



Submission on a notified proposal for Plan Change 88 (Private): Beachlands South

1.0 SUBMITTER DETAILS

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2.0 SCOPE OF SUBMISSION

This is a submission on proposed Private Plan Change 88: Beachlands South

Plan Provisions:	The full extent of Proposed Change 88 (Private) – Beachlands South, as described in the Public Notice dated 20 January 2023 on the Auckland Council website ¹ , and any consequential amendments arising therefrom.
Property Address:	The properties including 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands (as described on the Council’s website ²).
Map:	The full extent of the proposed private plan change (including all off site dependencies and effects) as identified, described, or illustrated in the PPC88 request, supporting technical reports, Section 32 evaluation, supplementary information, and revisions as notified on 20 January 2023 and listed on the Council’s website on 10 March 2023 ³ .

3.0 SUBMISSION

Our submission **opposes** the proposed Private Plan Change in its present form.

The specific parts of the plan change to which our submission relates are:

The application in its entirety and the full extent of proposed changes, including (but not limited to):

1. The nature and extent of the proposed ‘live’ Residential, Business, & Open Space Zoning.

¹ <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-public-notice-notification.pdf>

² <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=187>

³ <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=187>

2. The nature and extent of the proposed Future Urban Zone (FUZ) on the southern portion.
3. The new precinct (and sub-precincts) that replace the existing Whitford Precinct (and sub-Precinct) provisions.

The reasons for our views are:

As described in *Attachment 1*.

We seek the following decision by council:

Decline the proposed plan change. If the proposed plan change is not declined, then amend it as outlined below:

As described in *Attachment 1*.

4.0 SUBMISSION AT THE HEARING

We wish to be heard in support of our submission.

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

5.0 TRADE COMPETITION

We could not gain an advantage in trade competition through this submission.



Signature:

Date: 10 March 2023

Attachment 1

Reasons for submission

1 Background & Context

- 1.1 The Whitford Residents & Ratepayers Association (WRRRA) was formed in 1968, and since then has been promoting the wellbeing of the Whitford Community. Is a volunteer organisation that seeks to improve the lifestyle of all those who live in and around the Whitford Village by progressing community, social, sporting, and environmental issues.
- 1.2 The WRRRA had a key role in the development of the existing Auckland Unitary Plan (AUP) Whitford Precinct provisions (in which the subject site is located) and has maintained an interest in how those provisions are administered or changed over time.

2 Urban Growth

- 2.1 For the purposes of the Resource Management Act (RMA), “sustainable management means managing the use, development, and protection of natural and physical resources in a way, or **at a rate**, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety ...” [Emphasis added].
- 2.2 Private Plan Change 88: Beachlands (PPC88) seeks to rezone approximately 307 hectares of Rural – Countryside Living zoned land with a contiguous boundary to existing coastal town of Beachlands. Just over half of the area (160ha) would assume a variety of ‘live’ urban zones, while the remaining land (approximately 148ha) to the south is to be zoned Future Urban.
- 2.3 In response to the Council’s Clause 23 request, the applicant suggests that Objective B2.2.1(2) “refers to urban growth within the RUB”, and because PPC88 is outside the RUB, “this objective and associated policies are considered to be of little relevance to this Plan Change request”. A similar line of reasoning was advanced in the *Ahuareka* appeal, and the Environment Court shared its thoughts on the matter in its subsequent decision.
- 2.4 It is our view that the applicant’s analysis of the objectives and policies of the AUP are insufficiently nuanced and appear to follow a more binary ‘rural vs urban’ approach. To suggest everything outside the RUB is “coastal town expansion” or somehow otherwise ticking the box for provision of rural housing supply so has ‘little relevance’ to urban growth is in our view incorrect. The land is quite clearly being changed from rural to urban (and Future **Urban** Zone).

3 Urbanisation

- 3.1 The urbanisation of the PPC88 Area requires full consideration of the associated changes to the surrounding environment. For example, the photo montages in Attachment 14A to the application do not illustrate the extent of effects that urbanisation will have on light pollution at night time, which will be visible from quite some distance.
- 3.2 While the National Policy Statement for Urban Development requires that Council be responsive to private plan changes where they would add significant development capacity and contribute to well-functioning urban environments, this is predicated on functionality, serviceability, and proximity.
- 3.3 The Beachlands study and Pine Harbour Plan Change were not ad hoc as is suggested in the application. They formed part of wider planning for the area considering its location and context relative to other parts of the sub-region. We do not consider that comparing this development with Hobsonville Point is particularly helpful. If comparisons are to be drawn, the proposal shares as much with the Whangaparoa Peninsula than anywhere else in the region.

4 Compact Form

- 4.1 It is not clear from the information provided how the PPC is consistent with the Auckland Plan 2050's "quality compact approach" that requires integration of land use and infrastructure. While the applicant's counsel go to some length to explain how the plan change expands the existing Beachlands town in a "quality compact form", the s32 report builds upon the notion that in the 1920's Beachlands was "The Marine Garden Suburb" a handy "12 ¼ miles from Queen's Wharf". In our view whether something has a 'compact form' largely depends upon which 'parts' are arranged together, and at what scale. Notwithstanding how 'compact' the PPC88 area is considered to be relative to its own boundaries, it most certainly does have a functional relationship with Whitford Village.

5 Impact on Whitford Village

- 5.1 Consideration of the impacts that PPC88 will have on Whitford Village has been insufficiently considered throughout the application. We anticipate that the increased traffic associated with the development and construction of the new urban area will have a significant and lasting impact on the Village. This scale of growth at Beachlands has not been planned for within the next 30 years. There is no basis for the extent of FUZ proposed and makes significant assumptions regarding the travel and work habits of the future 4000+ households.
- 5.2 There have been many plans in place over recent history to provide transport, three waters, social and recreational infrastructure in a coordinated and comprehensive manner. The objective and policy assessment set out in the application omits some of those that seek to ensure that development does

not have a detrimental effect on existing infrastructure. We remain of the view that these have not been properly considered.

- 5.3 Notwithstanding the applicant's assertion that they will meet the requirements and costs associated with the provision of infrastructure to service the development, the future development is not taking place on an island. It can be reasonably anticipated (and given the roading and transport requirements set out in the s32 evaluation and supporting technical reports) that the proposal will certainly have a 'spill over' effect on the existing infrastructure that services the locality.

6 Public Transport

- 6.1 The assumptions made throughout the application are predicated on increased mode shift, reduced vehicle movements, and increased patronage of ferry and bus services. The application also recognises that the applicant has no ability to control the provision of these services. There is a significant level of uncertainty as to how these levels of service can be achieved, and how the AUP provisions can manage development in the face of such uncertainty.

7 Traffic Generation

- 7.1 There appear to be some inconsistencies with the traffic information provided in the application and information that has previously been made available by the Council. We request that a peer review of the ITA should be provided.

8 Physical Infrastructure

- 8.1 Similarly, it is not clear whether the proposed water and wastewater infrastructure will achieve the required levels of service. In our view further assessment is required to better understand how provision, operation and maintenance would ensure infrastructure is resilient, efficient and effective.

9 Community Infrastructure

- 9.1 The application anticipates that a new secondary school will be built, but there is no guarantee that this will eventuate. The existing Whitford Precinct contains numerous provisions requiring ecological and recreational assets be established, and we can find no equivalent in the new Precinct Provisions.