

Submission No 114

SUBMISSION TO PRIVATE PLAN CHANGE 373

Submission by Margaret ting November 2014

1. Background

- 1.1. I am a private resident directly affected by Private Plan Change *and* the Three Kings Plan.
- 1.2. I support the support the Precinct Planning process and approach undertaken by Council, which recently culminated in publication of a document entitled "*Three Kings Plan*".
- 1.3. I generally oppose Private Plan Change 373, but seek the following amendments as an alternative.

2. Process**2.1. Issue:**

- 2.1.1. Development and renewal of the land in the Three Kings precinct requires a coordinated and comprehensive planning approach in which the area is planned as a coherent whole. **This is best achieved by a Precinct---wide approach coupled with the development of a set of performance criteria based on the *Three Kings Plan*.** The development of the Private Plan change prior to the completion of Three Kings Plan demonstrates a strong disregard to the community process and the desired community outcomes contained in this document. Individual proposals by individual landowners should then be based on based on a set of overarching principles developed by Council and community as specified in a Three Kings Plan.
- 2.1.2. **The Private Plan Change is therefore premature** given the absence of such guiding principles, the current fill rate of the excavation, the likely availability and timing of additional fill and the contour requirements of the current fill consent (*See 4. Restoration of Te Tātua a Riukiuta / Big King below*).

2.2. Relief Sought:

- 2.2.1. **A Master Plan is prepared that develops further the proposals outlined in the *Three Kings Plan* and is developed in partnership with all stakeholders including the community.**
- 2.2.2. **A 'neighbourhood design committee'** (the committee) be established to be made part of the planning process. In principle the committee would be elected by the community and be allowed to contribute through planning mechanisms such as the Urban Design Panel review process. It should also be involved in resource consent approvals. This is not to say the committee would have veto power over the process, and would only operate within the bounds of those delegated to the council.

3. Public Open Space**3.1. Issue:**

- 3.1.1. There is no significant increase in Public Open space and a lack of diversity of open spaces and recreational facilities.
- 3.1.2. There is a lack of provision in the public realm for assets that will

THE SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301

1. Background

The Department of Defense has been directed to conduct a study of the current state of the Department's information systems. The study is to be completed by the end of the fiscal year 1977. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems.

2. Purpose

2.1. Objectives

The purpose of this study is to determine the current state of the Department's information systems. The study is to be completed by the end of the fiscal year 1977. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems.

2.2. Scope

The study is to be completed by the end of the fiscal year 1977. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems.

3. Methodology

3.1. Data Collection

The study is to be completed by the end of the fiscal year 1977. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems. The study is to be conducted by a team of experts in the field of information systems.

help to build community resilience. A master plan with such a provision would allocate a greater proportion of land to ecological integrity, self-reliance and local economic development.

3.2. Relief Sought:

- 3.2.1. A significant increase in the quantity and diversity of public open space and recreational opportunities should be integrated into the master plan -- at least 50% to be zoned Open Space. This would include but not be limited to separate walkways and cycle ways to enable the public to easily cross the site without significant level changes, skate park and all age playgrounds.
- 3.2.2. In order to help support and build community resilience, explicit requirements should be made water sensitive urban design and food production should be integrated into the public space network.

4. Restoration of Te Tātua a Riukiuta / Big King

4.1. Issue:

- 4.1.1. **Little to no restoration of Te Tātua a Riukiuta / Big King is proposed.** Te Tātua a Riukiuta / Big King must be restored to compensate the community, for at least some of the commercial value that has been extracted from the natural capital and natural character of the area over the last 80 years.
- 4.1.2. A decision of the Environment Court NZ Env C 130 and NZ Env C 214 specifies a minimum contour for the site, this being first proposed by the consent holder and current applicant at a joint hearing of the ARC and ACC heard by commissioners. This contour (Harrison and Grierson Plan 122314 Fig 002) was subsequently also presented at Appeal before the Environment Court and agreed to by all parties. **The Private Plan Change departs from the decision of the Court and appears to place the consent holder in breach of two key current fill consent conditions (#76 and #77).**

4.2. Relief sort:

- 4.2.1. Land affected by quarrying activities, including all publicly and privately held land should be maintained in the current zones until the recommended amendments contained within this submission are addressed.
- 4.2.2. ***The extent of departure from the consented fill level is large enough to require the applicant to apply for a new consent rather than a variation of the current consent. Any new application should be processed prior to Council considering this Private Plan Change.***
- 4.2.3. Landuse zoning and development of the floor and walls of the quarry should be bound by the level of restoration of Te Tātua a Riukiuta / Big King. The greater and more complete the restoration, the greater the development outcome achieved. At a minimum the eastern slope of Big King be restored to form a natural slope / landform – i.e. **restoration of Te Tātua a Riukiuta / Big King should include restoration of the contour and landform of the Maunga not simply planting of the landform as it stands today.**

5. View Shafts

5.1. Issue:

- 5.1.1. There are only two view shafts included in Private Plan Change 373 where Private Plan Change 373 has five. Both Private Plan Changes should include the same view shafts.
- 5.1.2. A primary reason stated for developing buildings at the base of the quarry (15 -- 18m below surrounding ground level) is to reduce the visual impact of the development and to maintain view shafts to the Maunga. There is no evidence to suggest that alternative urban forms have been explored that would maintain these view shafts with the quarry filled to the existing consent.
- 5.1.3. View shaft 3 should be removed to ensure future development could occur on the publicly held land in the future and as indicated in the *Three Kings Plan*.

5.2. Relief Sought:

- 5.2.1. Views to the Maunga are maintained and created in key public spaces. At a minimum these view shafts should be those indicated in the *Three Kings Plan*.

6. Access & Connectivity

6.1. Issue:

- 6.1.1. There is poor connectivity into and through the development, particularly east west connectivity. The connections that are proposed rely on steep changes in gradient and indirect routes as well as limited and step access into the floor of quarry.
- 6.1.2. The 15 -- 17m level differences between the finished ground level and the town centre does not provide an easy and direct pedestrian connection to town centre. Staircases are not a good contextual fit for the quarry development.
- 6.1.3. The interface between adjacent land uses is poor -- particularly along the western and southern edges.
- 6.1.4. Single access point provides creates a very large cul-de-ac.

6.2. Relief Sought:

- 6.2.1. **At a minimum, the network of paths and access points should match that outlined in the Three Kings Plan -- without steep gradient changes. These routes should be formed in consultation with Greenways Network.**
- 6.2.2. No develop should occur in the floor of the quarry without at least two vehicle access to the floor of the quarry.

7. High Quality Development

7.1. Issue:

- 7.1.1. Planning rulebooks like the Unitary Plan are typically conservative --

being formulated around worst---case scenarios, they enforce minimum standards rules that by their nature are intended to restrict and in some cases punish bad behavior.

- 7.1.2. Shading from Te Tātua a Riukiuta / Big King and cliff faces mean that ability to design dwellings for passive solar is severely constrained across large areas of the site.

7.2. Relief Sought:

- 7.2.1. **I recommend that incentives be provided to reward high quality development.**

For example, fast tracked consenting and special priority could be granted to those developments seeking to achieve high quality performance standards such as the Living Community Challenge or the Sustainable Sites Initiative.

8. Urban and Landscape Character

8.1. Issue:

- 8.1.1. The future character and mix of uses along Mount Eden Road is not defined and needs further investigation and clarification.

8.2. Relief Sought:

- 8.2.1. Further analysis and design into the appropriate character, mix of uses and interface along Mount Eden Road is undertaken and included in any proposal for the quarry site.

9. Future Proof North-South Linkage.

9-1. Issue

- 9-1.1. The connection between the quarry site and public open space is severed by the 4 apartment buildings along the southern edge of the property.

9-2

9-2 Relief sought

- 9-2.1. The connection between the Town Centre and the quarry should allow for a better connection to occur once the Council is able to establish this link.

being developed around road-side structures, they cannot
maintain standards that by their nature are intended to
control and reduce noise and vibration.

Exhibit 10 shows the TDR's findings, the key and the main reason
that noise is design standard for houses with a separate
conducted noise level of the road.

7.2. Reliability

7.2.1. I recommend that incentives be provided to reward high
quality development.
For example, the best ranked planning and design priority could be
granted to those developments seeking to achieve high quality
performance standards such as the 'excellent' category of the
the 'excellent' category.

8. Urban and Landscape Character

8.1. Issues

8.1.1. The urban character and form of the Mount Eden Road is not
defined and needs further investigation and clarification.

8.2. Reliability

8.2.1. Further research and design work the appropriate character and
form and a vision along Mount Eden Road is undertaken and
included in the proposal for the priority plan.

Submission No 115

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

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



Correspondence to :

AUCKLAND COUNCIL

10 NOV 2014

CENTRAL-GRAHAM ST

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name of Submitter or Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

MRS MARGARET DON TING

Organisation Name (if submission is on behalf of Organisation)

N/A

Address for service of the Submitter

497 MT ALBERT ROAD, THREE KINGS, AUCKLAND 1042.

Telephone:

(09) 6291525

Email:

robert.ting@vodafone.co.nz

Contact Person: (Name and designation if applicable)

MRS MARGARET TING

Scope of submission

This is a submission to:

Plan Change/Variation Number

PA372

Plan Change/Variation Name

AUCKLAND CITY OPERATIVE DISTRICT PLAN
PRIVATE PLAN CHANGE: THREE KINGS PRECINCT

To the (indicate which plan below)

Relevant District Plan:

☐ Auckland Central

☐ Auckland Gulf Islands

☒ Auckland Isthmus

☐ Franklin

☐ Manukau

☐ North Shore

☐ Papakura

☐ Rodney

☐ Waitakere

Relevant Regional Plan/ Policy Statement:

☐ Coastal

☐ Sediment Control

☐ Proposed Air Land Water

☐ Farm Dairy Discharges

☐ Transitional Regional Plan

☒ Auckland Regional Policy Statement

The specific provisions that my submission relates to are:

Please identify the specific parts of the Proposed Plan Change/Variation

Rule(s)

Or

Property Address

Or

Map

PLANNING MAP no. 1. sheet no F07, F08, G07 and G08

Or

Other (specify)

Submission

Submission on a publicly notified proposal for policy

Statement of plan change or variation

1. Name of the person or persons who submitted the proposal

2. Date of submission

Submission No.

Project Name

Submitted details

Full Name of Submitter or Agent (if applicable)

Address of Submitter

The submission is made by the submitter in their own name

Address for service of the submission

Telephone

Facsimile

Scope of submission

Is this a submission on:

1. A proposed plan change

2. A proposed variation to a plan change

3. A proposed variation to a plan change

4. A proposed variation to a plan change

5. A proposed variation to a plan change

6. A proposed variation to a plan change

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16. A proposed variation to a plan change

17. A proposed variation to a plan change

Submission No 115

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 SEE ATTACHMENT.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the Plan Change/Variation ☐

Accept the Plan Change/Variation with amendments as outlined below ☐

Decline the Plan Change/Variation ☒

If the Plan Change/Variation is not declined, then amend it as outlined below. ☐

I wish to be heard in support of my submission ☒

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

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

Date

9/11/2014

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.

I could ☐ could not ☒ gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission please complete the following:

I am ☐ am not ☐ directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Submission No 115

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SUBMISSION TO PRIVATE PLAN CHANGE 372

Submission by Margaret Ting 9 November 2014

1. Background

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- 1.2. I support the support the Precinct Planning process and approach undertaken by Council, which recently culminated in publication of a document entitled "*Three Kings Plan*"
- 1.3. I generally oppose Private Plan Change 372, but seek the following amendments as an alternative.

2. Process

2.1. Issue:

- 2.1.1. Development and renewal of the land in the Three Kings precinct requires a coordinated and comprehensive planning approach in which the area is planned as a coherent whole. **This is best achieved by a Precinct--wide approach coupled with the development of a set of performance criteria based on the Three Kings Plan.** The development of the Private Plan change prior to the completion of Three Kings Plan demonstrates a strong disregard to the community process and the desired community outcomes contained in this document. Individual proposals by individual landowners should then be based on based on a set of overarching principles developed by Council and community as specified in a Three Kings Plan.
- 2.1.2. **The Private Plan Change is therefore premature** given the absence of such guiding principles, and the contour requirements of the current fill consent (*See 4. Restoration of Te Tātua a Riukiuta / Big King below*).
- 2.1.3. The Private Plan Changes proposes the **exchange of current reserve land** zoned Open Space 3 and 4 to a mix of business 2, residential 8b and open space 2. The exchange proposed would result in premium north and northeast facing rehabilitated public land being exchanged for an area of both lower value and much reduced contour (15 -- 17 metres below the level of adjacent land). This land swap will disproportionately benefit private interests and should not be considered without a comprehensive Master Plan being undertaken.

2.2. Relief Sought:

- 2.2.1. **A Master Plan is prepared that develops further the proposals outlined in the *Three Kings Plan* and is developed in partnership with all stakeholders including the community.**
- 2.2.2. **A 'neighbourhood design committee'** (the committee) be established to be made part of the planning process. In principle the committee would be elected by the community and be allowed to contribute through planning mechanisms such as the Urban Design Panel review process. It should also be involved in resource consent approvals. This is not to say the committee would have veto power over the process, and would only operate within the bounds of those delegated to the council.
- 2.2.3. **An independent valuation of publicly held land** is undertaken to assess the full value of any land exchange and this process is undertaken carried out in a transparent manner.

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2. The second part of the paper is devoted to the study of the

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3. Public Open Space

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- 3.1.1. 372 --- There is a decrease in public open space and a lack of diversity of open spaces and recreational facilities.
- 3.1.2. There is a lack of provision in the public realm for assets that will help to build community resilience. A master plan with such a provision would allocate a greater proportion of land to ecological integrity, self-reliance and local economic development.

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- 3.2.1. A significant increase in the quantity and diversity of public open space and recreational opportunities should be integrated into the master plan --- at least 50% to be zoned Open Space. This would include but not be limited to separate walkways and cycle ways to enable the public to easily cross the site without significant level changes, skate park and all- age playgrounds.
- 3.2.2. In order to help support and build community resilience, explicit requirements should be made. Water sensitive urban design and food production should be integrated into the public space network. ~~See Appendix 1 for more detail~~

4. Restoration of Te Tātua a Riukiuta / Big King

4.1. Issue:

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1.1. Introduction

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1.3. Methodology

1.4. Results and Discussion

1.5. Conclusion

1.6. References

1.7. Appendix

1.8. Bibliography

1.9. Glossary

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For example, fast tracked consenting and special priority could be granted to those developments seeking to achieve high quality performance standards such as the Living Community Challenge or the Sustainable Sites Initiative.

10/10/2010

The first part of the paper is devoted to the study of the properties of the function $f(x)$ defined by the equation

$f(x) = \int_0^x f(t) dt$

where

$f(x)$ is a continuous function on the interval $[0, 1]$ and $f(0) = 1$. It is easy to see that $f(x)$ is a constant function, i.e. $f(x) = 1$ for all $x \in [0, 1]$. This is because the derivative of $f(x)$ is $f(x)$ and the only function satisfying this condition is the constant function $f(x) = 1$.

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8.1. Issue: Urban and Landscape character

- 8.1.1. The future character and mix of uses along Mount Eden Road is not defined and needs further investigation and clarification.
- 8.1.2. The character of Grahame Breed Drive is significantly affected by the proposed access way.

8.2. Relief Sought:

- 8.2.1. Further analysis and design into the appropriate character, mix of uses and interface along Mount Eden Road is undertaken and included in any proposal for the quarry site.
- 8.2.2. **No matter what use Grahame Breed Drive takes in the future its existing character as a slow speed, leafy, green street should be maintained.**

to the extent of the law, the following shall apply:

1. The purpose of this law is to ensure that the public has access to the information that is held by the government and its agencies.

2. The law shall apply to all government agencies, including the police, the courts, and the public service.

3. The law shall apply to all information that is held by the government and its agencies.

4. The law shall apply to all information that is held by the government and its agencies, including information that is held in the form of documents, records, or data.

5. The law shall apply to all information that is held by the government and its agencies, including information that is held in the form of documents, records, or data.

Submission No 116

From: jckoller@xtra.co.nz
To: [District Plans Central](#)
Cc: jckoller@xtra.co.nz
Subject: District Plan online submission
Date: Sunday, 9 November 2014 6:36:43 p.m.

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: James Clark KOLLER
Organisation:
Agent:
Phone (daytime): 09 6201284
Phone (evening): 09 6201284
Mobile:
Email address: jckoller@xtra.co.nz
Postal address: 18B Dally Terrace, Three Kings, Auckland
Post code: 1041
Date of submission: 9-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
Private Plan Change PA372

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Accessibility
Private Land Exchanges
History Buildings
View Shafts

I/We:
Oppose

The reason for my/our views is:

1) As a senior citizen I would like direct Accessible Walkway and Cycleways through

Submission No 116

the development so that senior citizens (and school children) can easily cross the site to the Shopping Centre (& children to the school).

2) I do not wish to see prime public land swapped for low value land at the bottom of the quarry. I wish to see a large increase in the amount of park area.

3) I wish to see any historic buildings recognised and protected.

4) I wish the views to Big King to be protected from public spaces and Mt Eden Road.

I/We seek the following decision from the council:

If the plan change/modification is not declined, then amend it as outlined below

Proposed amendments:

1) Prepare a Masterplan which involves all of the surrounding property owners and the community.

2) Provide Accessible paths through the quarry - to form direct connections for the community. (North to South and East to West).

3) Do not swap public park land for private land - unless there is a significant community benefit (such as a large increase in the overall amount of park land).

5) Provide Protection for historic buildings.

6) Provide View Shaft rules to protect public views of Big King - from Mt Eden Road and from the Shopping Centre.

7) Significantly increase the amount of Park space.

I/We wish to be heard at the council planning hearing:

No

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

Submission No 117

From: jckoller@xtra.co.nz
To: [District Plans Central](#)
Cc: jckoller@xtra.co.nz
Subject: District Plan online submission
Date: Sunday, 9 November 2014 6:39:06 p.m.

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: James Clark KOLLER
Organisation:
Agent:
Phone (daytime): 09 6201284
Phone (evening): 09 6201284
Mobile:
Email address: jckoller@xtra.co.nz
Postal address: 18B Dally Terrace, Three Kings, Auckland
Post code: 1041
Date of submission: 9-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
Private Plan Change PA373

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Accessibility
Connection to the Shopping Centre
Historic Buildings
View Shafts

I/We:
Generally support, but seek amendments

The reason for my/our views is:
1) As a senior citizen I would like direct Accessible Walkway and Cycleways through

Submission No 117

the development so that senior citizens (and school children) can easily cross the site to the Shopping Centre (& children to the school).

2) I wish to see a strong (and accessible) connection to the existing Shopping Centre.

3) I wish to see any historic buildings recognised and protected.

4) I wish the views to Big King to be protected from public spaces and Mt Eden Road.

I/We seek the following decision from the council:

Accept the plan change/modification with amendments as outlined below

Proposed amendments:

1) Prepare a Masterplan which involves all of the surrounding property owners and the community.

2) Provide Accessible paths through the quarry - to form direct connections for the community. (North to South and East to West)

3) Provide Protection for historic buildings.

4) Provide View Shaft rules to protect public views of Big King - from Mt Eden Road and from the Shopping Centre.

5) Remove the Apartment buildings at the South of the development - so that strong connection to the Shopping Centre can take place.

I/We wish to be heard at the council planning hearing:

No

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

Submission No 118

From: gbryant@xtra.co.nz
To: [District Plans Central](#)
Cc: gbryant@xtra.co.nz
Subject: District Plan online submission
Date: Monday, 10 November 2014 9:21:31 a.m.
Attachments: [TKUG Submission to Private Plan Modification 372 101114.pdf](#)
[Three Kings Plan August 2014 Final.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Garry Bryant
Organisation: Three Kings United Group Inc.
Agent:
Phone (daytime): 021 998 305
Phone (evening): 09 630 8478
Mobile:
Email address: gbryant@xtra.co.nz
Postal address: 43B Peary Road, Mt Eden
Post code: 1024
Date of submission: 10-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):

Proposed plan modification 372

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
The whole plan.

I/We:
Oppose

The reason for my/our views is:
See attached submission document

I/We seek the following decision from the council:

Submission No 118

Decline the plan change/modification

Proposed amendments:

See attached submission document

I/We wish to be heard at the council planning hearing:

Yes

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

TKUG Submission to Private Plan Modification 372 101114.pdf Three Kings Plan

August 2014 Final.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

Submission No 118

Private Plan Changes: Three Kings

Submission on Proposed Plan Modification 372 to the Auckland Council District Plan (Operative Auckland City Isthmus Section 1999)

TO: Auckland Council

FROM: President,
Three Kings United Group Inc.
PO Box 29115
Greenwoods Corner
Auckland 1347
(021) 998 305
gbryant@xtra.co.nz

Name of submitter: THREE KINGS UNITED GROUP INC. (TKUG)

1. This is a submission on the Proposed Plan Modification 372 (PPM372) to the Operative Plan of the Auckland City Council (now Auckland Council).
2. TKUG could not gain an advantage in trade competition through this submission.
3. The specific provisions of the PPM372 that this submission relates to are set out in Appendix 1.
4. TKUG's submission is set out in Appendix 1 and the accompanying Attachment 1 – Three Kings Plan and Attachment 2 – Proposed set of objectives and rules for a Three Kings Precinct Plan.
5. TKUG considers that unless the relief sought in this submission is granted, then PPM372 and in particular the specific provisions challenged:
 - 5.1 Will not promote the sustainable management of resources;
 - 5.2 Will be inconsistent with the resource management principles addressed in Part 2 of the Resource Management Act 1991 ("RMA");
 - 5.3 Will variously be inappropriate, unnecessary and contrary to sound resource management practice;

Submission No 118

- 5.4 Will enable the generation of significant adverse effects on the environment that warrant being addressed through PPM372 or by other actions initiated by Auckland Council.
 - 5.5 Will not have sufficient and effective regard or give effect to the structure plan provisions of the operative regional policy statement, which at this time have the most weight.
 - 5.6 Will not have sufficient and effective regard to the need for protection of the volcanic cone as specified in Part 5C.4.1 of the Operative Plan: PPM372 should also reference the Reserves and Other Lands Disposal and Public Bodies Empowering Act 1915, in that the proposed changes do not have sufficient and effective regard to the imperative of that Act
- 6. TKUG also incorporates into this submission the more specific reasons articulated in Appendix 1.
 - 7. TKUG seeks the decisions from the Auckland Council set out in Appendix 1 or similar and consequential relief.
 - 8. TKUG wishes to be heard in support of its submission.
 - 9. If others make a similar submission, TKUG will consider presenting a joint case with them at a hearing.

A handwritten signature in black ink, appearing to read 'Garry Bryant', written in a cursive style.

Garry Bryant, President, Three Kings United Group Inc.

DATED: 10 November 2014

Submission No 118

Appendix 1

Submission by the Three Kings United Group Inc.

1. Background

- 1.1 The Group has a longstanding interest and involvement (over 20 years) in the future of Council administered reserve land and land formerly administered by the Crown that is commonly referred to as the Big King Reserve which is now administered by the joint Iwi/Department of Conservation/Council governing body.
- 1.2 The Group also has been involved for many years in discussions involving the future end use of the quarried land that is known as the Three Kings Quarry; this land is currently owned by Fletcher Building Ltd and is the subject of Private Plan Modification applications 372 and 373.
- 1.3 The Group supports the Precinct Planning approach undertaken by Council that recently culminated in publication of a document entitled “Three Kings Plan” (see Attachment 1). The Group was represented on the Reference Group established by the Puketapapa Local Board of Auckland Council to provide feedback on matters involved in the Three Kings precinct planning exercise. The membership of this Group largely reflects the stakeholders whose land falls within the Precinct boundary, with these parties controlling land in the ratio of approximately 1:1:1:1:1 - Council: DOC/Iwi: Commercial Owners: Housing New Zealand: local residents.
- 1.4 The Three Kings Precinct has been defined by Council as being that land that falls within the tuff ring of the Three Kings explosion crater. Within that area lie significant areas of land zoned reserve, these being administered either by Council or by the Crown (See Pages 10-15 of Attachment 1).

2 Matters about which the Group is concerned and which the Group considers relevant to Proposed Private Plan Modification 372

- 2.1 Development and renewal of the land in the Three Kings Precinct requires a coordinated and comprehensive planning approach in which the area is planned as a coherent whole. This is best achieved by a Precinct-wide planning approach coupled with the development of a set of principles based on the current contents of the Three Kings Plan. Individual proposals by

Submission No 118

individual landowners should then be based on Structure Plans based on a set of overarching principles developed by Council and specified in a future Three Kings Precinct Plan. (A draft set of objectives and rules to inform the principles is presented in Attachment 2.)

- 2.2** Given these considerations, PPM372 is premature in the absence of any such guiding principles. The current depth of the excavation, the current slow fill rate, and the specific contour requirements of the current fill consent (see 2.7 below) introduce further complications.
- 2.3** PPM372 proposes a preemptive approach without consideration of boundary effects, the need for integrated planning, and the clear need of the community for appropriate and better access to reserve land. The proposal essentially ignores all such effects and fails to follow sound Resource Management Practice as specified in the Resource Management Act 1991.
- 2.4** PPM372 also proposes the exchange of reserve land currently zoned Open Space 3 and 4 to a mix of Business 2, Residential 8b and Open Space 2. The exchange proposed would result in premium north and north-east facing rehabilitated public land being exchanged for an area of both lower value and much reduced contour. This land and the remainder of the applicant's site is envisaged as being developed in an inappropriate manner to a level that is 15 to 18 metres below Mount Eden Road level.
- 2.5** It is widely acknowledged that there is a substantial requirement and demand for informal open space in the Puketapapa and Eden-Albert Local Board areas, and in the Three Kings Precinct current reserve land is disjointed and difficult to access. Playing fields, in contrast, are already adequately provided for, or would much better be sited elsewhere (for example, the very extensive UNITEC site).
- 2.6** If boundary adjustments or land exchanges are to be contemplated for public land, Council should investigate the impacts comprehensively and approach all adjacent land owners (and the community), not just make commitments based on negotiation with one particular applicant. Restoration and redevelopment of the quarry land also will require better integration with the current Town Centre (as specified in the Three Kings Plan). If boundary adjustments are to be contemplated, the current owner of the future 'Town Centre' (Antipodean Properties) should also be invited to discuss boundary adjustment issues, as should both the community at large, the Local Board and Housing New Zealand.

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- 2.7** A decision of the Environment Court NZ Env C 130 and NZ Env C 214 specifies a minimum contour for the quarry site, this contour being first proposed by the consent holder (Fletcher Concrete and Infrastructure, a division of Fletcher Building Ltd viz: the current applicant) at a joint hearing of the Auckland Regional Council and Auckland City Council involving independent commissioners. This contour (Harrison and Grierson Plan 122314 Fig 002) was subsequently also presented at Appeal before the Environment Court and agreed to by all parties. PPM372 radically departs from the decision of the Court and appears now to place the consent holder in breach of two key current fill consent conditions namely #76 and #77. The changes to contour and restoration processes now proposed are so large that the applicant should be required to apply for a new consent rather than for a variation of the current consent. Any such application should be processed prior to Council considering PPM372, particularly now that it is proposed to re-excavate fill already placed (which will involve mixing cells) and to switch to an engineered fill approach.
- 2.8** The underground infrastructure in the catchment (viz: stormwater and sewage) is currently at capacity in the Meola catchment and this is acknowledged in the application. The scale and intensity of the development proposed in PPM372 far exceeds current capacity. PPM372 therefore is clearly premature and requires access to the Central interceptor Project (currently under appeal) and not scheduled for completion until 2030 or later.
- 2.9** Council's own further and recent submission to the Proposed Auckland Unitary Plan (PAUP) indicates that out of sequence rezoning and infrastructure provision should be specifically avoided (FS 5716-9) indicating the desirability of sequencing rezoning in a logical progression and that *"rezoning or infrastructure provision should be done in a logical sequence and (that) out of sequence rezoning or infrastructure provision should be specifically avoided"* (quotation is from the Councils submission to PAUP Urban Growth B.2.3). PPM372 is therefore clearly contrary to current Council policy concerning infrastructure provision.
- 2.10** The density of development proposed is out of scale with the size of the site and the proposed topography.
- 2.11** These and many other uncertainties that will be addressed at the hearing indicate that Council should not approve PPM372 in its present form.

Submission No 118

2.12 Council approval would be contrary to sound Resource Management Practice and would not comply with key provisions of the Resource Management Act 1991.

3 The Group's submissions regarding Private Plan Modification 372 would be met by Council:

Either:

3.1 Declining to adopt PPM372 and retaining the current zoning of B7 of the area involved in the Operative Plan of the former Auckland City Council and that proposed in the PAUP.

3.2 Inviting the applicant to participate in genuine discussion with adjacent major landowners and the community so that the underpinning principles of the Three Kings Plan can be better reflected in a comprehensive Council-initiated Precinct-wide rezoning exercise aimed at resolving boundary issues and adoption of a Three Kings Precinct overlay including the rules and objectives set out in Attachment 2.

Or, in the alternative, approving proposed Private Plan Modification 372 but only if that approval is subject to:

3.3 Requiring the applicant to seek a new fill consent that is consistent with the objectives policies and rules of a Three Kings Precinct Plan and based on the minimum contour specified in NZ Env C 214.

3.4 Requiring such additional contributions of reserve land that would facilitate appropriate slope restoration at the site and thereby create better pedestrian access from adjacent residential areas and between current Crown and Council administered reserve land.

3.5 Removal from PPM372 of the Council land areas currently zoned Open Space 3 and 4 in the Operative Plan.

3.6 Adopting the proposed set of objectives and rules specified in Attachment 2 for Framework Plans for developments in the Three Kings precinct.

Submission No 118

3.7 Adopting the activity status specified below for the land currently zoned Business 7 in the Operative Plan to provide guidelines for the development of Framework Plans in the Three Kings Precinct generally.

Activity	Activity Status
Any land use or development complying with an approved framework plan	P
Any land use or development prior to the approval of a framework plan or not complying with an approved framework plan	NC
A framework plan or replacement framework plan complying with the objectives and policies above	D
A framework plan, amendments to an approved framework plan or a replacement framework plan, not complying with the objectives and policies above	NC
Amendments to an approved framework plan complying with the objectives and policies above	RD
Rehabilitation of former Quarry Land	RD

- 4 In addition to the relief sought above, the Group seeks any similar and consequential relief necessary to give effect to this submission based on other matters addressed at the hearing.**

Attachments 1 : The Three Kings Plan.

(Please refer to attached PDF file)

Attachment 2: Proposed set of objectives and rules for a Three Kings Precinct Plan

The future end uses of the land within the large area of undeveloped land located within the Three Kings Precinct will be guided by the preparation by Council of a Plan Change following consultation with local stakeholders. The criteria by which any future development will be assessed shall also apply to any Private Plan Change/ Modification that any individual party may propose. These criteria are:

- 1. All future proposed developments must be consistent with the objective for the mixed use of the Precinct for residential, commercial and reserve purposes and proposals must be consistent with both sound planning principles and the overall objectives of the Unitary Plan.*
- 2. The ratio of reserve land to commercial and residential land shall not be reduced below than that currently applying and desirably should increase significantly the overall area of reserve land accessible to the public. Within this requirement, where rationalisation of reserve boundaries through land exchanges is considered to be in the public interest, the affected areas shall be identified and be the subject of public notification and the preparation of a new Reserve Management Plan under the provisions of the Reserves Act.*
- 3. Subject to the availability of financial resources, a primary Council objective shall be to increase the combined area of accessible land zoned reserve in the Precinct beyond that identified in both the current Operative Plan and the Proposed Unitary Plan notified on 30 September 2013 and to ensure the area is more useable and efficient.*
- 4. For all land previously quarried, no Plan Change shall be initiated by Council and no Private Plan Change considered by Council until a finished Contour and Landscaping Plan is submitted, not less than 24 months prior to the cessation of fill operations, or not less than 6 months prior to the consultation with the parties identified in conditions #76 and #77 of the Fill Consent approved by the Environment Court dated May18th, 2011 (refer decision NZEnvC 130). If a final contour substantially different to NZEnvC is proposed (as defined in Harrison and Grierson Plan122314 Fig 002), then the applicant(s) shall be required to apply for a new fill consent rather than for a variation.*

Submission No 118

5. *For both land currently zoned for Quarry purposes and Reserve previously quarried, the Contour and Landscaping Plan must identify the desired sequencing of restoration of land and its subsequent development. In particular, the desirability of developing an integrated final landform and a more useable and efficient open space network surrounding development sites must be addressed to the satisfaction of Council.*

6. *Development proposals must have regard to Council's objective of promoting the harmonious relation of any development proposed to the surrounding overall topography and land form, in particular Big King Reserve, the former Hunters Quarry, and Council-administered reserve land.*

7. *Restoration or redevelopment of the private land known as the Three Kings Quarry (refer to the Quarry area shown on page 15 in Attachment 1) which abuts the Council-administered reserve land previously subjected to quarrying (identified as Western and Central Open Space and Three Kings Reserve on page 15 in Attachment 1), shall not create an overall slope that exceeds 12 degrees where it joins the external boundary of the reserve land, and no local slope of the restored or rezoned land may exceed an average of 12 degrees when measured over a horizontal distance of 5 metres.*

8. *Restoration or redevelopment of Council-administered reserve land (areas Western and Central Open Space and Three Kings Reserve on page 15 of Attachment 1), where it abuts either private land or land administered by Government agencies (viz Housing Corporation of New Zealand) (identified as Western Residential area on page 23 of Attachment 1), shall be to an overall and local slope of no more than 12 degrees determined in the manner specified in rule 7 above.*

9. *Any land which abuts the slopes of the remaining Maunga (Te Tātua-a-Riukiuta - Big King) which currently is administered by the Crown (refer to page 23 of Attachment 1), shall be restored to an overall and local slope based on the natural angle of repose of the scoria deposited following the eruption which formed the southern and northern slopes of the Big King Reserve (that average slope being approximately 23 degrees), this slope being determined as described in rule 7 above.*

10. *Proposals for land development must indicate how practicable public access to reserve land will be facilitated within the Precinct and how walking access will be achieved to both Council reserve land and that land administered by the Crown. Development proposals must also provide for access and movement within and across the overall Precinct and to public roads in a manner that is both feasible and suitable for adults and children as well as for the elderly and infirm.*

Submission No 118

11. All proposed developments must demonstrate how servicing requirements including traffic, storm water and sewage disposal can be accommodated within the capacity of existing roads, drains and sewers and where this capacity may not currently be available, how additional capacity will be provided contemporaneously with the sequence of rezoning or subdivision that would provide for the new development that may be proposed.

12. Compliance is required for all proposed developments that fall within current volcanic sight lines specified in the relevant overlay of the Unitary Plan (as notified September 30, 2013).

Submission No 119

From: NickR@barker.co.nz
To: [District Plans Central](#)
Cc: NickR@barker.co.nz
Subject: District Plan online submission
Date: Monday, 10 November 2014 2:30:29 p.m.
Attachments: [Three Kings_372_Sub_FINAL.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Nick Roberts
Organisation: Antipodean Properties Limited
Agent: Nick Roberts - Barker and Associates
Phone (daytime): 09 375 0999
Phone (evening):
Mobile:
Email address: NickR@barker.co.nz
Postal address: PO Box 1986, , Shortland Street, Auckland
Post code: 1140
Date of submission: 10-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
PM372 - Three Kings Quarry

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Please see attached document

I/We:
Oppose

The reason for my/our views is:
Please see attached document

I/We seek the following decision from the council:

Submission No 119

Decline the plan change/modification

Proposed amendments:

Please see attached document

I/We wish to be heard at the council planning hearing:

Yes

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

Three Kings_372 Sub_FINAL.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

I am directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Submission No 119

FORM 5

THE RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 372 (THREE KINGS QUARRY) TO THE AUCKLAND COUNCIL DISTRICT PLAN (AUCKLAND CITY ISTHMUS SECTION)

TO: Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142
Attn: Planning Technicians

FROM: Antipodean Properties Limited
c/o Barker and Associates
PO Box 1986
Shortland Street
Auckland 1140

DATE: 6 November 2014

INTRODUCTION

1. **Antipodean Properties Limited** (Antipodean) makes the following submission to Proposed Private Plan Change 372 to the Auckland Council District Plan (Auckland City Isthmus Section) (the Plan Change).
2. This submission relates to the **whole** of the Plan Change.
3. Antipodean **opposes** the Plan Change.
4. Antipodean is a New Zealand Company which is ultimately owned by the William Pears Group from the United Kingdom (75%) and Jonathan Berman (25%). The William Pears Group was founded in 1952 and is still 100% owned and managed by the Pears family. It is one of the largest property companies in the UK. It has extensive property holdings throughout the world, including New Zealand where it has been active in the property market since 2003.
5. As part of the property portfolio, Antipodean is currently owns approximately 1.6ha of land used for commercial purposes located directly adjacent to the southern boundary of the Plan Change area (the town centre). In this regard, Antipodean considers itself to be directly and affected by the proposed Plan Change.
6. In making this submission Antipodean is not raising issues regarding trade competition or the effects of trade competition, nor is it motivated by trade competition concerns. Further Antipodean could not gain an advantage in trade competition through the lodgement of this submission.

Submission No 119

REASONS FOR SUBMISSION

7. Antipodean acknowledges that the redevelopment of the quarry site provides a significant opportunity to transform and revitalise the Three Kings area and supports, in principle, the aim of:
 - (a) Enabling greater integration between the quarry and the town centre.
 - (b) Enabling a range of higher intensity housing typologies located closer to the town centre.
 - (c) Creating quality linkages between the quarry, the town centre and surrounding land that enhance pedestrian accessibility and reduce reliance on private modes of transport.
8. However, given the scale of the proposal, redevelopment must be considered holistically, preferably through a master planning process that includes the town centre. Primarily this is because it is the interface between the town centre and the quarry which will be fundamental in determining the future patterns of activity and movement in Three Kings.
9. Antipodean understands that the applicant is already in negotiation with the council to undertake a land exchange in this area. While the concept of land exchange to achieve a better environmental outcome is supported, at this time Antipodean have not been party to any such discussion.
10. The proposal to rezone the land between the quarry and the town centre pre-empted the necessary analysis to determine how this area should best be developed and will set a position that, once established, will be difficult to amend. Without sufficient clarity or agreement about the future configuration of land ownership, the Plan Change in its current form undermines the ability to achieve meaningful integration between the town centre and the redeveloped quarry and to make the most of the opportunity to reconfigure and revitalise the town centre as part of this.
11. Furthermore, the Plan Change does not provide clarity about how the outcomes identified in the Master Plan are to be given effect to, nor is there sufficient certainty or control over the standard of quality required by development.
12. For these reasons, it is considered that the Plan Change in its current form will not achieve the purpose of the Resource Management Act

SCOPE OF SUBMISSION

13. Without limiting the generality of this submission, the following matters have been identified as requiring further consideration in order to achieve the purpose of the Act:

Interface between proposed residential and commercial areas

14. As discussed above, the treatment of the interface between the existing town centre and the redeveloped quarry is of fundamental importance to achieving the Plan Change's stated objective of integration. In this regard, Antipodean are concerned that insufficient consideration has been given to the intended outcome for this area and that the Plan

Submission No 119

Change provides insufficient direction or control regarding the location and design of the built form in this area and how it should relate to adjacent spaces.

15. In particular:
- (a) The Plan Change pre-empts discussion about the future configuration of land ownership and therefore plans to develop this area.
 - (b) Diagram F08-84(a) currently shows area adjacent to existing town centre as being residential. This contradicts the proposed zoning maps (Sheet 1 of F07, F08, G07 and G08) which show the same area as Business 2 zone.
 - (c) The explanation of the development controls (section F paragraph 2) state that the controls apply to “all land contained within the concept plan area” however business zoned land is not included in the latter part of the definition. It is therefore unclear which provisions apply.
16. While the proposed height limits are generally supported, the current provisions that control height through the use of a ‘relative level’ (RL) are currently ambiguous and require clarification.
17. Furthermore, it is noted that there is currently no provision to ensure the quarry is filled to a minimum standard before development, potentially allowing for a significant change in gradient between the town centre and the new residential area. Greater certainty is required regarding the finished contours of the redeveloped quarry so that the transition between the town centre can be appropriately considered and designed for.

Activities

18. The location, nature and scale of activities will be a key factor in determining the patterns of movement around Three Kings and the types of transport people use. In this regard, the Plan Change currently provides insufficient clarity and control over several activities.
19. In particular:
- (a) The proposed permitted activity status for retail, restaurants and healthcare facilities in the residential 8b zone is overly permissive. Additional control is required to ensure development in the quarry does not conflict with the town centre’s role as focal point for the community and undermine its vitality.
 - (b) The Plan Change currently provides little direction about the outcomes expected in the areas identified as “Active use at street level” on diagram F08-84. In particular, the assessment criteria for the cascading apartments (H.1.2(i)) suggest that ‘active use’ includes the front yards of residential dwellings.
20. Antipodean submits that the Plan Change needs to provide greater direction regarding the location and nature of active areas and that appropriate controls be included to ensure these outcomes are delivered and that the development compliments the town centre.

Open Spaces

21. It is noted that the Plan Change has reduced the requirement for the provision of private

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open space within the concept plan area. While Antipodean does not oppose this in principal, it places a much greater emphasis on the need to provide a mixture of high-quality public open spaces.

22. In this regard:

- (a) The current proposed location of the public plaza will not contribute to creating a coherent network of spaces and is inconsistent with a previous spatial planning exercise that underwent extensive public consultation.
 - (b) The Plan Change currently makes no obligation for the delivery of the public plaza area.
 - (c) The Plan Change provides no direction as to the intended outcome for the public plaza areas, nor does it provide any certainty regarding the standards to be achieved.
 - (d) The development control for sightlines to Te Tatua a Riukiuta states that no building must protrude, however no contours are included in the Plan Change to indicate when this may be the case.
- (e) It is also noted that the Plan Change includes a significant area of active open space close to the town centre for use as sports fields. Ideally, Antipodean considers that any sports fields should be located at the northern end of the quarry, allowing the residential activity to better integrate with the town centre and to increase residential accessibility to local services. However if the sports fields are to remain in the location as shown, provision must be made to address the induced traffic or parking effects of the proposal. Without clarity about the nature and scale of these effects and how they will be managed, there is significant risk that the parking areas provided on Antipodean's private land will be used to service these public open space facilities, to the detriment of the town centre itself.

Roading, Connections and Transport

23. The roading network is a major contributor to the wider public open space network and will therefore play a key role in determining the quality of the public realm, especially in light of the proposed reduction in private open space. The provision of roading infrastructure, transport and pedestrian and cycle connections needs to be to a high standard and traffic effects carefully managed to ensure the quality of the urban environment.
24. Antipodean supports the Plan Change's stated objectives and policies that seek to create quality linkages and enable high levels of walkability and pedestrian amenity. Antipodean is concerned however that the Plan Change identifies Grahame Breed Drive and the proposed town centre 'mainstreet' as being the primary access to the redeveloped quarry site. These streets will be key elements in achieving meaningful integration and high quality connections between the town centre and the redeveloped quarry.
25. In its current form, the Plan Change provides no direction as to the character of these roads nor does it make adequate provision for the management of potential traffic effects. Much greater clarity and control is required to ensure that these streets become a high amenity, pedestrian-oriented connections that support a vibrant urban environment.
26. In this regard,

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- (a) The proposed permitted activity status for “Any roading related or in-ground infrastructure works” is overly permissive and requires additional control to ensure development is of a high quality.
 - (b) Greater certainty and control should be provided regarding the quality and location of proposed pedestrian walkways and cycleways.
 - (c) Provision should be made for Traffic Demand Management techniques to ensure that the traffic effects associated with the development are adequately mitigated or managed.
27. It is noted that the definition of ‘rehabilitation’ described in the Plan Change also includes “establishment of such roading and services suitable for long term use”. However, while Rehabilitation is deemed to be a restricted discretionary activity, transport is currently not included as matters for discretion. This should be amended to ensure transport effects can be appropriately considered.
28. It is also noted that the Plan Change proposes to remove significant areas of car parking from the area adjacent to the existing town centre. No analysis has been provided that quantifies the effects of removing this parking and this should be undertaken to allow the transport effects to be appropriately considered. Without this analysis or adequate provision for traffic management, there is significant risk that the parking areas on Antipodean’s private land will be used to provide for the traffic induced by the Plan Change.

Stormwater and wastewater infrastructure

29. Antipodean understands that the stormwater and wastewater infrastructure in Three Kings is operating at or close to full capacity and acknowledges opportunity the redevelopment of the quarry presents in terms of ‘unlocking’ the future capacity of the system.
30. However, Antipodean submits that the proposed permitted status for “infrastructure works or works on land that is consistent with the concept plan shown in F08-84(a)” is overly permissive and requires additional control to ensure a high standard of amenity is achieved.

RELIEF SOUGHT

31. For the reasons stated above, Antipodean requests that the Plan Change in its current form is **declined** as a number of matters still need to be further addressed by the Applicant and Council.
32. In particular:
- (a) The proposed redevelopment of the quarry site must be considered holistically, preferably through a master planning process that includes the town centre. Without this, the Plan Change is a potentially ad hoc, does not represent sound resource management principles and practice and is contrary to Council’s function under s31 of the RMA to achieve integrated management of effects.
 - (b) The Applicant must address and resolve outstanding environmental issues including amenity, transportation, parking wastewater, and storm water effects.

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- (c) The Plan Change provisions need to be suitably amended to reflect the concerns raised in this submission and give effect to the findings of the master planning process.
 - (d) Such further or other relief as is considered appropriate in the circumstances.
33. Antipodean wishes to be **heard** in support of this submission.
34. If others make a similar submission, Antipodean would be prepared to consider presenting a **joint case** at any hearing.

Regards

A handwritten signature in black ink, appearing to read 'NR', is positioned above the printed name and firm.

Nick Roberts
Barker & Associates

Submission No 120

From: NickR@barker.co.nz
To: [District Plans Central](#)
Cc: NickR@barker.co.nz
Subject: District Plan online submission
Date: Monday, 10 November 2014 3:02:27 p.m.
Attachments: [Three Kings_373_Sub_FINAL.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Nick Roberts
Organisation: Antipodean Properties Limited
Agent: Nick Roberts - Barker and Associates
Phone (daytime): 09 375 0999
Phone (evening):
Mobile:
Email address: NickR@barker.co.nz
Postal address: PO Box 1986, , Shortland Street, Auckland
Post code: 1140
Date of submission: 10-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
PM373 - Three Kings Quarry

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Please see attached document

I/We:
Generally support, but seek amendments

The reason for my/our views is:
Please see attached document

I/We seek the following decision from the council:

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Accept the plan change/modification with amendments as outlined below

Proposed amendments:

Please see attached document

I/We wish to be heard at the council planning hearing:

Yes

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

Three Kings_373 Sub_FINAL.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

I am directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Submission No 120

FORM 5

THE RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 373 (THREE KINGS QUARRY) TO THE AUCKLAND COUNCIL DISTRICT PLAN (AUCKLAND CITY ISTHMUS SECTION)

TO: Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142
Attn: Planning Technicians

FROM: Antipodean Properties Limited
c/o Barker and Associates
PO Box 1986
Shortland Street
Auckland 1140

DATE: 6 November 2014

INTRODUCTION

1. **Antipodean Properties Limited** (Antipodean) makes the following submission to Proposed Private Plan Change 373 to the Auckland Council District Plan (Auckland City Isthmus Section) (the Plan Change).
2. This submission relates to the **whole** of the Plan Change.
3. Antipodean **supports** the Plan Change **with amendments**
4. Antipodean is a New Zealand Company which is ultimately owned by the William Pears Group from the United Kingdom (75%) and Jonathan Berman (25%). The William Pears Group was founded in 1952 and is still 100% owned and managed by the Pears family. It is one of the largest property companies in the UK. It has extensive property holdings throughout the world, including New Zealand where it has been active in the property market since 2003.
5. As part of the property portfolio, Antipodean is currently owns approximately 1.6ha of land uses for commercial purposes (the town centre) located directly adjacent to the southern boundary of the Plan Change area. In this regard Antipodean considers itself to be directly and significantly affected by the proposed Plan Change.
6. In making this submission Antipodean is not raising issues regarding trade competition or the effects of trade competition and is not motivated by trade competition concerns. Further Antipodean could not gain an advantage in trade competition through the lodgement of this submission.

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REASONS FOR SUBMISSION

7. Antipodean acknowledges that the redevelopment of the quarry site provides a significant opportunity to transform and revitalise the Three Kings area and supports, in principle, the aim of:
 - (a) Enabling greater integration between the quarry and the town centre.
 - (b) Enabling a range of higher intensity housing typologies located closer to the town centre.
 - (c) Creating quality linkages between the quarry, the town centre and surrounding land that enhance pedestrian accessibility and reduce reliance on private modes of transport.
8. The plan change in its current form however enables development to effectively 'turn its back on' the Council and Crown owned land separating the Plan Change site from the Three Kings Town Centre. This potentially will preclude the future opportunity for future integrated development and connections between the subject site and the town centre, being a major objective of the Three Kings Precinct Plan. Amendments are required to the plan change to ensure opportunities are made available for any future development on the Council/Crown land to integrate with the residential community within the subject site and ultimately with the town centre. In its present form, the Plan Change does not provide sufficient consideration about the interface between the proposed residential development and the surrounding land.
9. In the absence of the relief sought in this submission being granted, the proposed Plan Change is a potentially ad hoc, does not represent sound resource management principles and practice and is contrary to Council's function under s31 of the RMA to achieve integrated management of effects.

SCOPE OF SUBMISSION

10. Without limiting the generality of this submission, the following matters have been identified as requiring further consideration in order to achieve the purpose of the Plan Change:

Relationship between redeveloped quarry and surrounding land

11. Antipodean supports the Plan Change's stated objectives and policies that seek to achieve integration with surrounding land and establish high quality connections to enable high levels of walkability. Antipodean also accepts that the topography of the site and local area presents considerable challenges in terms of facilitating integration with surrounding land and establishing new connections.
12. However, Antipodean is concerned that, in its current form, the proposed configuration of the street network and residential areas:
 - (a) Will potentially preclude any ability to achieve future meaningful integration between the quarry and the town centre in the future.
 - (b) Will not support an accessible and walkable environment.

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13. In particular,
- (a) The majority of the residential dwellings are proposed to be located at the northern end of the quarry site where they will potentially incur significant shading effects and at a distance which does not encourage the future community to walk to the town centre to access services.
 - (b) The proposal to locate taller buildings at the southern end of the quarry site will:
 - potentially create shading and dominance effects on any future development in the adjacent council owned land; and
 - potentially prevent integrated and convenient connections across this land to the town centre, contrary to the objectives and policies of the plan change.
 - (c) There is currently no provision to ensure the quarry is filled to a minimum standard before development. Greater certainty is required regarding the finished contours of the redeveloped quarry so that the design treatment of transition between the quarry and the town centre can be appropriately considered and controlled.

Activities

14. The location, nature and scale of activities will be a key factor in determining the patterns of movement around Three Kings and the types of transport people use. In this regard, the Plan Change currently provides insufficient clarity and control over several activities. Antipodean submits that the Plan Change needs to provide greater direction regarding the location and nature of active areas and that appropriate controls be included to ensure these outcomes are delivered and that the development compliments the town centre. In particular, the proposed permitted activity status for retail, restaurants and healthcare facilities in the residential 8b zone is overly permissive. Additional control is required to ensure development in the quarry does not conflict with the town centre's role as focal point for the community and undermine its vitality.

RELIEF SOUGHT

15. For the reasons stated above, Antipodean requests that the Plan Change in its current form is **approved with amendments** as a number of matters still need to be addressed further by the Applicant and Council.
16. In particular:
- (a) The proposed objective policies and methods must be considered within the context of the future potential to integrate the quarry site with the town centre. Without this, the Plan Change is a potentially ad hoc, does not represent sound resource management principles and practice and is contrary to Council's function under s31 of the RMA to achieve integrated management of effects. This could be achieved by inserting provisions which avoid future development creating a barrier between the quarry and the town centre and to ensure that connections with the quarry land take account of the future potential for connections to the town centre across the Council / Crown land.

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- (b) Future consideration should be given to the community and environmental benefits of locating housing as close as possible to centres and thereby creating walkable communities.
 - (c) Clarification is required to ensure the quarry is filled to a minimum standard so that the design treatment of transition between the quarry and the town centre can be appropriately considered and controlled.
 - (d) Amendments are required to the scale of activities enabled to ensure that the future development compliments and supports the adjacent town centre.
 - (e) Such further or other relief as is considered appropriate in the circumstances to reflect the concerns raised in this submission
17. Antipodean wishes to be **heard** in support of this submission.
18. If others make a similar submission, Antipodean would be prepared to consider presenting a **joint case** at any hearing.

Regards



Nick Roberts
Barker & Associates

10 November 2014

Planning Technician: Central and Islands Planning
Regional and Local Planning
Auckland Council
Private Bag 92300
Auckland 1142

Dear Susanne

Submission on Proposed Private Plan Change 372 – Three Kings Quarry

Attached is Auckland Transport's submission on the following plan change:

- Plan Change 372 – "Three Kings Quarry", Auckland Council District Plan, Isthmus Section

Should you have any queries with respect to this submission, please contact Evan Keating (Senior Transport Planner) on (09) 447 5081.

Please note - a separate submission **will** be lodged for PC373.

Yours sincerely



Don Munro

Manager Strategic Transport Integration

Enc: Auckland Transport's submission

Cc: Bernie Chote, Fletcher Developments, via email



Submission No 121

SUBMISSION ON PUBLICLY NOTIFIED PLAN CHANGES

To Megan Tyler
Auckland Council
Private Bag 92300
Auckland 1142

From Don Munro
Auckland Transport
Private Bag 92250
Auckland 1142

This is a submission on:

- Plan Change 372 – “Three Kings Quarry”, Auckland Council District Plan, Isthmus Section

Auckland Transport cannot gain an advantage in Trade Competition through this submission.

Auckland Transport's submission is:

To support the above plan change from a transport perspective, subject to resolution of the issues noted below.

The reason for Auckland Transport's submission:

Auckland Transport (AT) is strongly supportive of this plan which will increase the supply of residential land in a location which is highly accessible by public transport. This support is provided on the condition that the transport matters identified below are addressed.

Auckland Transport was established as the Road Controlling Authority for the Auckland region under the Local Government (Auckland Council) Amendment Act 2010. That Act sets out that our main statutory purpose is “to contribute to an effective, efficient, and safe Auckland land transport system in the public interest.” It has as a function to manage and control the Auckland transport system for which it is the road controlling authority.

Auckland Transport is making this submission on this plan change to ensure that all transport matters are considered and addressed. The particular issues that this submission addresses are as follows:

- 1) Pedestrian and cycle access
- 2) Traffic safety
- 3) Traffic signals on Mt Eden Road
- 4) Parking
- 5) Stormwater issues
- 6) Modelling
- 7) Plan change provisions

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1. Pedestrian and cycle access

As noted above, AT is strongly supportive of the proposed development due to the potential catchment of a significant number of persons close to two frequent bus routes and for the potential walking and cycling connections to local facilities and services such as Three Kings School and Three Kings Plaza. However, the accessibility of these facilities will depend on the nature of the connections provided and this is a key issue for this development. The ITA and subsequently the plan change as appropriate, will need to be updated to expand on the following matters:

- The ITA does not include a pedestrian desire line map. This is essential to determine how well the proposed connections are aligned with potential movements and if the plan change needs to be updated to reflect this
- In the absence of the above, it appears that an additional public lift will be required on the eastern side of the development to line up with the proposed bus stop
- A public lift is identified in the supporting documents but it is unclear when it would be installed or what mechanism would require it as it is not identified in the plan change provisions. The plan change needs to be amended to incorporate this piece of infrastructure and detail provided as to who would be responsible for its funding, operation and on-going maintenance and renewal
- A plan, similar to the 'road typologies' plan should be provided showing which roads have dedicated cycle facilities and included in the plan change. It is likely that this will highlight the need for additional cycle facilities such as on road type 5 – Bush Road particularly as uphill cycling will be slow and subject to vehicle overtaking
- The location of the development relative to the Auckland Cycle Network and how it connects to it needs to be assessed and addressed appropriately.

The proposal will significantly increase the number of pedestrians on Mt Eden Road and as noted below, a signalised intersection has been proposed to accommodate this as shown on the concept plan to be included in the District Plan. However, there are no formalised crossing points north of this for approximately 1.2km which is inconvenient for pedestrians and presents a safety issue as people will cross the road at informal crossing points. This is particularly relevant at bus stop locations. Consideration needs to be given to additional facilities to address this issue. This is also relevant as the existing pedestrian refuge on Mt Eden Road is likely to conflict with the proposed access to road type 8.

2. Traffic safety

AT has a number of concerns relating to general traffic and safety aspects of the proposal, particularly around the access to the development from Mt Albert Road. These are noted as follows:

- The vehicle access opposite Kingsway is identified both as road type 8 and driveway D3 on the road typologies plan and the ITA respectively. Clarification of the type of road is required and the plan change diagrams will need to be updated if required. In either case, this would form a staggered intersection with Kingsway and an explanation as to why this form of intersection would be acceptable in this location is required
- The crash analysis should be expanded to include information on travel modes, particularly walking and cycling to determine if there are any existing issues in the immediate area which the development may exacerbate and therefore, need to address
- Turning movements from Plaza Drive to Mt Albert Road do not appear to have been adequately assessed:
 - There is likely to be conflict between southbound pedestrians on the refuge on Mt Albert Road and any right-turn exits out of Plaza Drive, should all movements be

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allowed here. Typically in such situations, motorists and pedestrians can mis-judge each other's intended actions. Given that the Dormwell Road / Hayr Road intersection is also confusing and close by, this location needs to be assessed in some detail

- The applicant has not clarified what proportion of traffic headed on Mt Albert Road is likely to use Plaza Drive and this needs to be taken into account
- Further to the above, any assessment cannot be done in isolation, as how many vehicles will exit from Plaza Drive will be affected by the design of Plaza Drive inside the Three Kings Plaza site. This will in turn affect how the internal parking layout is configured, and may also impact how Mt Albert Road frontage is treated
- If all turning movements on Plaza Drive are proposed, the applicant will need to demonstrate how this will be safely achieved, provide a cross section of Plaza Drive and its connection to Grahame Breed Drive and explain what actions need to be taken to implement this option (including changes on the Three Kings Plaza site).

3. Traffic signals on Mt Eden Road

The applicant has proposed to provide a new set of traffic signals at the intersection of Mt Eden Road and Grahame Breed Drive as shown on the concept plan that forms part of the plan change. This is intended to aid in pedestrian access across Mt Eden Road but does not appear to be otherwise required, based on the ITA. While AT supports the applicant's desire to improve pedestrian crossing facilities, especially when located close to a school, the methodology is queried as a signalised pedestrian crossing may achieve similar benefits and, if so, it may be more appropriately located further to the south. It is also relevant to know at what stage of the development that signals would be required as an infrastructure funding agreement with the developer may be needed and/or staging provisions included in the plan change.

Overall, further research on these points is required.

AT is currently undertaking a study of the Mt Eden Road corridor to identify its future form and functions. This work is scheduled to be completed early in 2015 and we will then be in a better position to advise the applicant on the suitability of this intersection for signalisation. AT look forward to working with the applicant on this point and in the meantime, the Council is advised that the signalisation of this intersection has not been confirmed by AT.

4. Parking

There are a number of parking issues that need to be addressed:

- There is a discrepancy between the ITA and the proposed District Plan provisions as the ITA states that the parking provision will be in line with the Proposed Auckland Unitary Plan (PAUP) but Rule 7.8.2.15 of the District Plan would take precedence unless the plan change specified otherwise. This should be clarified and amended appropriately.
- The plan change needs to consider whether there should be parking provided on road type 4 – wetland road as AT notes this is not shown on the cross sections provided with the plan change application
- Cycle parking is referred to in the ITA as being in line with the PAUP but this is not reflected in the proposed District Plan provisions – the plan change needs to be amended to reflect this point.

Aligned with the public transport and active mode opportunities, the location and scale of the proposed development also provides opportunities for innovative parking solutions such as car

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sharing. This could reduce the amount of off street parking provided on site. AT notes that it is interested in exploring this option with the applicant.

5. Stormwater

It is noted that the applicant has been in discussions with the Council's stormwater team and has provided a comprehensive stormwater management plan. However, given the complexity of the site, AT will need to have a role in stormwater issues for this development. To that end, we have identified a number of detailed matters which will need to be addressed with the applicant in conjunction with Council's stormwater unit. These issues are listed below and need to be addressed to determine any amendments to the plan change that may be required:

- The submitted stormwater report at section 7.1 identifies the opportunity to disconnect Mt Eden Road drainage from combined sewer by utilising new soakholes. This opportunity should be identified as a requirement for redeveloping Mt Eden Road frontage, to ensure that it can be secured. Space will be required to provide for rain garden pre-treatment which is likely to be outside the existing road reserve. A mechanism of providing this space will need to be agreed
- At Henshaw Ave/Three Kings Plaza and Grahame Breed Drive, existing stormwater discharges will need to be diverted, treated and disposed
- Overland flow along Bush Road should be subject to concept calculation, to ensure depth and velocity will remain within Austroads criteria. This is to confirm the stormwater management concept, and will then be subject to review at detailed design stage
- Stormwater treatment devices, especially tree pits, will not be standard designs, due to special groundwater and stormwater management conditions. The Plan Change should provide for appropriate design guidance to support development control.

6. Modelling

The applicant's ITA assumes no background traffic growth and that the completion of State Highway 20 will reduce the traffic volume on Mt Eden Road and Mt Albert Road significantly. However, this prediction differs from the Auckland Regional Transport Model (ART3) as it predicts a small decrease in Mt Eden Road traffic and an increase in traffic on Mt Albert Road. Another sensitivity test is required using the ART3 traffic growth to assess the traffic effects of the proposed development. The applicant is encouraged to contact AT directly to discuss this issue. AT requests that this be undertaken before the hearing so that necessary amendments to the plan change can be identified in evidence, as appropriate.

7. Plan change provisions

Aside from the general comments above which may require alterations to the plan change provisions, AT have identified a number of provisions which require amendment or clarification:

- AT queries why transport such as roading has not been identified in the objectives and policies of the plan change as a form of infrastructure to be enabled. Similarly, there are no provisions to prevent development proceeding ahead of infrastructure provision
- While AT has raised a number of specific matters below regarding the indicative road cross sections, there is no reference to the cross sections in the plan change so it is unclear what

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form the proposed roads will take. This should be clarified and the minimum width of roads specified in the plan change

- If cross sections are to be included in the plan change, the plan provisions must state that the cross sections only apply at development stage and cease to have effect once roads are vested. This is to ensure that AT has the ability to carry out works in the road reserve to meet the transport needs of the area
- AT notes that there is no Gross Floor Area restriction on 'education and cultural facilities' and queries if one is appropriate, particularly given the potential transport implications
- Some of the proposed rules apply to 'cascading apartments' only but this term is not defined in the District Plan nor in the plan change. This should be clarified in the plan change
- It is unclear why the proposed front yard control (rule 2.5 of section F) does not apply to streets within the site and this should be clarified
- A number of the assessment criteria for cascading apartments, particularly (v) and (vi) appear to be directive and AT query whether they should be rules instead. This is required to provide more certainty regarding vehicle access and parking locations
- 'Reverse sensitivity' is listed in section G as a matter for discretion but it is unclear what this refers to. The plan change should clarify what activities are to be protected from reverse sensitivity effects and if this includes the transport network
- It is unclear what the relationship is between parts 1.0 and 1.1 of section H, if both provisions relate to new buildings or if one provision takes precedence over another. AT requests that this be clarified in the plan change and that the criteria be expanded to include pedestrian and cyclist connectivity and amenity
- Point (iii) of section 8 of the proposed assessment criteria should refer to pedestrian and cyclist movements as well as traffic
- The reference to AT's standards in section 2.12 of part F of the District Plan provisions is welcomed but it should be reworded to refer to any works within the road reserve and any proposed road to be vested instead of 'any roading related works'. It should also apply to any activity status not just permitted activities

There are a number of other matters identified in the supporting documents which mainly relate to the proposed cross sections that appear to be included in the plan change. It is noted that these cross sections are indicative but it is important to highlight potential issues that may require amendments them at this stage and prior to consent stage. These are summarised as follows:

- Footpaths are generally shown adjoining property boundaries which does not leave space for water meters and results in private water pipes under footpaths which raises difficulties with their maintenance. Further discussions on this issue should be entered into with Watercare Services Ltd and AT
- Other services such as gas meters and power and telecommunication termination plinths may also need to be located next to property boundaries and this is difficult when there is a footpath adjoining the boundary
- Street and regulatory signs do not appear to have been considered in the cross sections
- Road type 5 – Bush Road may have difficulties in accommodating service vehicles due to its carriageway width and single cross fall. Confirmation is sought as to the proposed function of this road and that it and all other public roads will be suitable for emergency vehicle access
- Road type 5 – Bush Road will need changes to its design due to its gradient and to accommodate cyclist facilities. This may include some form of traffic calming and the footpath may need to be increased in width as it is proposed for one side of the road only
- AT questions how will road type 7 – Plaza Road accommodate street lights and regulatory signs
- AT questions why road type 8 only has footpaths on one side

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- The width of road type 1 needs to be clarified as it is stated to be a minimum of 24m but the cross section shows it to be 23.6m. The traffic lanes are also shown to be 4.8m but it is unclear if this includes the 1.8m cycle lanes
- The cross sections which have cycle lanes should have the cycle lane and parking lane reversed so that parked cars form a buffer for the cycle lane. The applicant may wish to investigate other forms of physical separation but either option will require additional space for the cycle lane. Further details of such treatments are contained in the Auckland Transport Code of Practice (ATCOP)
- Details of how pedestrians will cross proposed swales should be provided
- The concept for the 'shared space' in the plaza is unclear as it appears to be an undefined space between the plazas and a wide carriageway
- Indented parking bays as proposed can be difficult to implement as they may conflict with vehicle crossings. Their use will need to be carefully planned with future development to ensure that such conflicts are avoided
- AT notes that London Plane trees are no longer listed in the plan change as a proposed street tree. Pohutukawa can also raise issues due to their invasive roots and need for frequent and extensive pruning. As such they are not likely to be acceptable for use in this location. A statement describing the outcomes sought by the planting of the street trees rather than an exclusive selection of a species is required at this stage so as to provide appropriate flexibility, to be included with the final selection undertaken with AT at detailed design stage in accordance with ATCOP
- While the existing transport context is described in the ITA, no mention is made of the proposed transport environment in terms of current AT strategies as required by the ITA guidelines. These include the Auckland Cycle Network, Carrington Road / Mt Albert Road Corridor Management Plan, the proposed Mt Eden Road Corridor Management Plan and the proposed Parking Strategy
- More detail on the design and operation of the public lifts is required. It is unclear who will manage, fund and own them. While AT considers that their use is appropriate in this situation due to the applicant's proposed retention of the quarry excavation, consideration needs to be given to who will be responsible for their on-going operation.

Auckland Transport seeks the following decision from Auckland Council:

That Council approve the proposed plan change providing the matters raised in Auckland Transport's submission are fully addressed, including:

- Pedestrian and cycle access be assessed in greater detail and additional provision be provided
- That an updated ITA be provided with necessary amendments made to the plan change to address traffic safety matters particularly at the proposed changes to Plaza Drive and the new road or driveway opposite Kingsway
- The applicant's proposal for traffic signals on Mt Eden Road be assessed in conjunction with AT when further information on the future of Mt Eden Road is available
- Parking is assessed in more detail including additional research and an exploration of parking for car share schemes
- Stormwater issues and a commitment to continue working with AT to resolve them
- Updated modelling based on the ART3 model

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- Other issues such as details of proposed public lifts and further work on the proposed cross sections
- Amendments to the plan change provisions to address AT's concerns/comments and any other consequential changes required

And/or such other relief that will give effect to Auckland Transport's concerns.

The submitter does wish to appear and be heard in support of its submission



Signed for and on behalf of Auckland Transport

Don Munro
Manager Strategic Transport Integration

Address for service of submitter
Auckland Transport
Private Bag 92250
Auckland 1142

Telephone:	(09) 447 5081
Email:	evan.keating@aucklandtransport.govt.nz
For:	Evan Keating Senior Transport Planner - Transport Land Use Integration

10 November 2014

Planning Technician: Central and Islands Planning
Regional and Local Planning
Auckland Council
Private Bag 92300
Auckland 1142

Dear Susanne

Submission on Proposed Private Plan Change 373 – Three Kings Quarry

Attached is Auckland Transport's submission on the following plan change:

- Plan Change 373 – "Three Kings Quarry", Auckland Council District Plan, Isthmus Section

Should you have any queries with respect to this submission, please contact Evan Keating (Senior Transport Planner) on (09) 447 5081.

Please note - a separate submission **will** be lodged for PC372.

Yours sincerely



Don Munro

Manager Strategic Transport Integration

Enc: Auckland Transport's submission

Cc: Bernie Chote, Fletcher Developments, via email



Submission No 122

SUBMISSION ON PUBLICLY NOTIFIED PLAN CHANGES

To Megan Tyler
Auckland Council
Private Bag 92300
Auckland 1142

From Don Munro
Auckland Transport
Private Bag 92250
Auckland 1142

This is a submission on:

- Plan Change 373 – “Three Kings Quarry”, Auckland Council District Plan, Isthmus Section

Auckland Transport cannot gain an advantage in Trade Competition through this submission.

Auckland Transport’s submission is:

To support the above plan change from a transport perspective, subject to resolution of the issues noted below.

The reason for Auckland Transport’s submission:

Auckland Transport (AT) is supportive of this plan change which will increase the supply of residential land in a location which is highly accessible by public transport. This support is provided on the condition that the transport matters identified below are addressed.

Auckland Transport was established as the Road Controlling Authority for the Auckland region under the Local Government (Auckland Council) Amendment Act 2010. That Act sets out that our main statutory purpose is “to contribute to an effective, efficient, and safe Auckland land transport system in the public interest.” It has as a function to manage and control the Auckland transport system for which it is the road controlling authority.

Auckland Transport is making this submission on this plan change to ensure that all transport matters are considered and addressed. The particular issues that this submission addresses are as follows:

- 1) Pedestrian and cycle access
- 2) Traffic safety
- 3) Traffic signals on Mt Eden Road
- 4) Parking
- 5) Stormwater issues
- 6) Modelling
- 7) Plan change provisions

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1. Pedestrian and cycle access

As noted above, AT is supportive of the proposed development due to the potential catchment of a significant number of persons close to two frequent bus routes and for the potential walking and cycling connections to local facilities and services such as Three Kings School and Three Kings Plaza. However, the accessibility of these facilities will depend on the nature of the connections provided and this is a key issue for this development. In contrast to the parallel application (PC372) which includes the land between the quarry and the Three Kings Plaza, residents of the proposed development provided for by PC373, will find it difficult to access the Three Kings Plaza and this fundamental issue needs to be considered in detail. As presented, the proposal appears to be a large cul de sac and if vehicle access to the south is not feasible, greater pedestrian and cycle access must be created. The ITA and subsequently the plan change as appropriate will need to be updated to expand on the following matters:

- The ITA does not include a pedestrian desire line map. This is essential to determine how well the proposed connections are aligned with potential movements
- In the absence of the above, it appears that a public lift will be required on the eastern side of the development to provide access to Mt Eden Road. This will need to be included in the plan change and detail provided as to who would be responsible for its funding, operation and on-going maintenance and renewal
- An explanation of how pedestrians will access the Three Kings Plaza is required both as proposed and how such accesses would be future proofed for in the event of redevelopment of the Council owned land to the south. Eastern only pedestrian access to the site is not supported
- The location of the development relative to the Auckland Cycle Network and how it connects to it needs to be assessed and addressed appropriately
- A plan, similar to the 'road typologies' plan should be provided showing which roads have dedicated cycle facilities as it appears that at present none are proposed. It is likely that this will highlight the need for cycle facilities such as on road type 5 – Bush Road particularly as this is the primary vehicle access where uphill cycling will be slow and subject to vehicle overtaking.

The proposal will significantly increase the number of pedestrians on Mt Eden Road and as noted below, a signalised intersection has been proposed to accommodate this as shown on the concept plan to be included in the District Plan. However, there are no formalised crossing points south of this and many pedestrians are likely to cross close to Three Kings School and the intersection with Mt Albert Road which is inconvenient for pedestrians and presents a safety issue as people will cross the road at informal crossing points. This is particularly relevant at bus stop locations. Consideration needs to be given to additional facilities to address this issue. This is also relevant as the existing pedestrian refuge on Mt Eden Road is likely to conflict with the proposed access to road type 8.

2. Traffic safety

AT has a number of concerns relating to general traffic and safety aspects of the proposal. These are noted as follows:

- The vehicle access opposite Kingsway is identified both as road type 8 and driveway D3 on the road typologies plan and the ITA respectively. Clarification of the type of road is required. In either case, this would form a staggered intersection with Kingsway and an explanation as to why this form of intersection would be acceptable in this location is required

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- The crash analysis should be expanded to include information on travel modes, particularly walking and cycling to determine if there are any existing issues in the immediate area which the development may exacerbate and therefore, need to address.

3. Traffic signals on Mt Eden Road

The applicant has proposed to provide a new set of traffic signals at the intersection of Mt Eden Road and the northern access to the development as shown on the concept plan that forms part of the plan change. This is intended to aid in pedestrian access across Mt Eden Road but does not appear to be otherwise required, based on the ITA. While AT supports the applicant's desire to improve pedestrian crossing facilities, the methodology is queried as a signalised pedestrian crossing may achieve similar benefits and, if so, it may be more appropriately located further to the south, or that two such facilities may need to be provided. It is also relevant to know at what stage of the development that signals would be required as an infrastructure funding agreement with the developer may be needed and/or staging provisions included in the plan change.

Overall, further research on these points is required.

AT is currently undertaking a study of the Mt Eden Road corridor to identify its future form and functions. This work is scheduled to be completed early in 2015 and we will then be in a better position to advise the applicant on the suitability of this intersection for signalisation. AT look forward to working with the applicant on this point and in the meantime, the Council is advised that the signalisation of this intersection has not been confirmed by AT.

4. Parking

There are a number of parking issues that need to be addressed:

- There is a discrepancy between the ITA and the proposed District Plan provisions as the ITA states that the parking provision will be in line with the Proposed Auckland Unitary Plan (PAUP) but Rule 7.8.2.15 of the District Plan would take precedence unless the plan change specified otherwise. This should be clarified and amended appropriately
- The plan change needs to consider whether there should be parking provided on road type 4 – wetland road as AT notes that this is not shown on the cross sections provided with the plan change application.
- Cycle parking is referred to in the ITA as being in line with the PAUP but this is not reflected in the proposed District Plan provisions – the plan change needs to be amended to reflect this point.

Aligned with the public transport and active mode opportunities, the location and scale of the proposed development also provides opportunities for innovative parking solutions such as car sharing. This could reduce the amount of off street parking provided on site. AT notes that it is interested in exploring this option with the applicant.

5. Stormwater

It is noted that the applicant has been in discussions with the Council's stormwater team and has provided a comprehensive stormwater management plan. However, given the complexity of the site, AT will need to have a role in stormwater issues for this development. To that end, we have identified a number of detailed matters which will need to be addressed with the applicant in conjunction with

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Council's stormwater unit. These issues are listed below and need to be assessed to determine any amendments to the plan change that may be required:

- The submitted stormwater report at section 7.1 identifies the opportunity to disconnect Mt Eden Road drainage from combined sewer by utilising new soakholes. This opportunity should be identified as a requirement for redeveloping Mt Eden Road frontage, to ensure that it can be secured. Space will be required to provide for rain garden pre-treatment which is likely to be outside the existing road reserve. A mechanism of providing this space will need to be agreed
- At Henshaw Ave/Three Kings Plaza and Grahame Breed Drive, existing stormwater discharges will need to be diverted, treated and disposed
- Overland flow along Bush Road should be subject to concept calculation, to ensure depth and velocity will remain within Austroads criteria. This is to confirm stormwater management concept, and will then be subject to review at detailed design stage
- Stormwater treatment devices, especially tree pits, will not be standard designs, due to special groundwater and stormwater management conditions. The Plan Change should provide for appropriate design guidance to support development control.

6. Modelling

The applicant's ITA assumes no background traffic growth and that the completion of State Highway 20 will reduce the traffic volume on Mt Eden Road and Mt Albert Road significantly. However, this prediction differs from the Auckland Regional Transport Model (ART3) as it predicts a small decrease in Mt Eden Road traffic and an increase in traffic on Mt Albert Road. Another sensitivity test is required using the ART3 traffic growth to assess the traffic effects of the proposed development. The applicant is encouraged to contact AT directly to discuss this issue. AT requests that this be undertaken before the hearing so that necessary amendments to the plan change can be identified in evidence, as appropriate.

7. Plan change provisions

Aside from the general comments above which may require alterations to the plan change provisions, AT have identified a number of provisions which require amendment or clarification:

- AT queries why transport such as roading has not been identified in the objectives and policies of the plan change as a form of infrastructure to be enabled. Similarly, there are no provisions to prevent development proceeding ahead of infrastructure provision
- While AT has raised a number of specific matters below regarding the indicative road cross sections, there is no reference to the cross sections in the plan change so it is unclear what form the proposed roads will take. This should be clarified and the minimum width of roads specified in the plan change
- If cross sections are to be included in the plan change, the plan provisions must state that the cross sections only apply at development stage and cease to have effect once roads are vested. This is to ensure that AT has the ability to carry out works in the road reserve to meet the transport needs of the area
- AT notes that there is no Gross Floor Area restriction on 'education and cultural facilities' and queries if one is appropriate, particularly given potential transport implications
- Some of the proposed rules apply to 'cascading apartments' only but this term is not defined in the District Plan nor in the plan change. This should be clarified in the plan change

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- It is unclear why the proposed front yard control (rule 2.5 of section F) does not apply to streets within the site and this should be clarified
- A number of the assessment criteria for cascading apartments, particularly (v) and (vi) appear to be directive and AT query whether they should be rules instead. This is required to provide more certainty regarding vehicle access and parking locations
- 'Reverse sensitivity' is listed in section G as a matter for discretion but it is unclear what this refers to. The plan change should clarify what activities are to be protected from reverse sensitivity effects and if this includes the transport network
- It is unclear what the relationship is between parts 1.0 and 1.1 of section H, if both provisions relate to new buildings or if one provision takes precedence over another. AT requests that this be clarified in the plan change and that the criteria be expanded to include pedestrian and cyclist connectivity and amenity
- Point (iii) of section 8 of the proposed assessment criteria should refer to pedestrian and cyclist movements as well as traffic
- The reference to AT's standards in section 2.12 of part F of the District Plan provisions is welcomed but it should be reworded to refer to any works within the road reserve and any proposed road to be vested instead of 'any roading related works'. It should also apply to any activity status not just permitted activities.

There are a number of other matters identified in the supporting documents which mainly relate to the proposed cross sections that appear to be included in the plan change. It is noted that these cross sections are indicative but it is important to highlight potential issues that may require amendments to them at this stage and prior to consent stage. These are summarised as follows:

- Footpaths are generally shown adjoining property boundaries which does not leave space for water meters and results in private water pipes under footpaths which raises difficulties with their maintenance. Further discussions on this issue should be entered into with Watercare Services Ltd and AT
- Other services such as gas meters and power and telecommunication termination plinths may also need to be located next to property boundaries and this is difficult when there is a footpath adjoining the boundary
- Street and regulatory signs do not appear to have been considered in the cross sections
- Road type 5 – Bush Road may have difficulties in accommodating service vehicles due to its carriageway width and single cross fall. Confirmation is sought as to the proposed function of this road and that it and all other public roads will be suitable for emergency vehicle access
- AT questions why road type 8 only have footpaths on one side
- Details of how pedestrians will cross proposed swales should be provided
- Road type 5 – Bush Road will need changes to its design (including provision for cyclists) due to its gradient. This may include some form of traffic calming and as only one footpath is proposed, it may be necessary to widen the footpath
- AT notes that London Plane trees are no longer listed in the plan change as a proposed street tree. Pohutukawa can also raise issues due to their invasive roots and need for frequent and extensive pruning. As such they are not likely to be acceptable for use in this location. A statement describing the outcomes sought by the planting of the street trees rather than an exclusive selection of a species is required at this stage so as to provide appropriate flexibility be included, with the final selection undertaken with AT at detailed design stage in accordance with ATCOP
- While the existing transport context is described in the ITA, no mention is made of the proposed transport environment in terms of current AT strategies as required by the ITA guidelines. These include the Auckland Cycle Network, Carrington Road / Mt Albert Road Corridor Management Plan, the proposed Mt Eden Road Corridor Management Plan and the proposed Parking Strategy

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- AT questions how the western most apartment building in 'The Park' precinct is to be accessed. This portion of the site does not appear to have vehicle access on the masterplan nor on the concept plan and this needs to be addressed
- If public lifts are to be part of the solution for pedestrian access to the site, detail on the design and operation of them is required. It is unclear who would manage, fund and own them. While AT considers that their use is appropriate in this situation due to the applicant's proposed retention of the quarry excavation, consideration needs to be given to who will be responsible for their on-going operation
- Indented parking bays as proposed can be difficult to implement as they may conflict with vehicle crossings. Their use will need to be carefully planned with future development to ensure that such conflicts are avoided.


Auckland Transport seeks the following decision from Auckland Council:

That Council approve the proposed plan change providing the matters raised in Auckland Transport's submission are fully addressed, including:

- Pedestrian and cycle access be assessed in greater detail and additional provision be provided
- That an updated ITA be provided be provided with necessary amendments made to the plan change to address traffic safety matters particularly at the new road or driveway opposite Kingsway
- The applicant's proposal for traffic signals on Mt Eden Road be assessed in conjunction with AT when further information on the future of Mt Eden Road is available
- Parking is assessed in more detail including an exploration of parking for car share schemes
- Stormwater issues and a commitment to continue working with AT to resolve them
- Updated modelling based on the ART3 model
- Other issues such as details of potential public lifts and further work on the proposed cross sections
- Amendments to the plan change provisions to address AT's concerns/comments and any other consequential changes required

And/or such other relief that will give effect to Auckland Transport's concerns.

The submitter does wish to appear and be heard in support of its submission



Signed for and on behalf of Auckland Transport

Don Munro
Manager Strategic Transport Integration

Submission No 122

Address for service of submitter
Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: (09) 447 5081
Email: evan.keating@aucklandtransport.govt.nz
For: Evan Keating
Senior Transport Planner - Transport Land Use Integration

**SUBMISSION ON PROPOSED PLAN MODIFICATION 372
(THREE KINGS RENEWAL) TO THE AUCKLAND CITY
OPERATIVE DISTRICT PLAN (ISTHMUS 1999)**

TO: Auckland Council
Regional and Local Planning
Private Bag 92300
Auckland 1142

Attention: Planning Technician, Business Services Central

Cc: Steve Van Kampen, Principal Planner Central/Islands

NAME OF SUBMITTER: Rob Berry

1. I wish to submit in support of the proposed Plan Modification 372 in relation to the Three Kings Quarry area (**site**).
2. I currently live in the vicinity of the site.
3. The provisions of the Plan Modification that this submission relates to are those concerning the Green Terrace part of the development including:
 - (a) The proposed Planning Map 01;
 - (b) Figures F08 84(a) Concept Plan, F08 84(c) Te Tatua a Riukiuta Sightlines, and F08 84(d) Stormwater Management Concept; and
 - (c) Concept Plan policies 7 and 11.

Reasons for Submission

4. I support the wider Plan Modification proposal, but wish to suggest an amendment, because I believe that Plan Modification 372 in its current form does not fully harness the potential of the site in the sense that it inhibits the cohesiveness of the town centre.

General Support for Plan Modification 372

5. I have read the applications for development by Fletcher Residential – Plan Modifications 372 and 373. I believe that both of the proposed applications capitalise on the value of the site. The developments proposed are able to foster and enhance the recreational and aesthetic aspects of the site, whilst also providing practical elements of housing and retail – both necessary components given the growing Auckland population.

6. My preference is for Plan Modification 372. This is because Plan Modification 372 achieves and promotes better linkages with the town centre. The importance of a local 'hub' cannot be overstated, as it promotes a sense of collectiveness and wellbeing within the local township, and provides amenity in a form that could not be achieved by anything else.

Suggested amendments to Plan Modification 372

7. However, given the importance of the Three Kings town centre to local residents and those who will visit the development in the future, I believe it would be prudent to amend the layout of Plan Modification 372. The Green Terrace aspect of the development should be shifted to the west of where it exists in the current 372 master plan so that it is adjacent to the staircase and opposite the Three Kings town centre. This would better align the Town Square with the location proposed for the civic plaza in the Three Kings Plan, as put forward by the Puketapapa Local Board.
8. This new location for the Green Terrace would help the Town Square achieve better connectivity and linkages with the wider town centre, as the Green Terrace would form a direct linear relationship with the pedestrian oriented main street and the hub of the town. This would further enhance the benefits achieved by having a functional and vibrant town centre, as highlighted earlier in my submission. This would also support commercial endeavours within the Three Kings town centre.
9. This change will require some necessary amendments to the objectives, policies and maps and plans in Plan Modification 372.

Relief Sought

10. I seek the following decision from the Council:
- (a) that Plan Modification 372 be confirmed with the following amendments:
 - (i) that the location of the Green Terrace in figures F08 84(a) Concept Plan, F08 84(c) Te Tatua a Riukiuta Sightlines, and F08 84(d) Stormwater Management Concept be amended by shifting it to the west so it is immediately beside the staircase and opposite the Three Kings town centre;
 - (ii) that planning map 01 be amended so that the current location of the Green Terrace is rezoned Residential 8b and the new location of the Green Terrace is rezoned as open space; and
 - (iii) that Concept Plan policies 7 and 11 be amended to reflect the new location of the Green Terrace and the improved alignment with the Three Kings town centre.

Conclusion

11. I endorse the proposed development put forward in Plan Modification 372. However, I believe it could be improved by shifting the Green Terrace to the west so it is immediately beside the staircase, to better align it with the wider Three Kings town centre.
12. I would like to be heard in respect of my submission.
13. If others make a similar submission, I would be prepared to consider presenting a joint case with them at any hearing.





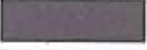


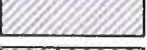
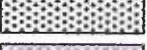


DATED at Auckland this 9th day of November 2014.



Rob Berry

Address for service of submitter: 78 Peary Road
Mt Eden
Auckland.

Part A: Amendments to planning map no.1 sheet no F07, F08, G07 and G08

The land shown		to be rezoned from Business 7 to Residential 8b
The land shown		to be rezoned from Business 7 to Open Space 2
The land shown		to be rezoned from Open Space 3 to Residential 8b
The land shown		to be rezoned from Open Space 3 to Open Space 2
The land shown		to be rezoned from Business 7 to Open Space 3
The land shown		to be rezoned from Open Space 4 to Business 2
The land shown		to be rezoned from Open Space 4 to Residential 8b
The land shown		to be rezoned from Open Space 3 to Business 2
The land shown		to be zoned Business 2
The land shown		Open Space 4 to be vested as Road
The land shown		to be rezoned from Residential 6a to Open Space 2



Planning Map
Amendments

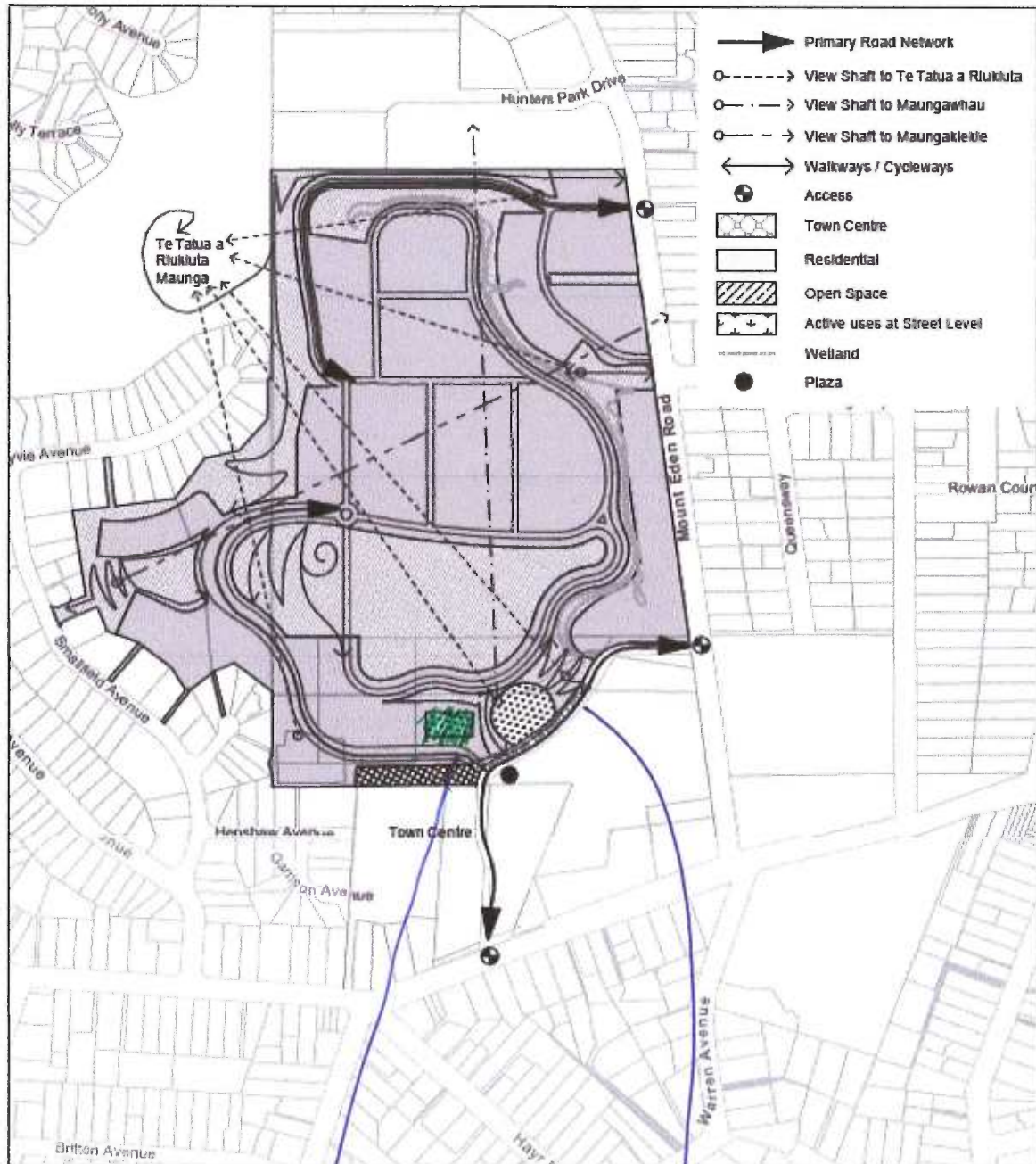
Map 01 (sheet no. F07, F08, G07, G08)

Zone open
space

Zone residential
8b.

Swap location of open space area shown
and relocate to the position shown in the
Three Kings Plan.

Diagram F08-84(a) Concept Plan



Planning Map
Amendments

Concept Plan

New relocated open space's view shaft



relocate open space and view corridor from this location. Shown as residential.

Figure F08 84(c): Te Tatua a Riukiuta Sightlines



Planning Map
Amendments

View Shafts

Delete sightline 3

Expand sightline 4

Submission No 124

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

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



Correspondence to :

This document is by John William Maassen, solicitor of the firm Cooper Rapley. The address for service is 240 Broadway Avenue, Palmerston North. documents for service may be left at that address for service or may be:
(a) posted to PO Box 1945, Palmerston North 4440, or
(b) left for the solicitor at a document exchange for direction to DX PP 80001, Palmerston North, or
(c) transmitted to the solicitor by email to jmaassen@crlaw.co.nz

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name of Submitter or Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Margaret Anne Bilsland and Anne Houghton

Organisation Name (if submission is on behalf of Organisation)

Address for service of the Submitter

as above

Telephone:

027 271 2999

Email:

jwmaassen@gmail.com

Contact Person: (Name and designation if applicable)

Scope of submission

This is a submission to:

Plan Change/Variation Number

Plan Modification 373

Plan Change/Variation Name

Private Plan Change: 985 Mt Eden Rd Three Kings

To the (indicate which plan below)

Relevant District Plan:

☐ Auckland Central

☐ Auckland Gulf Islands

☒ Auckland Isthmus

☐ Franklin

☐ Manukau

☐ North Shore

☐ Papakura

☐ Rodney

☐ Waitakere

Relevant Regional Plan/ Policy Statement:

☐ Coastal

☐ Sediment Control

☐ Proposed Air Land Water

☐ Farm Dairy Discharges

☐ Transitional Regional Plan

☐ Auckland Regional Policy Statement

The specific provisions that my submission relates to are:

Please identify the specific parts of the Proposed Plan Change/Variation

Rule(s)

all

Or

Property Address

as above

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

see attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the Plan Change/Variation ☐

Accept the Plan Change/Variation with amendments as outlined below ☐

Decline the Plan Change/Variation ☒

If the Plan Change/Variation is not declined, then amend it as outlined below. ☐

see attached

I wish to be heard in support of my submission ☒

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


as solicitor and agent

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

10 November 2014

Date

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.

I could ☐ could not ☒ gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission please complete the following:

I am ☐ am not ☐ directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

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EXPANDED SUBMISSION ON PLAN CHANGES 372 – 373 – THREE KINGS, AUCKLAND

Our Interest

- [1] We own the site at 932 Mt Eden Road that we wish to develop eventually for medium density units.

Positive Comment

- [2] Plan Changes 372 & 373 have a number of positive aspects. It is inevitable that some of the land will be used for residential development and the proposed development concept has much to commend it. An integrated development plan for the locality, which enables its rehabilitation for urban use is to be encouraged. There is a sensitive treatment of view shafts to the volcanic cone and there is a consideration of open space requirements arising from a significant increase in urban population.
- [3] Plan 372 which incorporates the Crown parcel (parcel B) is the most integrated proposal. The incorporation of this land is essential to create an outcome encompassing good urban design and good linkages between the proposed residential development in the existing town centre. Without that, the result is disjointed.
- [4] The concept of tiered apartments on the Mt Eden Road edge is innovative and overcomes a range of constraints in a way that might work, provided it is designed appropriately.
- [5] Not challenge the general proposition the land is generally suitable for more intense residential and urban development.

Deficient aspects of the applicant

- [6] The layout plan that is put forward is called a “concept plan”. A concept plan is different from a master plan. There are also weak linkages to this concept plan in the policy, rules, methods and assessment criteria. Given the strategic importance of this site and the importance that adjoining land owners know exactly the type and scale of development, it is essential that there is a master plan. Further, the master plan must

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be entrenched in the planning instruments so that the broad outcomes intended to be secured by the Master plan will be achieved. The planning assessment as to how the provisions will work in practice is obscure.

- [7] Plan Change 373 suffers from the deficiency of not addressing the important linkage with the town centre. It also does not demonstrate that the open space will have any general value to the wider community, because of poor linkages.
- [8] There is no detailed analysis of reserve requirements for this intended population and there is no evidence that the proposed open space meets the recreation strategy of the Auckland Council. The recreational impacts of increased intensification need to consider not only this proposal, but the intended zoning of land around the area for terrace housing in apartment zone. The recreation and open space demand analysis is deficient.
- [9] Plan Change 373 essentially creates an isolated single road access development that does not connect well to the wider environment and represents poor urban design planning.
- [10] A paucity of urban design analysis of the treatment required for Mt Eden Road frontage supported by appropriate visual aids, leaves the intended outcomes for this important frontage unclear. A more detailed design statement should be required to enable proper analysis of its urban design merits. Particularly, as there will be large structures on an important interface..
- [11] There is no consideration of mixed use and the need for additional facilities, other than residential use, to accommodate the expanded population. Given the intended apartment zoning under the unitary plan for the general area, it is critical that there is sufficient retail and commercial space available to service the local population. It is far from clear that a change from business zoning to residential for the entire site (excluding open space) is the most efficient and effective use of resources and is the most appropriate outcome.

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- [12] The RMA, s 32 analysis is weak in relation to the alternatives assessment. The option of retention of business zoning is dismissed as inappropriate on the basis that the quarry will not continue. However, other business uses could be accommodated especially closer to the town centre. A more in-depth s 32 analysis would consider business and commercial use in addition to residential use, particularly located closer to the town centre. The analysis is generally focussed on the landowners principal interest in developing land for residential development, rather than reviewing the wider context and developing a strategic plan for the locality.
- [13] What is required is a more strategic high level analysis that considers the neighbourhood and how it may change as a result of the strategic direction expressed in the unitary plan. Then determining what scale and function of town centre is required in that locality and whether any additional land is required. Also what is required is a recreation strategy that shows how the intended development will work with existing recreational facilities in the locality and meet demand in the future. This approach needs the support or buy in of the Council.

Changes to the plan provisions if either Plan Change is approved

- [14] The following are the general areas where improvement is required in plan provisions if either plan change is approved:
- (a) A more detailed design statement and consideration of the opportunities/constraints of apartment development up to four floors on Mt Eden Road. This includes a full statement of the scale, bulk location and design treatment to achieve an appropriate relationship to residential land to which the apartments will face, having regard to topography and layout. Perhaps limit height to three floors and a greater set back;
 - (b) Ensure that the development plan is appropriate for the locality and of sufficient detail to be incorporated in the plan as a “master plan”;
 - (c) Include as an objective/goal for this locality, implementation of the approved master plan;

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- (d) Incorporate by reference in the District Plan, all of the design material accompanying the plan change application, including any additional design material supplied to assist decision makers when they come to make resource management decisions;
- (e) A more detailed policy for the treatment of the Mt Eden Road frontage based on an improved design analysis.
- (f) Ensure there are rules and methods that classify construction of apartment buildings as at least a restricted discretionary activity with full assessment criteria related to urban design, street appeal and relationship to adjoining residential context, as well as achievement of the design principles specifically developed for the design of the Mt Eden Road frontage;
- (g) Ensure there is notification of restricted discretionary activities where a building has frontage to Mt Eden Road;
- (h) Reduce the number of driveways located on Mt Eden Road;
- (i) Set minimum requirements for retail use at grade for the apartment buildings on Mt Eden Road to ensure full activation of the Mt Eden Road frontage;
- (j) In addition, we request any other relief, whether in the form of change of objectives, policies, rules or method to secure the best possible urban design outcome for the intended development of the site.

Discussions

[15] We are happy to attend any meetings or discussions to address our concerns.

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

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



Correspondence to :

This document is by John William Maassen, solicitor of the firm Cooper Rapley. The address for service is 240 Broadway Avenue, Palmerston North. documents for service may be left at that address for service or may be:
(a) posted to PO Box 1945, Palmerston North 4440, or
(b) left for the solicitor at a document exchange for direction to DX PP 80001, Palmerston North, or
(c) transmitted to the solicitor by email to jmaassen@crlaw.co.nz

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name of Submitter or Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Margaret Anne Bilsland and Anne Houghton

Organisation Name (if submission is on behalf of Organisation)

Address for service of the Submitter

as above

Telephone:

027 271 2999

Email:

jwmaassen@gmail.com

Contact Person: (Name and designation if applicable)

Scope of submission

This is a submission to:

Plan Change/Variation Number

Plan Modification 372

Plan Change/Variation Name

Private Plan Change: 985 Mt Eden Rd Three Kings

To the (indicate which plan below)

Relevant District Plan:

☐ Auckland Central

☐ Auckland Gulf Islands

☒ Auckland Isthmus

☐ Franklin

☐ Manukau

☐ North Shore

☐ Papakura

☐ Rodney

☐ Waitakere

Relevant Regional Plan/ Policy Statement:

☐ Coastal

☐ Sediment Control

☐ Proposed Air Land Water

☐ Farm Dairy Discharges

☐ Transitional Regional Plan

☐ Auckland Regional Policy Statement

The specific provisions that my submission relates to are:

Please identify the specific parts of the Proposed Plan Change/Variation

Rule(s)

all

Or

Property Address

as above

Or

Map

Or

Other (specify)

Submission

Submission No 125

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

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

see attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the Plan Change/Variation ☐

Accept the Plan Change/Variation with amendments as outlined below ☐

Decline the Plan Change/Variation ☒

If the Plan Change/Variation is not declined, then amend it as outlined below. ☐

see attached

I wish to be heard in support of my submission ☒

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


as solicitor and agent
Signature of Submitter
(or person authorised to sign on behalf of submitter)

10 November 2014
Date

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.

I could ☐ could not ☒ gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission please complete the following:

I am ☐ am not ☐ directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Submission No 125

EXPANDED SUBMISSION ON PLAN CHANGES 372 – 373 – THREE KINGS, AUCKLAND

Our Interest

- [1] We own the site at 932 Mt Eden Road that we wish to develop eventually for medium density units.

Positive Comment

- [2] Plan Changes 372 & 373 have a number of positive aspects. It is inevitable that some of the land will be used for residential development and the proposed development concept has much to commend it. An integrated development plan for the locality, which enables its rehabilitation for urban use is to be encouraged. There is a sensitive treatment of view shafts to the volcanic cone and there is a consideration of open space requirements arising from a significant increase in urban population.
- [3] Plan 372 which incorporates the Crown parcel (parcel B) is the most integrated proposal. The incorporation of this land is essential to create an outcome encompassing good urban design and good linkages between the proposed residential development in the existing town centre. Without that, the result is disjointed.
- [4] The concept of tiered apartments on the Mt Eden Road edge is innovative and overcomes a range of constraints in a way that might work, provided it is designed appropriately.
- [5] Not challenge the general proposition the land is generally suitable for more intense residential and urban development.

Deficient aspects of the applicant

- [6] The layout plan that is put forward is called a “concept plan”. A concept plan is different from a master plan. There are also weak linkages to this concept plan in the policy, rules, methods and assessment criteria. Given the strategic importance of this site and the importance that adjoining land owners know exactly the type and scale of development, it is essential that there is a master plan. Further, the master plan must

Submission No 125

be entrenched in the planning instruments so that the broad outcomes intended to be secured by the Master plan will be achieved. The planning assessment as to how the provisions will work in practice is obscure.

- [7] Plan Change 373 suffers from the deficiency of not addressing the important linkage with the town centre. It also does not demonstrate that the open space will have any general value to the wider community, because of poor linkages.
- [8] There is no detailed analysis of reserve requirements for this intended population and there is no evidence that the proposed open space meets the recreation strategy of the Auckland Council. The recreational impacts of increased intensification need to consider not only this proposal, but the intended zoning of land around the area for terrace housing in apartment zone. The recreation and open space demand analysis is deficient.
- [9] Plan Change 373 essentially creates an isolated single road access development that does not connect well to the wider environment and represents poor urban design planning.
- [10] A paucity of urban design analysis of the treatment required for Mt Eden Road frontage supported by appropriate visual aids, leaves the intended outcomes for this important frontage unclear. A more detailed design statement should be required to enable proper analysis of its urban design merits. Particularly, as there will be large structures on an important interface..
- [11] There is no consideration of mixed use and the need for additional facilities, other than residential use, to accommodate the expanded population. Given the intended apartment zoning under the unitary plan for the general area, it is critical that there is sufficient retail and commercial space available to service the local population. It is far from clear that a change from business zoning to residential for the entire site (excluding open space) is the most efficient and effective use of resources and is the most appropriate outcome.

Submission No 125

- [12] The RMA, s 32 analysis is weak in relation to the alternatives assessment. The option of retention of business zoning is dismissed as inappropriate on the basis that the quarry will not continue. However, other business uses could be accommodated especially closer to the town centre. A more in-depth s 32 analysis would consider business and commercial use in addition to residential use, particularly located closer to the town centre. The analysis is generally focussed on the landowners principal interest in developing land for residential development, rather than reviewing the wider context and developing a strategic plan for the locality.
- [13] What is required is a more strategic high level analysis that considers the neighbourhood and how it may change as a result of the strategic direction expressed in the unitary plan. Then determining what scale and function of town centre is required in that locality and whether any additional land is required. Also what is required is a recreation strategy that shows how the intended development will work with existing recreational facilities in the locality and meet demand in the future. This approach needs the support or buy in of the Council.

Changes to the plan provisions if either Plan Change is approved

- [14] The following are the general areas where improvement is required in plan provisions if either plan change is approved:
- (a) A more detailed design statement and consideration of the opportunities/constraints of apartment development up to four floors on Mt Eden Road. This includes a full statement of the scale, bulk location and design treatment to achieve an appropriate relationship to residential land to which the apartments will face, having regard to topography and layout. Perhaps limit height to three floors and a greater set back;
 - (b) Ensure that the development plan is appropriate for the locality and of sufficient detail to be incorporated in the plan as a “master plan”;
 - (c) Include as an objective/goal for this locality, implementation of the approved master plan;

Submission No 125

- (d) Incorporate by reference in the District Plan, all of the design material accompanying the plan change application, including any additional design material supplied to assist decision makers when they come to make resource management decisions;
- (e) A more detailed policy for the treatment of the Mt Eden Road frontage based on an improved design analysis.
- (f) Ensure there are rules and methods that classify construction of apartment buildings as at least a restricted discretionary activity with full assessment criteria related to urban design, street appeal and relationship to adjoining residential context, as well as achievement of the design principles specifically developed for the design of the Mt Eden Road frontage;
- (g) Ensure there is notification of restricted discretionary activities where a building has frontage to Mt Eden Road;
- (h) Reduce the number of driveways located on Mt Eden Road;
- (i) Set minimum requirements for retail use at grade for the apartment buildings on Mt Eden Road to ensure full activation of the Mt Eden Road frontage;
- (j) In addition, we request any other relief, whether in the form of change of objectives, policies, rules or method to secure the best possible urban design outcome for the intended development of the site.

Discussions

[15] We are happy to attend any meetings or discussions to address our concerns.

Submission No 126

From: gemmaw28@gmail.com
To: [District Plans Central](#)
Cc: gemmaw28@gmail.com
Subject: District Plan online submission
Date: Monday, 10 November 2014 1:43:24 a.m.
Attachments: [PLAN CHANGE 373 SUBMISSION - Gemma Bridges.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Gemma Bridges
Organisation:
Agent:
Phone (daytime): 092730956
Phone (evening): 092149110
Mobile: 0212282899
Email address: gemmaw28@gmail.com
Postal address: 10 Dally Terrace, Three Kings
Post code: 1041
Date of submission: 10-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
Proposed Plan Change 373 to the Auckland Council District Plan (Operative Auckland City Isthmus Section 1999)

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Please refer to attached document.

I/We:
Generally support, but seek amendments

The reason for my/our views is:
Please refer to attached document.

Submission No 126

I/We seek the following decision from the council:

Accept the plan change/modification with amendments as outlined below

Proposed amendments:

- Removal of southern buildings acting as a barrier between the new development and the town centre and between the public open space and the town centre
- An increase in public Space
- View shafts improved
- An overall Master plan prepared
- Improved accessibility through the development
- please refer to the attached document

I/We wish to be heard at the council planning hearing:

No

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

PLAN CHANGE 373 SUBMISSION - Gemma Bridges.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

I am directly affected by an effect of the subject matter of this submission that:

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

Submission No 126

GEMMA BRIDGES

10 Dally Tce,
Three Kings,
Auckland 1041

PROPOSED PLAN CHANGE 373 TO THE AUCKLAND COUNCIL DISTRICT PLAN (OPERATIVE AUCKLAND CITY ISTHMUS SECTION 1999)

GENERAL

Issue:

The proposal is a poor Urban Design and community outcome. The proposal effectively creates a Gated Community (because of the proposed 15-18m level changes) at the exclusion of the wider community. The proposal is not resilient and is at odds with good Resource Management planning.

Relief Sought:

We wish to see a Masterplan prepared for the entire Three Kings Precinct area, including input from all Stakeholders including the community. We wish to see the site contoured differently – to allow for direct and accessible walkways and cycleways through the site for the community, and better integration with the town centre and surrounding neighbourhood. We wish to see a significant nett increase in Public Open Space and better integration with the existing park. We wish the applicant to consult with the community in a meaningful way.

CONNECTIVITY AND ACCESSIBILITY

Issue:

The proposed connections through the site rely on steep changes in gradient and indirect routes. Steep changes make for a major barrier to walkers and cyclists, particularly children. The proposal boasts about its connectivity when in fact the connectivity is very poor.

Further, there are very limited connections allowed for across the site that will be cycle/pushchair accessible. To cross the site from its northwest corner to its northeast corner (from the Maunga to Mt Eden road) will necessitate a detour not only 15 metres down the hole in altitude, then back up 15m to the road, but also require the walker or cyclist to travel a long way south into the development.

The site will act as a major barrier to movement for walkers, cyclists and pedestrians - in fact little better than the current quarry hole. The community needs better than this.

Relief Sought:

I would like dedicated walking and cycling trails to form strong and direct routes with North-South and East West connections through the quarry site – without steep gradient changes. These routes should be formed in consultation with Greenways Network. It would be ideal if children in the wider community could make their way to and from Three Kings Primary School through the development without needing to travel along Mt Eden Road. This would also reduce school traffic movement if children could safely make their way to and from school independently or with a walking school bus.

Submission No 126

PUBLIC OPEN SPACE

Issue:

There is only a minor increase in public open space proposed. This is a very poor and disappointing community outcome. With this many new people proposed to live in the area, the amount of public open space should increase significantly.

Relief Sought:

I would like to see a significant increase in the amount of Public open recreational space (and not just sports fields). I request that there is a significant increase in Public recreation space (excluding roads) – and that a variety of outdoor recreational activities are included in the Masterplan design. This would include a network of separate walkways and cycleways to enable the public to easily cross the site without significant level changes. We would like at least 50% of the quarry site to be zoned Open Space (excluding roads).

Issue:

There is no integrated design scheme that includes the input from all parties including the community.

Relief Sought:

I request that a masterplan be prepared for the entire Three Kings Precinct area, (including Big King, other reserves, the shopping precinct, and the surrounding neighbourhood), in conjunction with all stakeholders including the community.

RESTORATION OF TE TĀTUA A RIUKIUTA / BIG KING

Issue:

Little to no restoration of Maunga is proposed. Te Tātua a Riukiuta / Big King must be restored to compensate the community, for at least some of the commercial value that has been extracted from the natural capital and natural character of the area over the last 80 years.

Relief Sought:

That the Eastern slope of Big King be restored to form a natural slope. I would like to see the land restored in a more meaningful way that respects the Maunga, the natural ecosystem, and the wishes of the community to move easily through the area.

DENSITY

Issue:

I consider that the proposed density is excessive and out of keeping with the neighbourhood and that it will overwhelm the existing Infrastructure.

Relief Sought:

That the zoning be independently assessed against similar areas in the city. I request that a full Auckland Transport Network Model analysis be undertaken before the application is assessed. I request that an analysis of Schools and Community Facilities is undertaken before the application is assessed.

Submission No 126

GRAHAME BREED DRIVE

Issue:

I ask that Grahame Breed Drive to remain a quiet, leafy, pedestrian friendly road and not a major vehicle access road (including traffic lights) to private development.

Relief Sought:

That Grahame Breed Drive is not used as a main vehicle road into the proposed development.

VIEWSHAFTS

Issue:

The proposed viewshafts shown in the Plan Change are inadequate and do not provide the public with good views of the Maunga (Big King) from key public spaces. (Eg. The current viewshafts on Mt Eden Rd are within the site and therefore the views from Mt Eden Road are not assured)

Relief Sought:

That views to the Maunga are maintained and created in key public spaces – including along Mt Eden Road and from outside of the Fickling Centre. That the viewshafts be independently assessed and that consultation with all Stakeholders be undertaken before finalising these locations. That the viewshafts become a part of an overall masterplan for the Precinct. That viewshafts to retain views of Maungawhau (Mt Eden) and Maungakiekie (One Tree Hill) are included in the view shaft analysis.

SUSTAINABILITY

Issue:

The proposed development will be built at a time when the PAUP (Proposed Auckland Unitary Plan) will be operative.

Relief Sought:

I request that the environmental standards in the PAUP (for Land, infrastructure, and buildings) be implemented now as part of this Plan Change PA373. I request that all dwellings be constructed to Greenstar standards as proposed in the PAUP, and that visual privacy provisions are included in this application.

CUMULATIVE EFFECTS

Issue:

The proposal does not take into account the cumulative effects of this development (approximately 4000 people proposed) and growth as a result of the Unitary Plan (approximately 3000 people).

Relief Sought:

For a proposal of this scale it is essential that a full Auckland Transport Network Model analysis is carried out to assess the transport effects, before any re-zoning can take place. The principle transport route is at capacity and will always be limited by the bottleneck at Mt Eden Village.

An analysis of schooling in the area also needs to be undertaken – as the population increase will potentially double the Three Kings Primary School role. I request that the Ministry of Education is consulted prior to the approval of any Plan Changes.

Submission No 126

ENVIRONMENT COURT DECISION

Issue:

A decision of the Environment Court NZEnv C 130 and NZ Env C 214 specifies a minimum contour for the quarry site, this contour being first proposed by the consent holder (Fletcher Concrete and Infrastructure, a division of Fletcher Building Ltd viz: the current applicant) at a joint hearing of the Auckland Regional Council and Auckland City Council involving independent commissioners. This contour (Harrison and Grierson Plan 122314 Fig 002) was subsequently also presented at Appeal before the Environment Court and agreed to by all parties. PA373 radically departs from the decision of the Court and appears now to place the consent holder in breach of two key current fill consent conditions (viz conditions #76 and #77. The changes to contour and restoration processes now proposed are so large that the applicant should be required to apply for a new consent rather than for a variation of the current consent.

Relief Sought:

The applicant should be required to apply for a new consent rather than a variation of the current consent. Any such application should be processed prior to Council considering PPC372, particularly now that it is proposed to re-excavate fill already placed (which will involve mixing cells) and to switch to an engineered fill approach.

INFRASTRUCTURE

Issue:

The underground infrastructure in the catchment (viz: stormwater and sewage) is currently at capacity in the Meola catchment and this is acknowledged in the application. The scale and intensity of the development proposed in PA373 far exceeds current capacity. PPC373 therefore is clearly premature and requires access to the Central interceptor Project (currently under appeal) and not scheduled for completion until 2030 or later. The existing wastewater proposal is not resilient and relies on a holding tank pumping into the existing (at capacity) Combined Drain between rain events. There is only an 8 hour holding capacity, no generator back-up, and the overflow is in the same location as the stormwater system.

Relief Sought:

I request that the stormwater is independently reviewed and that the final system is resilient and not reliant on mechanical pumps. I request that the proposed stormwater system is independently reviewed and that site testing is carried out – to ensure that the proposed system is resilient.

MT EDEN RD FRONTAGE

Issue:

The proposed zoning does not allow for an Active Edge along Mt Eden Rd (for the types of business activities that are currently occupy this streetfront).

Relief Sought:

I request that the zoning is modified to specifically allow for Business Activities (including Offices) to take place on Mt Eden Rd – and at least 75% of the road frontage is required to be an 'Active Edge' and not ground floor residences. I also request that a Landscape Plan be prepared – that includes the necessity for large trees to be planted down the Mt Eden Rd frontage – to form a tree lined Boulevard.

Submission No 126

THE AUCKLAND PLAN

Issue:

The proposal does not in keeping with the objectives of Chapter 11 of The Auckland Plan.

Relief Sought:

I request that Affordable Housing is included in the proposal.

DENSITY

Issue:

The density of development proposed is out of scale with the size of the site, infrastructure, and the proposed topography.

Relief Sought:

I request that the density be assessed against the current and future infrastructure requirements – before any approval is given for a zone change.

These and many other uncertainties that will be addressed at the hearing indicate that Council should not approve PA373 in its present form.

Council approval would be contrary to sound Resource Management Practice and would not comply with key provisions of the Resource Management Act 1991.

Submission No 127

From: gemmaw28@gmail.com
To: [District Plans Central](#)
Cc: gemmaw28@gmail.com
Subject: District Plan online submission
Date: Monday, 10 November 2014 12:58:29 a.m.
Attachments: [PLAN CHANGE 372 SUBMISSION - Gemma Bridges.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Gemma Bridges
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Email address: gemmaw28@gmail.com
Postal address: 10 Dally Terrace, Three Kings
Post code: 1041
Date of submission: 10-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
Proposed Plan Change 372 to the Auckland Council District Plan (Operative Auckland City Isthmus Section 1999)

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Please refer to attached document.

I/We:
Oppose

The reason for my/our views is:
Please refer to attached document.

Submission No 127

I/We seek the following decision from the council:

Decline the plan change/modification

Proposed amendments:

Please refer to attached document.

I/We wish to be heard at the council planning hearing:

No

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

PLAN CHANGE 372 SUBMISSION - Gemma Bridges.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission

I am directly affected by an effect of the subject matter of this submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Submission No 127

GEMMA BRIDGES

10 Dally Tce,
Three Kings,
Auckland 1041

PROPOSED PLAN CHANGE 372 TO THE AUCKLAND COUNCIL DISTRICT PLAN (OPERATIVE AUCKLAND CITY ISTHMUS SECTION 1999)

GENERAL

It is my strong belief that Council approval of this plan would be contrary to sound Resource Management Practice and would not comply with key provisions of the Resource Management Act 1991.

Issue:

The proposal is a poor Urban Design and community outcome. The proposal effectively creates a Gated Community (because of the proposed 15-18m level changes) at the exclusion of the wider community. The proposal is not resilient and is at odds with good Resource Management planning. The proposal creates a future for the area plagued with problems.

Relief Sought:

We wish to see a Masterplan prepared for the entire Three Kings Precinct area, including input from all Stakeholders including the community. We wish to see the site contoured differently – to allow for direct and accessible walkways and cycleways through the site for the community, and better integration with the town centre and surrounding neighbourhood. We wish to see the maunga restored on its eastern slopes. We wish to see a significant nett increase in Public Open Space and better integration with the existing park. We wish the applicant to consult with the community in a meaningful way.

PRIVATE PROFIT VS PUBLIC BENEFIT

Issue:

I object to high value Public Land being swapped for lower value sports fields (at the bottom of an 18m deep hole).

Relief Sought:

That private land is not swapped to benefit private interests without a comprehensive Masterplan being undertaken. I would like there to be an independent Valuation carried out and that this is a transparent process.

Issue:

There a decrease in public open space. This is a very poor and disappointing community outcome.

Relief Sought:

I would like to see a significant increase in the amount of Public open recreational space (and not just sports fields). I request that there is a significant increase in Public recreation space (excluding roads) – and that a variety of outdoor recreational activities are included in the Masterplan design. This would include a network of separate walkways and cycleways to enable the public to easily cross the site without significant level changes. We would like at least 50% of the quarry site to be zoned Open Space (excluding roads).

Submission No 127

Issue:

I would like an integrated design scheme that includes the input from all parties including the community.

Relief Sought:

I request that a masterplan be prepared for the entire Three Kings Precinct area, (including Big King, other reserves, the shopping precinct, and the surrounding neighbourhood), in conjunction with all stakeholders including the community.

CONNECTIVITY AND ACCESSIBILITY

Issue:

There are insufficient proposed connections through the site that can be navigated by walkers, cyclists, and pushchairs. The proposed connections through the site rely on steep changes in gradient and indirect routes. Many have steps instead of gentle ramps. Steep changes make for a major barrier to walkers and cyclists, particularly children. The proposal boasts about its connectivity when in fact the connectivity is extremely poor.

For example: To cross the site from its northwest corner to its northeast corner (from the Maunga to Mt Eden road) will necessitate a detour not only 15 metres down the hole in altitude, then back up 15m to the road but also require the walker or cyclist to travel a long way south into the development.

The site will act as a major barrier to movement for walkers, cyclists and pedestrians - in fact little better than the current quarry hole. The community needs better than this.

Relief Sought:

I would like dedicated walking and cycling trails to form strong and direct routes with North-South and East West connections through the quarry site – without steep gradient changes. These routes should be formed in consultation with Greenways Network. It would be ideal if children in the wider community could make their way to and from Three Kings Primary School through the development without needing to travel along Mt Eden Road. This would also reduce school traffic movement if children could safely make their way to and from school independently or with a walking school bus.

RESTORATION OF TE TĀTUA A RIUKIUTA / BIG KING

Issue:

Little to no restoration of the Maunga is proposed. Te Tātua a Riukiuta / Big King must be restored to compensate the community, for at least some of the commercial value that has been extracted from the natural capital and natural character of the area over the last 80 years. Auckland has aspirations of establishing a World Heritage Park with its field of maunga. This plan is not consistent with the respect we need to treat the maunga with if we are serious about protecting and preserving this heritage. We have one chance to restore this maunga and that is right now.

Relief Sought:

That the Eastern slope of Big King be restored to form a natural slope. I would like to see the land restored in a more meaningful way that respects the Maunga, the natural ecosystem, and the wishes of the community to move easily through the area.

Submission No 127

DENSITY

Issue:

The proposed density is excessive and out of keeping with the neighbourhood and that it will overwhelm the existing Infrastructure. While it is true that Auckland is in need of new housing, it must be done in a way consistent with good urban planning. 1500 new dwellings in this hole is not consistent with good urban planning.

Relief Sought:

That the zoning be independently assessed against similar areas in the city. I request that a full Auckland Transport Network Model analysis be undertaken before the application is assessed. I request that an analysis of Schools and Community Facilities is undertaken before the application is assessed.

GRAHAME BREED DRIVE

Issue:

I ask that Grahame Breed Drive to remain a quiet, leafy, pedestrian friendly road and not a major vehicle access road (including traffic lights) to private development.

Relief Sought:

That Grahame Breed Drive is not used as a main vehicle road into the proposed development.

VIEWSHAFTS

Issue:

The proposed viewshafts shown in the Plan Change are inadequate and do not provide the public with good views of the Maunga (Big King) from key public spaces. (Eg. The current viewshafts on Mt Eden Rd are within the site and therefore the views from Mt Eden Road are not assured)

Relief Sought:

That views to the Maunga are maintained and created in key public spaces – including along Mt Eden Road and from outside of the Fickling Centre. That the viewshafts be independently assessed and that consultation with all Stakeholders be undertaken before finalising these locations. That the viewshafts become a part of an overall masterplan for the Precinct. That viewshafts to retain views of Maungawhau (Mt Eden) and Maungakiekie (One Tree Hill) are included in the view shaft analysis.

CUMULATIVE EFFECTS

Issue:

The proposal does not take into account the cumulative effects of this development (approximately 4000 people proposed) and growth as a result of the Unitary Plan (approximately 3000 people).

Relief Sought:

For a proposal of this scale it is essential that a full Auckland Transport Network Model analysis is carried out to assess the transport effects, before any re-zoning can take place. The principle transport route is at capacity and will always be limited by the bottleneck at Mt Eden Village.

An analysis of schooling in the area also needs to be undertaken – as the population increase will potentially double the Three Kings Primary School role. I request that the Ministry of Education is consulted prior to the approval of any Plan Changes.

Submission No 127

MT EDEN RD FRONTAGE

Issue:

The proposed zoning does not allow for an Active Edge along Mt Eden Rd (for the types of business activities that are currently occupy this streetfront). The long line of apartment buildings with no active Edge is a major change to the current use of Mt Eden Rd and represents a loss of amenity.

Relief Sought:

I request that the zoning is modified to specifically allow for Business Activities (including Offices) to take place on Mt Eden Rd – and at least 60% of the road frontage is required to be an ‘Active Edge’ and not ground floor residences. I also request that a Landscape Plan be prepared – that includes the necessity for large trees to be planted down the Mt Eden Rd frontage – to form a tree lined Boulevard.

THE AUCKLAND PLAN

Issue:

The proposal is not in keeping with the objectives of Chapter 11 of The Auckland Plan.

Relief Sought:

I request that Affordable Housing is included in the proposal.

DENSITY

Issue:

The density of development proposed is out of scale with the size of the site, infrastructure, and the proposed topography.

Relief Sought:

I request that the density be assessed against the current and future infrastructure requirements – before any approval is given for a zone change.

GENERAL

It is my strong belief that Council approval of this plan would be contrary to sound Resource Management Practice and would not comply with key provisions of the Resource Management Act 1991.

Submission No 128

From: byers.stacey@gmail.com
To: [District Plans Central](#)
Cc: byers.stacey@gmail.com
Subject: District Plan online submission
Date: Sunday, 9 November 2014 10:41:04 p.m.
Attachments: [PLANCHANGE372and373SUBMISSION-StaceyByers.pdf](#)

Thank you for your submission.

Once submissions close, a summary of submission will be prepared. At a later date, Auckland Council will hold hearings to consider all submissions.

If you selected to be heard at a hearing then we will be in touch when hearings are scheduled.

If you have any questions, please contact us on 09 301 0101.



Contact details

Full name: Stacey Elizabeth Byers
Organisation:
Agent:
Phone (daytime): 09-940-6860
Phone (evening):
Mobile:
Email address: byers.stacey@gmail.com
Postal address: 10 Henshaw Ave, Mt Roskill
Post code: 1042
Date of submission: 9-Nov-2014

Submission details

This is a submission on the following plan change/modification (state plan change/modification name and number):
Plan modification 372

Please select the district plan your submission relates to:
Auckland Isthmus

The specific provision of the plan change/modification that my submission relates to:
Rezoning of public land
Connectivity and Accessibility
Restoration of Te Tātua a Riukiuta / Big King
Density
Grahame Breed Drive
Infrastructure - Wastewater & transportation
Viewshafts

I/We:

Submission No 128

Oppose

The reason for my/our views is:

Issue: The proposal is a poor Urban Design and community outcome. The proposal effectively creates a Gated Community (because of the proposed 15-18m change in height) at the exclusion of the wider community. The proposal is not resilient and is at odds with good Resource Management planning.

Relief Sought: I wish to see a Masterplan prepared for the entire Three Kings Precinct area, including input from all Stakeholders including the community. I wish to see the housing density of the site decreased. I wish to see an independent transportation management plan prepared for Mt Eden Road. I wish to see the site contoured differently – to allow for direct and accessible walkways and cycleways through the site for the community, and better integration with the town centre and surrounding neighbourhood. I wish to see a significant net increase in Public Open Space and better integration with the existing park. I wish the applicant to consult with the community in a meaningful way.

I/We seek the following decision from the council:

Decline the plan change/modification

I/We wish to be heard at the council planning hearing:

Yes

I/We would be prepared to present a joint case at the hearing with any others making a similar submission:

Yes

Attach a supporting document:

PLANCHANGE372and373SUBMISSION-StaceyByers.pdf

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

Accept

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act:

I could not gain an advantage in trade competition through this submission