

Submission No. **343**

**From:** Kate McKessar [Kate.McKessar@arc.govt.nz]  
**Sent:** Friday, 29 May 2009 14:26  
**To:** isthmusplan  
**Subject:** Proposed Private Plan Change 8, Westfields, St Lukes  
**Attachments:** ARC Submission.pdf

To Whom It May Concern:

Pursuant to clause 6 of the first schedule of the Resource Management Act 1991, please find enclosed the Auckland Regional Council's submission to Proposed Private Plan Change 8 for Westfield St Lukes.

Kind regards

***Kate McKessar***

Senior Policy Planner - Central and Southern  
Policy Implementation  
Auckland Regional Council  
Te Rauhitanga Taiao  
T + 64 9 366 2000 x 8711  
F + 64 9 366 2155  
E + kate.mckessar@arc.govt.nz  
www.arc.govt.nz

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**NOTICE OF SUBMISSION TO THE  
AUCKLAND DISTRICT PLAN PROPOSED PRIVATE PLAN CHANGE  
8 UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE  
RESOURCE MANAGEMENT ACT 1991**

**TO:** Manager City Planning  
Auckland City  
Private Bag 92-516  
Wellesley Street  
**Auckland 1141**

**FROM:** Auckland Regional Council  
Private Bag 92 012  
**Auckland**

21 Pitt Street Auckland Central  
Private Bag 92 012  
Auckland 1142 New Zealand  
DX CP 28 008 Pitt St  
Telephone +64 9 366 2000  
Facsimile +64 9 366 2155  
[www.arc.govt.nz](http://www.arc.govt.nz)

File Ref D160-02-28

**1. The Regional Council makes this submission to:**

1.1 Proposed (Private) Plan Change 8 (PC 8) to the Auckland City District Plan (Isthmus Section) – Westfield St Lukes

**2. The reasons for the Regional Council's submission are:**

2.1 The Auckland Regional Council (ARC) considers that this major redevelopment of the Westfield St Lukes shopping centre should be within a council-led structure plan process which integrates the centre within its surrounding area.

2.2 Should the Auckland City Council (ACC) be of a mind to approve PC 8 and notwithstanding the above issues, this submission also sets out various other relief sought in relation to PC 8.

**3. Managing growth**

3.1 The St Lukes area is not currently recognised as a town centre in statutory planning documents<sup>1</sup>. However, it is acknowledged that the St Lukes shopping centre currently demonstrates certain attributes of a town centre, particularly in terms of its retail elements and is identified in the ACC Draft Future Planning Framework as a future town centre.

3.2 The ARC considers that the planning for growth in this area should occur through a council led structure plan process which fully integrates the St Lukes shopping centre with its wider context. This is consistent with Method 2.6.2.8 of the Auckland Regional Policy Statement (ARPS) and Method 2.6.6.14 of Plan Change 6 (PC 6) to the ARPS which outline that existing urban areas proposed for significant redevelopment are to be provided through the structure

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<sup>1</sup> Westfield (New Zealand) Ltd have appealed PC 6 to the ARPS seeking that St Lukes be included as a town centre in Schedule 1A of the ARPS [ENV-2007-AKL-000580]

- 3.3 A structure planning process would facilitate consideration of the broader planning issues for the future St Lukes/Morningside town centre including its integration with the other key focal points and public transport. Poorly planned integration of this site with adjoining areas could potentially impact upon a future structure planning exercise and undermine the role that this key site could play.
- 3.4 The promotion of this private plan change in the absence of a structure plan which addresses how the wider St Lukes/Morningside area will develop, does not promote integrated planning. It is considered that an integrated approach to the development of the wider area will be necessary to achieve a successful outcome for the community.

#### **4. Urban design**

- 4.1 It is acknowledged that PC 8 does provide advances in terms of incorporating good urban design principles as compared to the development style of the existing St Lukes shopping centre.
- 4.2 The proposal to open up the shopping centre to address and provide active street edges is supported. However, consideration needs to be given to extending the active frontages to apply to all sides of the centre including the full extent of St Lukes Road as appropriate.
- 4.3 If the St Lukes area is to be developed as a town centre then it is important that the diversity of functions required to support a town centre are provided, including public realm, civic and community elements. As currently proposed, PC 8 currently provides for a wide range of activities including residential, office and community facilities and this is supported. However, the ARC considers that greater consideration should be given to ensuring that such activities will actually be provided and in the most appropriate locations that best provides for good integration with the rest of the future town centre.

#### Relief sought

- 4.4 Review (and amend as appropriate) the Interface Controls and Concept Plan EO6-05(2) in PC 8 to extend the active edges and verandah controls to include the full extent of St Lukes Road as appropriate.
- 4.5 Review the provision in PC 8 (and amend as appropriate) to provide planning mechanisms which actively ensures a mix of activities including residential, office and community facilities and in appropriate locations

## 5. Car parking

- 5.1 To achieve a successful transition from an enclosed retail complex into an effective town centre, the management of car parking provision is required.
- 5.2 Regional policy (through the ARPS and the Auckland Regional Parking Strategy) seeks to address excessive provision for parking and is moving towards focusing on maximum levels, rather than minimums. PC 8 should employ such an approach

### Relief Sought

- 5.3 Amend Section B7 of PC 8 to replace the reference to 'minimum' parking spaces with 'maximum' parking spaces

## 6. Stormwater

- 6.1 PC 8 currently provides insufficient information to allow a full assessment of the potential effects of the proposed stormwater treatment system. Stormwater is proposed to be treated before discharging into the ground via soak holes and alternative storage options. This includes the possible use of car parks as a storage system in the event that the drainage capacity is insufficient. Preliminary designs are required to determine whether the proposed stormwater management is adequate

### Relief sought

- 6.1 Prior to the ACC making a decision on PC 8, preliminary designs are required to determine the adequacy of the proposed stormwater treatment and retention system

## 7. The Regional Council's submission would be met by:

- 7.1 The ACC refusing PC 8 and undertaking a structure plan in an expeditious manner and in conjunction with Westfields and the community that fully integrates the Westfield St Lukes Shopping Centre within the wider St Lukes/Morningside town centre.
- 7.2 Should the ACC determine to approve PC 8 that the various relief sought in this submission be incorporated into the plan change together with any consequential amendments that satisfactorily addresses the matters outlined in this submission.

8. **The Regional Council does wish to be heard in support of this submission.**

Signed for and on behalf of the  
**AUCKLAND REGIONAL COUNCIL**



John Smith  
**General Manager, Transport and Urban Development**

29 May 2009

**Address for Contact:**

H D Jarvis  
Group Manager, Policy Implementation  
Auckland Regional Council  
Private Bag 92 012  
**Auckland**