the issue of increased demand for public parking/ management of this, which is falling on the Councils, to make up for the removal of minimum parking standards (not a win-win situation).
129.2	Soren Moller	sorenchooying@ovensam.co.nz	Decline the plan change; central government needs to provide more flexible and radical housing solutions (e.g. Government funded kitset housing factory, infrastructure support etc).	Plan making and Procedural	Central Government process - mandatory requirements	S	Agree. Townhouses and apartments need to be cleverly designed and optimised, like we are seeing with Tiny Homes (refer Chapter 1 of MEDIUM - A technical design guide for creating better medium density housing in Aotearoa New Zealand, by Guy Marriage / EBOSS, 2022). Other soft options such as relaxing/ amending the existing provisions to create other more affordable housing solutions, such as legalising through an amnesty on unapproved self contained units/ bedsits/ granny flats, where the owner / applicant can demonstrate that these meet the Building Code and are safe and sanitary (an approach that has been successful in LA) or even making national provision for tiny homes (now often better designed than apartments through their well thought out and optimised storage solutions and arrangement of spaces) have been overlooked which could have alleviated the affordable housing shortages. MDRS "One size fits all" blanket approach combined with reactive changes to AUP will not do and will only make the planning rules and process more cumbersome and result in poor quality design and outcomes. MDRS needs to be repealed and PC78 scrapped and go back to the drawing board this time with specialists involved from the outset!
129.3	Soren Moller	sorenchooying@ovensam.co.nz	Decline the plan change and demand the Government return to the AUP with some modifications.	Plan making and Procedural	General	S	
132.1	Tony Watkins	tony@tony-watkins.com	[Inferred] Decline the plan change; density is the problem not the solution. Density causes issues in respect of transport, carbon emissions, noise, population, waste and housing. [See supporting density report].	Plan making and Procedural	General	S	Density in the wrong places is the problem. The MDRS blanket approach to the Urban Area within Tier 1 Cities will perpetuate urban sprawl which which will have adverse effects in terms of sustainability both in terms of the built and the natural environment (e.g. inefficient provision of infrastructure, increased greenhouse gas emissions, etc). This goes against the spatial strategy of the NPS:UD and Auckland Council's RPS which promote intensification around centres and transport corridors, ensuring compact urban form through keeping people and places proximate. One is sustainable (NPS:UD). The other (MDRS) is not.

141.1	Christine Major	christinemajor25@gmail.com	Approve plan change; Council's approach to special character areas supported without change.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
143.1	Lindsay Esler	35 Seaview Rd Remuera Auckland 1050	Decline the plan change; reject intensification and the blanket application of MDRS.	Plan making and Procedural	General	S	
145.1	Carolyn Nimmo	nimmoc5@gmail.com	Add requirement for amalgamation of sites to create better urban design outcomes for six to twelve dwellings.	Residdntial Zones	Residential Zones (General or other)	S	In order to intensify (i.e. increase height and density) lot sizes need to increase. This is to allow for space between buildings to protect sunlight and daylight, ensuring passive design and energy efficiency goals are achieved, to provide space for trees, outlook, etc. Refer Residential Flat Design Code, 2002 prepared by NSW Planning Dept which includes a section on amalgamation and subdivision (extracts of): Amalgamation and Subdivision - important planning and redevelopment tools for restructuring an area undergoing change. Blocks and lots determine the possible building types and capacities that fit into an area. When areas change from one use to another, for example from single family detached houses to residential flats, the size and shape of lots need to be considered, and street layout and block sizes may need to change. Topography and significant natural features also impact on block, lot and street layouts. **Without change to lot sizes, changes to building types can result in poor residential amenity and open space provision.** [Own emphasis added]. Otherwise, the 6 storey heights won't be realised on THAB land and in the walkable catchments. At the moment most developments on THAB sites are only up to three storeys because of the small sizes of the sites and the cost of going higher.
152	Oliver Wilson	oliver.wilson.o.w@gmail.com	"Upzone everything" [Implied as meaning: Rezone all residential areas to THAB].	Urban Environment	Larger rezoning proposal	O	Upzoning everything to THAB is not the answer. Density in the wrong places is the problem. The MDRS blanket approach to the Urban Area within Tier 1 Cities will perpetuate urban sprawl which which will have adverse effects in terms of sustainability both in terms of the built and the natural environment (e.g. inefficient provision of infrastructure, increased greenhouse gas emissions, etc). This goes against the spatial strategy of the NPS:UD and Auckland Council's RPS which promote intensification around centres and transport corridors, ensuring compact urban form through keeping people and places proximate. One is sustainable (NPS:UD). The other (MDRS) is not.
154.1	Graeme McInnes	graeme.mcinnes@gmail.com	Reject the plan change due to infrastructure limitations and the poor quality of housing.	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	S	Agree. (1) When it comes to infrastructure, the NPS:UD and the Enabling Housing Act including the MDRS standards are seeking contrary things. The NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl. This is not sustainable and will have adverse effects on infrastructure (both in terms of existing and the planning, delivery and cost of providing new infrastructure). While some thought has been given to those areas with insufficient wastewater and stormwater servicing and included these as qualifying matters, this is not enough given the pressures likely to come from the development being permitted through the MDRS standards. Furthermore, no thought has been given to other infrastructure such as schools, parks, community facilities and zoning for these and then there is the issue of increased demand for public parking/ management of this, which is falling on the Councils, to make up for the removal of minimum parking standards (not a win-win situation). (2) MDRS will create expensive slums as the standards will result in a greater number of dwellings on sites at greater heights, with bulk closer to site boundaries (due to the more lenient height in relation to boundary standard) with narrower front yard setbacks, smaller outdoor spaces, and outlook spaces. The MDRS HIRB plane has no relationship to the angle of the sun in Winter (33 degrees), nor do the standards consider topography. There are no standards in the existing Plan or introduced by the Plan Change that protect energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. The MDRS standards will set the new permitted baseline opening the way for more intensive development (if the MDRS permitted standards have compromised access to sunlight, then it makes it more difficult to refuse applications for more than 3 units on a site as the shading effects are likely to be similar). Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will result in cold, dark, damp homes that require heating with continued reliance on burning fossil fuels (passive technology such as solar powered heating will not be possible). Without access to sun, residents will not be able to enjoy their homes, grow plants, etc all of which affects quality of life.
161.7	Bruce Michael O'Brien	nzbruce@yahoo.com	AUP provides for 30 years, 900,000 house provision so do not understand why the plan change has been pushed upon the people of Auckland	Plan making and procedural	Development Capacity Analysis	S	

164.1	Omer Maqsood	omer_maqsood2003@yahoo.com	Concerns relating to infrastructure, neighbourhood well being and environmental impacts associated with intensification. Existing AUP satisfactory in providing for intensification.	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	S	Agree. (1) When it comes to infrastructure, the NPS:UD and the Enabling Housing Act including the MDRS standards are seeking contrary things. The NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl. This is not sustainable and will have adverse effects on infrastructure (both in terms of existing and the planning, delivery and cost of providing new infrastructure). While some thought has been given to those areas with insufficient wastewater and stormwater servicing and included these as qualifying matters, this is not enough given the pressures likely to come from the development being permitted through the MDRS standards. Furthermore, no thought has been given to other infrastructure such as schools, parks, community facilities and zoning for these and then there is the issue of increased demand for public parking/ management of this, which is falling on the Councils, to make up for the removal of minimum parking standards (not a win-win situation). (2) MDRS will create expensive slums as the standards will result in a greater number of dwellings on sites at greater heights, with bulk closer to site boundaries (due to the more lenient height in relation to boundary standard) with narrower front yard setbacks, smaller outdoor spaces, and outlook spaces. The MDRS HIRB plane has no relationship to the angle of the sun in Winter (33 degrees), nor do the standards consider topography. There are no standards in the existing Plan or introduced by the Plan Change that protect energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. The MDRS standards will set the new permitted baseline opening the way for more intensive development (if the MDRS permitted standards have compromised access to sunlight, then it makes it more difficult to refuse applications for more than 3 units on a site as the shading effects are likely to be similar). Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will result in cold, dark, damp homes that require heating with continued reliance on burning fossil fuels (passive technology such as solar powered heating will not be possible). Without access to sun, residents will not be able to enjoy their homes, grow plants, etc all of which affects quality of life.
174.1	Nikolas Rusten	nikolas@rusten.co.nz	Allow further intensification in central Auckland to reduce climate change impact.	Urban Environment	Larger rezoning proposal	S	Generally agree as that was the point of the NPS:UD, although there is the conflicting issue of the heritage QM and SCA areas. Before further intensification takes place within these inner suburbs, the onus should be on Council to demonstrate the need for this intensification over and above that already enabled through the existing AUP and also for there to have been a careful assessment of the extent of the SCA.
181.1	Paul Wood	woodelectrical@xtra.co.nz	Decline the plan change as the existing AUP provides for future growth.	Plan making and procedural	Development Capacity Analysis	S	
185.2	Hugh Blackley	hughblackley@xtra.co.nz	Concerns relating to intensification directive from Wellington politicians.	Plan making and Procedural	Central Government process - mandatory requirements	S	
191.1	Richard John Sorrenson	richard.sorrenson@gmail.com	Approve plan change as a sensible balance between intensification and ability of Watercare infrastructure to cope.	Plan making and Procedural	General	O	There is a lot more to it than just this. MDRS is contrary to NPS:UD and AUP RPS. It is not sustainable for the natural and physical environment and amounts to poor quality and reckless planning.
191.1	Richard John Sorrenson	richard.sorrenson@gmail.com	Approve plan change as a sensible balance between intensification and ability of Watercare infrastructure to cope.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: “5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.” Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

193.1	Rahul Ranchhodji	Lanrr8888@gmail.com	Approve plan change and appreciate Council's approach to preserve high quality special character.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
206.1	Avenit Kumar	avi.kumar@envivo.nz	Reject the deep soil area and canopy tree standards proposed within THAB outdoor living spaces.	Terrace Housing and Apartment Buildings Zone provisions	H6 Standards THAB Zone	O	Deep soil and canopy tree provisions are needed to ensure space for larger trees is retained within the THAB Zone to mitigate the effects of the increased building scale and bulk, increased coverage and to prevent urban heat islands. Refer https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
217.1	Brian Leslie O'Neill	irene_brian@hotmail.com	Reject intensification. Council should say no to the government's intensification plans.	Plan making and Procedural	Central Government process - mandatory requirements	S	
218.1	Chez Boon Lim	chezboon@yahoo.co.nz	Reject intensification. Do not want to see a high density Auckland.	Plan making and Procedural	General	S	Support insofar as MDRS is contrary to NPS:UD and AUP RPS (intensification resulting in urban sprawl vs intensification focused around centres and transport routes).
253.1	P Todd	peter.todd@rsvl.co.nz	Decline the plan change; intensification will lead to degradation of the urban environment and will not provide affordable housing in Devonport [refer to the submission for examples].	Plan making and Procedural	General	S	NB: Submission does not make direct reference to Devonport. Agree with submitter's points in the body of his submission: *(i) Intensification will lead to a degradation of the urban environment (eg. less places for children to play, traffic congestion, lack of light, trees and open space). (ii) Smaller but expensive (not cheaper) properties.* [MDRS will not solve the affordability crisis - is disingenuous to suggest that it will] *(iii) Infrastructure requirements, effects and costs don't seem to be taken into account (eg. water, sewer, roads, schools, hospitals etc). For example, increased stormwater runoff into the harbour. In Glen Innes there are 4000+ additional dwellings to be built. This means about 8,000 more schoolchildren. Where are the 8 schools at 1,000 children each? The existing schools do not have this capacity even if intensively developed. (iv) This major change to our beautiful city seems to be poorly thought through and rushed. (v) Slow down the process and work through it step by step and carefully to see the impact at each stage.*
266.1	Sam Cossey	samcossey@gmail.com	Approve the plan change.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

272.1	Ben and Bronwyn Harman	michael@campbellbrown.co.nz	Approve zoning of 1 Komaru Street, Remuera and the surrounding Komaru Street to Mixed Housing Urban zone.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
274.1	JHY Investment Trust	jhyinvestmenttrust@gmail.com	Rezone 71 Margot Street, Epsom to THAB zone.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
277.1	Robert Leslie Thomas	bobt@xtra.co.nz	Reject the 3 properties, 3 storeys proposal and reconsider intensification proposals. Concerns relating to infrastructure, parking, privacy, height to boundary, lack of public transport, and social impact on communities.	Plan making and Procedural	General	S	
278.3	Stan Jan Augustowicz	s.augustowicz@gmail.com	Reject intensification re concerns relating to apartments not being suitable for long term living for most people.	Plan making and Procedural	General	S	This is both to do with (i) apartments not being designed to be adaptable for long term living (Universal design and adaptable housing - greater housing choice for seniors, families and people with disabilities and provisions to enable residents to age in place) - this is a gap in the AUP provisions that needs addressing (refer North Sydney DCP for examples of these types of provisions) and (ii) substandard dwellings with internal living areas not being large enough for families. Further improvement is required in this area in Auckland to achieve quality liveable outcomes.

292.1	CIVIX Ltd	feitongc@gmail.com	Amend so that where no qualifying matter is relevant to the site, the Medium Density Residential Standards should apply to the entire central Auckland Light Rail Corridor area.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
294.1	Joseph Nicholas Marinovic	Joseph@fabricdigital.co.nz	Approve plan change.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
325.2	Jinxi Xie	jinxixie55@gmail.com	Ensure there is a correct estimation of the real demand of apartments and high-rise buildings to avoid an over supply of apartments.	Plan making and Procedural	Development Capacity Analysis	S	NPS:UD Objective 3 *requires that Regional policy statements and district plans enable more people to live in areas of an urban environment where* one or more of three criteria apply - i.e. *(i) near a centre zone or other area with many employment opportunities, (ii) the area is well-serviced by existing or planned public transport or (iii) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.* The MDRS is enabling apartments/ townhouses in areas that do not meet these criteria and therefore the MDRS is contrary to Objective 3 of the NPS:UD.
328.13	Herald Island Environmental Group	heraldislandenviro@gmail.com	Reject intensification and what the government is requiring as it will result in mass tree felling across Auckland and not help climate change and the environment.	Plan making and Procedural	General	S	Widespread intensification enabled through Central Govt mandated MDRS is contrary to the objectives and policies of the NPS:UD, Council's RPS and DP relating to climate change. By pushing this through they are unwittingly compromising the ability of NZ Tier 1 Cities to achieve the very outcomes set out within the NPS:UD, Council's RPS and DP and Council's Climate Plan 2020. This is irresponsible governance and will have serious implications for NZ.
328.5	Herald Island Environmental Group	heraldislandenviro@gmail.com	Reject intensification as tree loss (38% tree cover reduction) and increased impermeable surfaces (in particular on Herald Island) are a negative biodiversity, climate and harbour water quality input.	Plan making and Procedural	General	S	Widespread intensification enabled through Central Govt mandated MDRS is contrary to the objectives and policies of the NPS:UD, Council's RPS and DP relating to climate change. By pushing this through they are unwittingly compromising the ability of NZ Tier 1 Cities to achieve the very outcomes set out within the NPS:UD, Council's RPS and DP and Council's Climate Plan 2020. This is irresponsible governance and will have serious implications for NZ.
338.31	Scott Macarthur	scott@urbanplan.co.nz	Amend H5.8.2(17) - Minimum Dwelling Size as the three criteria are located in the wrong place. Relocate the criteria under 17(d)(a)(i)-(iii) to H5.8.2(2) and include reference to the Auckland Design Manual guidance.	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	S	We support the inclusion of reference to the ADM in the residential standards so that there is some objective guidance to assist with interpreting the minimum dwelling size plan provisions. This will make explicit the link between the minimum dwelling size provisions and the ADM for all stakeholders when preparing, assessing and deciding upon applications so that better quality and consistent outcomes are achieved.

350.1	Nelson Bennett	nelsonbennett1@gmail.com	Approve the plan change as more density is needed.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
351.1	iSolutions	rajm@isolutionsnz.com	Approve the overall intent of the plan change to enable higher density residential development across Auckland.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
366.1	Gareth Shute	garethshute@gmail.com	Approve the plan change without any amendments.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

368.1	Songfeng Liu	alanliu930@gmail.com	Reject the reduction of maximum building coverage to 35 per cent within Height and Building Sensitive Areas at 198 Clovelly Road, Bucklands Beach.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
391.1	James Schoch	james@schoch.co.nz	Approve the plan change to allow for more housing for Auckland.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
398.1	Reuben Dylan Fong	rfon572@aucklanduni.ac.nz	Support intensification proposed.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

420.1	Mahajabeen Padamsee	majp@yahoo.com	Support the intensification in the plan change.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
423.1	Witten-Hannah Howard Solicitors	alex@whhlaw.co.nz	Approve the plan change for intensification.	Plan making and Procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
431.1	Vital Healthcare Property Trust	mattn@barker.co.nz	Support the total building height of 21m (6 storeys) (Table H11.6.11) and height in relation to boundary of 19m +60 degrees (Table H11.6.2.1) in the walkable catchments in the Local Centre Zone.	Walkable Catchments	WC General - Methodology	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

445.1	Yi Chang	whitfordholiday@gmail.com	Include Whitford Rural - Countryside Living zone in the plan change and rezone to allow for housing.	Outside Urban Environment	Outside Urban Environment - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
452.1	Brent Clode	brent@developmentpartners.nz	Reject the Water and/or Wastewater Constraints Control over Chatswood catchment due to the upgrade of wastewater being an easy option. Rezone the area to MHU.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
457.1	Jeremy Crosby	jeremy.crosby.nz@gmail.com	Approve the plan change as it will future proof the city, maximise transport network usage and more equitable access to inner city living.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

480.1	Joshua Ho	joshuaho300@gmail.com	Approve all changes to further intensify Auckland, notably in the areas which connects public transport amenities.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
481.1	Megan Kully	megan.kully@gmail.com	Apply MDRS zoning (MHU zone) to Herringson and Rona Avenue and parts of Tuarangi Road, Grey Lynn. (supporting documents of the submission-diagram page 4).	Centres - NPS-UD Policy 3d response	Grey Lynn Local Centre - extent of intensification	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
482.1	Michael Richard Adamson	mike22240@hotmail.com	Allow mass development in all character areas.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

509.1	Claire Stewart	claire_stewart69@hotmail.com	Decline the plan change as it will lead to the creation of slums and take people's space and sunlight.	Plan making and procedural	General	S	MDRS will create expensive slums as the standards will result in a greater number of dwellings on sites at greater heights, with bulk closer to site boundaries (due to the more lenient height in relation to boundary standard) with narrower front yard setbacks, smaller outdoor spaces, and outlook spaces. The MDRS HIRB plane has no relationship to the angle of the sun in Winter (33 degrees), nor do the standards consider topography. There are no standards in the existing Plan or introduced by the Plan Change that protect energy efficiency and solar access (except for the reference to energy efficiency within the RPS, chapter B2 Urban growth and form). These are missed opportunities. The MDRS standards will set the new permitted baseline opening the way for more intensive development (if the MDRS permitted standards have compromised access to sunlight, then it makes it more difficult to refuse applications for more than 3 units on a site as the shading effects are likely to be similar). Access to sunlight is therefore not guaranteed within development or for adjoining sites. This will result in cold, dark, damp homes that require heating with continued reliance on burning fossil fuels (passive technology such as solar powered heating will not be possible).
510.1	David Cunningham	absolut.dc@xtra.co.nz	Decline the plan change as there has been lack of consultation with the community and the plan change will have adverse impacts on culture and feel of community.	Plan making and procedural	Consultation and engagement - general	S	MDRS and PC78 will have adverse impacts on culture because MDRS sets a permissive baseline that will enable developers to push for more units per site. The effects of MDRS on the environment will be significant (e.g. shading) and therefore it will become more difficult to decline more intense proposals. Units are getting smaller and are not meeting the needs of the community, especially Maori and Pasifika, larger families
514.1	Josh Irvine	josh_irvine@icloud.com	Allow for unlimited height at 37 Esmonde Road and surrounding area in Takapuna walkable catchment.	Walkable Catchments	WC Metropolitan Centre - Takapuna	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
515.1	Liam Appleton	liamappleton@msn.com	Remove all Special Character Areas, it perpetuates inequitable wealth and social outcomes.	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

516.1	Maryann Savagr	maryann.savage@gmail.com	Approve the plan change, reduce the effect of climate change, make housing more accessible and support urban density.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
520.1	Tara Moreton	tara_baskerville@yahoo.co.uk	Decline the plan change because of lack of planning and thought of the impact of the plan change on existing residents [inferred]. Impact on property values, shading, traffic, wastewater and stormwater.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
521.1	Tatiana Nazarova	tatiananazarova@hotmail.com	Approve the plan change to accommodate more people into affordable housing, for example in Henderson.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

524.1	Accommodation Investment Trust	matthew@positiveplanning.co.nz	Remove the SCAR from 187 Gillies Avenue and 191 Gillies Avenue, Epsom.	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
529.1	Douglas Sierra Trust	matthew@positiveplanning.co.nz	Approve the Mixed Housing Urban zoning at 50 Sierra Street, Glendowie and surrounding properties, [inferred] to include 70 Pembroke Crescent, 52 Sierra Street, 52A Sierra Street and 68 Pembroke Crescent, Glendowie.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
530.1	ET Commercial Investments Limited	matthew@positiveplanning.co.nz	Remove the Special Character Areas overlay from 102 Arney Road and 102A Arney Road, Remuera.	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

536.1	Misa Properties Partnership	matthew@positiveplanning.co.nz	Rezone 116 Balmoral Road and 122 Balmoral Road, Mt Eden to THAB or such other intensification zone as may be appropriate.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
537.1	P G Beattie and W M Walker Trust	matthew@positiveplanning.co.nz	Remove the Special Character Areas overlay from 39B Disraeli Street, Mt Eden.	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
538.1	Yash Idnani and Divya Verma	baris.chung@cornerstoneplanning.co.nz	Approve Mixed Housing Urban zoning for 75 Jolson Road, Mount Wellington.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

539.1	Zora Trust	matthew@positiveplanning.co.nz	Rezone 218 Hibiscus Coast Highway, 220 Hibiscus Coast Highway, 222 Hibiscus Coast Highway, 222B Hibiscus Coast Highway, 2 Beach Road, 2 Loop Road and 10 Loop Road, Orewa to THAB.	Urban Environment	Larger rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
545.1	Mary Williamson	maryfmld@gmail.com	Reject proposed zoning for Devonport. (Refer to submission for detail). [Inferred] includes some or all of the properties on streets including Lake Road, Regent Street, Ngataringa Road, Abbotsford Terrace, Aramoana Avenue, Vauxhall Road, Kawerau Avenue, Ariho Terrace, King Edward Parade, Church Street, Empire Road, Mozeley Avenue, Oxford Terrace, Merwood Lane, Victoria Road, Wesley Street, Tudor Street, Kerr Street, Cambria Road, Stanley Point Road, Glen Road, Russell Street, and Albert Road, Devonport.	Urban Environment	Larger rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
549.1	Murali Narayana Swamy	vinmurali@hotmail.com	Approve the plan change.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

559.1	Peter Norwood	beaversnorwood@gmail.com	Reject proposed zoning for Devonport. (Refer to submission for detail). [Inferred] includes some or all of the properties on streets including Lake Road, Regent Street, Ngataringa Road, Abbotsford Terrace, Aramoana Avenue, Vauxhall Road, Kawerau Avenue, Ariho Terrace, King Edward Parade, Church Street, Empire Road, Mozeley Avenue, Oxford Terrace, Merwood Lane, Victoria Road, Wesley Street, Tudor Street, Kerr Street, Cambria Road, Stanley Point Road, Glen Road, Russell Street and Albert Road, Devonport.	Urban Environment	Larger rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
580.1	Yuva Adhikary	yuva53@hotmail.com	Adopt a staged intensification strategy, firstly around city centre, at RTN's and metropolitan centres and then staged intensification in the suburbs.	Plan making and procedural	Development Capacity Analysis	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
591.1	Diane Jelas	Dianegjelas@gmail.com	Approve plan change: provides for new housing.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

615.1	Lin Song	joeben0524@hotmail.com	Remove volcanic viewshaft height restrictions.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
617.1	Jennifer Sutton	ambiencehair@yahoo.co.nz	Approve the plan change.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
636.1	Glenbrook Beach Residents and Ratepayers Association	gbresidentsandratepayerssa ss@gmail.com	Approve the plan change without any amendments. Particularly the exclusion of small settlements of less than 5000 people from MDRS and THAB zoning.	Outside Urban Environment	Outside Urban Environment - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

651.1	Clem Wilson	clemjbw@protonmail.com	Increase the area covered by the Special Character Area Overlay to include more residential villas.	Qualifying Matters - Special Character	Special Character Residential - add new property/area to SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
691.1	Richard Pamatatau	richard.pamatatau@gmail.com	Approve plan change for intensification to prevent urban sprawl.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
692.1	Kristen Jane and John Douglas Parlane	kjwenzlick@inspire.net.nz	Approve proposed zoning for Greenhithe area to Mixed Housing Urban to support sustainable management of resources and allow more houses to be built.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

706.1	Tara-Lee Carden	michael@campbellbrown.co.nz	Rezone sites along Island Bay Road, Beach Haven to Mixed Housing Urban zone, including 38 Island Bay Road, 40 Island Bay Road, 40A Island Bay Road, 44 Island Bay Road, 46 Island Bay Road, 52 Island Bay Road, 54 Island Bay Road, 56 Island Bay Road, 60 Island Bay Road, 62A Island Bay Road, 68 Island Bay Road, 72 Island Bay Road, 74 Island Bay Road, 76 Island Bay Road, 78 Island Bay Road, 80 Island Bay Road, 82 Island Bay Road and 84 Island Bay Road, Beach Haven. (Refer to submission for detail).	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
711.1	Jessica de Heij	deheij@gmail.com	Approve plan change provisions allowing for more intensification as this will decrease house prices, increase build quality and is more equitable, as outlined in submission.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
739.1	Babich Wines Limited	Michael@campbellbrown.co.nz	Rezone sites 8 Babich Road, 9 Babich Road, 10 Babich Road, 11 Babich Road, 12 Babich Road, 15D Babich Road, 19 Babich Road and 21 Babich Road, Henderson Valley, Babich Precinct to MHU [refer to page 2 of submission for further details].	Precincts - NPSUD MDRS Response	I600 Babich Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

740.1	HND TS Limited	Michael@campbellbrown.co.nz	Amend sub-precinct A to include a height overlay of up to 8 storeys (33m).	Precincts - NPSUD MDRS Response	I540 Takapuna 1 Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
741.1	Qi Fan	Michael@campbellbrown.co.nz	Rezone 35 Laurie Avenue, 33 Laurie Avenue, 31 Laurie Avenue, 29 Laurie Avenue, 27 Laurie Avenue, 25 Laurie Avenue, 23 Laurie Avenue, 21 Laurie Avenue, 19 Laurie Avenue, 14 Ayr Street, 16A Ayr Street, 16 Ayr Street. 18 Ayr Street, 20 Ayr Street, 22 Ayr Street, 24B Ayr Street, 24A Ayr Street, 26 Ayr Street, 28 Ayr Street to THAB.	Urban Environment	Larger rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
781.1	Brand Qu	brandqu1980@gmail.com	Enable 12m building height for waterfront property owners on Churchill Road, Murrays Bay.	Low Density Residential Zone provisions	H3A Standards Low Density Residential Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

812.1	Iain McManus	iain@civitas.co.nz	Amend H10.6.1 (Building Height) height limit from 21m to 22.5m, to enable 6 storeys with good urban design outcomes.	Business Zones provisions	Town Centre Zone - provisions	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
813.1	Gaynor Steel	gaynorsteel45@gmail.com	Reject further development/intensification without additional park being created, as contrary to Auckland Council Urban Ngahere Strategy and Climate Plan 2020.	Plan making and procedural	General	S & N	(i) Agree that additional parks will be required with further intensification as this will result in additional runoff, loss of established tree cover, less space within sites for outdoor activities/ amenity, loss of quality of life for residents. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities (ii) Development which is being enabled by MDRS is contrary to NPS:UD, RPS and Auckland Council Climate Plan 2020 because it will not result in reduced emissions
815.4	Keith Law	keith.jean99@gmail.com	Delete the walkable catchment of 400m measured from Ponsonby Road Town Centre western edge and replace it with a 200m walkable catchment measured from the Three Lamps intersection.	Centres - NPS-UD Policy 3d response	Ponsonby Town Centre - extent of intensification	O	Contrary to NPS:UD which seeks to create well functioning urban environments with intensification located around centres and transport corridors (and apply to all other like submissions - multiple)
823.1	Jones Family Trust	barrykaye@xtra.co.nz	Zoning around existing rapid transit stations in the Light Rail Corridor should not be excluded from the plan change where they already exist and form part of the transport network	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

830.1	Ockham Group Ltd	barrykaye@xtra.co.nz	Ensure that all walkable catchment boundaries are ground truthed based on at least a 15 minutes' walk time and incorporate any amendments to walkable catchment boundaries based on these findings.	Walkable Catchments	WC General - Methodology	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
833.1	Waterchild Ltd	peter@waterchild.co.nz	Require currently zoned MHS and SHZ land which is rezoned as MHU and have no qualifying matters to be subject to current MHU AUP(OP) standards with immediate effect, with considerable weighting for 'MHU proposed' (PC780 density standards.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
834.1	Auckland Thoroughbred Racing Incorporated	alice.gilbert@russellmcveagh.com	Rezone part of 100 Ascot Avenue, Greenlane from Special Purpose - Major Recreation Facility to Business - Mixed Use. [Refer to Schedule 1 page 6 for further details and mapped extent].	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

834.3	Auckland Thoroughbred Racing Incorporated	alice.gilbert@russellmcveagh.com	Delete the Ellerslie 2 Precinct in full, or alternatively amend precinct to give effect to the NPS-UD including but not limited to increasing the height limit to 50m. [Refer to Schedule 1 pages 9 and 10 for further details and mapped extent].	Precincts - NPSUD MDRS Response	I312 Ellerslie 2 Precinct	O	What is the justification for this? What about the effects on the local roads and community?
835.1	Avondale Jockey Club Incorporated	dsadlier@ellisgould.co.nz	Amend the Avondale Town Centre walkable catchment by consolidating and expanding the Avondale Town Centre and New Lynn Metropolitan Centre walkable catchments with a new northern boundary along Ash Street, and a new southern boundary along Wolverton and Blockhouse Bay Roads. {refer to attachment 2, page 8 for mapped proposed extent].	Walkable Catchments	WC RTN Avondale	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
836.1	North Eastern Investments Limited	amanda@proarch.co.nz	See PC 71: NPS-UD Removal of Car Parking Minimums – Consequential Technical Amendments PC79 (Amendments to the transport provisions) PC 81 (Additions to Schedule 14 Historic Heritage Schedule) PC 82 (Amendments to Schedule 14 Historic Heritage Schedule)	Other Plan Change		O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
839.1	Russell Property Group	Vijay.lala@tattico.co.nz	Amend the plan change provisions so that they give effect to the NPS UD and RMA Enabling Act [refer to page 11 of submission for further details].	Plan making and procedural	General	N	The NPS:UD and the Enabling Housing Act are seeking contrary things and therefore it is not possible to amend the Plan Change to meet both. Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions as the NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl which will have adverse effects on infrastructure; and the NPS:UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore provide for their social wellbeing and health.

839.1	Russell Property Group	Vijay.lala@tattico.co.nz	Amend the plan change provisions so that they give effect to the NPS UD and RMA Enabling Act [refer to page 11 of submission for further details].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
839.3	Russell Property Group	Vijay.lala@tattico.co.nz	Apply zoning appropriate to give effect to the NPS UD and RMA Enabling Act [refer to page 12 of submission for further details].	Plan making and procedural	Mapping - general, clarity of rezoning	N	The NPS:UD and the Enabling Housing Act are seeking contrary things and therefore it is not possible to amend the Plan Change to meet both. Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions as the NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl which will have adverse effects on infrastructure; and the NPS:UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore provide for their social wellbeing and health.
839.4	Russell Property Group	Vijay.lala@tattico.co.nz	Remove overlays and QM that inappropriately restrict the implementation of the NPS UD and RMA Enabling Act [refer to page 12 of submission for further details].	Plan making and procedural	Mapping - general, clarity of rezoning	S & O	(i) Some QM restrict the implementation of the NPS:UD - such as SCA and Heritage Areas across wholesale inner suburbs. The SCA and Heritage Areas should be reviewed by Council to identify those areas that it is appropriate to protect from a SC/ Heritage perspective and free up areas within the central suburbs for intensification close to the city centre and transport corridors. (ii) Council needs to be very careful about what QM and overlays it deletes to ensure the objectives and policies of the NPS:UD and the RPS are achieved.
840.1	Auckland City Centre Residents Group	nbuckland@xtra.co.nz	Apply a standard walkable catchment length of 2,000 metres applies across all areas of Auckland rather that three different walkable catchments with three different distances.	Walkable Catchments	WC General - Methodology	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
840.14	Auckland City Centre Residents	nbuckland@xtra.co.nz	For the purposes of giving effect to the NPSUD Objectives, do not make Special Character Areas a Qualifying Matter under clause 3.32 or 3.33 of the NPSUD.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	S	The SCA and Heritage Areas should be reviewed by Council to identify those areas that it is appropriate to protect from a SC/ Heritage perspective and free up areas within the central suburbs for intensification close to the city centre and transport corridors.
841.10	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	[Amend plan so] any constraints identified are dealt with through other mechanisms, and 'down-zoning' the underlying zone is not necessary to appropriately manage those constraints. [refer to page 14 of the submission for further details].	Residential Zones	Residential Zones (General or other)	O	Down zoning is being done only where there are relevant overlays or QM. This is appropriate and efficient and should not be left to "other mecahanisms".

841.1	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	In terms of enabling intensification outside of these arbitrary limits [regarding application of the 800m walkable catchment], it is logical to ensure that the land on the periphery/edge is able to be up zoned if this is the most appropriate outcome, as opposed to further urban sprawl. On this basis, the catchment for the Highland Park metropolitan centre for Upzoning around Local Centre and Town Centres in line with NPS-UD Policy 3d should be extended to include Pakuranga Park Village and other above-mentioned properties located along Pakuranga Road, including Business Mixed Use Zone land [refer to pages 7-8 of the submission for further details, and includes properties at 189 Pigeon Mountain Road Half Moon Bay, 37 Stanniland Street and 320 Pakuranga Road, 330 Pakuranga Road, 332 Pakuranga Road, 334S Pakuranga Road, 350 Pakuranga Road, 470 Pakuranga Road, 472 Pakuranga Road, 474 Pakuranga Road and 490 Pakuranga Road, Pakuranga].	Centres - NPS-UD Policy 3d response	Highland Park Town Centre - extent of intensification	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
841.16	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.3B Dwellings within the Infrastructure – Combined Wastewater Network Control as identified on the planning maps [refer to submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	These provisions are necessary to protect areas where servicing is not available and should not be deleted.
841.17	Villages of New Zealand Limited	Tom.Morgan@Tatti co.co.nz	Delete proposed provisions under H5.6.3C Dwellings within the Infrastructure – Stormwater Disposal Constraints Control as identified on the planning maps [refer to submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	These provisions are necessary to protect areas where servicing is not available and should not be deleted.
841.2	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Amend the plan change provisions so that they give effect to the NPS-UD and RM Enabling Act [refer to page 11 of the submission for further details].	Plan making and procedural	General	N	The NPS:UD and the Enabling Housing Act are seeking contrary things and therefore it is not possible to amend the Plan Change to meet both. Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions as the NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl which will have adverse effects on infrastructure; and the NPS:UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore provide for their social wellbeing and health.
841.22	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete SEA QM requirement from the MHU zone [in relation to H5.6.10 (Building coverage)].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	These provisions are necessary to protect SEAs in MHUZ and should not be deleted.
841.23	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.11 (Landscaped area) other than those required by MDRS [refer to page 23 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to amend, at short notice and considerable expense, its AUP to accommodate the Central Government mandated MDRS provisions and has been forced to make rushed changes to its provisions to counteract these. The changes to the standards are necessary to ensure quality development for 4 or more dwellings and should not be deleted.
841.25	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions [not required by MDRS] under H5.6.12 (Outlook space) or amend to address reasons identified in the submission [refer to page 24 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to amend, at short notice and considerable expense, its AUP to accommodate the Central Government mandated MDRS provisions and has been forced to make rushed changes to its provisions to counteract these. The changes to the standards are necessary to ensure quality development for 4 or more dwellings and should not be deleted.
841.27	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions [not required by MDRS] under H5.6.14 (Outdoor living space) [refer to page 24 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to amend, at short notice and considerable expense, its AUP to accommodate the Central Government mandated MDRS provisions and has been forced to make rushed changes to its provisions to counteract these. The changes to the standards are necessary to ensure quality development for 4 or more dwellings and should not be deleted.
841.28	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.18 (Windows to street and private vehicle and pedestrian accessways) [refer to page 25 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to amend, at short notice and considerable expense, its AUP to accommodate the Central Government mandated MDRS provisions and has been forced to make rushed changes to its provisions to counteract these. The changes to the standards are necessary to ensure quality development (passive surveillance and privacy) and should not be deleted.
841.29	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.19 (Deep soil area and canopy tree) [refer to page 26 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to make rushed changes to incorporate provisions to address the NPS:UD and the increased intensity brought about by the MDRS standards and NPS:UD. The changes to the standards are a necessary part of ensuring resilience against the effects of climate change. Such provisions are important. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
841.30	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.20 (Safety and privacy buffer from private pedestrian and vehicle accessways) [refer to page 27 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to make rushed changes to incorporate provisions to address the NPS:UD and the increased intensity brought about by the MDRS standards. The changes to the standards are necessary to ensure safety and privacy.
841.31	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed provisions under H5.6.21 (Residential waste management) [refer to submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	Council has had to amend, at short notice and considerable expense, its AUP to accommodate the Central Government mandated MDRS provisions and has been forced to make rushed changes to its provisions to counteract these. The changes to the standards are necessary to improve the quality development and should not be deleted.

841.4	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Apply zoning appropriate to give effect to the NPS UD and RMA Enabling Act [refer to page 12 of submission for further details].	Plan making and procedural	Mapping - general, clarity of rezoning	N	The NPS:UD and the Enabling Housing Act are seeking contrary things and therefore it is not possible to amend the Plan Change to meet both. Especially in relation to well-functioning urban environments, integrated infrastructure, climate change and greenhouse emissions as the NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl which will have adverse effects on infrastructure; and the NPS:UD is seeking to provide for resiliency to the effects of climate change, whereas the Housing Enabling Act through the MDRS standards is allowing development that restricts people's ability to gain access to the sun and incorporate passive design and energy efficiency and therefore provide for their social wellbeing and health.
841.45	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed changes to Assessment criteria at H5.8.2(10) for maximum impervious areas [refer to page 4 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Assessment MHU Zone		This submitter has stated there is no advantage in trade to the changes but it wants more room to develop. This indicates a stretching of the principles of being a good community member by embelishing their intentions. They also try to justify their requirement for walkable area conditions by siting a bus stop being close by speaking to their real intent.
841.45	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed changes to Assessment criteria at H5.8.2(10) for maximum impervious areas [refer to page 4 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Assessment MHU Zone	o	This submitter has stated there is no advantage in trade to the changes but it wants more room to develop. This indicates a stretching of the principles of being a good community member by embelishing their intentions. They also try to justify their requirement for walkable area conditions by siting a bus stop being close by speaking to their real intent. The old people will not be able to walk around their community, outside the aged home gates, because of conjestion. They will have to drive defeating the reason for such amendments.
841.5	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Remove overlays and QM that inappropriately restrict the implementation of the NPS UD and RMA Enabling Act [refer to page 12 of submission for further details].	Plan making and procedural	Mapping - general, clarity of rezoning	S & O	(i) Some QM restrict the implementation of the NPS:UD - such as SCA and Heritage Areas across wholesale inner suburbs. The SCA and Heritage Areas should be reviewed by Council to identify those areas that it is appropriate to protect from a SC/ Heritage perspective and free up areas within the central suburbs for intensification close to the city centre and transport corridors. (ii) Council needs to be very careful about what QM and overlays it deletes to ensure the objectives and policies of the NPS:UD and the RPS are achieved.
841.53	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed changes to Assessment criteria at H5.8.2(17) for minimum dwelling size [refer to page 49 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	The proposed inclusion of assessment criteria to do with minimum dwelling size is supported as this gives more clarity for the purposes of assessment. Although it is preferred that these be moved to sit under Assessment Criteria H5.8.2(2) (as requested by the submission of Scott Macarthur, # 338.31), as the likelihood of undersized dwellings are far more likely to occur where four or more dwellings are proposed on a site
841.54	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed Assessment criteria at H5.8.2(18) for deep soil and canopy [tree] [refer to page 49 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	The proposed change provides clarity around the matters of discretion when looking at deep soil and canopy trees and should be retained. Such provisions are important. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
841.54	Villages of New Zealand Limited	Tom.Morgan@Tattico.co.nz	Delete proposed special information requirements H5.9 [refer to page 51 of the submission for further details].	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	The proposed changes provide more clarity in terms of the level of information expected to be provided to address certain rules and should be retained. Such provisions are important. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
871.1	Property Council New Zealand	Logan@propertynz.co.nz	[Amend] city centre walkable catchment by at least 400m to 1.5km.	Walkable Catchments	WC City Centre - Extent	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
872.14	Heritage New Zealand Pouhere Taonga	bparslow@heritage.org.nz	Note that the Auckland Unitary Plan already enables substantial capacity for increases in housing and growth.	Plan making and procedural	Development Capacity Analysis	S	
872.15	Heritage New Zealand Pouhere Taonga	bparslow@heritage.org.nz	Express concern that the plan change does not consider the potential for adaptive re-use, regeneration, and repurposing of existing buildings for housing, or encourage or facilitate this, given that Auckland has too many unused or org.nz underutilised houses and these actions have the potential to positively mitigate the impacts of climate change.	Plan making and procedural	General	S	Likewise other soft options such as relaxing/ amending the existing provisions to create other more affordable housing solutions, such as legalising through an amnesty on unapproved self contained units/ bedsits/ granny flats, where the owner / applicant can demonstrate that these meet the Building Code and are safe and sanitary (an approach that has been successful in LA) or even making provision for tiny homes (now often better designed than apartments through their well thought out and optimised storage solutions and arrangement of spaces) have been overlooked which could have alleviated the affordable housing shortages.

873.1	Kāinga Ora	developmentplanning@kaingaora.govt.nz	Delete the Residential - Single House Zone entirely. Rezone with Residential - Mixed Housing Urban Zone as a minimum as set out in Appendix 2 of the submission. This includes applying the Residential - Mixed Housing Urban Zone to the 23 settlements currently excluded such as Helensville, Clarks Beach, Glenbrook Beach, Karaka, Maraetai, Riverhead and others. See Appendix 1, Table 1, row 43. Zone mapping changes summarised in separate submission points by suburb and Appendix 2 map number.	Outside Urban Environment	Outside Urban Environment - Excluded from IPI PC	O	The Kainga Ora submission needs to be struck off as out of order. They are the government. They will be under instruction to force the full letter of the law onto our community under the guise of being a stakeholder. This is evident throughout their submission as is their complete disregard for the provisions of the RMA. 1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
873.74	Kāinga Ora	developmentplanning@kaingaora.govt.nz	Delete the definition of deep soil from Chapter J.	Plan making and procedural	Definitions	O	This definition is necessary to provie clarity around the meaning and interpretation of the deep soil provisions and therefore needs to be retained. Such provisions are important. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
873.8	Kāinga Ora	developmentplanning@kaingaora.govt.nz	Delete the definition of servicing area from Chapter J.	Plan making and procedural	Definitions	O	The definition of servicing provides clarity where currently there is none. It should be retained.
873.81	Kāinga Ora	developmentplanning@kaingaora.govt.nz	Delete the definition of urban heat island from Chapter J.	Plan making and procedural	Definitions	O	This definition is necessary to provie clarity around the meaning and interpretation of the heat island provisions and therefore should be retained. Such provisions are important. Refer: https://www.newsroom.co.nz/strategic-green-spaces-can-cool-cities
875.1	Forever Investments Limited	cameron.smythe@waterenerg.co.nz	Increase the height restriction to greater than 13m for 5 Wynyard Street, Devonport to reflect NPS-UD objectives.	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/Precinct to limit height)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

877.1	Aptus Holdings Limited	matthew@positiveplanning.co.nz	Approve 2 Shaw Street, Kingsland as THAB zone.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
884.1	Linda Haynes	honzbro@actrix.co.nz	Decline the plan change [due to liveability, mental health and privacy effects result of MDRS and NPS-UD].	Plan making and procedural	General	S	MDRS One size fits all will not work - is going to create poor outcomes (social, mental, environmental, cultural, health, safety). This has also forced Council to make rushed proposed changes to salvage what it can. Rushed plan changes/ policy results in poor outcomes. Provisions are also deficient in so many ways (refer North Sydney example) - passive thermal design, solar and energy efficiency, affordable housing, housing mix, adaptability for elderly and disabled, etc. Provisions are also deficient in so many ways (refer North Sydney example) - passive thermal design, solar and energy efficiency, affordable housing, housing mix, adaptability for elderly and disabled, etc. Implementation of this is going to be a nightmare!! And will only INCREASE the length of time it takes to process applications and cost for consenting because of complicated set of rules. It is completely shambolic and is not in the interests of Aucklanders (all people and communities, both now and in the future). This is a poor process overall and should be thrown out (how many experts need to jump up and down about this before someone will listen!). RM HEA and MDRS should be repealed and Central Government made to pay for this huge waste of Auckland taxpayers money and a public enquiry held. Also the timing of this (over the Christmas break, which has been orchestrated by Central Govt) and the sheer scale of the number of submissions and the detail and complexity has meant little time for public input and therefore is undemocratic and against the Bill of Rights.
894.1	Independent Māori Statutory Board	helen.atkins@ahmlaw.nz louise.ford@ahmlaw.nz	The Board generally supports PC78 to the extent that it provides for affordable housing in Auckland. In particular, the Board is supportive of increasing affordable housing which will house more whānau in areas that have better access to transport, education, work and amenity opportunities	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
895.1	Ngāti Whātua Ōrākei Group	nickr@barker.co.nz, makarenad@barker.co.nz	NWŌ generally supports the application of the modified Mixed Housing Urban (MHU) zone throughout urban residential areas as a basis for incorporating the Medium Density Residential Standards (MDRS). NWŌ considers the proposed spatial extent of the MHU zone to be broadly consistent with the objectives and policies of the NPSUD, and supportive of the delivery of diverse well-designed housing developments.	Plan making and procedural	General	O	No it is not consistent (I.e. NPS:UD objectives and policies seek focused development whereas RM HEA and MDRS facilitate sprawl, development enabled by MDRS will result in costly and unsustainable delivery of infrastructure, and will increase greenhouse emissions (development in far flung suburbs not handy to centres or public transport and thus residents will be reliant on private motorcar for getting to work etc) and it will not deliver diverse well-designed housing (I.e. policy H5.3(A1) and H6.3(A1) only state: "Enable a variety of housing typologies with a mix of densities...", they do not "require" a mix of dwellings and apartment sizes. There are no standards on this (which is a gap in the AUP - refer North Sydney DCP example). Most development being proposed consists of narrow, small, "shoe-box" size, attached and detached two and three-storey dwellings which is not delivering the high density (especially in THAB) and good quality outcomes (e.g. universal design, adaptability for elderly and disabled (gaps in the AUP provisions - refer North Sydney DCP example). Combined kitchen/ living/ dining areas not large enough even for the number of occupants the dwellings have been designed for (three and four bedroom dwellings with not even the ADM recommended area for a one bedroom dwelling) let alone larger families and intergenerational living. This is disproportionally adversely affecting Maori and Pasifika communities as they tend to have larger numbers of family members (intergenerational) living together. The lack of variety is also not meeting the needs of the community (lack of larger dwellings and smaller affordable units). This is also likely to become more of an issues in the future as intergenerational living is likely to become more prevalent as extended families will have to live together for longer because housing is not affordable. The one size fits all, blanket MDRS provisions, sets a highly permissive baseline which has no regard to site circumstances (e.g. topography, orientation, site size or shape, geology, ground conditions including instability, etc). The bulk and location standards will have significant adverse effects on sunlight access amongst other things - effectively ruling out passive thermal design, solar and energy efficiency contrary to the NPS:UD goals of resilience to the effects of climate change and well-functioning urban environments enabling all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future . The MDRS standards are too simplistic and are setting communities up to fail.

895.1	Ngāti Whātua Ōrākei Group	nickr@barker.co.nz Makarenad@barker.co.nz	NWŌ generally supports the application of the modified Mixed Housing Urban (MHU) zone throughout urban residential areas as a basis for incorporating the Medium Density Residential Standards (MDRS). NWŌ considers the proposed spatial extent of the MHU zone to be broadly consistent with the objectives and policies of the NPSUD, and supportive of the delivery of diverse well-designed housing developments.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
895.2	Ngāti Whātua Ōrākei Group	nickr@barker.co.nz, makarenad@barker.co.nz	NWŌ generally supports the application of the modified Terraced Housing and Apartment Building (THAB) zone to walkable catchments around the city centre, metropolitan centres, and rapid transit stops	Plan making and procedural	General	S	Generally agree insofar as this is consistent with the NPS:UD to focus intensification.
897.1	Catholic Diocese of Auckland	michael@campbellbrown.co.nz	Approve deletion of Standards H8.6.10, H8.6.11, H8.6.12, H8.6.13, H8.6.14, H8.6.15, H8.6.16, H8.6.17, H8.6.18, H8.6.19, H8.6.20, H8.6.21 as notified.	Business Zones provisions	City Centre Zone - intensity/floor area ratio/bonus provisions	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
898.1	Cornwall Park Trust Board	mark.vinall@tattico.co.nz	Approve MHU zone and incorporation of MDRS in relation to land at Campbell Road and Wheturangi Roads.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

901.1	Metlifecare Limited	bianca.tree@minterellison.co.nz	Amend Zone Description H5.1 (paragraph 3) to include recognition of the functional and operational requirements of listed activities and development; and particular consideration of demand for housing for the elderly, including retirement villages. [Refer to Appendix 1, page 8 for amended plan text and reasoning].	Mixed Housing Urban Zone provisions	H5 Obs & Pols MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
902.1	Oyster Management Limited	bianca.tree@minterellison.co.nz henry.sullivan@minterellison.co.nz	Retain Objectives H13.2(3) and H13.2(10), and Policies H13.3(12A) and H13.3(13) as notified	Business Zones provisions	Mixed Use Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
909.1	Bill and Christine Endean	Nick@civix.co.nz	Delete the QM for Coastal Hazards from 11 Judge Street, Parnell.	Qualifying Matters A-I	Significant Natural Hazards	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

916.1	Triumph Capital	michael@campbellbrown.co.nz	Apply a height variation control for land including 1-11 Shipwright Lane, 15-19 Shipwright Lane, 21-23 Shipwright Lane, 25-33 The Strand, 35-37 The Strand, 39-41 The Strand, 43-45 The Strand, 47-49 The Strand, 51-53 The Strand, 55-57 The Strand, 59-63 The Strand, 65-71 The Strand, 73 The Strand, 77 The Strand, 93-95 The Strand, 30 Augustus Terrace, 24 Augustus Terrace, 10 Augustus Terrace, 8 Augustus Terrace, 4 Augustus Terrace, 2 Augustus Terrace and 2A Augustus Terrace [shown in red on figure 2 of submission] to increase the height limit to 32.5m.	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/Precinct to limit height)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
938.1	New Zealand Housing Foundation	michael@campbellbrown.co.nz	Retain proposed wording in C1.6A.	Plan making and procedural	Plan Interpretation (Chapter A and Chapter C)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
939.1	Auckland Council	unitaryplan@aucklandcouncil.govt.nz	Amend objective H5.2(9) to: Development is enabled on sites within subject to significant ecological areas where it provides for the protection and management of the significant ecological values.	Mixed Housing Urban Zone provisions	H5 Obs & Pols MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

941.1	Foodstuffs North Island Limited	dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Amend PC 78 to include infrastructure capacity constraints as a qualifying matter that constrains the extent which intensification may occur outside the existing City Centre, Metropolitan Centre, Town Centre and Local Centre zones. [Refer to the full submission for examples of how this could be accomplished including zoning extent, conditional rezonings, additional infrastructure capacity standard (paragraph 4(b)(i-iii) pages 4 and 5)].	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
945.1	Ports of Auckland Limited ("POAL")	marbuthnot@bentley.co.nz	Approve the proposal (plan change) as notified, and in particular the retention of the City Centre Port Noise Overlay.	Business Zones provisions	City Centre Zone - all other provisions	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
947.1	Retirement Villages Association of New Zealand Incorporated (RVA)	Luke.Hinchey@chapmantripp.com marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz	Amend Residential - Low Density Residential Zone objectives and policies to provide clear direction and remove interpretation uncertainty. Refer to page 27 in the full submission.	Low Density Residential Zone provisions	H3A Obs & Pols Low Density Residential Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

949.1	Piper Properties Consultants Limited	Tom.Morgan@Tattico.co.nz and layne@bastiongroup.co.nz	Amend the plan change provisions so that they give effect to the NPS UD and RMA Enabling Act [refer to page 14 of submission for further details].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
950.1	Eke Panuku Development Auckland	tracey.turner@simpsongrierson.com	Realign development sites in Wynyard Point (sub-precinct F) and amend associated built form controls. Refer to submissions appendices for details.	Precincts - NPSUD MDRS Response	I214 Wynyard Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
952.1	The Ascot Hospital and Clinics Limited	ablomfield@bentley.co.nz	Approves the proposed deletion of SCAR overlay from the landholdings at 1 and 3 Gilgit Road, Epsom.	Qualifying Matters - Special Character	Special Character Residential - support property/area in SCAR as notified	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

968.1	McGregor Bailey Holdings Limited	rh@planningfocus.co.nz	Remove the Special Character Areas Overlay Residential and Business - Business Ponsonby on the north-eastern side of Maidstone Street, Grey Lynn, including 2 Crummer Road, 17 Maidstone Street, 13 Maidstone Street, 26 Ponsonby Road, 9 Maidstone Street, 7A Maidstone Street, 1-7 Maidstone Street, 1A Maidstone Street and 29-45 Great North Road, Grey Lynn.	Qualifying Matters - Special Character	Special Character Business - remove property/area from SCAB	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
971.1	RTJ Property Professionals Limited	russell@rtjproperty.co.nz	Apply a wider walkable catchment to all town centres, metropolitan centres and rapid transit routes including bus routes throughout the Auckland region.	Walkable Catchments	WC General - Methodology	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
976.1	Judith Gayleen Mackereth	mackereth.g@gmail .com	Repeal the Enabling Housing Supply legislation. Population have been denied right to appeal.	Plan making and procedural	Central Government process - mandatory requirements	S	
976.10	Judith Gayleen Mackereth	mackereth.g@gmail.com	[Inferred] Amend the plan to provide for liveability for families.	Residential Zones	Residential Zones (General or other)	S	What happened to Auckland's goal of becoming the world's most liveable city? The current changes being imposed on Auckland City through the Enabling Housing Act and the MDRS standards will not achieve that end goal and should be stopped!
976.11	Judith Gayleen Mackereth	mackereth.g@gmail.com	[Inferred] Amend the plan to provide for Universal Design standards, for an aging society, and for disabled access.	Plan making and procedural	General	S	There are current gaps within the plan that need addressing to future proof the Plan. Auckland Council should be looking to other examples of best practice, such as North Sydney Development Control Plan.
976.5	Judith Gayleen Mackereth	mackereth.g@gmail.com	Request more time for [inferred] further submissions.	Plan making and procedural	Consultation and engagement - general	S	
976.6	Judith Gayleen Mackereth	mackereth.g@gmail.com	[Inferred] Amend the plan to apply more stringent regulations to ensure the safety and longevity of the housing built and to ensure the amenity value of the living environment is preserved.	Residential Zones	Residential Zones (General or other)	S	(i) Regulations to ensure safety and longevity of the housing built - this is a shortcoming/ gap of the current AUP provisions and is one area necessary to ensure well functioning urban environments both now and in the future. (ii) NPS:UD Objective 4 and Policy 6 are inconsistent with Objective 1 (well-functioning urban environment that enables social wellbeing for all people in our communities now and in the future). The MDRS standards will not deliver quality outcomes and will have significant adverse effects on amenity values of our suburban communities, and this should not be allowed. What happened to Auckland's goal of becoming the world's most liveable city? The current changes being imposed on Auckland City through the Enabling Housing Act and the MDRS standards will not achieve that end goal and should be stopped!
976.7	Judith Gayleen Mackereth	mackereth.g@gmail.com	[Inferred] Amend the plan to ensure development only occurs where there is capacity for buildings to be adequately serviced by water, stormwater and sewage reticulation.	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	S	When it comes to infrastructure, the NPS:UD and the Enabling Housing Act including the MDRS standards are seeking contrary things. The NPS:UD is seeking to focus development around centres and transport corridors whereas the Housing Enabling Act through the City wide MDRS standards is seeking to permit sprawl. This is not sustainable and will have adverse effects on infrastructure (both in terms of existing and the planning, delivery and cost of providing new infrastructure). While some thought has been given to those areas with insufficient wastewater and stormwater servicing and included these as qualifying matters, this is not enough given the pressures likely to come from the development being permitted through the MDRS standards. Furthermore, no thought has been given to other infrastructure such as schools, parks, community facilities and zoning for these and then there is the issue of increased demand for public parking/ management of this, which is falling on the Councils, to make up for the removal of minimum parking standards (not a win-win situation).

976.8	Judith Gayleen Mackereth	mackereth.g@gmail.com	[Inferred] Amend the plan to include provision for sustainability.	Residential Zones	Residential Zones (General or other)	S	There are current gaps within the plan that need addressing to future proof the Plan. Auckland Council should be looking to other examples of best practice, such as North Sydney Development Control Plan.
985.1	Kheng Kai Chew	alexchewk@gmail.com	Rezone 13 Wilkinson Road and 15 Wilkinson Road, Ellerslie to THAB.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
986.1	Tingran Duan	tingran.duan@gmail.com	Rezone 89 King George Avenue, Epsom to Mixed Housing Urban.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
988.1	Summerset Group Holdings Limited	oliver.boyd@summerset.co.nz	Approve the submission made by The Retirement Villages Association of New Zealand.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1007.1	Tony Fair	tonyfairnz@gmail.com	Support the plan change as it will provide for more housing options.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1024.1	Queenstown Nominees Limited	hamish@cohere.co.nz	Rezone 3 Ramsgate Street and 5 Ramsgate Street, Ellerslie as THAB.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1055.1	Domain Gardens Development Limited	david@davidwren.co.nz	Maintain the Terrace Housing and Apartment Building (THAB) zone on the site at 1 Domain Drive, Parnell.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1064.1	M and L Investments	marbuthnot@bentley.co.nz	Approve the plan change except where identified in this submission.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1066.1	Avant Group Limited ('Avant') and Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Limited ('NMWoK')	mark.vinall@tattico.co.nz	Retain proposed rule C1.6A.	Plan making and procedural	Plan Interpretation (Chapter A and Chapter C)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1068.1	Precinct Properties New Zealand Limited	karlc@barker.co.nz	Delete Objective H8.2(4)(d) or amend to address concerns in submission including references to qualifying matters.	Business Zones provisions	City Centre Zone - all other provisions	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1073.1	Fulton Hogan Land Development Limited	nickr@barker.co.nz rebeccas@barker.co.nz	Retain Residential MHU and THAB zoning within the Wainui Precinct - I544 Wainui Precinct - see page 40 of submission.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1074.1	Oyster Capital	nickr@barker.co.nz rebeccas@barker.co.nz	Amend H5.1. Zone Description to clarify that the MHU zone has a role in the reduction in carbon emissions through promoting a compact urban form and through criteria for 4+ dwellings that encourages deep soil areas for canopy trees to act as carbon sinks.	Mixed Housing Urban Zone provisions	H5 Obs & Pols MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1079.1	The Coalition for More Homes	morehomesnz@gmail.com	Approve intensification plan change [inferred] in isthmus suburbs [refer to page 5 of submission for definition of 'Isthmus suburbs'].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1080.1	Fletcher Residential Limited	kbergin@frl.co.nz	Delete Objective H3A.2.(12). [Refer to Appendix 1, page 12 for further details].	Low Density Residential Zone provisions	H3A Obs & Pols Low Density Residential Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1086.1	Sonn Group	Mark.Vinall@Tattico.co.nz	Amend the plan change provisions to give effect to the NPS-UD and RM Enabling Act.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1088.1	Viaduct Harbour Holdings Limited	dallan@ellisgould.co.nz adevine@ellisgould.co.nz	Remove all provisions governing or constraining the height of development on sites in Precincts [Viaduct Harbour Precinct and Wynyard Precinct] and replace with (i) A maximum height standard applicable across both Precincts of 72.5 m; (ii) Site-specific maximum height standards enabling taller, marker buildings on the sites and to the heights specified on the plan attached as Attachment 2 of the submission; (iii) Changes to the Precinct rules to implement height standards in accordance with (i) and (ii) above; and (iv) Complementary changes to the height standards on the parts of the Wynyard Precinct not addressed in Attachment 2 [within the submission], being the land on the northern part of the Precinct, to the extent that such changes are considered appropriate by Council and acceptable to the owners and occupiers of that land.	Height	Height response - other zones	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1090.1	Steven Wang and Shirley Wang	milan.covic@ckl.co.nz	Remove Rule H5.4.1(A2A).	Qualifying Matters A-I	SEAs (D9)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1093.1	Philip Eaton	eatonphil68@gmail.com	Amend H6.1 Zone Description to address the scale of public transport, accessibility of the centre and the potential, planned or intended scale" of the centre.	Terrace Housing and Apartment Buildings Zone provisions	H6 Obs & Pols THAB Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1131.1	Ryan Moran	r.moran.nz@gmail.com	Approve the plan change.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1168.1	The Subdivision Company Limited	david@davidwren.co.nz	Approve the Mixed Housing Urban zoning on the site at 34 Tabitha Crescent, Henderson.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1199.1	Expanse Ltd	alex@expanseplanning.co.nz	Amend Objectives H3A.2 (5)-(11) and Policies H3A.3 (8)-(17) to link them back to specific qualifying matters. Alternatively reduce to one objective/policy referring to applicable qualifying matters.	Low Density Residential Zone provisions	H3A Obs & Pols Low Density Residential Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1202.1	Brad Allen	bradjamesallen@gmail.com	Approve the plan change to reduce consenting red tape.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1205.1	Charissa Snijders	charissa@csaarchitect.co.nz	Support in principle with amendments Auckland Council's response to National Policy Statement on Urban Development.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1206.1	Daniel Graham Maier-Gant	dmaiergant@gmail.com	Approve the plan change with the amendments requested	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1215.1	617 New North Limited	delilah@civix.co.nz	Change the height variation control for 617-619 New North Road, Kingsland to 27m as enabled / required by the NPS-UD.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1216.1	New Avenues No. 8 LP	mark@planco.co.nz	Approve Mixed Housing Urban zoning for 84 Eighth View Avenue, Beachlands.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1223.1	Emma Dixon	cowie.ea@gmail.com	Reject the Residential - Low Density Residential (LDR) Zone provisions.	Residential Zones	Residential Zones (General or other)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1225.1	Aaron Ghee	delilah@civix.co.nz	Give effect to the requirements of the NPS-UD within the Auckland Light Rail corridor via variation to plan change.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1270.1	Orewa Developments Ltd	sarah.robson@ckl.co.nz	Remove the Water and/or Wastewater Constraints Control is removed from 289 West Hoe Heights, Orewa as a qualifying matter.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1271.1	Prasanthi	prasanthi.cottingham@gmail.com	[Inferred] Remove Special Character Areas as a qualifying matter.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1304.1	Janette Jiayi Yan and Mark	mark@planco.co.nz	Amend D14 Volcanic Viewshaft and Height Sensitive Areas Overlay to remove qualifying matter for developments is below the viewshaft height control. e.g. a 3D plane that starts at the same identified RL / height above the site as identified by the current operative viewshaft controls.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1319.1	Nafis Rashid	nafis@blueprintplanning.co.nz	Amend standard H5.6.14. (4) to apply to developments over 35 units, and specify that it does not apply to apartments.	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1351.1	CHL (Carriss Holdings Limited)	tnp@tnp.co.nz	Apply qualifying matters (particularly those relating to natural hazards) only to the extent necessary and in accordance with s6 of the RMA and the AUP.	Qualifying Matters A-I	Appropriateness of QMs (A-I)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1359.1	Hugh Green Limited	emma@civilplan.co.nz	Retain the National Grid Corridor Overlay provisions in D26 without change.	Qualifying Matters A-I	National Grid (D26)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1430.1	Hanno Willers	hwillers@gmail.com	Increase walking catchments.	Walkable Catchments	WC General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1442.1	Jeremy Christian Hansen	jeremy@jeremyhansen.co.nz	Special Character should not be identified as a qualifying matter.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1470.1	Apec Equity Ltd	sarah.robson@ckl.co.nz	Remove the Water and/or Wastewater Constraints Control qualifying matter from 52 Sunnyheights Road, Orewa.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1474.1	College Hill Investments Ltd	matthew@positiveplanning.co.nz	Retain the Business Mixed Use zoning for 27 College Hill, 33 College Hill, 41 College Hill and 43 College Hill, Freemans Bay.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1533.1	The Titus Group	carly.h@stellarprojects.co.nz	Amend standard H5.6.14(4) relating to communal outdoor spaces for 20 or more units where other features of a development are present, as set out in the submission.	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1543.1	Winton Land Limited	ross.cooper@tattico.co.nz	Amend the plan change provisions so that they give effect to the NPS UD and RMA Enabling Act [refer to page 11 of submission for further details].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1546.1	Zoe Alexis Dunster	zoealexisdunster@gmail.com	Remove Special Character Areas as a qualifying matter.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1584.1	30 Hospital Road Limited Partnership	ross.cooper@tattico.co.nz	Approve the broad application of the MHU zone.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1585.1	Gibbonsco Management Limited	ross.cooper@tattico.co.nz	Approve the broad application of the MHU zone.	Residential Zones	Residential Zones (General or other)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1586.1	Shundi Tamaki Village Limited	ross.cooper@tattico.co.nz	Retain the Business Mixed Use zone for [inferred] 259, 261 and 263 Morrin Road, St Johns.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1593.1	Logan Paul O'Callahan	o'callahanl@wsc.school.nz	Reject Special Character Areas as qualifying matters.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1615.1	1 Manui Ltd / 58 James Laurie Ltd / 34 Moore Ltd	Michael@campbellbrown.co.nz	Rezone 1 Manui Place, Sunnyvale to THAB zone.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1675.1	Lawrie Knight	david@davidwren.co.nz	Approve the THAB zoning, 21m height and height in relation to boundary of 20 Park Avenue, Grafton.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1693.1	3 Park Avenue Ltd and Michael Knight	david@davidwren.co.nz	Approve THAB zoning for 3 Park Avenue, Grafton.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1717.1	Sarah C	greenredblueblack@gmail.com	Amend the plan by increasing the walkable catchments including around the city centre.	Walkable Catchments	WC General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1722.1	Sentinel Planning Ltd	simon@sentinelplanning.co.nz	Amend the plan so that MDRS and policy 3 are not made any less enabling for sites located within floodplains.	Qualifying Matters A-I	Significant Natural Hazards	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1726.1	Xudong Wang	gerard@sentinelplanning.co.nz	Recognise Mairangi Bay as a small Town Centre and apply further intensification surrounding 200m.	Centres - NPS-UD Policy 3d response	Other centres - extent of intensification	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1746.1	Neil Construction Limited	matt@neilgroup.co.nz Philip@campbellbrown.co.nz	Rezone 455 Whangaparāoa Road, Stanmore Bay to Mixed Housing Urban.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1747.1	Harry Platt	harryplatt555@icloud.com	Remove Special Character Overlay as a Qualifying Matter.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1753.1	Sam Shears	samjshears@gmail.com	Approve the plan change and the level of intensification in MDRS.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1755.1	Irvin Kaur and Tarandeep Singh	yash@epicdesign.nz	Enable the MDRS provisions to apply on sites where flooding applies on a case-by-case scenario.	Qualifying Matters A-I	Significant Natural Hazards	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1756.1	Smarty Home 2021 Ltd	yash@epicdesign.nz	Enable the MDRS provisions to apply on sites where flooding applies on a case-by-case scenario.	Qualifying Matters A-I	Significant Natural Hazards	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1761.1	C and V Family Trust and the Ruthmarie Trust	helen@telawyers.co.nz	Approve zoning of 18 The Promenade and 20 The Promenade, Takapuna, as THAB.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1765.1	Samson Corporation Limited and Sterling Nominees Limited	office@brownandcompany.co.nz	Approve the intent and outcomes of the plan change, particularly those provisions that seek to provide for intensification of development within a walkable catchment of centres and public transportation networks. Especially the concept of a '20-minute city', the idea that daily necessities can be accessed by walking or cycling within 20 minutes from one's home.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1776.1	Arkcon Limited	david@davidwren.co.nz	Approve THAB zone on the site at 67 Tahapa Crescent, Meadowbank..	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1780.1	Excel Bloom Limited, Chun Sum Lam, Excel Billion Limited, Excel Wealth Limited, 285 Red Hill Limited, Fong's Investment Limited	kay@formeplanning.co.nz	Retain the Mixed Housing Urban zone for the following properties (See also Figure 1 in the submission): 18 Henwood Road, Taupaki, 32 Henwood Road, Taupaki, 86 Henwood Road, Taupaki, 275 Redhills Road, Taupaki, 285 Redhills Road, Taupaki. and 319 Redhills Road, Taupaki.	Precincts - NPSUD MDRS Response	I610 Redhills Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1781.1	Build Rich Limited	kay@formeplanning.co.nz	Seeks no changes to the remainder of the General Business zoned land within both Silverdale 2 and 3 Precincts.	Precincts - NPSUD MDRS Response	I537 Silverdale 3 Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1791.1	26 Aroha Apartments	28 Aroha Avenue Sandringham Auckland 1025	Raise height within the walkable catchment [inferred of Town Centres] to 23 metres.	Residential Zones	Residential Zones (General or other)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1885.1	Andrew Calder	andrewgcalder@hotmail.com	Apply the MDRS provisions (Mixed Housing Urban zone) to all parts of Auckland stated as forming part of the 'urban environment', inclusive of those urban areas (including Helensville, Kumeu/Huapai, Riverhead and Kingseat) with populations of less than 5000 as at 2018 census.	Urban Environment	Larger rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1886.1	Angela Lin	angela.qi.lin@gmail.com	Approve H5.6.8.1 Yards.	Mixed Housing Urban Zone provisions	H5 Standards MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1888.1	Anthony James Chapman	ajchapman@gmail.com	Extend the walkable catchments to enable increased intensification. E.g. 2400m from the edge of the city centre.	Walkable Catchments	WC General - Methodology	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1895.1	Damian Light	damian@damianlight.co.nz	Reject the D18 Special Character Overlay particularly in walkable catchment areas.	Qualifying Matters - Special Character	Appropriateness of QM (Special Character)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1911.1	Glen McCabe	glendmccabe@gmail.com	Accept the plan change with the amendments requested.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1914.1	Iain Rea	iainrea@gmail.com	Accept the plan change with the amendments requested	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1915.1	Jack Gibbons	gibbonsj97@gmail.com	Accept the plan change with the amendments requested.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1921.1	Paul Manning	manning_p@hotmail.com	Decline the plan change [rejects increasing housing density on Herald Island which will increase the stormwater catchment area (increase of roof area) which will further inundate the pit drains and reduce the natural storm water retention/draining of the land as it is replaced with housing].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1923.1	Sandra Louise Caulton	sandycaulton@gmail.com	Accept the plan change without any amendments. Retain Low Density Residential zoning for Hillpark. [Inferred] includes some or all of the properties on streets including Lawrence Crescent, David Avenue, Lynmore Drive, Vista Place, Collie Street, Arthur Road, Claude Road, Dennis Avenue, Earls Court, Frank Place, Freshney Place, Grande Vue Road, Great South Road, Halsey Road, Hill Road, Hill Road On Ramp, Hillcrest Grove, Iorangi Place, Jill Place, Kahurangi Place, Kelvyn Grove, Knights Grove, Knox Road, Orams Road, Pantera Way, Patricia Place, Scenic Drive, Southern Motorway, Tampin Road and Walpole Avenue, Hillpark.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1931.1	Jeri Misa	jerifelizmisa@gmail.com	Accept the plan change without any amendments. Retain Low Density Residential zoning for Hillpark. [Inferred] includes some or all of the properties on streets including Lawrence Crescent, David Avenue, Lynmore Drive, Vista Place, Collie Street, Arthur Road, Claude Road, Dennis Avenue, Earls Court, Frank Place, Freshney Place, Grande Vue Road, Great South Road, Halsey Road, Hill Road, Hill Road On Ramp, Hillcrest Grove, Iorangi Place, Jill Place, Kahurangi Place, Kelvyn Grove, Knights Grove, Knox Road, Orams Road, Pantera Way, Patricia Place, Scenic Drive, Southern Motorway, Tampin Road and Walpole Avenue, Hillpark.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1933.1	Joanna Bason and Brad Bason	joannabason@gmail.com	Approves the proposed changes to date in PC78.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1941.1	Joshua Waterman	j.t.waterman.jw@gmail.com	Approve the plan change, and the objectives and policies for greater intensification of Auckland's urban areas.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1943.1	Kristen Greenfield	krissyross@hotmail.com	Accept the plan change without any amendments. Retain Low Density Residential zoning for Hillpark. [Inferred] includes some or all of the properties on streets including Lawrence Crescent, David Avenue, Lynmore Drive, Vista Place, Collie Street, Arthur Road, Claude Road, Dennis Avenue, Earls Court, Frank Place, Freshney Place, Grande Vue Road, Great South Road, Halsey Road, Hill Road, Hill Road On Ramp, Hillcrest Grove, Iorangi Place, Jill Place, Kahurangi Place, Kelvyn Grove, Knights Grove, Knox Road, Orams Road, Pantera Way, Patricia Place, Scenic Drive, Southern Motorway, Tampin Road and Walpole Avenue, Hillpark.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1946.1	Lichelle Ngawini	lmngawini@gmail.com	Accept the plan change without any amendments. Retain Low Density Residential zoning for Hillpark. [Inferred] includes some or all of the properties on streets including Lawrence Crescent, David Avenue, Lynmore Drive, Vista Place, Collie Street, Arthur Road, Claude Road, Dennis Avenue, Earls Court, Frank Place, Freshney Place, Grande Vue Road, Great South Road, Halsey Road, Hill Road, Hill Road On Ramp, Hillcrest Grove, Iorangi Place, Jill Place, Kahurangi Place, Kelvyn Grove, Knights Grove, Knox Road, Orams Road, Pantera Way, Patricia Place, Scenic Drive, Southern Motorway, Tampin Road and Walpole Avenue, Hillpark.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1953.1	Matthew Wansbone	matthew.wansbone@gmail.com	Amend [lower north shore RTN, Smales Farm] WC to 1600m.	Walkable Catchments	WC RTN Smales Farm	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1961.1	Oscar Sims	oscar@oscarsims.co.nz	Remove H8.6.2 general height control in the City Centre.	Business Zones provisions	City Centre Zone - height provisions	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1962.1	Aedifice Property Group	jessica@civix.co.nz	Approve the QM relating to the Auckland War Memorial Museum Viewshaft.	Qualifying Matters Other	Auckland Museum Viewshaft (D19)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1981.1	Southpark	nickr@barker.co.nz PamelaS@barker.co.nz	Amend H5.1 MHU zone description to clarify that the MHU zone has a role in the reduction in carbon emissions through promoting a compact urban form and through criteria for 4+ dwellings that encourages deep soil areas for canopy trees to act as carbon sinks.	Mixed Housing Urban Zone provisions	H5 Obs & Pols MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1982.1	Dalkara GP Limited	emma@civilplan.co.nz	Include 3 and 4 Cunningham Place, Conifer Grove in the Takanini RTN walkable catchment.	Walkable Catchments	WC RTN Takaanini	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1983.1	Cassiny Limited	judy@cassiny.nz	Reject standards I600.6.1 that restrict minimum site size in the proposed zones to 450m2 (MHU zone) and 2000m2 (Large Lot Residential zone).	Precincts - NPSUD MDRS Response	I600 Babich Precinct	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

1984.1	The Surveying Company Ltd	info@subdivision.co.nz	Confirm the SEA qualifying matter applies only to the SEA-T area overlay identified on a site by amending D9.1.1 as follows: This overlay has been identified as a qualifying matter in accordance with sections 77I(a) and 77O(a) of the RMA., with the qualifying matter area only applicable to the extent of the feature identified in the SEA-T Overlay.	Qualifying Matters A-I	SEAs (D9)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1986.1	Rosemarke Investments Limited	c.hebditch@vfemail.net	Remove the requirement in Activity Table H5.4.1 for four or more units to comply with standards additional to those required to be complied with as a permitted activity, and amend any of the proposed standards to be consistent with the MDRS standards.	Mixed Housing Urban Zone provisions	H5 Activity Table MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
1988.1	Robyn Alexander and Katherine Heatley	Burnette@thepc.co.nz	Rezone 3 Matakana Road, Warkworth to Mixed Housing Urban zone as opposed to the Residential Large Lot zoning and incorporating the MDRS with regard to PC78 objectives.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2025.1	Greater Auckland	Lowrie.matt@gmail.com	Better align the plan change through hearings process with Councils own strategic direction, especially the Transport Emissions Reduction Pathway work and the Auckland Plan 2050 which proposes a quality compact urban form and strong integration between land use and transport, with growth focused in areas with good travel options.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2033.1	Classic Group	Michael@campbellbrown.co.nz	Reject plan change as not consistent with the NPS-UD or MDRS.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2036.1	Evans Randall Investors Ltd	Michael@campbellbrown.co.nz	Reject plan change as not consistent with the NPS UD or MDRS.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2040.1	Mike Greer Developments	Michael@campbellbrown.co.nz	Approve C1.6A Overlay and precinct rules as the revised wording proposed by the plan change clarifies the status of the precinct or Auckland Wide Rules.	Plan making and procedural	Plan Interpretation (Chapter A and Chapter C)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2041.1	Neilston Homes	Michael@campbellbrown.co.nz	Amend the plan change to as it is inefficient and costly, onerous and would lead to complicated and costly resource consent applications and interpretation issues.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2049.1	Waka Kotahi	evan.keating@nzta.govt.nz	Amend provision G.2 to a walkable catchment of 1,600m applied from edge of the Business - City Centre Zone.	Walkable Catchments	WC City Centre - Extent	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2053.1	Wayne Russell	werrussell@gmail.com	Retain the existing consented setback area and building height and a height in relation to boundary control on 16 Spring Street and England Street (Freemans Bay) frontages [see Figure H6.6.5.1 in the submission , page 14]	Terrace Housing and Apartment Buildings Zone provisions	H6 Standards THAB Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2066.1	Investore Property Limited	bianca.tree@minterellison.co.nz	Apply a 27m Height Variation Control to the Mt Wellington Shopping Centre at 295 Penrose Road, Mt Wellington.	Height	Business Height - Strategic Approach (use of a single control HVC/Zone/Precinct to limit height)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2067.1	Southern Cross Healthcare Limited	bianca.tree@minterellison.co.nz	Seeks that the SCA Overlay is not a qualifying matter and that the SCA Overlay is removed from the Development sites (149, 151 and 153 Gillies Ave, Epsom) and the following Surrounding sites [see Figure 6 in the submission]: (a) 2 Brightside Road, 4 Brightside Road, 6 Brightside Road, 8 Brightside Road, Epsom (b) 155-195 (odd numbers) Gillies Ave [Inferred properties include 155 Gillies Avenue, 157 Gillies Avenue, 159 Gillies Avenue, 161 Gillies Avenue, 163 Gillies Avenue, 167 Gillies Avenue, 169 Gillies Avenue, 171 Gillies Avenue, 179 Gillies Avenue, 183 Gillies Avenue, 187 Gillies Avenue, 191 Gillies Avenue, 193 Gillies Avenue, 193A Gillies Avenue, 195 Gillies Avenue, 195A Gillies Avenue, Epsom]. (c) 7-21 Domett Ave [inferred properties include 7 Domett Avenue, 9 Domett Avenue, 9A Domett Avenue, 11 Domett Avenue, 13 Domett Avenue, 15 Domett Avenue, 17 Domett Avenue, 19 Domett Avenue, 21 Domett Avenue, Epsom] and 14-22 Domett Ave [Inferred properties include 14 Domett Avenue, 16 Domett Avenue, 18 Domett Avenue, 20 Domett Avenue, 22 Domett Avenue, Epsom]. (d) 1-7 Albury Ave [Inferred properties include 1 Albury Avenue, 3 Albury Avenue, 5 Albury Avenue, 7 Albury Avenue, Epsom] and 113 Gillies Ave, Epsom; (e) 1A – 27 (odd numbers) Epsom Avenue, Epsom [Inferred includes properties 1A Epsom Avenue, 3 Epsom Avenue, 3A Epsom Avenue, 5 Epsom Avenue, 7 Epsom Avenue, 9 Epsom Avenue, 11 Epsom Avenue, 13 Epsom Avenue, 15 Epsom Avenue, 17 Epsom Avenue, 19 Epsom Avenue, 21 Epsom Avenue, 23 Epsom Avenue, 25 Epsom Avenue, 27 Epsom Avenue, Epsom]	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2068.1	Stride Property Limited	bianca.tree@minterellison.co.nz	Approve the residential intensification proposed to be enabled around the Westgate Metropolitan Centre. This includes the extension of the Terrace Housing and Apartment Building zone, the extent of the walkable catchment, and the 21m height limit in this area.	Walkable Catchments	WC Metropolitan Centre - Westgate	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2079.1	Silver Hill Limited	Burnette@thepc.co.nz	Amend Plan Change 78 to include Snells Beach in the plan change.	Outside Urban Environment	Outside Urban Environment - Excluded from IPI PC	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2083.1	Universal Homes	Michael@campbellbrown.co.nz	Retain the revised wording of C1.6A.	Plan making and procedural	Plan Interpretation (Chapter A and Chapter C)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2189.1	Milenko Boric	tnp@tnp.co.nz	Delete the Low Density Residential Zone and apply the Mixed Housing Urban Zone on the subject site [367 Hibiscus Coast Highway, Orewa] and other sites at Orewa with the same proposed zoning and the same or lesser qualifying matters.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2194.1	Zac Norris	tnp@tnp.co.nz	Delete the Low Density Residential Zone and apply the Mixed Housing Urban Zone on the subject site [367 Hibiscus Coast Highway, Orewa] and other sites at Orewa with the same proposed zoning and the same or lesser qualifying matters.	Urban Environment	Single or small area rezoning proposal	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2238.1	Beachlands South Limited Partnership	bill.loutit@simpsongrierson.com / sarah.mitchell@simpsongrierson.com	Approve in general the application of the Mixed Housing urban zone through urban residential areas to incorporate the MDRS.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2243.1	Buildcorp Management Limited	philip@campbellbrown.co.nz	Approve the zoning of 3 Orwell Road, Greenhithe.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2248.1	Stuart P.C. Ltd	mark.vinall@tattico.co.nz	Approve the zoning of Selwyn Avenue, Mission Bay.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2249.1	Jack van de Water	jack.vandewater@outlook.com	Add a Transportation related qualifying matter at Matija Place, Red Beach as appropriate for development to be limited and resource consent application take in account infrastructure related constraints. [Inferred to include 1 Matija Place, 7 Matija Place, 17 Matija Place, 19 Matija Place, 21 Matija Place, 22 Matija Place, 23 Matija Place, 23A Matija Place, 24 Matija Place, 26 Matija Place, 28 Matija Place, 30 Matija Place, 32 Matija Place, 34 Matija Place, 36 Matija Place, 38 Matija Place, 40 Matija Place, 42 Matija Place, 44 Matija Place, 46 Matija Place, 48 Matija Place, 50 Matija Place, 52 Matija Place, 56 Matija Place, 58 Matija Place, 60 Matija Place, 62 Matija Place, 66 Matija Place, 68 Matija Place, 70 Matija Place, 78 Matija Place, 86 Matija Place, 65 Matija Place, 67 Matija Place, 69 Matija Place, 71 Matija Place, 73 Matija Place, 75 Matija Place, 25 Matija Place, 27 Matija Place, 77 Matija Place, 2 Miran Lane, 4 Miran Lane, 6 Miran Lane, 8 Miran Lane, 10 Miran Lane, 10 Miran Lane and 12 Miran Lane].	Qualifying Matters - Additional	Qualifying Matters - Additional	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2272.1	CivilPlan Consultants Limited	aaron@civilplan.co.nz	Remove proposed provisions related to natural hazards, protecting or managing historic heritage, managing sites and areas of significance to Māori, or protecting or managing outstanding natural features and landscapes from the zone provisions and inserting these within the overlay, Auckland-wide and precinct provisions, as relevant [consistent with the National Planning Standards].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2273.1	Aaron Grey	aaronjgrey@gmail.com	Remove proposed provisions related to natural hazards, protecting or managing heritage, managing sites and areas of significance to Māori, or protecting or managing outstanding natural features and landscapes from the zone provisions and inserting these within the overlay Auckland-wide and precinct provisions (if not already located there), as relevant [consistent with the National Planning Standards].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2297.1	Squirrel Trust	gillian@chappell.nz	Generally supports the proposal to include significant infrastructure constraints as a qualifying matter. In particular, this should apply to areas such as Tindalls Bay on the Whangaparaoa Isthmus.	Qualifying Matters - Infrastructure	Appropriateness of QM (Infrastructure)	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2303.1	Templeton Group	mark.vinall@tattico.co.nz	Amend the plan change provisions so that they give effect to the NPS UD and RMA Enabling Act [refer to page 10 of submission for further details].	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.

2313.1	Gordon Griffin	gegriffin_4@outlook.com	Retain objectives H5.2 (A1) and (B1); H5.2 (3); H5.2 (4 - 10); and H5.2 as notified.	Mixed Housing Urban Zone provisions	H5 Obs & Pols MHU Zone	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2383.1	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Amend I605.6.4 (Mixed Housing Urban) as notified to exclude the following rules: H5.6.19, H5.6.20 and H5.6.21.	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct	o	To in depth for the time span allowed to properly research
2383.2	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Amend I605.6.5 (Terraced Housing) as notified to exclude the following rules: H5.6.19, H5.6.20 and H5.6.21.	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct	o	To in depth for the time span allowed to properly research
2383.5	Malborough Precinct Holdings Limited	Michael@campbellbrown.co.nz	Rezone the identified portion of 8 Launch Road, Hobsonville Point, from Mixed Use to THAB to be consistent with the remainder of the site [refer to submission for detail].	Precincts - NPSUD MDRS Response	I605 Hobsonville Point Precinct	o	To in depth for the time span allowed to properly research
2386.1	Zeo Limited	david@whitburngroup.co.nz	Should the plan change be approved, upzoning for the Light Rail corridor must be available by 21 February 2023.	Plan making and procedural	General	O	1 We oppose this submission as, in one form or another, and/or to a greater or lesser extent it supports the deployment of the NPS-UD and the provisions under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Intensification Act), yet fails to prove the need for such development, which is over and above the development capability within the existing Auckland Unitary Plan (AUP). The AUP has sufficient development potential for another 900,000 living dwellings and, based on market observation, it is already delivering Auckland out of the so-called housing crisis. In so doing it is already meeting the objectives of the NPS-UD, the MDRS and the Intensification Act. 2. With respect to the Intensification Act, the Crown failed to carry out substantive substantive proof of need, which resulted in the passing of an unnecessary law, particularly as it pertains to Auckland. This then obliges Auckland Council and submitters who desire development over and above the existing AUP to: a) prove there is an actual need for more intensification outside of zones already designated for such development in the AUP and, b) carry out an assessment of effects to demonstrate that the Plan Change 78 amendments proposed are in accordance with sustainable resource management, as legally required under the RMA S 5(1) and S 5 (2) (a) (b) and (c), copied here for the avoidance of doubt: "5 Purpose (1) The purpose of this Act is to promote the sustainable management of natural and physical resources. (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety, while: (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment." Similarly, Sections 7 (c) and 7 (f) of the RMA are relevant: 3. To the best of our knowledge, considering the limited and therefore unfair amount of time allowed to conduct a detailed analysis, we argue this submitter will have done neither of the above. As such their submission should not be considered, until such time as these requirements are met.
2386.1	Zeo Limited	david@whitburngroup.co.nz	Should the plan change be approved, upzoning for the Light Rail corridor must be available by 21 February 2023.	Plan making and procedural	General	o	Submitter has financial interests they put before the emocratic interests of the communities affected by their requests. They are prpared to destroy local character now for a rail system that has not been accepted by the people of Auckland and no concrete decisions made on what it will look like.
2386.2	Zeo Limited	david@whitburngroup.co.nz	Should the plan change be approved, upzoning for the Light Rail corridor must be available by 21 February 2023.	Outside of Plan Change Area	Light Rail Corridor - Excluded from IPI PC	o	Submitter has financial interests they put before the emocratic interests of the communities affected by their requests. They are prpared to destroy local character now for a rail system that has not been accepted by the people of Auckland and no concrete decisions made on what it will look like.
2386.3	Zeo Limited	david@whitburngroup.co.nz	Delete all references to special character from the plan, including Chapter D18, all overlay maps, schedules and appendices relating to special character.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Submitter has financial interests they put before the emocratic interests of the communities affected by their requests. They are prpared to destroy local character now for a rail system that has not been accepted by the people of Auckland and no concrete decisions made on what it will look like.
2386.4	Zeo Limited	david@whitburngroup.co.nz	Remove the Market Road Special Character Area [refer to submission for further details].	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	o	Submitter has financial interests they put before the emocratic interests of the communities affected by their requests. They are prpared to destroy local character now for a rail system that has not been accepted by the people of Auckland and no concrete decisions made on what it will look like.

2386.5	Zeo Limited	david@whitburngroup.co.nz	Rezone the Market Road area [refer to submission for area description] to THAB zoning.	Urban Environment	Single or small area rezoning proposal	o	Submitter has financial interests they put before the emocratic interests of the communities affected by their requests. They are prpared to destroy local character now for a rail system that has not been accepted by the people of Auckland and no concrete decisions made on what it will look like.
2389.1	Elizabeth Knox Home and Hospital	cmcgarr@bentley.co.nz	Delete all changes proposed to Chapter D14.	Qualifying Matters A-I	Maunga Viewshafts and Height Sensitive Areas (D14)	o	Allowing a removal of D14 would prescribe future potential short cuts to greater development than intended for the area.The potential outcome would be overdevelopment to make money for a few.
2389.2	Elizabeth Knox Home and Hospital	cmcgarr@bentley.co.nz	Rezone the land at 2 Ranfurly Road, 4 Ranfurly Road, 6 Ranfurly Road, 10 Ranfurly Road, 10 Market Road, and 8 Griffin Avenue and 10 Griffin Ave, Epsom to THAB zone.	Urban Environment	Single or small area rezoning proposal	o	Allowing a THUB designation would prescribe future potential short cuts to greater development than intended for the area. The potential outcome would be overdevelopment to make money for a few.
2390.1	Society of Mary Trust Board	iain@civitas.co.nz	Remove the Special Character Areas Overlay – Residential from the properties at 2 Hopetoun Street, 4 Hopetoun Street, 6 Hopetoun Street, 8 Hopetoun Street, 10 Hopetoun Street and 12 Hopetoun Street, Freemans Bay, or, in the alternative, from the submitter's properties at 10 Hopetoun Street and 12 Hopetoun Street only. [Refer to figures 1 and 3 of submission for extent].	Qualifying Matters - Special Character	Special Character Residential - remove property/area from SCAR	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one. The sites will be sold in the future and up to 6 stories of accomodation built overlooking the school. The whole appearance of the street will be transformed and European history lost to future generations.
2390.1	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.6.1. [standard D18.6.1.6 Maximum impervious area] consequentially to reflect the higher building coverage permitted on sites greater than 200m2 within the relief sought on standard D18.6.1.4 [submission point 2930.].	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.2	Society of Mary Trust Board	iain@civitas.co.nz	Rezone the properties at 2 Hopetoun Street, 4 Hopetoun Street, 6 Hopetoun Street, 8 Hopetoun Street, 10 Hopetoun Street and 12 Hopetoun Street, Freemans Bay to Business – Mixed Use [from proposed LDRZ] or, in the alternative, the rezoning of the submitter's properties at 10 Hopetoun Street and 12 Hopetoun Street only to Business – Mixed Use. [Refer to figures 1 and 3 of submission for extent.]	Urban Environment	Single or small area rezoning proposal	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.3	Society of Mary Trust Board	iain@civitas.co.nz	The retention of all other provisions proposed in PC78 for the Special Character Areas Overlay – Residential without modification intended to reduce development potential or flexibility.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.4	Society of Mary Trust Board	iain@civitas.co.nz	Approve rule D18.4(3) as notified.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.5	Society of Mary Trust Board	iain@civitas.co.nz	Delete the standards listed in the "Standards to be complied with" column for activity D18.4(A1) within activity table D18.4.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.6	Society of Mary Trust Board	iain@civitas.co.nz	Amend standard D18.6.1.2(1) as follows: (1) Buildings in the Special Character Areas Overlay – Residential must not project above a 45 60 degree recession plane measured from a point 3m 4m above the ground level along any boundary of the site.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.7	Society of Mary Trust Board	iain@civitas.co.nz	Amend Figure D18.6.1.3.1 [standard D18.6.1.3(2)(Yards)] to show one of the rear sites with 3m yards to the long boundaries and 1.2m yards to the short boundaries (or other arrangement that is different to the arrangement shown for the other rear site within the notified figure). Requested to illustrate the freedom provided by notified standard.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2390.8	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.4.1 [standard D18.6.1.4 Building coverage] as set out on page 16 of the submission to apply MDRS building coverage standard.	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.

2390.9	Society of Mary Trust Board	iain@civitas.co.nz	Amend Table D18.6.1.5.1. [standard D18.6.1.5 Landscaped area] consequentially to reflect the higher building coverage permitted on sites greater than 200m2 within the relief sought on standard D18.6.1.4 [submission point 2930.].	Qualifying Matters - Special Character	Special Character Residential - provisions	o	Needs to be considered a special case. The buildings are indicative of the European history of Auckland and it is evident by the submission that there is profit ot be made from their removal or alteration beyond the history they hold and therefore require more stringent oversight. On the other hand restrictive council processes would turn them into unmaintained buildings. This is why their importance requires the safety of a heritage designation with a bit of common sence from council. I.e. more time to consider. The buildings overlook a school and park. It would not make children any safer with a 6 story building right on the border. Changing this designation would impose a new character that is incompatable with the present one.
2395.1	Matt Lowrie	Lowrie.matt@gmail.com	Rezone area around Russett Grove, Henderson (in particular 5 Russett Grove) to THAB zone like the rest of the areas nearby within walking distance of a rapid transit station.	Urban Environment	Single or small area rezoning proposal	o	The walking distance refered to would be for a healthy individual. There are hills and extremely busy roads that would make such a walk a stressful situation for the young, old and less able people. More households would make the situation worse. A tall house on this hill will affect all those around it by cutting the sun and privacy
2395.2	Matt Lowrie	Lowrie.matt@gmail.com	Reject use of coarse flood plain modelling that doesn't property take into account local geography or structures. Sections on Russett Grove, Henderson are higher than those on Hillwell Drive, Henderson and separated by a retaining wall.	Qualifying Matters A-I	Significant Natural Hazards	o	There is insufficient data on the submission and insufficient time to research the facts on this proposal
2396.1	Grant Dunn	grant.dunn@buddlefindlay.com	Rezone 9 Ewenson Avenue and 1 Ewenson Avenue, Ellerslie to THAB zone.	Urban Environment	Single or small area rezoning proposal	o	The property is close to an entrance to a park that is closed in by houses all around it. Planning to build high buildings on this property would make the entrance to this park a safety issue for people, especially the young. Those who live in the houses close to the walk way could also feel volnerable as well as having their privacy invaded should they open their windows. The sunlight would not shine on the walkway. The break does not seem arbitrary, rather it seems to add some quality of life to those who use the park. A small gap between the houses would cause stress on the occupants due to privacy and encourage only groups of people to enter the park.
2398.1	Scott Lamason	scott@engineous.co.nz	Remove the Wastewater and Water Supply qualifying matter from 22 Fairway Avenue, Red Beach.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	o	Watercare is not abiding by the councils plan in principle and is expanding by stealth the pressure put on the water supply system. The "proposed" system is not there yet and may not be for many years if at all should the downturn or any other crisis arise. Expansion needs to follow infrastructure not precede it or the eco systems will suffer. More houses will put pressure on present water supply and waste water management
2398.2	Scott Lamason	scott@engineous.co.nz	Remove the Wastewater and Water Supply qualifying matter from all of Orewa and Whangaparāoa.	Qualifying Matters - Infrastructure	Infrastructure - Water and wastewater constraints	o	Watercare is not abiding by the councils plan in principle and is expanding by stealth the pressure put on the water supply system. The "proposed" system is not there yet and may not be for many years if at all should the downturn or any other crisis arise. Expansion needs to follow infrastructure not precede it or the eco systems will suffer. More houses will put pressure on present water supply and waste water management

Therese Strickland

From: More Homes <morehomesnz@gmail.com>
Sent: Friday, 20 January 2023 8:51 PM
To: Unitary Plan
Subject: PC78 Further Submission
Attachments: Coalition for More Homes PC78 Further Submission.pdf

Kia ora

Please find our further submission to Plan Change 78 attached.

Submitter details.
Submitter: Miller Adams (on behalf of the Coalition for More Homes)

Address: 306/3 Rose Garden Lane, Albany, Auckland 0632

Contact phone number: 02102995016

Kind regards

Miller Adams
Coalition for More Homes NZ

morehomes.nz
Auckland

The Coalition for More Homes presents a further submission to Auckland Council on Plan Change 78.

About us

The Coalition for More Homes is a non-partisan group of volunteers and organisations including think tanks, consultancies, incorporated societies, Community Housing Providers, unions and developers.

Our vision

We want to see Auckland make the most of the opportunity provided by the NPS-UD and MDRS.

Auckland is in a multi-generational housing crisis. Secure and affordable housing is out of reach for more Aucklanders than ever. Poor housing quality is also leading to poor health outcomes, especially for renters.

We also have a climate crisis. On the 11th of June 2019, Auckland Council declared a climate emergency. In Auckland, 43.6% of carbon emissions are from transport. With constrained housing choices in high demand areas, many people are forced to live far from work and family, and accept long, costly commutes.

Allowing more people to live closer to where they work, study, shop and socialise and where they can access other transport options can significantly reduce our transport emissions. To expand housing capacity and choice, and reduce our emissions, we need to enable greater intensification around our existing centres, the rapid transit network and frequent bus network. This is what Climate Responsive Urban Development looks like.

Plan Change 78 ("PC78") is a significant opportunity for Tāmaki Makaurau, now and for future generations, to:

- Enable more homes for Aucklanders
- Boost housing choice & quality
- Enable more convenient, liveable neighbourhoods with access to transport & amenities
- Reduce emissions from housing and transport
- Lower travel cost and demand.

We believe that everyone deserves a healthy and affordable home, and the opportunity to live in a convenient, liveable and resilient neighbourhood.

Our submission presents the following arguments, with supporting recommendations to achieve a "well-functioning urban environment" for Auckland:

1. The Auckland isthmus suburbs are the most critical areas for new housing
2. The walkable catchments around rapid transit stops and metropolitan centres comprise the second most critical area for new housing
3. The areas surrounding highly accessible Town and Local Centres are the third most critical for new housing
4. Enable higher density than proposed and perimeter block housing in the Terrace Housing and Apartment Buildings Zone (THAB)
5. Enable more intensification than proposed and better design outcomes In the Mixed Housing Urban Zone (MHU)
6. Recommendations on other matters.

For the avoidance of doubt, our submission defines "the isthmus" to mean the former Auckland City Council area, from Avondale and Blockhouse Bay in the west to Ōtāhuhu in the south.

Submission number 873 - Kāinga Ora

We support point 873.29

We support point 873.43, but noting our comments on submission #2273 below i.e. Maunga Volcanic Viewshafts should be retained as a qualifying matter but with some individual viewshafts deleted.

Submission number 2049 - Waka Kotahi

We support points 2049.13 and 2049.14.

We support point 2049.75.

We support the following text in the Waka Kotahi submission: “the land within the Auckland Light Rail Corridor is highly accessible and ultimately it should be largely up-zoned around the Sandringham Road, Dominion Rd and Mt Eden Road corridors”

Submission number 2273 - Aaron Grey

We support points 2273.42 and 2273.43.