

Further Submission No. 1174

From: Tracey Fox [Tracey.Fox@boffamiskell.co.nz] on behalf of Phil Stickney [Phil.Stickney@boffamiskell.co.nz]
Sent: Monday, 28 May 2007 15:10
To: hgiplan
Cc: Phil Stickney
Attachments: 05199-001 28-05-07 Further submission Hauraki Gulf Planning Group.pdf; 05199-002 28-05-07 Further submission Department of Conservation.pdf; 05199-003 28-05-07 Further submission Auckland Conservation Board.pdf; 05199-004 28-05-07 Further submission Auckland Regional Council.pdf

Good Afternoon

Please find attached, further submissions on behalf of the Salvation Army New Zealand Trust Board.

Kind regards



Boffa Miskell

Tracey Fox

email: tracey.fox@boffamiskell.co.nz | tel: 64 9 358 25 26 | fax: 64 9 359 53 00
PO BOX 91 250 | LEVEL 3, IBM CENTRE | 82 WYNDHAM STREET | AUCKLAND | NEW ZEALAND
www.boffamiskell.co.nz

Note:

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. **Boffa Miskell Ltd** and any of its subsidiaries each reserve the right to monitor all e-mail communications through its networks.

Any views expressed in this message are those of the individual sender, except where the message states otherwise and the sender is authorized to state them to be the views of any such entity.

Thank You.

Level 3
IBM Centre
82 Wyndham Street
Auckland
New Zealand

PO Box 91250
Auckland 1142
New Zealand

Tel: 64 9 358 2526
Fax: 64 9 359 5300
www.boffamiskell.co.nz



FURTHER SUBMISSION UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

1. General Information

Further Submitter Name: The Salvation Army New Zealand Trust Board

Organisation/Agent: Boffa Miskell Limited
Bell Gully

Address for Service: Boffa Miskell Limited
PO Box 91250
Auckland 1030
Attn: Phil Stickney / John Goodwin

Phone: (09) 358 2526 Fax: (09) 359 5323

Bell Gully
Counsel for the Salvation Army New Zealand Trust Board
P O Box 4199
Auckland 1030
Attn: David McGregor / Lisa Bartrum

Phone: (09) 916 8800 Fax: (09) 916 8801

2. Further Submission to "Barry Kaye on behalf of Hauraki Gulf Planning Group" (Council Reference: 947)

The Salvation Army New Zealand Trust Board ("The Army") wishes to make a further submission on the above submission.

3. The reason for the further submission is:

3.1 The submission raises a number of points. The reasons for, and the support or opposition to the submission points are set out below:

Submission Number	Plan Reference	Support/Oppose Submission	Further Submission
<i>Hauraki Gulf Planning Group – Barry Kaye</i>			
947/10	10a.27.4	Oppose	The Army considers that the integrated approach methodology of the Proposed Plan provides sufficient flexibility to ensure an effects based assessment of a proposal, whether it incorporates retaining existing facilities, incorporates new development, or is a hybrid of both.
947/11	10a.27.5.1	Oppose	The Army considers that the submission provides insufficient information to support a discretionary activity status for multiple dwellings.
		Oppose	The Army is of the view that it is inappropriate to provide for a caretakers dwelling as a restricted discretionary activity given that caretakers dwellings are essential to the functionality and maintenance of the Island.
		Support	The Army agree that outdoor recreation should be provided for as a permitted activity so as to be consistent with the resource management strategy for the Conservation/Residential Area.
		Oppose	The Army is of the view that it is inappropriate to provide for "any structures" as a restricted discretionary activity as the term "any structures" is too broad.
947/12	10a.27.5.2	Oppose	The Army considers that the submission provides insufficient information to support a discretionary activity status for new buildings or additions/alterations to existing buildings.
		Oppose	The Army is of the view that it is inappropriate to provide for a caretakers dwelling as a restricted discretionary activity given that caretakers dwellings are essential to the functionality and maintenance of

Submission Number	Plan Reference	Support/Oppose Submission	Further Submission
		Support	the Island. The Army agree that outdoor recreation should be provided for as a permitted activity so as to be consistent with the resource management strategy for the Visitor Area A and B.
		Oppose	The Army is of the view that it is inappropriate to provide for "any structures" as a restricted discretionary activity as the term "any structures" is too broad.
		Oppose	The Army consider that the submission provides insufficient information to support a restricted discretionary activity status for maintenance and formation of accessways and roads.
		Support in part	The Army maintain that it is appropriate to provide for wharf administration and freight handling activities as a permitted activity service given that the Visitor Area is intended to provide the service infrastructure for the island.
947/14	10a.27.5.2	Oppose	The submission does identify (in a separate sheet) what current/historical uses should be included in the activity table for Visitor Areas A and B. It is not considered that the inclusion of these uses is appropriate given that such uses are likely to have existing use rights.
947/15	10c.5T	Oppose	The Army opposes the changes sought, as they are too restrictive, are too prescriptive and do not provide flexibility in design outcomes, and are not justified, when considered in the context of the broader matters for assessment of such development included in the Plan.
947/17	10c.5T	Oppose	The Army considers that a reduction of the building footprint for dwellings on the Island would restrict the ability to blend developments into the natural landscape. The Army consider that a non-complying activity status for buildings over 250m ² is unduly onerous given the nature of activities proposed for the Island.
947/18	10c.5T	Oppose	The Army maintain that Visitor Area A will become overly complicated if it is split into 2 parts with a prescribed maximum coverage ratio allocation for each sub-part.

Submission Number	Plan Reference	Support/Oppose Submission	Further Submission
947/19	10a.5F	Oppose	It is unclear what is being sought by the submission because the terms "defined conservation strip" and "wharf access alignment" are not defined.
947/2	12.1	Oppose	It is unclear what is being sought by this submission. Public recreation or public visitor related activities will be provided for on the Island but their context in relation to subdivision is uncertain at this point in time.
947/20	10.a.27	Oppose Support	Provision in the Proposed Plan for access to the water for boat launching by the public generally is not appropriate on account of the unique ownership of the Island by the Army. The Army agree that it is appropriate to provide for maintenance of the access to the wharf as a controlled activity on account of the wharf being an entry point onto the Island.
947/21	10.a.27	Oppose	The Army consider that a requirement for a specific conservation management strategy is prescriptive and not suitable for inclusion in the Proposed Plan. Such a level of detail should accompany applications for any development and building proposals.
947/22	10a.27.5.2	Oppose	The Army maintains that it is inappropriate to include the list of historical and recent activities which the submission identifies on the basis that such activities will be protected by existing use rights.
947/23	10a.27.3	Oppose	The Army consider that the submission is overly prescriptive given that the Proposed Plan makes adequate provision for recreation activities and public access opportunities where appropriate.
947/24	A1b	Oppose	The Army consider that it is not necessary to include the existing chapel and the 'ex army' accommodation block on Rotoroa in the cultural and heritage provisions of the Proposed Plan because there are separate mechanisms for scheduling and registration of such items.
947/3	10a.27.1	Support in part	The Army agree that clause 10a.27.1 should refer to the potential for sustainable re-use of existing buildings and their enhancement for recreation and visitor related uses but the Army consider that making sustainable re-use of existing buildings a requirement under the Proposed Plan is impractical on account of compliance difficulties.
947/4	10a.27.2	Support in part	The Army agree that clause 10a.27.2 should refer to the potential for sustainable re-use of existing buildings

Submission Number	Plan Reference	Support/Oppose Submission	Further Submission
			and their enhancement for recreation and visitor related uses but the Army consider that making sustainable re-use of existing buildings a requirement under the Proposed Plan is impractical on account of compliance difficulties.
947/5	10a.27.2	Support	The Army agree that appropriate reference to recreation activities should be made at an "issues" level to ensure consistency with the planning provisions proposed for the Island.
947/6	10a.27.3	Oppose	The Army maintain that clause 10a.27.3 as proposed already makes adequate provision for visitor activities and recreation activities in the Objective and Policies prescribed.
947/7	10a.27.4.	Oppose	The areas allocated are considered to provide sufficient control as to where activities may establish. The house locations denote the future extent of development within the Conservation Residential Area. Separate or further delineation is not considered necessary.
947/8	10a.5F	Oppose	The Army consider that Visitor Area A would become unnecessarily complicated by splitting it into 2 parts.
947/9	10c.5T	Oppose	The Army consider that the submission provides insufficient information to enable an assessment of merits to be made.

3.2 The Army wishes to be heard in respect of this further submission. If others make similar submissions, the Army will be prepared to consider presenting a joint case with them at any hearing.

Signed for and behalf of
The Salvation Army New Zealand Trust Board

28 May 2007

Date

Address for Service:
Boffa Miskell Limited
PO Box 91250
AUCKLAND 1030
Attn: Phil Stickney

Bell Gully
Counsel for the Salvation Army New Zealand Trust Board
P O Box 4199
Auckland 1030
Attn: Lisa Bartrum