

**Proposed Auckland Unitary Plan Submission Form**

Sections 123 and 125, Local Government (Auckland Transitional Provisions) Act 2010  
Clause 6 of First Schedule, Resource Management Act 1991  
FORM 2

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	Submission No:
	Receipt Date:

<b><u>Submitter details</u> Full Name of Submitter or Agent (if applicable)</b>
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<b><u>Scope of submission</u> This is a series of submissions to: Proposed Auckland Unitary Plan</b>  Residential growth strategy and the provisions of the residential and business zones as detailed in the specific submissions below
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**1- The specific provisions that my submission relates to are:**

**Provision(s):**

PART 2 - REGIONAL AND DISTRICT OBJECTIVES AND POLICIES»Chapter D: Zone objectives and policies»1 Residential zones

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones

**Submission Our submission is:**

**The residential objectives and policies and the development controls provide an overly simplistic approach to Auckland's future growth and need to be rewritten. Local area studies to identify those areas best suited to intensification should be undertaken.**

**I oppose the specific provisions identified above**

**I wish to have the provisions identified above amended Yes**

**The reasons for our views are:**

**The residential provisions of the PUP provide an overly simplistic framework for the future direction and management of Auckland's existing and planned residential zones.**

**While the UP makes statements advocating a compact city form with high levels of design, an analysis of the development controls reveals that Council can have no confidence that such lofty objectives can in fact be achieved.**

**Based on an analysis of residential building consents since 2001 little more than 1% of all building consents would have reached the threshold of 4 dwellings in a development needed before a resource consent is required. As a design assessment can only be required on resource consent applications nearly 99% of all building consents will not be subject to design assessment unless they fail one or more development rules.**

**The proposed development rules are significantly relaxed when compared to Auckland's legacy plans. In the MHS zone density is permitted to a significantly greater level than in all but the most intensive zones in the legacy plans. Coverage, height to boundary, yard and other controls have all been significantly relaxed.**

**As such Councils claims that the PUP has high levels of design control are illusory and in fact for the great majority of residential developments the level of design control (including development rules) is of a considerably lesser degree than found in the legacy plans.**

The residential provisions fail to give sufficient recognition of the need to recognise the unique character of the varying residential zones in the existing residential areas and the distinction between existing residential areas, development of large brownfields areas and greenfields development. Council has arbitrarily determined the location of the higher density zones (MHU and THAB) based on short workshops and has in the main either failed to undertake the local area studies necessary to determine the appropriate locations for higher density residential development or in some cases ignored the studies that were done by the legacy councils.

The PUP places an inappropriate emphasis on greenfields development typifying it as “Urban Sprawl” and utilizing “Elite Soils”. Planned greenfields development along predetermined growth corridors should not be confused with unplanned expansion on the periphery of the urban area.

**Note: Proposed additions to the UP provisions are in blue and deletions are in strike through**

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

**Delete and rewrite PART 2 - REGIONAL AND DISTRICT OBJECTIVES AND POLICIES»Chapter D: Zone objectives and policies»1 Residential zones and**

**PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones**

**2- The specific provisions that my submission relates to are:**

**Provision(s):**

PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»1 Issues of regional significance - Ngā take matua ā-rohe»1.1 Enabling quality urban growth.

“Our Sense of Place”

**Submission Our submission is:**

The provision entitled “Our Sense of Place” does not adequately recognize the varying character of Auckland’s residential areas and the need to focus residential intensification into those areas most suited for it while preserving the residential character of other areas.

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes

**The reasons for our views are:**

“Our Sense of Place” does not adequately recognize the importance of retaining the residential character of Auckland’s residential suburbs. As Auckland has developed over time, each suburb has developed its own somewhat unique character. In the oldest suburbs such as in Ponsonby or Devonport the housing stock is characterised by closely developed stand-alone houses, often on small sites, with minimal yards and little provision for off street parking. With the expansion into the suburbs much more emphasis was placed on larger sites. These provided ample room for planting, gardens, outdoor living space and provision for on-site vehicle parking. Housing was predominantly one or two story detached. These suburbs have matured over time and now have mature trees and established streetscapes. Infill has substantially increased the density of many suburbs and while there have been some problems with infill, the resultant development has not materially affected the residential character of the suburbs which can be typified as containing one or two storey, stand-alone housing set in landscaped grounds with an established streetscape.

The suburbs are vulnerable to the impact of inappropriate development. The introduction of multi storey apartment developments into established mature residential suburbs introduces a discordant building form entirely out of character with the existing built form. Issues raised by multi storey apartments include; building height and bulk, dominance, loss of privacy, shading and sunlight, car parking, loss of mature trees and effect on existing infrastructure such as stormwater and sewage.

Councils proposed emphasis on urban design cannot overcome the discordant building form introduced by a multi storey apartment building. In addition the PUP has in fact relaxed many of the development controls permitting greater bulk and coverage and reducing yards and height to boundary controls.

Development of multi storey apartments in a suburb leads to the expectation that similar developments will occur in the same area resulting in home owners being reluctant to expend large amounts on renovations and maintenance. This leads to urban blight as houses are allowed to run down in the expectation that they will eventually be redeveloped for multi storey apartments.

In planning for urban intensification in Auckland, Auckland 2040 believes that zoning should identify those specific areas where a more intensive residential multi storey building form is appropriate. In this scenario it would be envisaged that the existing housing would be progressively removed and replaced with multi storey apartment developments. The identification of these areas should be subject to local area studies which examine all the issues associated with such a proposal before the zoning is implemented. Councils Mixed Housing Urban and Terrace Housing and Apartment zones represent this type of zone.

Outside of the planned urban intensification zones Auckland 2040 believes that maintenance of the existing residential character should be the prime objective. In these areas while intensification is permitted the objective is to largely retain the existing housing stock while allowing intensification of a similar character to that which currently exists.

A distinction needs to be made between development occurring in existing developed residential areas and greenfields development. In the developed suburbs the character of the area is set by the existing development set in the context of the physical topography of the area. In greenfields there is a “blank canvas”, the residential character has yet to be set. Development controls suited to the progressive intensification of existing suburbs need not and perhaps should not be the same as those for greenfields development.

Auckland 2040’s submission is that while residential intensification is appropriate:

1. a clear distinction needs to be made between those specific areas which should be progressively redeveloped with a new more intensive multi storey urban form and
2. the balance of the residential zones where preservation of existing residential character is the prime objective while allowing some intensification of a similar character

Auckland 2040’s submission is that the objectives and policies of the UP do not make this distinction and should be amended as set out below to reflect this.

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

**Amend “Our Sense of place” to:**

Our sense of place

Our sense of place and belonging comes from Auckland’s rich diversity. Our urban fabric

includes historic buildings and places, as well as special character areas such as Ponsonby and Devonport. We also have many distinctive towns, local centres and places of interest such as Warkworth and Clevedon. [Our residential suburbs contain a wide diversity of building forms representing the periods when they were developed. In order to accommodate Auckland's residential growth, intensification within our existing suburbs will be required. However Council will balance the need for intensification with the desirability of retaining the residential character of the majority of the suburbs. This will be achieved through local area studies identifying those areas adjoining the larger commercial center's or along major transport routes which are best suited to a change in urban form through conversion to multi storey apartments.](#) Our challenge is to retain ~~this~~ [our](#) sense of place while providing for growth and development.

The Mana Whenua of Tāmaki Makaurau narrative provides a unique and vibrant tūrangawaewae which is the special point of difference which distinguishes Auckland from any other place in the South Pacific.

Changing demographics and the desire of many to live close to work, transport links or areas of high amenity, has created demand for quality medium to high density housing within our existing urban area. Meeting Auckland's needs means we need more choices and options around how and where we live. [Council will make a distinction between:](#)

1. [Those areas where higher density development will see the replacement of the existing housing stock with more intensive multi storey development, and](#)
2. [The majority of Auckland's residential areas where some intensification will be permitted but retention of the existing character of those residential areas is the prime objective.](#)
3. [Greenfield development or brown field redevelopment where large areas of land are being developed based on rules designed to facilitate optimum development](#)

We need to consider urban form and design, and sustainability outcomes to maximise economic opportunity and well-being, social well-being, cultural diversity and environmental health. These disciplines are critical in ensuring developments provide:

- high quality urban living experiences with sufficient amenities
- a range of housing to accommodate a diverse population
  - [A development mix sensitive to the existing character of Auckland's residential areas](#)
- mixed use, vibrant and coherent high density centres
- visibility of Auckland's cultural diversity in urban design
- increased travel choices and a reduction in reliance on private vehicles.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>3- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b> PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»1 Issues of regional significance - Ngā take matua ā-rohe»1.1 Enabling quality urban growth.
<b>“Supply of Land in Appropriate Locations”</b>
<b>My submission is:</b>
The provision entitled “Supply of Land in Appropriate Locations” is incorrect when it asserts that “opportunities for growth around all edges of the urban area are limited”.
I oppose the specific provisions identified above
I wish to have the provisions identified above amended Yes
<b>The reasons for my views are:</b>
While there are some constraints to growth at the edges of Auckland, Council has failed to recognize the potential for a North South urban growth corridor linking the northern part of the North Shore to Silverdale and Orewa. This area is already serviced by a motorway with potential for an extended bus lane or in the future train. Urbanization along this corridor would support existing commercial areas at Orewa, Silverdale and Albany. The provision of more employment zoning along this corridor would bring increased employment opportunities helping to counter the current pattern of residents leaving the North Shore to work. Council has not adequately recognized the potential for satellite town development. Warkworth in the north and Helinsville in the west are two examples of townships where there is demand for both residential and employment zonings. Both have potential motorway or rail connections to Auckland.
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>
Amend as follows
Supply of land in appropriate locations
Opportunities for growth around all edges of the <u>beyond the current</u> urban area are limited.
Auckland’s geography limits our supply of suitable greenfield land
<u>However significant potential for urban development lies along a North South corridor linking Albany to Silverdale and Orewa. This area is already serviced by a motorway with potential for an extended bus lane or in the future train. Urbanization along this corridor would support existing commercial areas at Orewa and Albany. The provision of more employment zoning along this corridor would bring increased employment opportunities helping to counter the current pattern of residents leaving the North Shore to work. Council will undertake planning studies with a view to identifying the potential for urban growth along this corridor.</u>

Further development of satellite towns, such as Warkworth and Helinsville, with good transport links to Auckland is desirable and Council will work towards identifying the potential for accommodating some growth in these areas

~~The coastline and significant park areas in the Waitākere and Hunua ranges constrain the expansion of the existing metropolitan area in a number of areas. Development must also optimise the investment of infrastructure and utilities, and not cause the need for ineffective or less cost effective forms of development.~~

Auckland's significant infrastructure such as:

- the transport network
- electricity
- water and wastewater
- the telecommunication network
- the Port of Auckland
- Auckland Airport

needs substantial investment to meet increasing demand caused by growth and higher environmental standards, particularly in relation to water quality. The timing, location and funding of new upgrades to services and amenities, such as water, wastewater disposal, transport and schools, will influence where and when new communities are established and whether or when existing communities can grow.

Auckland faces many challenges in accommodating growth. Development must optimise the benefits of transport integrated with land use, while providing high quality urban living, lifestyle choices, a healthy environment and protection of Mana Whenua interests. A compact well-designed urban form coupled with planned greenfield development around the urban fringe and along recognized growth corridors is the primary approach to achieving this balance.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

**4- The specific provisions that my submission relates to are:**

**Provision(s)**

PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.1 Providing for growth in a quality compact urban form

and

PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.2 A quality built environment

And

PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.3 Development capacity and supply of land for urban development

**Submission My submission is:**

**The Unitary Plan has a focus on providing for “a quality built environment”. However this laudable objective is not supported by policies and rules designed to achieve these objectives.**

**A further objective is to achieve this within a “quality compact urban form”. This objective again is not supported by adequate policies and rules and there is a disjoint between quality and compact in reference to urban form.**

**I oppose the specific provisions identified above**

**I wish to have the provisions identified above amended - Yes**

**The reasons for my views are:**

**While achieving “a quality built environment” is a laudable objective it can only occur if there are adequate policies and rules guiding development towards this objective. However on an analysis of the UP it is apparent that:**

- 1. Only developments containing 4 or more dwellings are subject to resource consent and hence some design guidance**
- 2. Developments containing 1 to 3 units are a permitted activity and subject only to compliance with the development rules of the zone.**
- 3. The development rules have been significantly relaxed compared to those in the legacy district plans; specifically rules relating to coverage, density, height, yards, height to boundary**

**It is therefore apparent that contrary to The UP’s objectives the great majority of developments will have no design guidance and be only subject to less restrictive development rules. It is therefore difficult to see how the UP can meet this objective.**

**A “quality compact urban form” is also laudable in principal. Quality depends on the controls guiding development as above. Compact assumes residential intensification.**

**When dealing with the existing residential areas compact should not mean wholesale replacement of the housing stock anywhere across Auckland, but rather the identification through local area studies of those areas most suited to intensive residential redevelopment. Typical areas would be in close proximity to metropolitan and town centers, adjoining employment areas and along major transport corridors (avoiding heritage housing). In such areas the removal of the existing housing stock and its replacement with multi storey apartment development is appropriate. In other areas it is equally important to maintain the character of the existing residential areas. While intensification should still occur this should be limited in scale and be sympathetic to the existing built form. On this basis some residential areas will be redeveloped and take on a compact form but others will increase in intensity only slowly while retaining much of their current residential form and character.**

**A compact city need not mean that planned expansion of the urban area should not occur. The potential for a North South corridor linking Albany to Orewa and Silverdale would be a logical extension to the North Shore. Many comparable cities to Auckland, such as Brisbane, are planning for intensification but at the same time developing growth corridors. Such development can occur in a well researched planned manner and should not be labeled “urban sprawl”. Nor need any such development cover “elite soils”.**

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

**PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.1 Providing for growth in a quality compact urban form**

This chapter sets out the objectives and policies for managing Auckland’s urban areas over the next 30 years. The urban areas include the metropolitan area, the satellite towns of Warkworth and Pukekohe and the rural and coastal towns and serviced villages.

The primary policy approach is to provide for housing choice and affordability and focus residential and business growth in centres, within neighbourhoods and along frequent transport routes. The bulk of planned residential intensification will occur in close proximity to the larger business centres and along major transport routes. Additional intensification will occur across the residential zones but constrained by the need to preserve residential character in those areas. Transport and other infrastructure is to be integrated with growth, while enabling business and residential development. Emphasis is placed on creating a quality built environment. Urban growth needs to make the best use of existing significant infrastructure, recognising protected values such as residential character, historic character and ecological areas, while considering constraints such as natural hazards.

Objectives, policies, methods relating to business land supply and business activities are in the RPS - Commercial and Industrial Growth section.

#### Objectives

1. A quality compact urban form with a clear defensible limit (Rural Urban Boundary - RUB) to the urban expansion of the metropolitan area, satellite towns, rural and coastal towns and serviced villages.
2. [Identify a major north south growth corridor linking Albany to Silverdale and Orewa](#)
3. Urban growth is ~~primarily focused~~ [balanced between growth](#) within the metropolitan area 2010 [and greenfields development on the periphery and along defined growth corridors](#).
4. Land within and adjacent to centres, frequent public transport routes and facilities is the primary focus for residential intensification with a lesser degree of intensification in surrounding neighbourhoods [subject to the retention of the existing residential character](#).
5. The focus for urban growth outside of the metropolitan area 2010, is greenfield land ~~within the RUB~~ that is contiguous with the urban area, [investigation of the potential North South urban corridor](#) and the satellite towns of Pukekohe, Helinsville and Warkworth.

#### Policies

1. Concentrate urban activities within, the metropolitan area 2010, the RUB, [the potential North South urban corridor](#), the satellite towns, rural and coastal towns and serviced villages.
2. ~~Enable higher residential densities and the efficient use of land in neighbourhoods:~~ [Identify those areas in close proximity to the larger business centres and along major transport routes which are suited to significant residential intensification. Additional intensification will occur across the residential zones but constrained by the need to preserve residential character in those areas](#)
  - a. within and around centres and within moderate walking distances from the city, metropolitan, town and local centres
  - b. in areas close to the frequent public transport routes and facilities
  - c. in close proximity to existing or proposed large open spaces, ~~community facilities, education and healthcare facilities~~
  - d. adequately serviced by existing physical infrastructure or where infrastructure can be efficiently upgraded.
3. Provide for and encourage residential intensification within centres while ensuring that:
  - a. there is a broad mix of activities within centres
  - b. residential activities do not compromise the ability for mixed use developments, or commercial activities to locate in centres
  - c. development uses land efficiently.

#### Methods

#### Regulatory

#### Unitary Plan:

- Appendix 1.1 and 1.2 on structure plan guidelines and the metropolitan area 2010.

- RUB – RPS maps on the council GIS viewer to show the maximum extent of the urban area.
- The Unitary Plan will be changed to define the RUB around [the north south growth corridor](#), rural and coastal towns and serviced villages and other areas the council has deemed necessary.
- Zones objectives policies and rules for the Future Urban zone.

#### Explanation and reasons

These objectives, policies and methods recognise the need for a well-located and designed compact urban form, and the [retention of the](#) natural and built character of the urban environment. A quality compact urban form delivers a range of benefits by:

- creating a range of housing choices from apartment living to rural and coastal lifestyle opportunities
- achieving a more integrated approach to land use and transport which improves transport efficiency and enhances accessibility
- protecting core environmental values such as air quality, water quality and biodiversity fostering improvements in productivity and creativity by having a network of businesses in proximity to each other, suppliers, customers and their employees and enabling the exchange of ideas
- providing certainty about areas that will be well supported by infrastructure investment
- protecting highly valued areas from development [and preserving residential character from inappropriate development](#)
- creating greater social and cultural vitality in centres and neighbourhoods
- supporting access to open space, community facilities, and education facilities.

The objectives and policies recognise the need to focus residential intensification within the metropolitan area 2010 [along proposed growth corridors](#) and within centres. The benefit of this policy approach is that it provides for more efficient use of existing infrastructure and services and enables people to be closer to employment opportunities.

The policy approach focuses urban activities to identified areas, rather than urban activities developing in an ad hoc manner in the rural environment. It also focuses infrastructure investment in identified locations and supports the development of identified growth [corridors and](#) areas or existing towns and serviced villages.

## **PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.1 Providing for growth in a quality compact urban form**

### Introduction

This section sets out objectives and policies to deliver quality, sustainable development as Auckland moves to a compact urban form. A quality built environment is one which maximises opportunities for the well-being of communities and social and economic exchange by providing safe and lively streets and public spaces, fronted by visually rich and

engaging buildings. In the New Zealand, and particularly the Auckland context, with its numerous volcanic cones and extensive shoreline, it is one where buildings respect and respond to the natural environment in which they are placed. A compact form objective needs to recognize the distinction between greenfield, brownfield development and intensification of the existing urban area. In the existing residential areas this objective will be focused on redeveloping to a higher density residential areas in close proximity to existing centres and along major transport routes. For the balance of the residential areas the focus will be on permitting residential intensification in keeping with the residential character of the areas in which it is occurring. For greenfield development the future form of development will be determined through the structure planning process required for greenfield development.

A robust design process is part of achieving a quality built environment, and results in development that contributes to an Auckland that is a sustainable, attractive and desirable city to live, work and play in.

Robust design can only be achieved through strong design guidelines, specifically targeted to the type of development envisaged in each zone. Design guidelines need to be backed up with robust development controls limiting the bulk and scale of development to a level that is appropriate in the zone. Dispensation policies need to reinforce the development objectives for the zone.

#### Objective

1. A quality built environment where development, including subdivision, across the site, street, block, neighbourhood and city scales:

2. Design guidelines and development rules that guide the form of development envisaged for the zone

- a. recognises Auckland's sense of place and enriches its landscape, character, heritage and legibility (identity)
- b. provides for a rich mix of choice and opportunity for our communities and can adapt to changing needs (diversity)
- c. considers and reinforces use, activity centres, energy systems and movement networks which are well connected and provide convenient and equal access for all (integration)
- d. supports and optimises the full potential of a site's intrinsic qualities, including its shape, landform, outlook and relationship to its surroundings (efficiency).

#### Policies

1. Require development to be designed to integrate all elements of a place, buildings or space into a coherently designed solution.
2. Design development to respond positively to the site, its context, its neighbours, the streetscape and the existing ~~planned~~ future character of the place, and to reinforce the role of the public realm as the primary place for public interaction.
3. Require development to contribute to the safety of the street and neighbourhood.
4. Encourage development which is designed for change of use through time.

5. Design development with a level of amenity that enables long term options for living and working.
6. Encourage development to be designed to have equal access for people of all ages and abilities.
7. Require a high standard of design in areas of residential and business intensification.
8. Enable the development of a range of built forms within neighbourhoods to support maximum choice and recognise different lifestyles, [while recognizing the need to retain the existing residential character of those residential areas not zoned MHU or THAB .](#)
9. Design streets and block patterns that maximise connectivity, provide for a range of travel options and have a high standard of amenity and safety for pedestrians and cyclists to promote walking and cycling.
10. Balance the place and movement functions of streets while emphasising their role as places for people over movement of vehicles in centres and areas of residential intensification.
11. Require large scale development, and encourage all other development, to minimise its environmental impact through best practice sustainable design which incorporates energy efficiency, renewable energy generation, waste minimisation and water sensitive design.
12. [Recognise the limitations to further development posed by existing developed residential areas and the desirability of restraining development types to those that will fit in with the existing residential character of those areas.](#)

PART 1 - INTRODUCTION AND STRATEGIC DIRECTION»Chapter B: Regional Policy Statement - Kupu Kaupapa ā-Rohe»2 Enabling quality urban growth - Tāhuhu whakaruruhau ā-tāone»2.3 Development capacity and supply of land for urban development.

Methods

Regulatory

Unitary Plan:

- Appendix 1.1 and 1.2 on structure plan guidelines and the metropolitan area 2010.
- RUB – RPS maps on the council GIS viewer to show the maximum extent of the urban area.
- The Unitary Plan will be changed to define the rural urban boundary around rural and coastal towns and serviced villages and other areas the council has deemed necessary [including around areas identified as suitable for urban development along the north south growth corridor.](#)
- Zone objectives policies and rules for Future Urban zone.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

**5- The specific provisions that my submission relates to are:**

PART 2 - REGIONAL AND DISTRICT OBJECTIVES AND POLICIES » Chapter D: Zone objectives and policies»1 Residential zones

**Submission My submission is:**

The UP seeks a design led quality urban form. However the large majority of developments will have no design input at the consent stage and this therefore calls into question a fundamental premise of the UP

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes

**The reasons for my views are:**

In terms of the MHS and MHU zones, developments with up to 3 dwelling units which comply with the development rules will be assessed as a permitted activity. The only constraints to such developments are the development rules and there is no Council design assessment unless the development fails one or more rules. The UP places great emphasis on “a quality built environment” as the foundation for creating a “compact urban form”. However the UP cannot achieve these laudable objectives when the great majority of future developments will have no design assessment. This then places great reliance on the development rules in each zone. Much criticism has been directed at the shortcomings of urban design resulting from the development rules contained in the legacy plans and the lack of design control. However this criticism has even more validity when the UP rules are examined. In most cases the rules in the MHS and MHU zones have been relaxed not strengthened. In particular rules designed to reduce adverse effects on adjoining properties have been relaxed. For example; density and allowable coverage has been increased, yards, particularly rear yards reduced, an alternative height to boundary control introduced and the building length control relaxed. If a development meets the development rules and contains 3 or less units it is a permitted activity and Council will have control over its design.

Given that over 90% of all new residential developments are likely to be for 1 to 3 dwelling units it is not correct to say that the UP promotes a quality built environment. That may be an objective but it is one not supported by the rules in the plan.

To achieve a quality built environment the development rules for residential zones, need to be tightened, not relaxed. With the rules providing a strong guidance to good development, developers promoting good design could use the dispensation provisions to amend the rules to suit a particularly good design, Council would have control through the consent process to ensure good design and therefore lead towards a quality built environment.

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

PART 2 - REGIONAL AND DISTRICT OBJECTIVES AND POLICIES»Chapter D: Zone objectives and policies»1 Residential zones

Introduction

There are six residential zones in the Unitary Plan:

- Large Lot
- Rural and Coastal Settlement
- Single House
- Mixed Housing Suburban
- Mixed Housing Urban
- Terrace Housing and Apartment Buildings.

The Large Lot and the Coastal and Rural Settlement zones provide for residential development that is low intensity and which reflects the land characteristics and/or service constraints of the location.

The Single House, Mixed Housing Suburban, Mixed Housing Urban and the Terrace Housing and Apartment Buildings zones are applied in existing and future urban areas and provide for a variety of densities. The highest density of development is expected to occur in close proximity to the rapid and frequent service network and within and around centres. Providing for growth in this manner and in these locations is not only an efficient use of land but it also provides access to public transport for a greater number of households and strengthens the role of centres.

Collectively, these zones provide for a mix of housing types, ranging from a house in a coastal settlement, to a single detached house on a suburban section, to an apartment near a metropolitan centre. In some zones the conversion of an existing single dwelling into two dwellings is allowed to cater for different family needs or to generate additional family income without subdividing the property and retaining the appearance of a single building.

As the density of development increases the greater the requirement for quality design. To address this, ~~four~~ [three](#) or more dwellings in the Mixed Housing Suburban and Mixed Housing Urban zones and more than one dwelling in the Terrace Housing and Apartment Buildings zone requires a resource consent. The resource consent process will ensure that the proposal gives effect to the quality built environment provisions of the Unitary Plan and that it contributes to the Auckland Plan priority of a quality urban environment.

As the majority of new residential developments will still be between 1 and 3 dwelling units it is important that the development rules be sufficiently robust to ensure good design outcomes from small developments. For those developers wishing a more design led process, the dispensation provisions provide a mechanism for Council to consider relaxing some development rules in return for a good design outcome. This will enable best use of the site while being sympathetic to adjoining properties, the streetscape and the residential character of the area.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>6- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>
PART 2 - REGIONAL AND DISTRICT OBJECTIVES AND POLICIES»Chapter D: Zone objectives and policies»1 Residential zones»1.5 Mixed Housing Suburban zone
<b><u>Submission</u> My submission is:</b>
<p><b>For the Mixed Housing Suburban zone Auckland 2040 believes that within established suburbs maintenance of the existing residential character should be the prime objective. In the MHS Zone while intensification is permitted, the objective is to largely retain the existing housing stock while allowing intensification of a similar character to that which currently exists.</b></p> <p><b>I oppose the specific provisions identified above</b></p> <p><b>I wish to have the provisions identified above amended Yes</b></p> <p><b>The reasons for my views are:</b></p> <p><b>There is an important distinction which needs to be made between greenfields development and development occurring within established suburbs. Within existing suburbs a residential character already exists which reflects the development which occurred at the time the area was developed. That character is ongoing and even though subsequent infill development has an impact, Infill is of a similar scale as exists and the enduring qualities which make up each suburb’s character are retained over time. This character is also a significant factor in what leads people to purchase in a particular area. With greenfields there is a blank canvas, the residential character has yet to be defined. Whatever the new development is, that will become the residential character of that area. Therefore there should be recognition in the UP that the character of existing residential areas should be retained and new development be required to fit into and recognize that character. Greenfields development should be subject to structure planning which will determine the character of that area as it develops.</b></p>
<b>I seek the following decisions from Auckland Council:</b>
<p><b>Accept the Proposed Plan with amendments as outlined below:</b></p> <p>Mixed Housing Suburban zone</p> <p>Zone description</p> <p>This zone is the most widespread residential zone in Auckland. Its density controls allow a moderate level of intensification, while retaining a relatively spacious quality consistent with a suburban residential character, compared to the Mixed Housing Urban and Terrace Housing and Apartment Buildings zones. Development within the zone will generally be two <u>one or two</u> storey detached and attached housing in a variety of types and sizes to provide housing choice. <u>It is not envisaged that there will be widespread replacement of existing housing stock in this zone.</u></p>

~~The zone encourages new housing types, including attached housing on smaller sites facing the street. To facilitate the efficient use of these sites and promote quality design outcomes, when assessed through the resource consent process, dwellings may have building bulk closer to site boundaries, provided that shading and dominance effects on adjoining sites are minimised.~~

Through the resource consent process, four or more dwellings at a higher density may be built on large sites with wide road frontages. This is because larger sites are capable of accommodating a wider range of housing types, integrating development into the neighbourhood and achieving high quality on-site amenity.

#### Objectives

1. Housing choice within neighbourhoods is increased.
2. Development is of a height, bulk, form and appearance that positively responds to the site and the neighbourhood's [existing and in the case of greenfields development](#) planned suburban residential character, engaging with and addressing the street.
3. Development provides high-quality on-site amenity for residents and ~~achieves a reasonable standard of amenity for adjoining sites.~~
4. Development is adequately serviced by network infrastructure and is of a density that is appropriate for the physical attributes of the site and any infrastructure constraints.

#### Policies

1. Enable a variety of detached and attached housing types.
2. Manage the height, bulk, form and appearance of development and require sufficient setbacks and landscaped areas to maintain a suburban residential character of ~~generally~~ [one or two storeys in existing residential areas](#).
3. Require development to be of a height and bulk that allows immediate neighbours to have a reasonable standard of sunlight access and privacy and to avoid ~~excessive~~ dominance effects.
4. Enable attached housing on smaller sites where the development faces the street and integrates well into the neighbourhood.
5. Require dwellings to be designed to:
  - a. have usable and accessible outdoor living space
  - b. provide privacy and outlook
  - c. be of a size, have access to daylight and sunlight and provide the amenities necessary to meet the day-to-day needs of residents.
6. Require development to be designed, with a particular emphasis on those parts of the dwelling visible from the street to:
  - [a. be compatible with the existing residential character and streetscape of the area](#)
  - ~~a~~ [b. create visual interest](#)
  - ~~b~~ [c. face the street and maximise passive surveillance of it](#)
  - ~~c~~ [d. minimise the dominance of garage doors visible from the street.](#)

7.Limit the density and scale of development to take account of one or more of the following factors:

- a.achieving a balance between making the most efficient use of the site and providing high-quality on-site amenity, [while protecting the amenity of adjoining properties](#)
- b.the proportions or topography of the site or the width of its road frontage mean that it is not possible to maximise development without generating unreasonable adverse effects on the amenity of adjoining sites and the surrounding area
- c.any infrastructure constraints.

8.Require development to have available connections to water supply and wastewater networks.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<p><b>7- The specific provisions that my submission relates to are:</b></p>
<p><b>Provision(s)</b></p> <p>PART 3 - REGIONAL AND DISTRICT RULES»Chapter G: General provisions»2 General rules and special information requirements»2.3 Rule infringements for permitted, controlled and restricted discretionary activities</p>
<p><b><u>Submission</u> My submission is:</b></p> <p>2. A permitted, controlled or restricted discretionary activity that does not comply with one or more land use or development controls is a restricted discretionary activity unless otherwise stated in the Unitary Plan.</p> <p>3. For rule infringements that are a restricted discretionary activity, the council will restrict its discretion to the following matters, in addition to any specific matters listed in the rules:</p> <p>a. Site/development characteristics</p> <p>b. The purpose of the control.</p> <p>The above provision severely limits Councils discretion in assessing infringements to rules. Council’s fundamental proposition in the plan is for “a quality built environment”. To this end should a development not meet any rule in the plan Council should reserve its discretion to look at the building design and how this fits into the neighbourhood</p> <p><b>I oppose the specific provisions identified above</b></p> <p><b>I wish to have the provisions identified above amended Yes</b></p> <p><b>The reasons for my views are:</b></p> <p>An infringement of a development rule provides an opportunity for Council to look at the design of the development and whether grant of the resource consent will result in a better design outcome. Council will be able to influence the outcome towards a better design outcome but only if the matters for its discretion include design.</p>
<p><b>I seek the following decisions from Auckland Council:</b></p>
<p><b>Accept the Proposed Plan with amendments as outlined below:</b></p> <p>1. All activities must comply with the land use and development controls applying to the activity.</p> <p>2. A permitted, controlled or restricted discretionary activity that does not comply with one or more land use or development controls is a restricted discretionary activity unless otherwise stated in the Unitary Plan.</p> <p>3. For rule infringements that are a restricted discretionary activity, the council will restrict its discretion to the following matters, in addition to any specific matters listed in the rules:</p> <p>a. Site/development characteristics</p>

b. The purpose of the control.

[c. The potential effect of the non-compliance on adjoining properties, the streetscape and the residential character of the area.](#)

[d. The design of the development](#)

4. When assessing a restricted discretionary land use or development control infringement, the council may consider the following criteria as they relate to the matters of discretion above.

a. Whether the site has any unusual features or particular characteristics that make compliance with the development control unnecessary, such as:

i. unusual size, shape, topography, substratum, soil type, vegetation or natural hazard susceptibility

ii. adverse topography or the unusual use or particular location of buildings on neighbouring sites.

iii. Whether the land use or development control infringement achieves the purpose of the control, demonstrating that a better outcome is achieved than a complying proposal and that the proposal makes a positive contribution to the site and neighbourhood by improving liveability, amenity or visual appearance.

[iv The effect of the development on adjoining properties and the extent to which the design is compatible with the streetscape and character of the area.](#)

b. While not exhaustive, for applicable developments the [ADM](#) may offer guidance on these matters.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>8- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>  PART 3 - REGIONAL AND DISTRICT RULES»Chapter G: General provisions»2 General rules and special information requirements»2.4 Notification
<b><u>Submission</u> My submission is:</b>  <b>The UP proposes that</b> “1. Controlled and restricted discretionary activities will be considered without public or limited notification, or the need to obtain written approval from affected parties, unless otherwise specified in the Unitary Plan or special circumstances exist in accordance with s. 95A (4) of the RMA that make notification desirable.”  <b>I oppose the specific provisions identified above</b>  <b>I wish to have the provisions identified above amended Yes</b>  <b>The reasons for my views are:</b>  The extent of Councils powers to grant controlled and restricted discretionary activity RC is considerable. It is not reasonable to have a blanket provision stating that all Controlled and restricted discretionary activities will be considered without public or limited notification, or the need to obtain written approval from affected parties, unless otherwise specified in the Unitary Plan or special circumstances exist in accordance with s. 95A (4) of the RMA that make notification desirable. The default provision should be reversed with the UP stating that each resource consent should be considered for notification or approval of affected parties unless specified in the UP.
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>  1. Controlled and restricted discretionary activities will be <del>considered without</del> assessed against the tests for public or limited notification, or the need to obtain written approval from affected parties, unless otherwise specified in the Unitary Plan 2.To avoid doubt, <u>all</u> discretionary and non-complying activities <del>are</del> <u>will be</u> subject to the normal tests for notification under the relevant sections of the RMA, unless otherwise specified in the Unitary Plan
<b>16- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>

**Submission My submission is:**

The PUP has restricted the matters it will take into account when assessing a restricted discretionary activity for “Four or more dwellings in the Mixed Housing Suburban and Mixed Housing Urban zone, more than one dwelling in the Terrace Housing and Apartment Buildings zone” The list of matters fails to address matters that should be considered.

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes

**The reasons for my views are:**

The rules governing development within a zone guide the form and intensity of development proposed. This in turn creates the residential character of each area. Dispensations from rules need guidance from the plan to ensure that dispensations are not granted when the effect of such dispensations would go against the objectives of the zone and the form of development envisaged by the set of development controls.

The proposed matters for discretion do not adequately address matters which need to be assessed in applications for dispensation.

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

10.1 Matters of discretion

The council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the zone activity table

1 & 2 stet

3.Four or more dwellings in the Mixed Housing Suburban and Mixed Housing Urban zone, more than one dwelling in the Terrace Housing and Apartment Buildings zone

a.building design and external appearance

b.design and scale of buildings adjoining historic heritage and historic character areas

c.topography, site orientation and earthworks

d.design and layout of dwellings, visitor accommodation and boarding houses

e.design of landscaping

f.design of parking and access

g.infrastructure and servicing

h.water sensitive design.

i. Design, scale, bulk and location of buildings and the effect on adjoining properties, streetscape and residential character of the area

j. Where the THAB zone adjoins the Single House, Mixed Housing Suburban or Mixed Housing Urban zones the effects of overshadowing, dominance, loss of privacy on adjoining properties and streetscape.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

**9- The specific provisions that my submission relates to are:**

**Provision(s)**

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»2. Notification

and

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.1 Development control infringements AND

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»8. Development Controls - Mixed Housing Urban zone»8.1 Development control infringements AND

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»9. Development Controls - Terrace Housing and Apartment Buildings zone»9.1 Development control infringements

**Submission My submission is:**

**The UP limits the number of rule infringements which are subject to the tests for notification, this does not recognise that an infringement to a single rule can in certain circumstances have a significant adverse effect on adjoining properties, the streetscape and residential character.**

**The UP proposes to make infringements of 3 or more rules a discretionary activity. This does not take into account the fact that a single infringement of a rule, ie height can have a marked impact on the adjoining properties and the streetscape and character of an area.**

**I oppose the specific provisions identified above**

**I wish to have the provisions identified above amended Yes**

**The reasons for my views are:**

**Infringement of any rule in the plan should have an assessment based on the likely impact such infringement will create. This should include an assessment of whether the infringement will create adverse effects such that the consent of affected parties should be required or whether the application should be publically notified. Infringements to one or more rules can have a significant impact on the surrounding area. For example an infringement to the MHS rules increasing the height of a building from 8m to 10m may, coupled with a height to boundary infringement permit an entirely different building form such as a 3 storey apartment building, contrary to the zone objective.**

**Each infringement should be considered on its merits and the decision on notification not be reflective of the number of infringements.**

**Infringement of a development rule should bring in a mandatory design assessment process so the infringement (s) can be considered in the context of the design of the whole development and its impact on adjoining properties, the streetscape and residential character of the area.**

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»2. Notification.

Buildings that do not comply with [any of the development controls in the zone](#) the following development controls will be subject to the normal tests for notification under the relevant sections of the RMA:

~~a. building height~~

~~b. height in relation to boundary~~

~~c. alternative height in relation to boundary in the Mixed Housing Suburban and Mixed Housing Urban zones~~

~~d. side and rear yards in the Large Lot zone~~

~~e. maximum building length~~

~~f. building setbacks within the Terrace Housing and Apartment Buildings zone~~

~~g. building setbacks in the Terrace Housing and Apartment Buildings zone where it adjoins lower density zones~~

~~h. building coverage~~

~~i. landscaping~~

~~j. outlook.~~

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.1 Development control infringements AND

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»8. Development Controls - Mixed Housing Urban zone»8.1 Development control infringements AND

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»9. Development Controls - Terrace Housing and Apartment Buildings zone»9.1 Development control infringements

1. Buildings that infringe ~~three or more of the following~~ [any](#) development controls are a [restricted](#) discretionary activity:

- a. ~~building height~~
- b. ~~height in relation to boundary~~
- e. ~~yards~~
- d. ~~maximum impervious area~~
- e. ~~building coverage~~
- f. ~~landscaping~~
- g. ~~outlook.~~

In addition to the assessment criteria specified in the plan for rules, all resource consents shall be assessed on:

1. Design of the development
2. The likely impact on adjoining properties
3. The visual effect on the existing streetscape
4. The likely impact on the residential character of the area.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>10- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>  PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»1. Activity table
<b><u>Submission</u> My submission is:</b>  <b>Within the MHS and MHU zones design control through a resource consent only applies to developments containing 4 or more dwellings. This is too high a threshold for design assessment. If Council is serious about achieving a high level of urban design then a greater proportion of developments should be subject to design assessment.</b>  <b>I oppose the specific provisions identified above</b>  <b>I wish to have the provisions identified above amended Yes</b>  <b>The reasons for my views are:</b>
<b>The vast majority of residential developments that have occurred in Auckland City over the past 13 years have been less than 4 dwellings. In terms of the PUP these developments will have no urban design input unless they fail a development rule. Given the general relaxation of development rules in the PUP it is difficult to see the justification for Council's claim that the PUP will achieve high levels of urban design. Lowering the threshold for resource consent from 4 dwellings to 3 will see some level of urban design input to these moderate sized developments.</b>
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below: Amend PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»1. Activity table so that 3 or more dwellings on a site are a restricted discretionary resource consent in the Mixed Housing Suburban and Mixed Housing Urban Zones.</b>  <b>Or such alternative relief as achieves the purpose of Auckland 2040's submission.</b>

**11- The specific provisions that my submission relates to are:**

**Provision(s)**

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»3. Land use controls»3.1 Maximum density

1.The number of dwellings on a site must not exceed the limits specified below:

Table 1:

Zone	Dwellings
Large Lot	One dwelling per site
Rural and coastal settlements	One dwelling per 4000m <sup>2</sup> net site area
Single House	One dwelling per site
Mixed Housing Suburban	One dwelling per 400m <sup>2</sup> net site area , or  One dwelling per 300m <sup>2</sup> net site area where the requirements of clause 3.1.2 below are met, or  One dwelling per 200m <sup>2</sup> net site area where the requirements of clause 3.1.5 below are met

**Submission My submission is:**

**Within the Mixed Housing Suburban Zone (MHS) a density of 1:200m<sup>2</sup> provides for too intensive a form of development on >1200m<sup>2</sup> sites**

**I oppose the specific provisions identified above**

**I wish to have the provisions identified above amended Yes**

**The reasons for my views are:**

**The proposed density in the MHS zone is considerably greater than previously permitted in all but the most intensive zones under the legacy district plans.**

**Even in suburbs which have been subject to significant infill, residential density averages over 500m<sup>2</sup> per unit.**

A >1200m<sup>2</sup> site with a >20m frontage can be created by the amalgamation of two standard residential sites. At 1:200m<sup>2</sup> density 6 units can be constructed. This can only be achieved by the removal of any existing dwellings and the construction of a new development.

To achieve this level of density a different building form will be required which will need to be built to the maximum in terms of coverage, height, height to boundary and yards.

It is considered that 1:200m<sup>2</sup> is too high a density for the MHS Zone and that it should be amended to 1:300m<sup>2</sup> reflecting the more low density suburban character of the MHS zone.

**I seek the following decisions from Auckland Council:**

**Accept the Proposed Plan with amendments as outlined below:**

Mixed Housing Suburban	One dwelling per 400m <sup>2</sup> net site area , or  One dwelling per 300m <sup>2</sup> net site area where the requirements of clause 3.1.2 below are met, or  One dwelling per <del>200m<sup>2</sup></del> <u>300m<sup>2</sup></u> net site area where the requirements of clause 3.1.5 below are met
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**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>12- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.4 Alternative height in relation to boundary
<b><u>Submission</u> My submission is:</b>
<p><b>Height to boundary controls is one of the most important development rules as it requires the bulk of a building to be set back as its height increases. The alternative Height to boundary control permits very bulky buildings far closer to the boundary than does the conventional Height to boundary control.</b></p> <p><b>I oppose the specific provisions identified above</b></p> <p><b>I wish to have the provisions identified above amended Yes</b></p> <p><b>The reasons for my views are:</b></p> <p><b>Dominance, overshadowing, loss of daylight and sunlight, loss of privacy and overlooking are all influenced by the height to boundary control. These controls have been in place since the earliest district schemes and have varied between 2m and 37 degrees to 2.5m and 45 degrees which is now the most common. Assuming a two storey building is approximately 5.5m to the gutter line a two storey building complying with 2m plus 45 degree would need to be set back 3.5m from the boundary. This provides sufficient separation between buildings and contributes greatly to the suburban character of residential areas.</b></p> <p><b>By contrast the alternative Height to boundary control would require a setback of only 1.6m. This could have a very significant impacts in terms of the effects listed above. Importantly buildings built to the alternative Height to boundary control would have significant detrimental effect on the spaciousness, streetscape and amenity which form the foundations of Auckland’s suburbs.</b></p>
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>
<b>Auckland 2040 seeks the removal of the alternative Height to boundary control.</b>
<b>Or such alternative relief as achieves the purpose of Auckland 2040’s submission.</b>

<b>13- The specific provisions that my submission relates to are:</b>		
<b>Provision(s)</b>		
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.5 Yards		
<b><u>Submission</u> My submission is:</b>		
Yards, particularly front yards and rear yards play an important role in the urban form of suburbs. The reduction in the rear yard as proposed is opposed.		
I oppose the specific provisions identified above		
I wish to have the provisions identified above amended Yes		
The reasons for my views are:		
<b>Rear yards</b>		
The UP proposes to reduce the rear yard requirement to 1m. Traditionally rear yards have been between 4-6m. When combined back to back, as commonly occurs, the area of unbuilt open space is often between 8-12m. This is where many established trees are located or areas of green space and shrubs. In some cases there are drainage channels or streams running through the rear yards. The greenery in the rear yards plays an important role in softening the urban landscape, providing visual relief and screening as well as reducing silt run off into drainage channels and streams.		
Reducing the rear yard to 1m will result in the progressive loss of existing rear yards, this will have the following impacts:		
<ol style="list-style-type: none"> <li>1. Loss of mature trees, vegetation and green spaces thus reducing the “green lungs” of the suburbs and increasing the “concrete jungle effect” symptomatic of residential overdevelopment.</li> <li>2. Reduced separation between buildings leading to loss of privacy, loss of visual separation and dominance of the built environment</li> <li>3. A significant change to the built environment of the suburbs and the residents reliance on the green swathes at the rear of their properties being retained over time</li> </ol>		
<b>I seek the following decisions from Auckland Council:</b>		
<b>Accept the Proposed Plan with amendments as outlined below:</b>		
<b>Amend S3.1.1.7.5 Yards as follows:</b>		
Table 5		
Yard	Minimum depth	
Front	4m	
Side	1m	

Rear	<del>1m</del> <a href="#">4m</a>	
Riparian	10m from the edge of all other permanent and intermittent streams	
Lake	30m	
Coastal protection yard	10m, or as otherwise specified in <a href="#">appendix 6.7</a>	

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

<b>14- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.8 Building coverage
<b><u>Submission</u> My submission is:</b>
<b>The UP proposes to increase allowable building coverage to 40% for site with a density of less than or equal to 1:400m<sup>2</sup> and 50% for sites with a density greater than 1:400m<sup>2</sup></b>
<b>I oppose the specific provisions identified above</b>
<b>I wish to have the provisions identified above amended Yes</b>
<b>The reasons for my views are:</b>
<b>Building coverage is one of the most important residential development rules, as coverage in association with height and height to boundary controls the bulk of buildings. Residential areas with low building coverage exhibit a low density, more green, more spacious feel while areas with higher building coverage look more intensively developed, less spacious and have fewer green areas and in particular fewer mature trees. The MHS Zone is as the name suggests a suburban zone which should allow for a more open spacious level of development. The majority of Auckland's suburban residential zones have had a maximum 35% coverage for many years. This coverage has dictated the form of development which in turn has significantly contributed to the character of the residential areas. To increase the coverage to 40 to 50% will upset the development balance in the existing residential areas introducing building forms which will be alien to the existing scale of development</b>
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.8 Building coverage
Purpose: maintain the suburban residential character of the zone.
1. Maximum building coverage <del>35%</del> for proposed sites with a density less than or equal to one dwelling per 400m <sup>2</sup> : 40 per cent.
2. Maximum building coverage for proposed sites with a density greater than one dwelling per 400m <sup>2</sup> that comply with the requirements of clause 3.1.2 above: 50 per cent.
<b>Or such alternative relief as achieves the purpose of Auckland 2040's submission.</b>

<b>15- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.9 Landscaping
<b><u>Submission</u> My submission is:</b>
<b>The rule provides for minimum Landscaping for sites at a density greater than 1:400m<sup>2</sup> be reduced from 40% to 30%</b>
<b>I oppose the specific provisions identified above</b>
<b>I wish to have the provisions identified above amended Yes</b>
<b>The reasons for my views are:</b>
<b>The minimum landscaping for sites with a density of less than 1:400m<sup>2</sup> is 40%. This is proposed to be reduced for sites with a density of greater than 1:400m<sup>2</sup> to 30%. Green space in the MHS zone has an important role in contributing to the streetscape, visual relief, screening and in reducing the apparent bulk of buildings. The MHS zone as distinct to the MHU zone is a suburban zone which should have an appearance consistent with a lower density residential area with abundant green spaces. The minimum landscaping should reflect this.</b>
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.9 Landscaping
Purpose:
<ul style="list-style-type: none"> <li>•provide for on-site amenity and an attractive streetscape character</li> <li>•improve stormwater absorption on-site.</li> </ul>
1.For proposed sites with a density less than or equal to one dwelling per 400m <sup>2</sup> or more at least 40 per cent must comprise landscaped area.
2.For proposed sites with a density greater than one dwelling per 400m <sup>2</sup> that comply with the requirements of clause 3.1.2 above, at least <del>30</del> <u>35%</u> per cent must comprise landscaped area.
3. For clauses 1 and 2 above, the following must be met:
a. at least 10 per cent of the required landscaped area must be planted with shrubs including at least one tree that is pB95 or larger at the time of planting
b. at least 50 per cent of the front yard must comprise landscaped area
<b>Or such alternative relief as achieves the purpose of Auckland 2040's submission.</b>

<b>16- The specific provisions that my submission relates to are:</b>
<b>Provision(s)</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.15 Fences
<b><u>Submission</u> My submission is:</b>
<b>It is not reasonable to restrict the height of fences in front yards where the outdoor living space of the dwelling looks towards the road.</b>
<b>I oppose the specific provisions identified above</b>
<b>I wish to have the provisions identified above amended Yes</b>
<b>The reasons for my views are:</b>
<b>Where an outdoor living area looks towards the road a maximum fence height of 1.2m in the front yard is not appropriate. For privacy and security reasons a fence height of 1.8m would be more appropriate. Supervision of the street can still be achieved from upper floor levels</b>
<b>I seek the following decisions from Auckland Council:</b>
<b>Accept the Proposed Plan with amendments as outlined below:</b>
PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»7. Development Controls - Mixed Housing Suburban zone»7.15 Fences
Purpose: enhance passive surveillance of the street and maintain the open character of front yards.
1. Fences in a front yard must not exceed <del>1.2m</del> 1.8m in height.
<b>Or such alternative relief as achieves the purpose of Auckland 2040's submission.</b>

<p><b>17- The specific provisions that my submission relates to are:</b></p> <p><b>Provision(s)</b>  PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»9. Development Controls - Terrace Housing and Apartment Buildings zone»9.5 Building setbacks adjoining lower density zones</p> <p>PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»3 Business zones»4. Development Controls - Centres, Mixed Use, General Business and Business Park zones</p>
<p><b><u>Submission</u> My submission is:</b></p> <p><b>The building setback rule for the THAB zone provides for a lesser degree of setback for sites adjoining the MHS and MHU than for sites adjoining the SH zone. This is inappropriate as the effects of a tall building on adjoining boundary is the same irrespective of the zone.</b></p> <p><b>There is no building setback control for developments in Business zones adjoining residential zones. The control should be the same as that which applies to the THAB zone adjoining residential zones.</b></p> <p><b>I oppose the specific provisions identified above</b></p> <p><b>I wish to have the provisions identified above amended Yes</b></p> <p><b>The reasons for my views are:</b></p> <p><b>The MHS zone is a lower density suburban residential zone with an emphasis on one or two storey housing. The MHU zone is similar but also provides for up to 3 storey apartments. Given that the THAB and most business zones permit between 4 and 6 storey development such a development could have a significant adverse effect on adjoining sites zoned SH, MHS and MHU. The setbacks proposed for the SH zone should be applied to all THAB and Business zone sites adjoining zones with a lower height control.</b></p>
<p><b>I seek the following decisions from Auckland Council:</b></p> <p><b>Accept the Proposed Plan with amendments as outlined below:</b></p> <p><b>Amend</b></p> <p>PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»1 Residential zones»9. Development Controls - Terrace Housing and Apartment Buildings zone»9.5 Building setbacks adjoining lower density zones</p> <p>Purpose: provide an appropriate transition in building bulk and scale to lower density residential zones and small public open spaces.</p>

1. Where sites in the Terraced Housing and Apartment Buildings zone adjoin sites in the Single House zone, [Mixed Housing Suburban](#), [Mixed Housing Urban](#) or sites less than 2000m<sup>2</sup> in the public open space zones, the building must be set back from side and rear boundaries as follows:

- a. 5m for storeys one and two
- b. 9m for storeys three and four
- c. 13m for storeys five and six.

PART 3 - REGIONAL AND DISTRICT RULES»Chapter I: Zone rules»3 Business zones»4. Development Controls - Centres, Mixed Use, General Business and Business Park zones

[Where sites in the centres and mixed use zones and the General Business and Business Park zones, adjoin sites in the Single House zone, Mixed Housing Suburban, Mixed Housing Urban or sites less than 2000m<sup>2</sup> in the public open space zones, the building must be set back from side and rear boundaries as follows:](#)

- [a. 5m for storeys one and two](#)
- [b. 9m for storeys three and four](#)
- [c. 13m for storeys five and six.](#)

Delete 2.

**Or such alternative relief as achieves the purpose of Auckland 2040's submission.**

**I wish to be heard in support of my submissions**

**Telephone 09 4860 783 or 021 720 107**

**Please note that your contact details and phone number will be 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.**

Signature of

Submitter Date February 2014

*(or person authorised to sign on behalf of submitter. A signature is not required if you make your submission by electronic means)*