

Attn: Auckland Council

SLR Ref No.: PC100_Z Energy
Submission_v1.0

17 May 2024

SLR Ref No.: PC100_Z Energy Submission_v1.0

Attn: Auckland Council

By email: unitaryplan@aucklandcouncil.govt.nz**Re: Submission on Plan Change 100 (PC100) to the Auckland Unitary Plan****Submitter:**

Z Energy Limited

PO Box 2091

Wellington 6140

Address for Service

SLR Consulting New Zealand

PO Box 911310

Victoria St West

Auckland 1142

Attention: Phil Brown

Phone: 027 467 1566

Email: philip.brown@slrconsulting.com

1. This is a submission on Plan Change 100 (PC100) to the Auckland Unitary Plan (AUP). PC100 is a private plan change which proposes to establish a Riverhead Precinct and involves the rezoning of approximately 75.5 hectares of Future Urban Zone land.
2. Z Energy supports the principle of PC100, insofar as it will accommodate the future growth and urbanisation of Riverhead. Z Energy has a particular interest in ensuring that road changes associated with the plan change will not adversely affect the operation of the Caltex Riverhead service station located at 1090 Coatesville Riverhead Highway, Riverhead.
3. Z Energy, the Submitter, could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.
4. Z Energy's interest in PC100 relates specifically to:
 - a. Upgrades / changes to Cambridge Road, a paper road adjoining Caltex Riverhead's western / rear boundary; and
 - b. Upgrades / changes to the Coatesville-Riverhead Highway including a future pedestrian crossing between Edward Street and Princes Street (location unconfirmed).
5. Caltex Riverhead was recently redeveloped as a service station having obtained resource consent in 2022 (LUC60392331 & DIS60398679). It is served by two existing crossings along the Coatesville-Riverhead Highway frontage, which tankers and customers use on a frequent basis. A mountable shoulder is positioned near the entrance crossing and extends over the property boundary, and this was approved by Auckland Transport as part of the resource consent to facilitate safe access for tankers entering the site. The site also has a building line restriction inside its front boundary. These site features are depicted in Figure 1 below. Z Energy seeks to ensure that these aspects of the site are not impacted by road changes proposed through PC100.

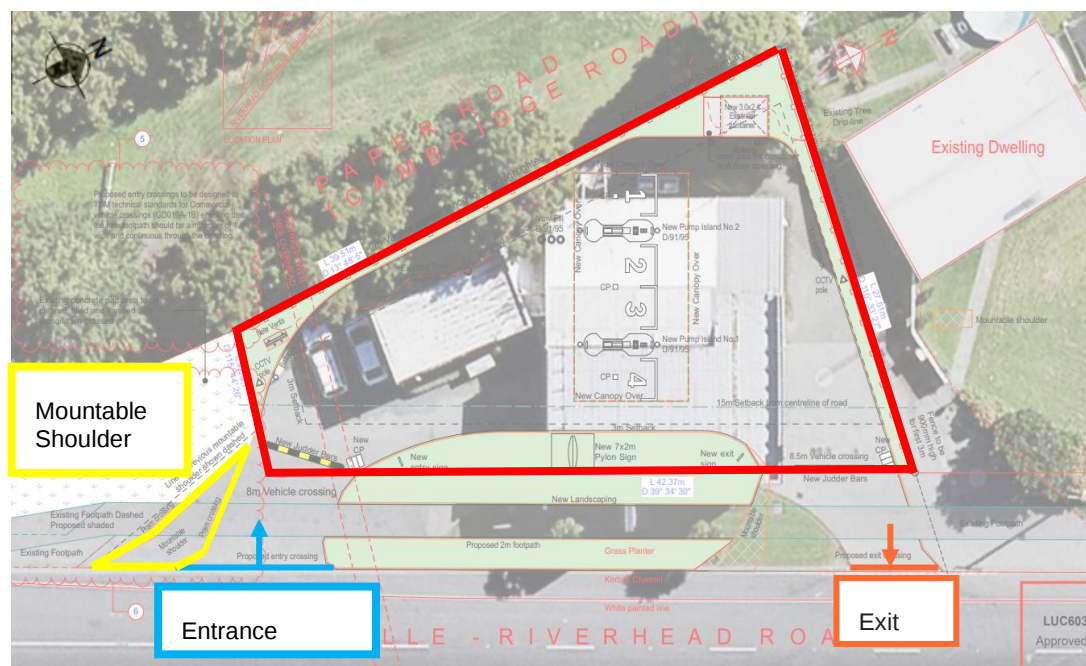


Figure 1: Existing site plan (site boundary shown by red line)

6. Standard IX.6.1(5) of the Proposed Riverhead Precinct Chapter requires that prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, (a) a new footpath shall be constructed on the western side of Cambridge Road between Queen Street and Riverhead Road, and (b) the existing carriageway of the formed portion of Cambridge Road shall be upgraded to an urban standard. Z Energy understands that the applicant's intention, consistent with these provisions, is to provide vehicle access for only the existing formed portion of Cambridge Road (to the north of Caltex Riverhead), with only a pedestrian footpath (no vehicle access) in the existing paper road portion of Cambridge Road next to Caltex Riverhead. Refer to Figure 2 below. Z Energy seeks confirmation regarding the road changes proposed through PC100, noting that Precinct Plan 3 indicates that there is potential for the entirety of Cambridge Road to be 'upgraded' (refer to Figure 2 below).

203.1

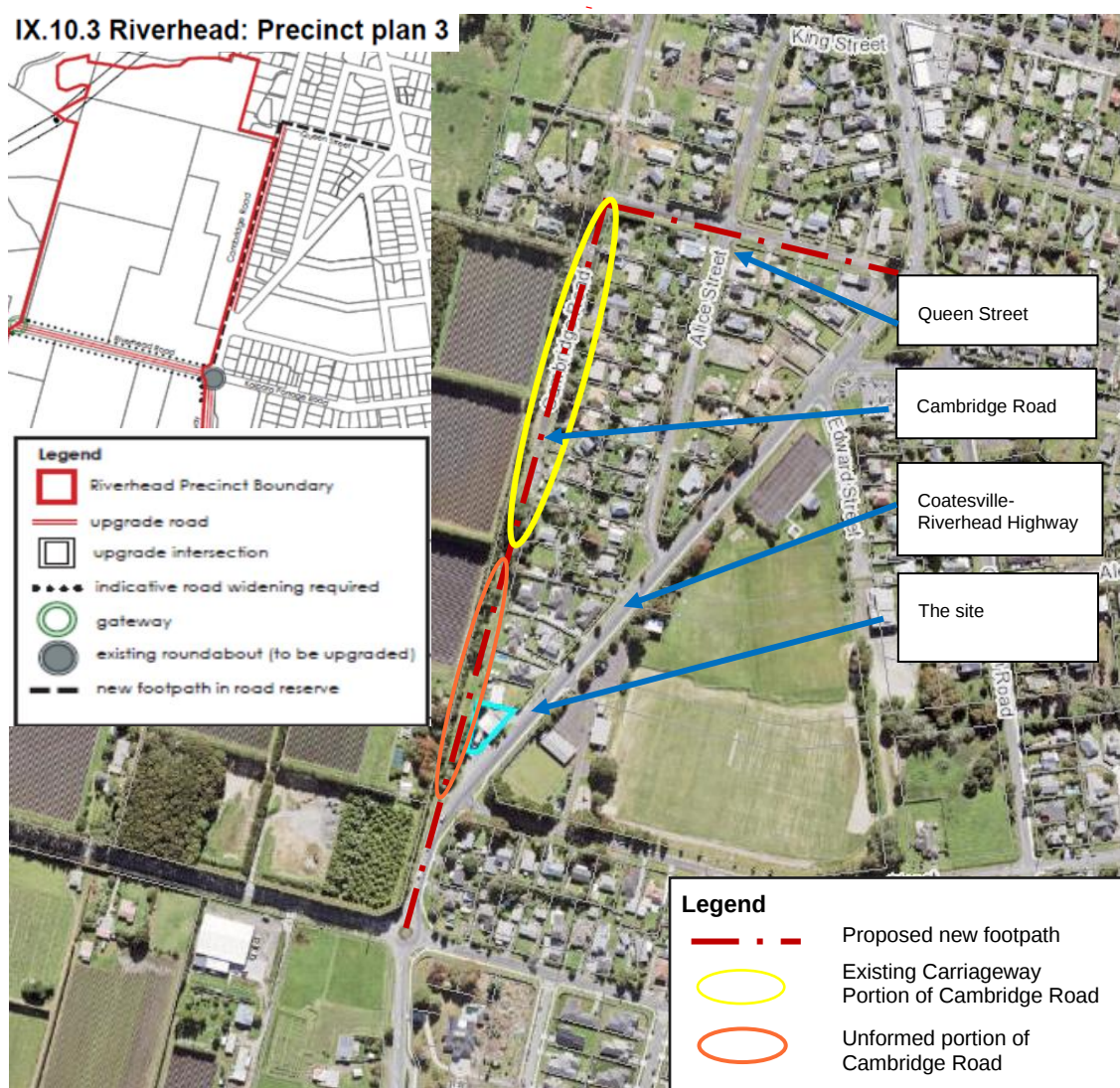


Figure 2: PC100 Proposed Road Upgrades

7. Z Energy supports the proposal for only a pedestrian footpath and no vehicle carriageway in the unformed portion of Cambridge Road next to Caltex Riverhead, if this is proposed as part of PC100. This arrangement ensures that vehicles can continue to safely enter the Caltex site, including via the mountable shoulder that sits outside its boundaries. If, on the other hand, a new vehicle carriageway was proposed at the Cambridge Road / Coatesville-Riverhead Highway intersection, this could

implicate the Caltex site's entrance and ability for tankers to safely turn into the site using the mountable shoulder.

8. Standard IX.6.1(5)(d) of the Proposed Riverhead Precinct Chapter requires that prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, an additional vehicle crossing facility on the Coatesville-Riverhead Highway is constructed between Edward Street and Princes Street. No other changes along the section of the Coatesville-Riverhead Highway next to Caltex Riverhead appear to be proposed through PC100.
9. Z Energy seeks to ensure that the future pedestrian crossing on the Coatesville-Riverhead Highway is not situated proximal to Caltex Riverhead, as this could result in an unsafe environment for vehicles and pedestrians. Both customer vehicles and tankers (carrying large volumes of hazardous substances) frequently enter and exit the site to / from the Coatesville-Riverhead Highway, and placing a pedestrian crossing in this context would increase the risk of accidents and result in an unsafe environment for vehicles and pedestrians. 203.2
10. In summary, Z Energy seeks confirmation regarding the nature of road changes on Cambridge Road and the Coatesville-Riverhead Highway proximal to the Caltex Riverhead site. Z Energy also requests to be consulted by the applicant and / or Auckland Transport when the relevant road upgrades are undertaken, to ensure that these do not unduly restrict the site's operation. 203,3
11. Z Energy appreciates the opportunity to submit in relation to PC100 and would be pleased to meet with the applicant, Auckland Transport, and/or Auckland Council to discuss this submission.

Signed on behalf of Z Energy Limited

Regards,

SLR Consulting New Zealand



Phil Brown

Associate Planner

philip.brown@slrconsulting.com



New Zealand Defence Force
Defence Estate and Infrastructure
NZDF Headquarters
Private Bag 39997
Wellington 6045

Submission on Proposed Plan Change 100 Auckland Unitary Plan (Operative in Part)

Clause 6 of First Schedule, Resource Management Act 1991

To: Auckland Council
Address: Private Bag 92300
Auckland 1142
Email: unitaryplan@aucklandcouncil.govt.nz

Submitter: New Zealand Defence Force
Contact Person: Rebecca Davies, Principal Statutory Planner

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Background

1. This is a submission on Proposed Private Plan Change 100 (Private): Riverhead to the Auckland Unitary Plan – Operative in Part (“PPC100”).
2. The New Zealand Defence Force (“NZDF”) operates the Royal New Zealand Air Force (RNZAF) Base Auckland at Whenuapai, located to the south-east of the PPC100 area. RNZAF Base Auckland is a significant Defence facility, of strategic importance regionally, nationally and internationally. Ensuring that this facility can continue to operate to meet Defence purposes under section 5 of the Defence Act 1990 is critical. Defence purposes include the defence of New Zealand, the provision of assistance to the civil power either in New Zealand or elsewhere in times of emergency, and the provision of public service when required. RNZAF Base Auckland is essential to achieving these purposes.
3. The location of the area subject to PPC100 (PPC area) is within Minister of Defence Designation 4311 “Whenuapai Airfield Approach and Departure Path Protection” (Designation 4311) which applies to the airspace in the vicinity of RNZAF Base Auckland. The purpose of the designation is “Defence purposes (as defined by section 5 of the Defence Act 1990) – protection of approach and departure paths”.

4. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS) (as shown on the planning maps and described in the designation) without the prior approval in writing of NZDF.
5. Such obstacles present a significant safety risk for the operation of aircraft at RNZAF Base Auckland.
6. PPC100 proposes a mix of Terrace Housing and Apartment Building Zone, Mixed Housing Suburban Zone, Local Centre Zone, Neighbourhood Centre Zone and Mixed Rural Zone and applies a Precinct to the area. NZDF understands that PPC100 provides for a maximum total building height of up to 18m in the Local Centre zone and 16m in the Terraced Housing and Apartment Building zone.
7. Across the PPC100 area, the separation distance between ground level and the OLS is approximately 30 - 80m. Accordingly, proposed permanent structure heights are unlikely to be an issue (although this is indicative only and should be surveyed). However, there is the potential for cranes, or other construction equipment, to be an issue during construction. NZDF wishes to highlight that any proposed intrusion into the OLS, including temporary intrusions required for construction equipment including cranes, will require prior written approval from NZDF in accordance with the requirements of Designation 4311. The applicant may also need to notify the Civil Aviation Authority (CAA) under Part 77 CAA Rules.
8. The impact to flight operations from unapproved crane use within the OLS is that it forces the closure of the RNZAF Base Auckland runway, which constrains the use of RNZAF Base Auckland. Whilst Designation 4311 should prevent this occurring, there have been many instances where NZDF has not been notified prior to the operation of cranes or erection of other temporary structures within the OLS. Incorporating provisions into the Precinct is therefore necessary to avoid risk to flight safety and operations, and will increase visibility and awareness of the OLS.
9. The objectives and policies in the Auckland Unitary Plan Regional Policy Statement (RPS) provide a strong policy direction for the protection of infrastructure. Policy B3.2.2(4) seeks to "avoid", where practicable, adverse effects on infrastructure in the first instance, or otherwise remedy or mitigate. Policy B3.2.2(5) seeks to "ensure" development "does not constrain" the operation and upgrading of existing infrastructure. PPC100 therefore needs to give effect to these objectives and policies by ensuring appropriate provisions are included in the AUP.
10. NZDF seeks an amendment to PPC100 to specifically reference the OLS and requirements in Designation 4311. The specific relief sought is set out in the attached table.

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

NZDF **wishes to be heard** in support of this submission.

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



 Person authorised to sign
 on behalf of New Zealand Defence Force

17 May 2024
 Date _____

Point	Provision	Support/ Oppose	Reasons	Relief Sought
1	IX.1. Precinct description	Oppose in part	The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS). Although the height of permanent structures is expected to be below the OLS, temporary construction structures such as cranes have the potential to penetrate the OLS and cause safety issues and require approval from NZDF and possible notification to the Civil Aviation Authority. PPC100 needs to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure. For clarity, NZDF considers that the existence of the designation and its requirements should be referenced in the Precinct chapter, including in the description.	Amend the Precinct chapter to reference Designation 4311 requirements. Amend IX.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined): <i>All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.</i> <i><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u></i>
2	IX.4. Activity table	Oppose in part	The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS). Although the height of permanent structures is expected to be below the OLS, temporary construction structures such as cranes have the potential to penetrate the OLS and cause safety issues and require approval from NZDF and possible notification to the Civil Aviation Authority. PPC100 needs to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure. For clarity, NZDF considers that the existence of the designation and its requirements should be referenced above the Activity table.	Amend IX. Activity table to add a sentence referencing Designation 4311 (additions underlined): <i>Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.</i> <i><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in</u></i>

204.1

204.2

Point	Provision	Support/ Oppose	Reasons	Relief Sought
				<u>Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u>

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Boman Zakeri
Date: Friday, 17 May 2024 3:30:19 pm
Attachments: [FINAL PC100 Submission.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Boman Zakeri

Organisation name: Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri

Agent's full name:

Email address: bnzakeri@gmail.com

Contact phone number: 0211691696

Postal address:
 30 Cambridge Road
 Riverhead
 Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
 See attached PDF

Property address: See attached PDF

Map or maps: See attached PDF

Other provisions:
 See attached PDF

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
 See attached PDF

I or we seek the following decision by council: Approve the plan change with the amendments I requested

205.1

Details of amendments: See attached PDF

Submission date: 17 May 2024

Supporting documents
 FINAL PC100 Submission.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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**SUBMISSION ON PRIVATE PLAN CHANGE 100 (RIVERHEAD) TO THE AUCKLAND UNITARY PLAN
(OPERATIVE IN PART)**

Clause 6 of First Schedule, Resource Management Act 1991

TO: Auckland Council

By Email: unitaryplan@aucklandcouncil.govt.nz

Submitter: **LUXEMBOURGH DEVELOPMENT COMPANY LTD**
RIVERHEAD TREELIFE TRUSTEE LTD
OMIDULLAH ZAKERI
RAFIULLAH MOHAMMAD TAHIR

Address for Service: Boman Zakeri
bnzakeri@gmail.com
021 169 1696

1. INTRODUCTION

- 1.1 This is a submission on Private Plan Change 100 to the Auckland Unitary Plan (Operative in Part) (**AUP**), requested by the Riverhead Landowner Group (**the Plan Change**).
- 1.2 The Plan Change proposes to rezone 6 hectares of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 hectares of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Buildings, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The Plan Change also proposes to shift the Rural Urban Boundary to align with the boundary between the proposed Rural-Mixed Rural zoning and the urban zones.
- 1.3 This submission is filed on behalf of a number of landowners and occupiers who have existing business and land interests within the Plan Change area and are directly affected by it. These entities are Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir and Boman Zakeri (**the Boman Submitters**) are directly affected by the Plan Change. Further detail on the Boman Submitters is set out in Section 2 below. **Table 1** and **Appendix A** show the affected landholdings that the Boman Submitters own.

Table 1. Land owned by the Submitter group within the proposed precinct/plan change area

Street Address	Registered Title	Owner
30 Cambridge Road	742646	Luxembourg Development Company Limited
340 Riverhead Road	NA20D/4	Omidullah Zakeri, Rafiullah Mohammad Tahir
1140 Coatesville-Riverhead Highway	NA18B/1033	Riverhead Treelife Trustee Limited

- 1.4 The Boman Submitters support enabling greater urban growth in the Riverhead area, including on the Boman Submitters' landholdings. However, the Boman Submitters consider further refinement of the Precinct Provisions would provide greater clarity and certainty for all plan users.
- 1.5 The Boman Submitters could not gain an advantage in trade competition through this submission and in any event is directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- 1.6 The changes requested by the Boman Submitters are made to:
 - (a) Ensure that the proposed provisions are the most appropriate to achieve sustainable management of natural and physical resources and are not otherwise contrary to the purpose and principles in Part 2 of the Resource Management Act 1991 (RMA);
 - (b) Ensure the requirements of section 32 of the RMA are met;
 - (c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development; and
 - (d) Provide clarity for all plan users.

2. THE SUBMITTERS

- 2.1 Mr Boman Zakeri is the founder and owner of one of the largest strawberry producers in New Zealand, operating under the brands "Best Berries Farms", "Zaberri World" and "Good Planet". Mr Zakeri also operates a well-known popular "pick your own" Riverhead visitor site in West Auckland. Best Berries has over 45 ha of planting at the Riverhead site and supplies to both the New Zealand and international market wholesale market. The business contributes to 13% of the berry producer industry in New Zealand. Best Berries is both an innovator and a leader in the strawberry industry with a focus on quality and environmental sustainability. The farm sites at Riverhead have been carefully managed in keeping with this approach.
- 2.2 The Boman Submitters understand that the underlying rural production land in the area including the growing sites have been zoned for future urban development and support the intent of the Plan Change to live zone this area. However, the Boman Submitters would like to ensure that any urban development is appropriately managed in a timely manner and sequenced with the necessary infrastructure upgrades to ensure a smooth transition from the existing rural uses to future urban and to provide for the necessary and appropriate level of community input. These submission points are provided against that background.

3. AREAS OF SUPPORT

- 3.1 The Boman Submitters generally support the rezoning of their affected landholdings (refer **Table 1** above) to Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre.

4. AREAS OF CONCERN

- 4.1 There are five general areas of concern in relation to the proposed precinct provisions, being:

(a) ***Precinct Plan and urban design***

The Precinct Plan has sought to directly implement a concept design from the structure plan process. While the structure plan has demonstrated that the Plan Change land is appropriate for urbanisation, the Precinct Plan has gone further to imbed the structure plan into the AUP. This approach can be appropriate in some instances, however in this case a specific approach to designing portages, swales, ecological corridors and walking trails has been proposed which have been mandated by the Precinct provisions. The Boman Submitters consider the design approaches included in the Precinct Plan are one of many outcomes that could be relevant to the opportunities and constraints. Greater flexibility in the Precinct Provisions is required to allow for alternative design options.

The multi-purpose green corridors are one example of a designer's vision being directly translated to the Precinct Plan as the outcome. However, this approach relies on vesting the asset with the Council in the future, a process which can be uncertain and take significant time. Recent experience with similar provisions in practice has shown that the Council is reticent for these types of assets to be vested as Council assets, due to the long-term maintenance and renewal obligations and the impact this may have on limited and constrained budgets.

While the corridors may have a legitimate stormwater conveyance function, the other aspects of the "multi-purpose" functions rely on Council decisions that may not be forthcoming at the time of future resource consents. To address this issue, the Boman Submitters consider it is appropriate that the Precinct Provision clearly state that the multi-purpose functionality components of these corridors are a "nice to have" urban design feature, not a fundamental structural requirement.

The multi-purpose green corridors are not necessary to achieve amenity outcomes in the Plan Change area. For example, recreation amenity can be provided by neighborhood parks, and walking and cycling opportunities in the standard manner through the road reserves. There are no ecological features to provide corridors or connections to. The vistas or portages are not considered to be of such significance that land should be put aside or development constrained.

There is no s32 evaluation of the multi-purpose green corridors in terms of their costs or their effects on the provisions of housing.

None of the matters identified on the Precinct Plans are considered to be qualifying matters in accordance with the National Policy Statement on Urban Development, as the proposed rezoning of the Plan Change area will bring this land into the scope of the NPS-UD.

(b) ***The proposed size of the local centre and extent of high density housing***

While the Boman Submitters acknowledge that a Business – Local Centre is necessary to support the day-to-day needs of the future residents within the Precinct, there is concern that proposed Business – Local Centre zoning is too large and that other retail opportunities will be too dispersed within the Plan Change area.

The Boman Submitters also consider that non-residential activities in Sub-precinct A should be capped based on the Sub-precinct as a whole, rather than being capped on a per-site basis.

The Boman Submitters query the necessity of a Business – Neighbourhood Centre Zone of such a large size in close proximity to the Business – Local Centre. It is not clear how this approach would appropriately support the development of a centre for employment and services to meet the day-to-day needs of the community. The Boman Submitters consider there is a risk that this approach may disperse and dilute the critical mass required to create an effective centre.

The Boman Submitters acknowledge that housing choice and affordability will require more variety in housing typologies within the Precinct. Apart from retirement villages, which utilise typologies such as apartments, the Boman Submitters consider that the proposed Residential – Terrace Housing and Apartment Buildings zoning is somewhat out of keeping with the objectives and policies of the Precinct, and creates an expectation of high density residential development which the market may not be able to sustain in Riverhead.

The Boman Submitters consider that the proposed zones within the Precinct require more refinement specific to this village concept. While the urban design assessment for the Plan Change may have translated urban concepts from Auckland, height and density (and creating the perception of density or the pressure of not achieving the maximum potential of density), this approach is not necessary to implement the Precinct's objectives or give effect to the Regional Policy Statement.

(c) ***Proposed staging of works through infrastructure triggers***

There is a concern that the triggers proposed have been established in such a manner which effectively result in development within the Precinct being stalled in the short to medium term. The infrastructure triggers either rely on the actions of third parties outside the control of the landowners, or require all the landowners to coordinate frontage upgrades and road widening at the time of first subdivision or development. While coordinated development outcomes are ideal, they may not always be feasible and could stall development or lead to inferior outcomes.

The Boman Submitters consider the infrastructure triggers should provide greater flexibility, focussed on appropriately addressing effects.

(d) ***Uncertainty relating to precinct standards informed by indicative maps***

The Precinct Plan identifies nearly every feature as “indicative”, yet the policies and provisions require their implementation. Many of the features identified relate to “nice to have” urban design features rather than fundamental structural elements. The Precinct Provisions should clearly identify which features must be implemented.

(e) ***Gap in precinct rules where subdivision to "super lots" could be allowed***

The Precinct provisions do not appropriately enable the creation of superlot titles to better support and enable future development opportunities.

- 4.2 The specific submission points in the appended table generally relate to these five general concerns. The appended table does not limit the general scope of the submission points listed above. The Boman Submitters are interested in the appropriate density and operation of the Plan Change provisions in their entirety.

5. RELIEF SOUGHT

- 5.1 The Boman Submitters seek that the Plan Change be allowed, subject to all necessary amendments set out below to address the concerns in this submission including any consequential or other necessary amendments required to give effect to the relief sought.
- 5.2 The Boman Submitters wish to be heard in support of its submission. If other parties make a similar submission, the Boman Submitters would consider presenting a joint case with them at any hearing.

Table of Specific Submission Points

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
1	IX.1 Precinct Description Proposed Centre zone extent on 1140 Coatesville-Riverhead Road plus all related provisions including Table IX.4.2	" A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability."	Support in part	The Boman Submitters support the intent of the provision of the local centre but query whether the current extent of the centre appropriately sized for the Precinct.	Amend the size of the Business - Local Centre Zone to better reflect the realistic opportunities in the short to medium term for retail and services. Delete or reduce the size of the Business - Neighbourhood Centre Zone. Table IX.4.2 – Cap non-residential activities in Sub-precinct A to the sub-precinct as a whole rather than on a per site basis.
2	IX.1 Precinct Description THAB zone extent on 340 Riverhead Road plus all related provisions	"The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement."	Support in part	The Boman Submitters support the provision of higher density zoning on 340 Riverhead Road property but considers current extent of the zoned area is excessive and/or the zoning creates expectations for height that are unlikely to be realised.	Amend the zones to either reduce the extent of Residential – Terrace Housing and Apartment Buildings Zone and/or utilise the Residential – Mixed Housing Urban Zone as a part or full replacement or alternative.
3	Precinct Plan 1, Precinct Plan 2 Precinct Plan 3	Precinct Plans 1, 2 and 3	Support in part / oppose in part	The Precinct Plans do not find the correct balance between critical framework infrastructure and “nice to have” design matters. It theorises a structure which is unlikely to be delivered in the manner illustrated, and relies on decisions to be made by the Council in the future in terms of vesting assets. While opportunities may exist, these are not fundamental to the urban form and infrastructure necessary to be illustrated on the Precinct Plans.	Delete Precinct Plan 1 and the relevant supporting provisions in the Precinct. Amend Precinct Plan 2 to: - Delete the Multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance. - Straighten the “bends” in the Collector Roads. - Delete the “key local roads”. - Align the “key pedestrian connections” to the Collector Roads.
4	IX.2 Objectives Objective 3	(3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan centre Zone and Business – Town Centre Zone.	Support in part	The references to complementing the other forms of centres is misplaced. The Riverhead Local Centre has no effect on those functions of the other centres. The objective should focus on the outcomes of the zone to Riverhead	Amend Objective 3 as follows: (3) Activities in the Business – Local Centre zone provide <u>for the day-to-day needs of the community and</u> local employment opportunities <u>and</u> complement the function, role and

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					amenity of the City Centre Zone, Business — Metropolitan centre Zone and Business — Town Centre Zone
5	IX.1 Precinct Description IX.3 Policies Policy 4 Table IX.4.1 (A4) and (A5) Standard IX.6.1	"The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage potential adverse effects on the wider transport network." Policy IX.3: (4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network. Table IX.4.1: (A4) Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades (A5) Subdivision and development that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades Standard IX.6.1: Staging of development with transport upgrades (1) Prior to occupation of a dwelling within the Riverhead Precinct, the following transport infrastructure must be constructed and operational: (a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency. (b) Upgrade of the Coatesville-Riverhead Highway / Old Railway Road intersection to provide a right turn bay. (c) Upgrade of the Coatesville-Riverhead Highway / Riverland Road intersection to provide a right turn bay. (2) Prior to occupation of a building on a site with vehicle access to and/or from Coatesville-Riverhead Highway, the following road infrastructure upgrades must be constructed and operational: (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including	Support in part	The Boman Submitters support general intent of the coordinated development of the Precinct with necessary infrastructure networks and transport infrastructure. However, the Boman Submitters consider that the interaction of policy directives, indicative precinct plans and precinct provisions which rely on implementation of specified mapped features require greater clarity for plan users particularly where they form part of the activity standards or pre-occupation requirements in the Precinct. There is a concern that road frontage upgrades are all required as a single tranche before any development can occur within the Precinct. This approach necessitates coordination of all landowners, particularly with those who own land that is required for the road widening. There is a risk that this approach, could be used by some landowners to stall the provision of needed housing and business activities due to of the high degree of coordination required.	Amend the policies, activity table and provisions (standards) to avoid the creation of opportunities where third parties or other landowners could prevent the development of the Precinct. Clarify that road widening relates to the vesting of land for that purpose at the time of subdivision and development of that site.

205.9

205.10

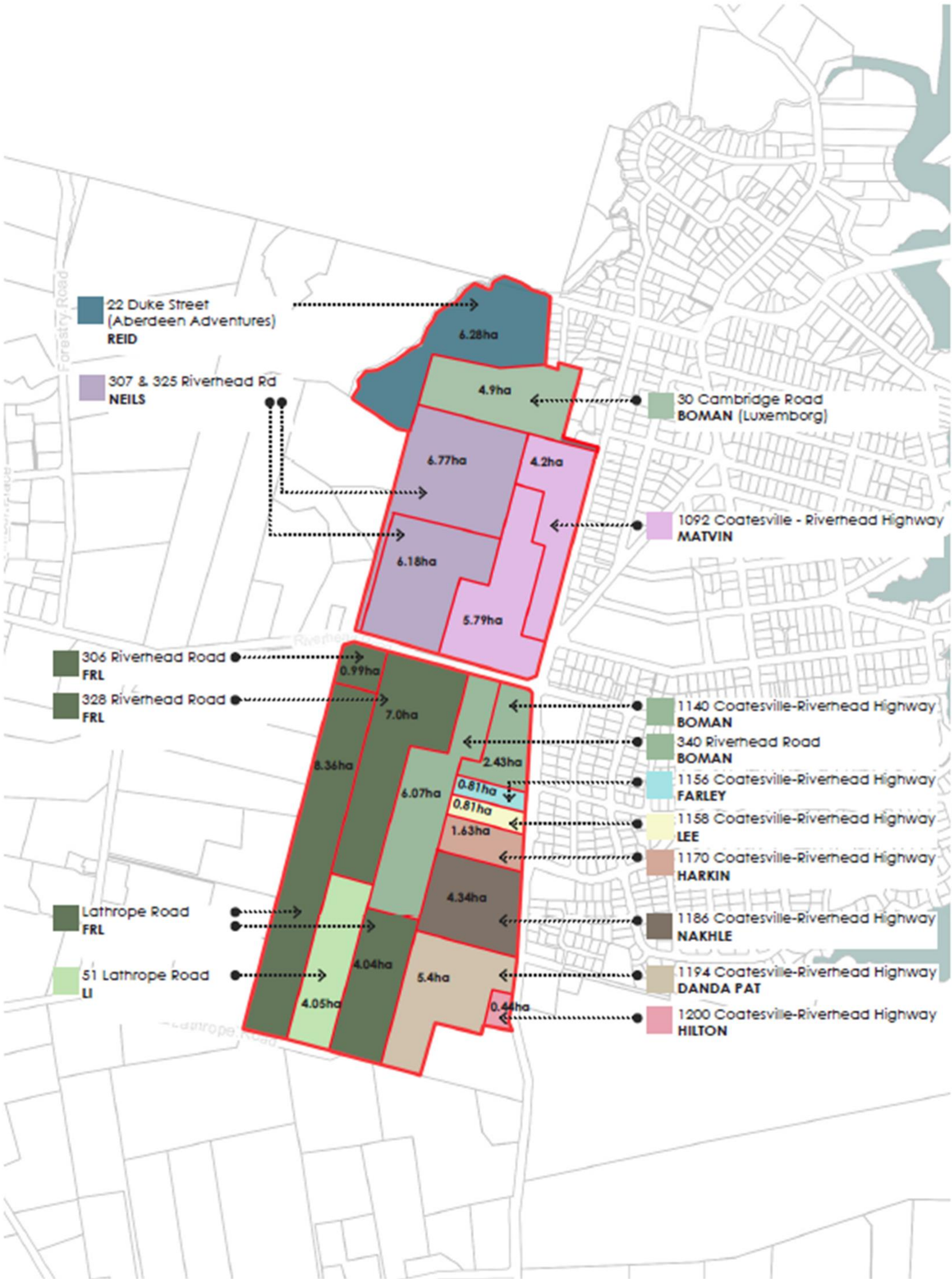
ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2 (3) Prior to occupation of a building on a site with vehicle access to and/or from Riverhead Road, the following road infrastructure upgrades must be constructed and operational: (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and (c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3. (4) Prior to occupation of a building on a site with vehicle access to and/or from Lathrope Road, the following road infrastructure upgrades must be constructed and operational: (a) Upgrade Lathrope Road between Riverhead Road and the new access point, in accordance with IX.10.3 Riverhead: Precinct plan 3 and Appendix 2; and (b) Upgrade the Riverhead Road/Lathrope Road intersection to a Give-Way controlled intersection, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2. (5) Prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, the following road infrastructure upgrades must be constructed and operational: (a) A new footpath on the western side of Cambridge Road between Queen Street and Riverhead Road in accordance with IX.10.3 Riverhead: Precinct plan 3; (b) Upgrade and urbanise the existing carriageway of the formed portion of Cambridge Road south of Queen Street to an urban standard, in accordance IX.10.3 Precinct Plan 3; (c) A new footpath on the northern side of Queen Street between Coatesville Riverhead Highway and Cambridge Road in accordance with IX.10.3 Riverhead: Precinct plan 3; and (d) An additional pedestrian crossing facility on Coatesville-Riverhead Highway between Edward Street and Princes Street.			

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
6	IX.3 Policies Policy 3	(3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide local employment opportunities and support the surrounding land uses in Riverhead Precinct	Support in part	It is unclear why office activities are being elevated to such prominence above the provisions of the local centre to provide for a range of employment activities and to meet the day-to-day needs of the community.	Amend Policy 3 as follows: (3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide for the day-to-day needs of the community. local employment opportunities and support the surrounding land uses in Riverhead Precinct
7	IX.3 Policies Policy 5	(5) Require subdivision and development in the precinct to be coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.	Support in part	The Boman Submitters support Policy IX.3 in relation to development, but consider it is unnecessary to impose such a restriction on subdivision. The Boman Submitters consider the preparation of development ready "super lots" should be enabled ahead of other critical infrastructure.	Reference to subdivision should be deleted from Policy 5. The activity table at IX.4.1 should be amended to separate subdivision from development. Subdivision should have blanket RD status.
8	IX.3 Policies Policy 8	(8) Require the key local roads and pedestrian connections to be generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout that integrates with the surrounding transport network	Oppose	The local road network including pedestrian connections is a matter for detailed design at the time of subdivision and development. The imposition of design outcomes from a concept plan does not take into account the manner in which the fine grained road network would be established. There is no section 32 analysis that demonstrates that all other options for local roads and connections are not as equally valid design solutions. Policy 9 is considered appropriate, along with those in E38 to achieve desired connectivity.	Delete Policy (8)
9	IX.3 Policies Policy 13	(13) Encourage the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2, which achieves the following outcomes	Oppose	While the Boman Submitters agree that stormwater conveyance is necessary, they disagree that a multi-purpose green corridor is necessary to give effect to the NPS-UD or the RPS. The multi-purpose green corridors do not connect with any no ecological features Pedestrian and cycle amenity can be achieved within the road network. Recreation amenity can	Delete Policy (13)

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				be achieved by the provision of neighbourhood reserves. There are no qualifying matters relating to the green corridor, nor do they provide connections between any such features. The multi-purpose green corridors are a nice to have design feature which have been elevated to be a requirement. , Implementation of the multi-purpose green corridors could be restricted due to the reliance on vesting the assets to Council. The purpose of multi-purpose green corridors could be achieved through standard subdivision and design responses.	
10	IX.3 Policies Policy 17	(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: (a) Providing a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2	Oppose	The Boman Submitters consider that a range of alternatives should be available to manage stormwater management devices rather than the current proposal being within or proximate to the proposed green corridor. Stormwater conveyance, along with treatment and retention/detention is a matter distinct form the establishment of multi-purpose green corridors. These functions can be achieved through a variety of means which does not require, by policy, a green corridor to be established.	Amend Policy 17 to - delete references to the multi-purpose green corridor; and - focus on appropriate solutions for stormwater conveyance, along with treatment and retention/detention.
11	IX.8.1 Matters of Discretion	(2) For new buildings prior to subdivision; and subdivision, including subdivision establishing private roads: (a) Location and design of the collector road, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes;	Support	The Boman Submitters agree that integration of a development with the rest of the precinct should be a matter of discretion.	Retain as notified except where consequential relief is necessary to address matters otherwise addressed by this submission.
12	IX.8.2 Assessment Criteria IX.8.2(2)(i)-(k) IX.8.2(2)(e) IX.8.2(2)(g) IX.8.2(2)(m)-(p)	(2) For new buildings prior to subdivision, and subdivision, including subdivision establishing private roads: (d) ... (m) Whether development is in accordance with the approved Stormwater Management Plan and Policies E1.3(1)-(14).	Support in part	The Boman Submitters consider that it is highly unlikely that Auckland Transport will support departures from design to incorporate cultural values in the design of roads. The provisions are unclear in terms of the outcomes sought and are aspirational.	Delete reference to streets in IX.8.2(2) and Policy IX.3(19) and limit the provisions to the design of public open spaces. Delete the multi-purpose green corridors in IX.8.2(2)(i)-(k).

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	IX.3 Policies IX.3(19)			The Boman Submitters agree with coordinated approach to stormwater management provided flexibility is retained for conveyance, treatment and retention/detention at the subdivision scale.	Amend the stormwater flooding matters to address stormwater quality, quantity and flooding matters distinct from limiting mitigation measures to one solution in IX.8.2(2)(m)-(p). 205.20
					Retain the remainder of IX.8.2 as notified except where consequential relief is necessary to address matters otherwise addressed by this submission. 205.21
13	IX.9 special information requirement	(3) Large or highly visible commercial or community focused buildings	Oppose	It is unnecessary to make this a mandatory information requirement where it is at best a matter which is encouraged.	Delete IX.9(3) 205.22 Retain the remainder of IX.9 as notified.
14	IX.11.1 Appendix 1: Road function and design elements table – Internal Roads within Precinct	Appendix 1: Road function and design elements table – internal roads within precinct	Support in part	The Collector Road and Local Road dimensions are wider than is necessary or that is identified in Auckland Transport’s design manuals. The extent of road widening of existing roads is a matter of detailed design. It is unnecessary to identify the minimum widening as this will vary.	Reduce the width of Collector Roads (without adjacent reserve) to 21m and Local Road to 16m as minimums. 205.23
					Identify that road widening is to be determined through detailed design. 205.24
					Retain the remainder of the table as notified. 205.25

Appendix A – Map showing landholding ownership within the Plan Change Area



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Emma Pearson
Date: Friday, 17 May 2024 3:30:23 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Emma Pearson

Organisation name:

Agent's full name:

Email address: e.stanyard@gmail.com

Contact phone number:

Postal address:

20 Alice Street

Riverhead

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land to west of Riverhead, as per Private Plan Change by Riverhead Landowner Group, 80.5 hectares

Map or maps:

Other provisions:

1. Traffic and pedestrian access from Cambridge Road to central Riverhead
2. Green space allowance
3. General transport infrastructure to/out of the area.
4. Business catchment area

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. There appears to be no consideration for the increased traffic along existing roads (Cambridge, Queen and Alice) that are already unsafe, poorly lit, partly footpathed and often in poor condition. Also the impacts on King street and Alice street junctions with the highway. These are already dangerous especially with regards pedestrians (King street) and parked vehicles when park is in high use (Alice Street). Additional pedestrian and vehicle access to Duke street could alleviate some pressure from the development but still of concern.
2. Lack of allowance for trees in housing/business use areas to maintain character with the rural surrounds and existing Riverhead. And will the northern most area next to the stream have public

access and be managed as park area? unclear as to impacts of proposed change.

3. SH16 continues to be a major issue in the northwest with no relief in sight as improvements get delayed or shelved etc. Traffic on weekdays and weekends at peak times, which are getting longer in duration, along the Coatesville Riverhead Highway is dire, with many residents already modifying their work hours, other activities, travel routes to try and avoid sitting in traffic. Even the construction phase of this project will add to this mayhem and no development should go ahead until the local transport network is in much better shape.

4. The catchment area for business is overoptimistic! Anyone on Dairy Flat highway is not likely to come to Riverhead when Albany is closer.

I or we seek the following decision by council: Decline the plan change

206.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Carole Paulus
Date: Friday, 17 May 2024 3:45:51 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Carole Paulus

Organisation name:

Agent's full name: Carole Paulus

Email address: CAROLE.PAULUS@YAHOO.FR

Contact phone number:

Postal address:

Grey Lynn
Auckland 1021

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

My submission applies to the plan change in its entirety (as well as all precinct provisions)

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I believe this plan change will deliver much needed residential housing in the North West, alongside additional amenity to the existing area, while also addressing issues around infrastructure (roading, flooding etc).

I or we seek the following decision by council: Approve the plan change without any amendments

207.1

Details of amendments:

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Janelle Lisa Redditt
Date: Friday, 17 May 2024 3:45:58 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Janelle Lisa Redditt

Organisation name:

Agent's full name: Janelle Redditt

Email address: janelleericksen@gmail.com

Contact phone number: 0211050490

Postal address:
janelleericksen@gmail.com
Riverhead
Riverhead 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: 17 Princes Street, Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

As the stormwater analysis for the proposed development was completed before 2023 it fails to consider the recent significant rain and weather events and the impact of the 2023 Auckland Anniversary floods in Riverhead. As such, the current Annual Exceedance Probability (AEP) calculations likely underestimate the true impact on our local community.

The completion of the proposed development will increase the impact of local flooding causing significant damage to existing properties, the livelihood and well-being of our community, and at worst cause loss of life.

There are significant challenges to the proposal of diverting additional stormwater downstream considering the capabilities of our current infrastructure and of course climate change.

The infrastructure of Riverhead is already struggling to cater to the community, particularly the roads (with public transport options lacking), only having one school (which doesn't cater to high school students), and a lack of services in the area.

High school students have to travel for hours each day to and from school, early childhood centers are already full as are doctors in the neighbouring communities.

The roads are over capacity with many having to drive hours to make it to work - the single-lane highway is not fit for purpose currently and certainly would not handle more traffic. Even on the weekends, there is a line of traffic waiting to get out of Riverhead.

Riverhead (and our neighbouring communities) is simply not set up for a population influx.

I or we seek the following decision by council: Decline the plan change

208.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

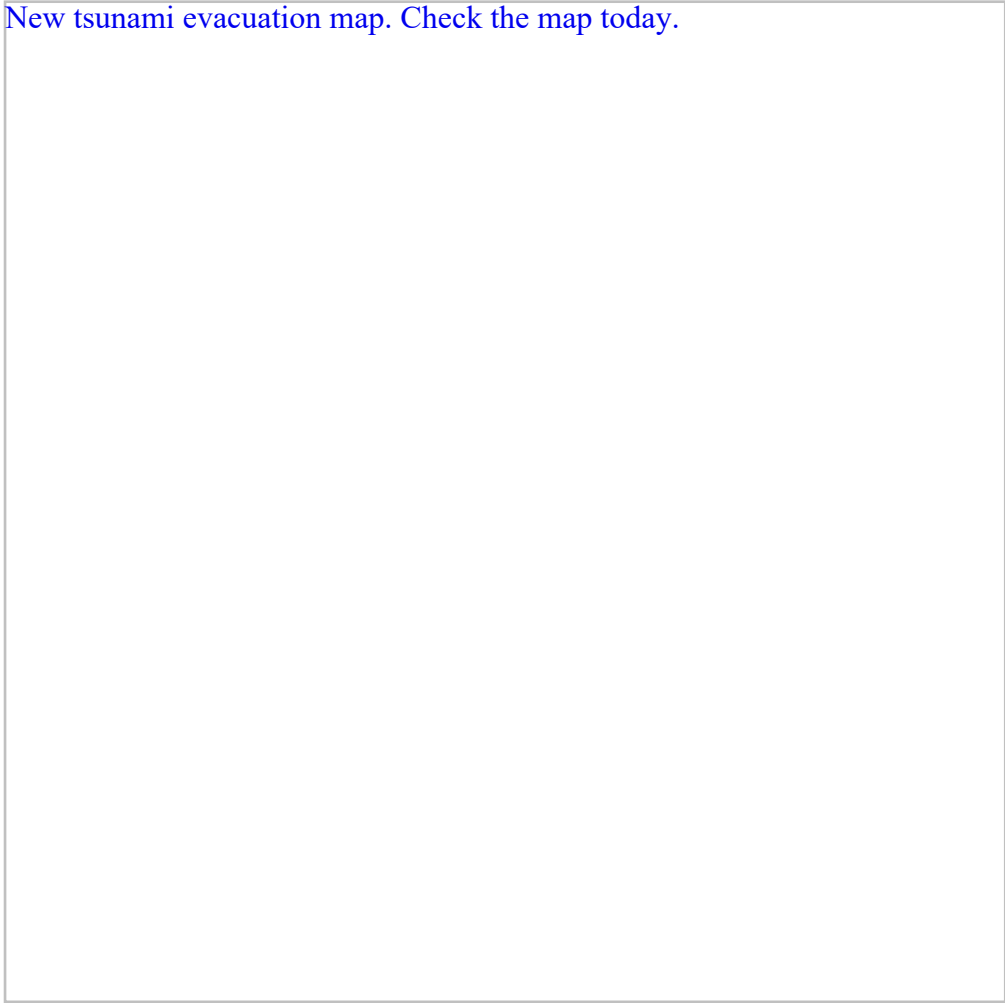
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Wayne Mitchell
Date: Friday, 17 May 2024 3:45:58 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Wayne Mitchell

Organisation name:

Agent's full name: Wayne Mitchell

Email address: wayne@mitchell-consulting.co.nz

Contact phone number: 0275055501

Postal address:

57 Queen St

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address: As above

Map or maps: As above

Other provisions:

As above

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This development must not proceed in any way whatsoever until the kumeu bypass is completed, the sh16 riverhead round about is completed and all roading, stormwater and sanitary drainage infrastructure between sh 16 and Albany Hill is upgraded and completed.

I or we seek the following decision by council: Decline the plan change

209.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Terence L Klein
Date: Friday, 17 May 2024 4:00:18 pm
Attachments: [Plan Change submission Terence Klein.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Terence L Klein

Organisation name:

Agent's full name: Terence Klein

Email address: kleint122@gmail.com

Contact phone number:

Postal address:
28 Langston Avenue
Palmerston North
Palmerston North 4414

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: 4 Princes Street

Map or maps:

Other provisions:
Plan Change in Riverhead

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
The planned development puts extreme pressure on the existing local and regional infra-structure that does not appear to be addressed in a timely by the developer or the long range Council plans.

I or we seek the following decision by council: Decline the plan change

210.1

Submission date: 17 May 2024

Supporting documents
Plan Change submission Terence Klein.pdf

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Concerns related to Riverhead development plan

Transport

The roading infrastructure currently does not handle the number of cars on the road well: Coatesville Riverhead Highway entrance onto 16 heading into Auckland has significant delays no matter the time of day and, of course by rush hour. At times, it takes more than ½ hour to go from Princes Street to the roundabout that feeds the highway into Auckland and Fred Taylor Drive

The developers apparently have come to some agreements that will mitigate some of the problems, but Auckland Transport and Waka Kotahi as well as the residents of Riverhead do not believe the roading infrastructure is sufficient to handle the increased use caused by the planned development. An Auckland Transport document regarding Riverhead holds that “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented,” Further AT wrote, “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented.” In several documents the Council mentions road infrastructure “improvements,” being fully funded and finished in 2025, but no evidence of that work can be seen.

The Plan Change request and the development in Riverhead must be halted until roading development can handle the current and future increased numbers. That circumstance appears to be years away.

Mass transit remains insufficient and slow as well. Auckland Transport journey planner cites that the trip from Riverhead to Auckland CBD takes 1 hour and 40 minutes (if buses are running perfectly) and can require using three different buses. During the morning and evening rush hours that will be significantly longer. When is the proposed Northwest Bus Lane to be started? Finished? Perhaps never?

The Plan Change request and the development in Riverhead should be halted until mass transit can efficiently handle the current and future increased numbers.

Flooding

The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs in many areas of Riverhead, not just in the area of the proposed development. Much of the drainage problem is likely the tidal nature of the Rangitopuni Stream changing the local drainage base level. How will that be addressed to allow for effective drainage in the entire area?

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure.

Electricity

Over the past several years, Princess Street has had many power outages due catastrophic transformer failures during storms, often caused by downed trees.

The electrical grid regionally is not robust and contains many kilometers of “rural standard” lines.

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have robust electrical management infrastructure.

Housing

The proposed Plan Change touts adding terraced housing and apartments with a 4-storey structure.

The tall buildings will detract from the character of Riverhead. A possible solution would be to move any 4-storey building to the corners furthest away from Coatesville Riverhead Highway where there are fewer houses affected.

If the Plan Change is approved, no buildings taller than a main and 1st level should sit on Coatesville Riverhead Highway.

The Plan Change also hopes to “increase the amount of available housing.”

Currently Riverhead has several developments that have failed to progress: the area at 1066-1070 Coatesville Riverhead Highway has a partially developed lot with pipes unburied and no progress being made. This area (between Alice and Coatesville Riverhead Highway also has terraced housing --- mostly finished, but completely unoccupied. Construction for those terraced houses and the amenities they would bring began about 5 years ago and has sat in its current state for 3 or 4 years. Both sites are blights on the community.

The Plan Change Request and its development in Riverhead should be halted until the current developments that sit idle are finished and occupied.

Education

Riverhead School (primary school) is currently near capacity and will remain so even after the current additions are completed. Adding more housing (and therefore families) directly affects the schools and their children. Riverhead, Kumeu, and Huapai do not have a secondary school. Students must travel up to an hour to get a high school education. How and when will this undesirable situation be resolved?

The Plan Change Request and its development in Riverhead should be halted until educational resources coincide with the numbers of children of all ages in the area.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Benjamin David Pennell
Date: Friday, 17 May 2024 4:00:52 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Benjamin David Pennell

Organisation name:

Agent's full name:

Email address: family@teampennell.nz

Contact phone number: 021493267

Postal address:
20 Crabb Fields Lane
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The primary reason we oppose this development is due to the lack of supporting infrastructure in our community and the issues that we already experience being magnified further.

The major concerns we have relate to:

1. Flooding
2. Schooling
3. Transport

Flooding

The surrounding area is flood-prone, having been significantly impacted by floods in the last few years. Our concern is that the further development of impermeable land will only exacerbate the issues we have experienced. Climate change related weather events appear to be increasing in

nature - both in frequency and impact - and we do not see how the proposed development seeks to reduce the impact our community has experienced.

Schooling

Our local primary school (Riverhead Primary) is already over capacity with nearly 1/3 of the school field now covered with 'temporary' buildings to accommodate the rapidly expanding school roll. The area around the school has become particularly dangerous during drop-off and pick-up due to the lack of safe on or off-street parking.

There is a distinct lack of in-zone options for our children to attend once they complete their primary years. With no planned intermediate or secondary school development in the community this issue will only be amplified if the development was to proceed.

Transport

The roading infrastructure in the community is very poor - both in terms of the state of the roads and their design. Travelling to/from the city for work in peak hours is incredibly challenging with limited viable public-transport options available. Traffic is often backed up to the Golf Club from SH16 in the morning, and in reverse the queues at Brigham Creek Roundabout have only lengthened in the 8 1/2 yrs that we have lived here. The intersection at SH16 / CRH is particularly dangerous; we have been involved in 2 accidents ourselves in the last 2 years.

We don't see how the proposed development will do anything other than increase the frequency and severity of traffic delays and accidents.

I or we seek the following decision by council: Decline the plan change

211.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jann Olding
Date: Friday, 17 May 2024 4:15:19 pm
Attachments: [PPC 100 - Riverhead Community Association Submission FINAL 20240517161353.312.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jann Olding

Organisation name:

Agent's full name:

Email address: jandjolding@gmail.com

Contact phone number:

Postal address:
 15 Pitoitoe Drive
 Riverhead
 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Proposed Intensified housing - THABs and related issues noted below - height of structure and off-street Occupier Garaging.

Parks areas

Green Corridor

Location of Neighbourhood centre

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Having read the PPC 100 Riverhead Community Association Submission Final response document I support every point made and the suggested solutions. The other things that thoroughly irks me is the THAB's that brings with it the associated intensification - THIS IS NOT RIVERHEAD. I don't recall any information that clarifies whether the Apartments and Terraced units will have off-street garaging for all the occupiers, if not you can imagine how clogged the streets will be, starting to look like Avondale!! The Parks areas don't look like Parks but more like "Small Greens" the size of a postage stamp, no quality offered there. The green corridor running through offers nothing other

than the appearance of a covered stormwater drain, to call it multi-purpose is a gross exaggeration, surely the design team can be more imaginative. The Plan Change and the proposed housing needs to be clarified more about how high the Apartments will be, is it 3 stories or 6 stories??? And again what about Apartment and THAB Occupiers garaging of their vehicles. The Neighbourhood Centre location looks weird - out on its own.

I or we seek the following decision by council: Decline the plan change

212.1

Submission date: 17 May 2024

Supporting documents

PPC 100 - Riverhead Community Association Submission FINAL_20240517161353.312.pdf

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

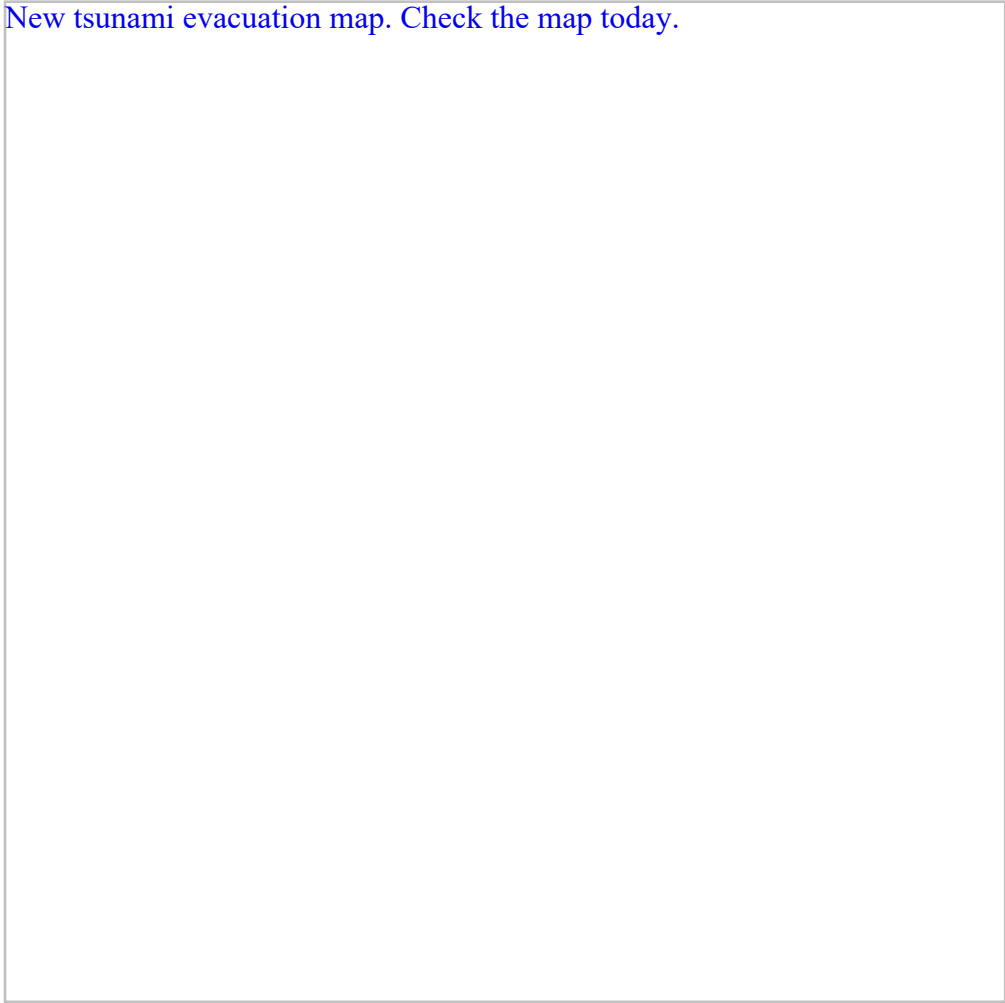
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Riverhead Community Association submission to PC 100 (Private): Riverhead

Introduction

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

Council's Position Pre-Notification

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission¹.

"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and

¹ Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73

detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”

And

“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”

RCA – Position Overview

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

Transport:

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.

Transport – remedies sought

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

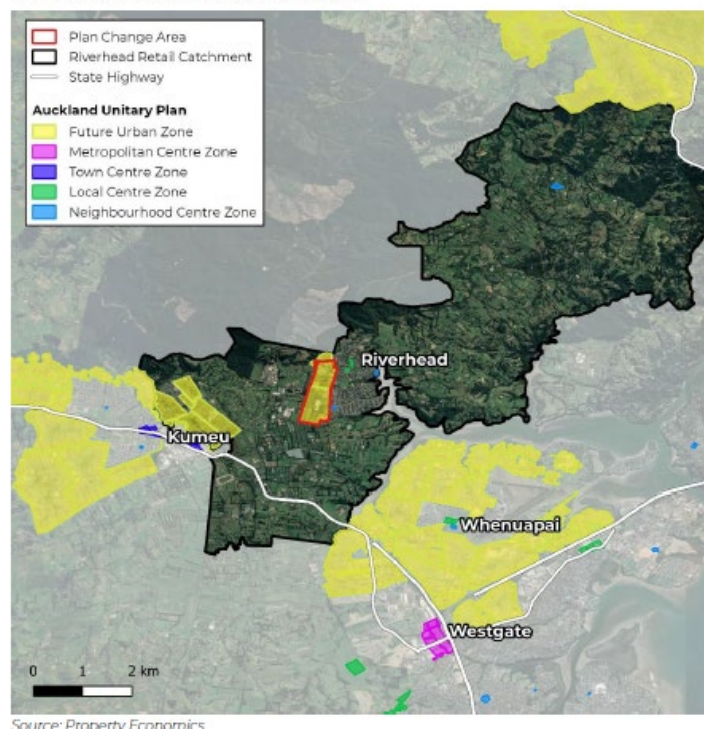
Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.



24 | KUMEŪ-HUAPAI CENTRE PLAN

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a

relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

Residential Zoning - Mixed Housing Suburban Zone:

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the

Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement

should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to remove the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

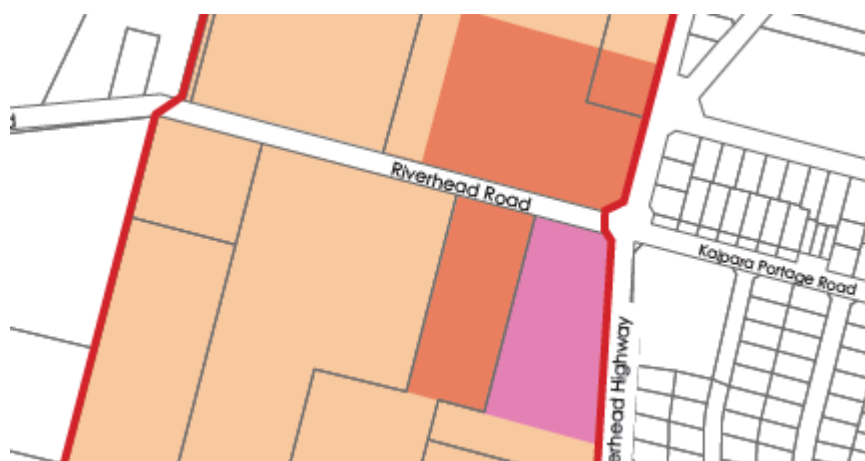
Residential Zoning - Mixed Housing Suburban Zone – Relief sought

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.

44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

Residential Zoning - Terrace Housing and Apartment Zone (THAB):

47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B



50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

Mixed Rural Zone:

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

Mixed Rural Zone – relief sought

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:
(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*

It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

Flooding and Stormwater - relief sought

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would

likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests *"Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space."*

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.
84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:

“The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”
85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.
87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide “... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

Auckland | A20405

Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of

the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

98. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with '*where possible*'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

Parks and Reserves – relief sought

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

Retirement Village (Matvin Group land):

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
 - a connected physical environment
 - an integrated community
 - access to nature
 - vibrant and local
 - housing choice and affordability
 - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also

does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

Retirement Village (Matvin Group land) – remedies sought

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

Structure Plans and Consultation:

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be

provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.

To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.

Commencing consultation early in the process is important, and can help with:

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Natalie Vose
Date: Friday, 17 May 2024 4:30:30 pm
Attachments: [Riverhead plan 100 Opposition.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Natalie Vose

Organisation name:

Agent's full name: Natalie Vose

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Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
in the attached

I or we seek the following decision by council: Decline the plan change

213.1

Submission date: 17 May 2024

Supporting documents
Riverhead plan 100 Opposition.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Opposition Document

Auckland Council Regarding Proposed Development of the Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

PC 100 (Private): Riverhead

Traffic Congestion

Overview of Traffic Concerns

The proposed development plan inadequately addresses the significant traffic congestion issues already prevalent in the area, particularly on the Riverhead Coatesville Highway (CRH), State Highway 16 (SH16), and the Northwest Motorway (NW Motorway). The addition of new residences will exacerbate these problems, making current conditions untenable.

Specific Issues

1. Lack of Alternatives and Single Lane Dependency

- The Coatesville Riverhead Highway is a single-lane road with no viable alternative routes for entering or exiting the area beyond CRH. All alternatives funnel traffic onto SH16, a major bottleneck.
- Current peak morning traffic queues extend far beyond Hallertau, and weekend traffic often backs up to the Huapai Golf Club just to enter the CRH/SH16 intersection.

2. Persistent SH16 Congestion

- SH16 is consistently congested from Kumeu through to the Brigham Creek Roundabout, causing delays at all times of the day.
- The proposed roundabout, while improving intersection safety, will not alleviate overall congestion. Instead, it may contribute to traffic slowdowns.

3. Impact of Proposed Intensification

- The introduction of circa 1500-1750 new residences and business zone likely to attract a minimum of 1-2 vehicles, will significantly increase traffic volume on these already burdened roads.

- With limited local employment, most residents will need to commute via CRH and SH16 to Albany, Central, or South Auckland, putting further pressure on these routes.

4. **Inadequate Public Transport**

- The current public transport network is insufficient to support the expanding Northwest community, including Kumeu, Huapai, and Riverhead.
- There are bus lanes or park-and-ride facilities for the NW motorway, and existing services are unreliable and inefficient.
- As an example, a bus journey to Westgate, a mere 5km away, estimated to take at least 30 minutes. Traveling to Auckland CBD requires two bus transfers and over an hour, complicating and extending commute times.

5. **Lack of Active Transport Infrastructure**

- There are no footpaths or cycle paths to facilitate alternative transport options to local facilities or to connect with the NW cycleway.
- Without viable alternatives, residents have no option but to rely on cars, increasing traffic congestion.

Conclusion on Traffic Concerns

It is irresponsible to approve a development of intensified 2-3 story terrace and apartment housing without a comprehensive and viable plan for improving public transport and road infrastructure, ahead of the development. The proposed development plan must include specific, actionable measures to address these issues satisfactorily for the community function.

Flooding and Environmental Concerns

Overview of Flooding Issues

The proposal to use standard stormwater design practices, involving stormwater management ponds along a central corridor, is insufficient. Recent flooding events have shown that current designs are inadequate and unable to handle increasingly frequent extreme weather events.

Specific Issues

1. **Inadequate Design Capacity**

- While current designs claim to handle a 1 in 100-year event, recent flooding events in 2023 demonstrate these events occur more frequently and with greater intensity than anticipated.
- Existing developments in north-west Riverhead, Kumeu/Huapai were designed to these standards but still failed, resulting in significant residential and infrastructural flooding.

2. **Frequent Overflows and Inadequate Assessments**

- The stormwater pond at Jessie Rise frequently overflows during regular rain events, indicating that the system is already operating beyond its intended capacity.
- The assessment performed (Appendix 10) appears outdated, and relying on current standards will likely result in repeated system failures.

3. **Increased Pressure on Infrastructure**

- Further development using the existing design standards will lead to failures in storm and wastewater infrastructure, particularly once the design limits are exceeded.
- There is a need to reassess and upgrade the stormwater management strategy to accommodate future capacity requirements and to prevent flooding.

Conclusion on Flooding and Environmental Concerns

The proposed development plan must incorporate updated, resilient stormwater management practices capable of handling more frequent and severe weather events. Without these improvements, further development will only exacerbate existing flooding issues, compromising the safety and sustainability of the community.

Final Recommendations

While development is inevitable in the continued expansion of Auckland, Auckland Council must address these concerns comprehensively before approving any proposed development plan. Specifically, there should be:

1. A thorough and updated traffic impact assessment, with concrete plans to expand and improve road infrastructure and public transport services.
2. Implementation of robust, future-proof stormwater management solutions to provide for future weather events including flooding and provision of adequate wastewater services to protect the environment.



FORM 5

**Submission on a publicly notified proposal for policy statement or plan, change or variation
under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Auckland Council

Name of submitter: **Te Tāhuhu o te Mātauranga | Ministry of Education**

Address for service: C/- Beca Ltd
PO Box 6345
Wellesley
Auckland 1141

Attention: Eden Rima

Phone: +64 9 300 9000

Email: Eden.Rima@beca.com

This is a submission on the Plan Change 100 (Private): Riverhead

Background

Te Tāhuhu o te Mātauranga | Ministry of Education ('the Ministry') is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets the Auckland region.

The Ministry of Education's submission is:

Future school network impacts

Plan Change 100 (PC 100) is seeking to rezone approximately 80.5 hectares of land located between Lathrope Road and Riverhead Road from Future Urban Zone to a mix of residential zones with a small Local Centre and Neighbourhood Centre. The proposed plan change will provide development capacity of approximately 1,450-1,750 new additional dwellings¹ within a developable area of approximately 73.3ha. Although the rezoning of this land was anticipated as it is being rezoned from Future Urban Zone, PC 100 would facilitate urban growth, thereby increasing the demand on the local school network in Riverhead.

Riverhead is located in the Massey Hobsonville Kaipara catchment as defined in the National Education Growth Plan 2030. The areas of Kumeū, Huapai, and Riverhead are identified as locations for future growth in the Auckland Unitary Plan with significant areas identified as Future Urban Zone. The Ministry has identified the requirement for an additional primary school in Riverhead to cater for future growth and the demand generated by the development signalled in PC 100.

The Ministry will continue to liaise with the Applicant to discuss opportunities for educational facilities within the plan change area (PCA). In addition, the Ministry considers that the current precinct provisions are consistent with other recent plan changes, and appropriately recognise that education facilities should be enabled throughout residential areas where student populations reside.

Walking and cycling provisions

The Ministry broadly agrees with the proposed walking and cycling provisions through the PCA. Quality pedestrian and cycle connections to schools and through neighbourhoods have health and safety benefits for children and reduce traffic generation at pick up and drop off times. All future schools should be well serviced by safe and accessible pedestrian and cycling links through the community. This includes safe and convenient connections to the existing developed Riverhead area so that the site covered by the PCA is well integrated into the existing urban structure. The Ministry requests that the applicant ensure these linkages are installed and operational to support the development and that they consider the most vulnerable users in their design.

Stormwater

The Ministry seeks to ensure that PC 100 provides flexibility in stormwater management in terms of enduring obligations for a potential future school.

In this regard, the Ministry understands that a Stormwater Management Plan (SMP) was lodged with PC 100, and that the aspirations within that SMP would translate through to future provisions - at both a regional and district level - that would have a bearing on development within a potential future school. In particular, the Ministry has identified that most of the PCA (except for two properties) is subject to a Stormwater Management Area Flow 1 (SMAF) control overlay. Therefore a potential future school within this area will likely be located within the SMAF 1 area. Additionally, the SMP makes reference to

¹Riverhead Private Plan Change Request S32 Report, B&A Urban & Environmental, 2023. Available at: <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/02-pc100-s32-report-riverhead-pc.pdf>

wetlands, overland flow paths, communal and on-lot devices, and potential peak flow attenuation requirements, all of which would likely have a bearing on a potential future school.

The Ministry requests that provisions are included in the SMP/plan change to address how appropriate stormwater management for schools will be resolved, without restrictive device obligations at this point (for example, stormwater tanks that would currently be required through the proposed SMP and SMAF-1 framework).

The Ministry's position on the Proposed Plan Change

The Ministry is **neutral** on PC 100 with proposed precinct provisions for education in its current form.

The Ministry is also **neutral** on PC 100 if the provisions for stormwater and transport are accepted.

The Ministry has been working with the Applicant for some time to identify a site for a potential new school and enable policy provisions for education. Continued planning and communication between the Applicant, Auckland Council and the Ministry is needed to ensure the planning for stormwater and transport can accommodate a potential future school(s) in the PCA.

The Ministry therefore has an ongoing interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when a school can be established.
- Ensuring the relevant Precinct provisions specifically acknowledge and provide for schools. This is critical given schools are an essential piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of the establishment of education facilities in future years.
- How safe walking and cycling infrastructure will be planned and delivered.
- The urban form and amenity provided through connected and usable areas of public open space.

The Ministry agrees with provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that enables the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

The Ministry's requested relief will ensure a school (or schools) can be located in an appropriate location with suitable infrastructure in place, so that any future school can serve the surrounding residential catchments, and be connected to town centres and the surrounding community in a safe and effective manner for all school users.

Decision sought

In the event that the Council confirms the proposed plan change, the Ministry requests that the following policy wording in the plan change be retained as this enables the establishment of a future educational facility, should the need arise:

Objective 8: Development is supported by social facilities, including education and healthcare facilities.

214.1

Policy 6: Provide for new social facilities, including education facilities, that meet the needs of the community.

The Ministry wants to ensure that ākonga (students) have the ability to safely and conveniently walk and cycle to their local school. As such, the Ministry requests the objectives and policies that create safe walking and cycling networks through the precinct are retained, in particular the following:

Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads.

214.2

Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.

In addition to this, the Ministry notes the following points in relation to traffic and the provisions within the Integrated Transport Assessment (ITA):

Bus Transport Provisions:

The Ministry has identified that under section 4.6.1 and 6.6 of the ITA, there is no reference to the proposed roading and transport infrastructure having been designed (or future proofed) to allow for such future bus services and infrastructure. There is also limited assessment of the potential for bus services to access a future school site and the physical and operational requirements that might be needed to facilitate this in a safe and convenient manner – in respect of both buses and other road users. The Ministry requests:

- That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.

214.3

External Transport Network Constraints and SH16/Coatesville Riverhead Upgrade:

Under Section 5.1 of the ITA, the Plan Change proposes a Restricted Discretionary Activity (RDA) status for any activity being established within the Plan Change in advance of the identified threshold as to “ensure effects of any occupied development are appropriately assessed”. The RDA assessment accompanying a resource consent application could make a specific assessment using management plans or specific features of an activity to refer or sidestep the requirement for certain pieces of infrastructure being in place to the detriment of the network and landuse development pattern overall.

The Ministry requests:

- that the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items.

214.4

Proposed Speed Limits:

The ITA places a high degree of reliance upon the proposed reduction of speed limits especially along Coatesville-Riverhead Highway, Riverhead and Lathrope Road yet there is limited control or jurisdiction by the Plan Change applicants over the creation of reduced speed limits. These are determined by third parties with some elements of public consultation, which the ITA relies on heavily to deliver safe and effective transport outcomes. However, there does not appear to be any specific additional measures or conditions that could be put in place to “tie in” Auckland Transport to the speed limit bylaw process other than what is proposed via the threshold provision in the Plan Change.

Therefore, the Ministry recommends:

- that greater specificity and even strategic alignment with Auckland Transport be provided to ensure that the Plan Change outcomes can be delivered where there is reliance upon this matter to mitigate some of the effects of the proposed rezoning.

214.5

School Access – Road Network:

The ITA refers to the strategic consideration of the local and collector road network within the portion of the Plan Change between Riverhead Road and Lathrope Road to the west of Coatesville-Riverhead Highway as being to limit through traffic movement. However, the ITA does not assess how the structure of the proposed local and collector road network within the Plan Change area might serve and relate to a future school site. The road network should consider how any future school site might contribute to the operation of the surrounding road network.

The Ministry requests:

- Required roading standards to be delivered for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features;

214.6

School Access – Walking & cycling

Any future school site will need to be well served by safe pedestrian and cycle routes to all areas of the school zone or catchment area. The proposed upgrading of Coatesville-Riverhead Highway between Riverhead and Riverhead Point Road proposes inclusion of a raised pedestrian and cyclist crossing to facilitate movement between the development areas to the east (existing) and west (Plan Change) parts of Riverhead. This connection point would be of prime importance for active mode access to the proposed school site as well as facilitating and encouraging local trips to be made by active modes. The connection of this point to the school site is important and appears to have been captured in the Boffa Miskell work considering school access. The ITA identifies the importance of this connection but does not identify anything specifically required to facilitate the safe movement of school-age ākonga and family/whanau within the local and collector road network anticipated in the block between Lathrope and Riverhead Roads.



As such, the Ministry requests:

- for the inclusion (or otherwise) of the establishment of a safe cycle/walking facility across Coatesville-Riverhead Highway within the Implementation Plan (and triggering of this via the Plan Change provisions and threshold activity status).

214.7

The Ministry wishes to be heard in support of its submission.

P.P. Krupa Patel

A handwritten signature in black ink, appearing to read 'P.P. Krupa Patel', written over a horizontal line.

**Eden Rima
Planner – Beca Ltd
(Consultant to the Ministry of Education)**

Date: 17 May 2024

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Taraani Mohammed
Date: Friday, 17 May 2024 5:00:20 pm

The following customer has submitted a Unitary Plan online submission.

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 Auckland 2016

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
 Rezoning to allow for housing intensification

Property address: -

Map or maps: -

Other provisions:

-

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The plan change will unlock land to enable more affordable housing in Auckland and I am supportive of the developers leading this change as they have a track record of successful developments, but more importantly creating successful communities.

I or we seek the following decision by council: Approve the plan change without any amendments

215.1

Details of amendments:

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chantelle
Date: Friday, 17 May 2024 5:15:16 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Chantelle

Organisation name:

Agent's full name:

Email address: cfraser2@hotmail.com

Contact phone number:

Postal address:

51 queen street

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

51 queen street riverhead

Property address: 51 queen street riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Added traffic, no infrastructure and not enough local resources to meet the needs of more people and housing

I or we seek the following decision by council: Decline the plan change

216.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Barbara Lynn Chatfield
Date: Friday, 17 May 2024 5:15:23 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Barbara Lynn Chatfield

Organisation name:

Agent's full name:

Email address: valleyviewnz@xtra.co.nz

Contact phone number:

Postal address:

0793

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Section 32 evaluation report (analysis of costs and benefits).

Agree with comments on page 22 of community input - Appendix 18

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I have serious concerns about possible environmental effects involving traffic , flooding and lack of infrastructure when adding the number of dwellings proposed to Riverhead. Stormwater drainage and the amount of impermeable surfaces that will result.

I also question the purpose of the plan change that professes to provide additional housing along with a local centre, neighbourhood centre and network of open spaces. Does this not exist in Riverhead now? What about the Riverhead Hall for example?

I or we seek the following decision by council: Decline the plan change

217.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Auckland Council
Unitary Plan Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 100 (Private): Riverhead Road, Coatesville-
Riverhead Highway, Cambridge Road and Duke Street,
Riverhead

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: **planchanges@water.co.nz**

DATE: 17th May 2024

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

1. WATERCARE'S PURPOSE AND MISSION

- 1.1. Watercare Services Limited ("Watercare") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("Council").
- 1.2. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the Auckland region. Watercare's mission is to provide reliable, safe, and efficient water and wastewater services to Auckland's communities.
- 1.3. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy 2023-2053¹.

¹ Local Government (Auckland Council) Act 2009, s58.

2. SUBMISSION

General

- 2.1. This is a submission on a private plan change requested by Riverhead Landowner Group ("Applicants") to the Auckland Unitary Plan (Operative in Part) (AUP OP) that was publicly notified on 18 April 2024 ("Plan Change 100").
- 2.2. Plan Change 100 affects approximately 80.5 ha of land and is located on 19 properties. Plan Change 100 requests to:
 - a) rezone approximately 6 ha of land from Future Urban Zone to Rural - Mixed Rural Zone;
 - b) rezone approximately 75.5ha of land from Future Urban Zone comprised of:
 - i. 69 ha to Residential – Mixed Housing Suburban;
 - ii. 4.3 ha to Residential – Terrace Housing and Apartment Building;
 - iii. 1.8 ha to Business – Local Centre; and
 - iv. 0.7 ha to Business – Neighbourhood Centre Zone.
 - c) move the Rural Urban Boundary to align with the boundary between the proposed Rural - Mixed Rural Zone and the proposed urban zones.
- 2.3. Plan Change 100 also proposes a new precinct to be included in the AUP OP known as the Riverhead Precinct. The proposed Riverhead Precinct provisions include two sub-precincts (A and B). The purpose of Plan Change 100 as outlined in section 4.2 of the Section 32 Assessment Report is to enable the provision of additional housing in Riverhead along with a Local Centre, a Neighbourhood Centre and a network of open spaces.
- 2.4. The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing to ensure that the effects of future development enabled under Plan Change 100 on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991 (RMA).
- 2.5. In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Pūtea Tau 2021-2031 / The 10-year Budget 2021-2031, the Auckland Future Development Strategy 2023-2053 (FDS), the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2021 – 2041. Watercare has also considered the relevant RMA documents including the AUP (OP) and the National Policy Statement on Urban Development 2020 (updated in May 2022).
- 2.6. For the reasons set out below, Watercare **opposes** Plan Change 100. Any infrastructure delivery dates provided in this submission below are forecast dates only and therefore subject to change.

Specific parts of the Plan Change

- 2.7. Watercare's submission in opposition to Plan Change 100 relates to the Plan Change in its entirety.

- 2.8. Without limiting the generality of 2.7 above, the specific parts of Plan Change 100 that Watercare has a particular interest in are:
- a) the actual and potential effects of Plan Change 100 on Watercare's existing and planned water and wastewater networks; and
 - b) the proposed Precinct provisions insofar as they relate to water supply and wastewater servicing.

Sequencing of development - Riverhead Future Urban Area

- 2.9. The FDS informs Watercare's asset planning and infrastructure funding priorities and sequencing. The FDS replaced the Auckland Future Urban Land Supply Strategy 2017 (FULSS) in December 2023.
- 2.10. Plan Change 100 refers to the FULSS, however it should be updated to refer to the FDS. The FULSS identified the Plan Change 100 area as being development ready in "Decade 2 1st half 2028-2032"² which is a significant shift from what is provided for in the FDS, as noted below.
- 2.11. Plan Change 100 is located within the Riverhead Future Urban Area (FUA) which the FDS identifies as not ready for development before 2050+.³
- 2.12. Appendix 6 of the FDS identifies the infrastructure prerequisites that enable the development of the FUAs.⁴ The FDS states:⁵ *"The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS."*
- 2.13. The Riverhead separation from the Kumeu-Huapai-Riverhead (KHR) wastewater main (Riverhead Wastewater Separation Project) is identified as an infrastructure prerequisite necessary to support the development and growth of the Kumeu-Huapai and Riverhead FUAs.⁶ The Riverhead Wastewater Separation Project is planned to be delivered in line with the timing set out by the FDS of 2050+.
- 2.14. Under the FDS, the area subject to Plan Change 100 will not be development ready until 2050+, and the infrastructure required to support the development envisaged by Plan Change 100 is not scheduled to be delivered until after 2050. Given this, Plan Change 100 is therefore "out of sequence", and substantially so. This is one of the key reasons why Watercare opposes Plan Change 100.

Structure Planning

- 2.15. The Spatial Land Use Strategy – North West, Kumeu-Huapai, Riverhead, Redhills North (Spatial Land Use Strategy) was prepared by Auckland Council and adopted in May 2021. The Spatial Land Use

² FULSS (July 2017) at p. 13.

³ FDS, Appendix 6 at p. 39.

⁴ As defined and introduced in the FDS 2023 Appendix 6 at p. 32.

⁵ FDS, Appendix 6 at p. 35.

⁶ FDS, Appendix 6 at p. 39.

Strategy is a high-level outline of the future land uses in the Kumeu-Huapai, Riverhead and Redhills North Future Urban Zoned (FUZ) areas and was required to inform the future transport network. The Spatial Land Use Strategy does not anticipate the commencement of structure plans for these areas until around 2025, and states the relevant area is not anticipated to be development ready for another 8-12 years.

- 2.16. B&A prepared the Riverhead Structure Plan (dated October 2023) for the Applicants.⁷ The Riverhead Structure Plan refers to the FULSS and should be updated to refer to the FDS. The Structure Plan guidelines contained in the AUP OP are part of the Regional Policy Statement and set out the process, documents to be taken into account, matters that must be identified, and the types of specialist documents to support the structure plan as part of the plan change process.⁸
- 2.17. The AUP OP Structure Plan guidelines make clear that structure plans should be developed first, followed by a plan change process.⁹ Policy 3 of the Urban Growth and Form policies set out in the AUP OP Regional Policy Statement provides that the rezoning of future urban zoned land for urbanisation should be enabled following structure planning and plan change processes in accordance with the Structure plan guidelines.¹⁰
- 2.18. The Riverhead Structure Plan prepared on behalf of the Applicant states that there is immediate capacity in the existing water and wastewater infrastructure for development of the Riverhead FUZ to commence and that identified upgrades will provide additional capacity as development progresses. Watercare agrees that there is some limited immediate capacity in the existing water and wastewater networks and that upgrades, to both the local and bulk networks, will be required to provide additional capacity to support development from the Plan Change 100 area. Water supply and wastewater capacity is discussed in detail at paragraph 2.34 to 2.41.

Yield and density

- 2.19. To support Plan Change 100, an assessment of potential yield and the existing and planned infrastructure required to service that yield has been undertaken by the Applicant¹¹. This assessment assists in assessing the effects of the development envisaged by Plan Change 100 on Watercare's existing and planned water and wastewater network.
- 2.20. Watercare understands that Plan Change 100 seeks to provide capacity for approximately 1450-1750 additional dwellings¹² and other land use activities such as retail, schools, healthcare, childcare and retirement villages¹³ which equates to approximately 1,861 development unit equivalents (DUEs).¹⁴ For the purpose of water and wastewater planning, 1,861 DUEs is equivalent to a population of 5,583.
- 2.21. The FDS does not provide anticipated dwelling capacities for the Riverhead FUA but does inform Auckland Council's Growth Scenario, which must be used by Auckland Council and CCOs as a basis to inform planning for services and infrastructure as well as their funding and financing. The most

⁷ Application for Plan Change 100, Appendix 4.

⁸ AUP OP, Appendix 1.

⁹ AUP OP, Appendix 1 at [1.2]: *"The regional policy statement promotes the preparation of structure plans as a precursor to plan changes and to support any of the following..."*.

¹⁰ AUP OP at B2.2.2(3)

¹¹ Riverhead Future Urban Zone Water and Wastewater Servicing Strategy Development dated 28 June 2022 and subsequently revised by the Water and Wastewater Servicing Memorandum 3 dated 28 September 2023.

¹² Section 2 of the Section 32 Assessment Report dated 4 October 2023.

¹³ Section 2.2 of the Water and Wastewater Servicing Strategy Development dated 28 June 2022.

¹⁴ Water and Wastewater Servicing Memorandum 3 dated 28 September 2023.

recent Auckland Council Growth Scenario was issued in February 2024 and is being incorporated as the new baseline in Watercare's population model.

- 2.22. Plan Change 100 incorporates density and subdivision rules that replicate the Medium Density Residential Standards ("MDRS") introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
- 2.23. There is some uncertainty in respect of the level of development that could be enabled by Plan Change 100. Watercare's experience is that when resource consents for subdivision and development enabled by approved plan changes are lodged, the level of development for which consent is sought can often be much more intensive than previously indicated through the plan change process. Where this increase in density has occurred previously, water and wastewater capacity has been taken up faster than planned which means that applications for connections to the network from live zoned areas may not be able to be approved by Watercare for some time.
- 2.24. The density of development possible under the AUP OP where the more permissive MDRS are incorporated can result in significantly higher development yield. Memorandum 3 (dated 28 September 2023) revises the proposed development scenario within Section 2.2 of Appendix 14 of Plan Change 100 and lists other activities which will also increase demand on the water supply and wastewater networks such as schools, retail, retirement villages, childcare and medical centres.
- 2.25. Given the above, the potential yield and density of Plan Change 100 has the potential to be significantly more than the 1450-1750 dwellings specified in the application and against which bulk water and wastewater infrastructure requirements has been assessed. Any density changes proposed at a future resource consent stage would then need to be assessed again separately by Watercare.

Proposed Plan Change 78

- 2.26. Plan Change 78 (PC 78) gives effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and requirements of the RMA.
- 2.27. Auckland Council is required to, amongst other things, incorporate the MDRS in relevant residential zones, and identify qualifying matters to reduce the level of development enabled by the MDRS in areas where full intensification is not appropriate. PC 78 was notified on 18 August 2022 and hearings are ongoing until 30 April 2025, having been given an extension by the Government in March 2024. It is noted the Government has signalled changes may be made to MDRS this year.
- 2.28. As part of PC 78 Watercare assisted Council in identifying sites subject to water and/or wastewater servicing constraints in the medium to long term (as defined in the NPS-UD) and these sites were identified as being subject to a qualifying matter under section 77I(j) of the RMA. This is discussed in detail in Auckland Council's section 32 evaluation report for PC 78. The Water and Wastewater Servicing Constraints qualifying matter is proposed to be included in PC 78 as an additional layer/new control on the AUP OP planning maps.
- 2.29. PC 78 does not apply to Future Urban Zoned land, and the area of Plan Change 100 is located outside the urban environment, as demonstrated on PC 78 map viewer. Under the AUP OP the primary residential zone in Riverhead is Residential - Single House Zone. PC 78 does not propose to increase the density of the urban area in Riverhead by rezoning land to Residential – Mixed Housing Urban. The MDRS provisions have been included in the provisions for the proposed Riverhead Precinct through referencing the standards in the Residential - Mixed Housing Urban Zone chapter of the AUP

OP [as amended by PC 78], rather than using the standards in the Residential - Mixed Housing Suburban Zone. Furthermore, PC 78 amends the Residential - Mixed Housing Suburban Zone to state "The zone does not incorporate Medium Density Residential Standards as it is not a relevant residential zone."

- 2.30. It would be useful for the Applicant to clarify how the potential yield for the Plan Change 100 area has been calculated, given it seems to have been calculated using the proposed precinct provisions for the Riverhead Precinct which incorporate the Residential Mixed Housing Urban Zone provisions (as modified by PC 78), rather than the provisions from the Residential - Mixed Housing Suburban Zone. Under the proposed precinct provisions for the Riverhead Precinct, more than 3 dwellings per site require a resource consent as a restricted discretionary activity and must comply with certain permitted activity standards.
- 2.31. The Applicant's justification of applying the MDRS through the application of the proposed Residential Mixed Housing Suburban Zone is set out in section 6.1 of the Section 32 Assessment Report. It discusses the MDRS, and notes that Tier 1 local authorities have discretion whether to apply the MDRS to settlements predominantly urban in character with a population under 5,000 as these are not captured by the definition of a 'relevant residential zone'. This discretion applies to Riverhead. It further states the Plan Change 100 area will increase the population of Riverhead to over 5,000 and states the Plan Change 100 documentation has demonstrated the density enabled by the MDRS is appropriate within the area for Plan Change 100 for a number of reasons.

Wastewater servicing

- 2.32. The Applicant will be required to extend the local pressure sewer network to service the Plan Change 100 area. Delivery of the required local network upgrades are the responsibility of the developer, with the design subject to Watercare's approval at the time of Resource Consent.
- 2.33. Options and constraints for servicing of the Plan Change 100 area will depend on timing and staging of development in relation to the timing and capacity of Watercare's bulk wastewater infrastructure delivery.
- 2.34. Watercare agrees that the existing Riverhead Wastewater Pump Station (Riverhead WWPS) currently has capacity to service an additional 500 DUE, ahead of the planned abandonment of the Whenuapai Village WWPS. Following the planned abandonment of the Whenuapai Village WWPS, an additional 500 DUE can be serviced by the existing Riverhead WWPS, bringing the total additional DUE able to be serviced to 1,000.
- 2.35. The timing of the removal of Whenuapai Village WWPS from the shared Riverhead Rising Main will depend on the delivery of the wider Whenuapai wastewater programme, in particular the delivery of the interim Slaughterhouse WWPS.
- 2.36. For servicing development above 1,000 DUE, the Riverhead WWPS will need to be either upgraded or separated from the KHR wastewater main. The latter being the Riverhead Wastewater Separation Project listed in the FDS as the infrastructure prerequisite for enabling development in the Riverhead, Kumeu and Huapai FUAs. Ultimately the Brigham Creek WWPS will be required to support the future development of Riverhead. The Riverhead Wastewater Separation Project and the Brigham Creek WWPS will be delivered in line with the demand and timing as forecast under the FDS.
- 2.37. Without prejudice to Watercare's overall opposition to Plan Change 100, further discussion is required with the Applicant on the use of a private smart sewer network, including in regard to controls which

could be put in place to enable Watercare to ensure adherence to the proposed off-peak pumping methodology. The current ownership model would leave control of the smart networks with the private village operator, requiring an agreement to ensure compliance and/or modifications as required to achieve the desired capacity outcomes. As currently proposed, the off peak pumping proposal would not be supported by Watercare.

Water supply servicing

- 2.38. The existing local water supply network currently has capacity for approximately 250 additional dwellings. Beyond this, a dual watermain along Deacon Road (as proposed by the Applicant) will be required to support development of the Plan Change 100 area. Delivery of the required local network upgrades are the responsibility of the developer, with the design subject to Watercare's approval at the time of Resource Consent.
- 2.39. The existing bulk water supply network has good capacity in both trunk and storage to service an additional 4,500 DUEs across the entire Riverhead and Kumeu / Huapai water supply areas. Development in excess of this (either from development enabled in the Plan Change 100 area or via infill or future plan changes in Kumeu or Huapai) will trigger the requirement for an additional bulk reservoir.

Precinct Provisions

- 2.40. As set out above, Watercare opposes Plan Change 100. | 218.1
- 2.41. Without prejudice to its overall opposition to the Plan Change, if the Commissioners are minded to approve the Plan Change notwithstanding Watercare's opposition, Watercare seeks precinct provisions that require subdivision and development to be coordinated with the provision of adequate water supply and wastewater infrastructure. That is, subdivision and development must be precluded by under the precinct provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100. | 218.2
- 2.42. In that regard, Watercare therefore seeks the following amendments (as set out in Attachment 1) to the proposed Riverhead Precinct provisions:
- a) Non-complying activity status for any subdivision and/or development that precedes the provision of adequate bulk water supply and wastewater infrastructure. | 218.3
 - b) All of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries. | 218.4
 - c) Amendments to the precinct description to include the purpose and function of the amended provisions. | 218.5
 - d) Amendments to Objective 5 to include the reference to 'capacity' and specify 'wastewater' and ensuring subdivision and development is coordinated with local infrastructure. This also supports the non-complying activity status. | 218.6
 - e) New Objective 5(A) which addresses the coordination, provision and capacity of bulk water and wastewater infrastructure necessary to service the new precinct. This supports the non-complying activity status. | 218.7

- f) Amendments to Policy 5 and addition of a new Policy 5A to support the non-complying activity status subdivision or development that precedes the provision of adequate bulk water supply and wastewater infrastructure. | 218.8
- g) Amendments to include new standard IX6.16 Water and Wastewater Infrastructure to require development and subdivision to connect to functioning bulk wastewater and water supply infrastructure with sufficient capacity to service the development. | 218.9
- h) Amendments to Table IX4.1(A2A) to require up to 3 dwellings to comply with new standard IX6.16 Water and Wastewater Infrastructure. | 218.10
- i) Amendments to Table IX.4.1(A2B) to require more than three dwellings per site to comply with new standard IX6.16 Water and Wastewater Infrastructure. | w218.11
- j) Amendments to IX.5 Notification (1A) requiring Watercare to be limited notified where resource consents infringe new standard IX6.16 Water and Wastewater Infrastructure. | 218.12
- k) Amendments to include new standard IX.9(6) Water and Wastewater Servicing Plan as a special information requirement. | 218.13

3. DECISION SOUGHT

- 3.1. Watercare opposes Plan Change 100 on the basis that the Plan Change is significantly out of sequence with the expected timing for development of the Riverhead Future Urban Area provided in the FDS.
- 3.2. In the event that Plan Change 100 is approved notwithstanding Watercare's opposition, Watercare seeks that the Commissioners:
 - a) Ensure that subdivision and development is precluded by the Plan Change provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100; and | 218.14
 - b) Include the proposed amendments to the precinct provisions as set out in Attachment 1, or similar provisions that will achieve the same outcomes as sought by Watercare. | 218.15
- 3.3. In addition, Watercare notes that it will require:
 - c) The Applicant to commit to delivering and funding the local water supply and wastewater network capacity and servicing requirements of the development enabled by Plan Change 100; and
 - d) An Infrastructure Funding Agreement to bring forward the required bulk infrastructure to enable the development envisaged by Plan Change 100 earlier than what Watercare is planning to provide in accordance with its Asset Management Plan is agreed with the Applicant, to Watercare's satisfaction.

4. HEARING

- 4.1. Watercare wishes to be heard in support of its submission.

17th May 2024

Mark Iszard

Mark Iszard
Head of Major Developments
Watercare Services Limited

Address for Service:
Amber Taylor
Development Planning Lead
Watercare Services Limited
Private Bag 92521
Victoria Street West
Auckland 1142
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Email: Planchanges@water.co.nz

ATTACHMENT 1.

IX.1. Precinct description

The Riverhead Precinct applies to approximately 75.5ha of land with a contiguous boundary to the existing urban settlement of Riverhead.

The purpose of the Riverhead Precinct is to provide for the development of a new, comprehensively planned residential community as an extension to Riverhead Village that supports a well-functioning urban environment and a quality compact built form.

A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability.

The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement.

There are two Sub-precincts within the Riverhead Precinct:

- Sub-precinct A is zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection location adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor.
- Sub-precinct B is zoned Residential Mixed Housing Suburban and provides for a transition in building height between Sub-precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.

...

The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage potential adverse effects on the wider transport network.

Subdivision and / or development is restricted until land within the Riverhead Precinct is able to be serviced by bulk water supply and wastewater infrastructure. Water supply and wastewater infrastructure requires a series of upgrades to avoid, remedy or mitigate adverse impacts on the existing and planned water supply and wastewater infrastructure. Many of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries.

The zoning of land within this precinct is Residential – Terrace Housing and Apartment Building, Residential – Mixed Housing Suburban, Business – Local Centre and Business – Neighbourhood Centre.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

IX.2. Objectives

(1) Riverhead Precinct is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.

(2) A variety of housing types and sizes are provided that respond to:

(a) Housing needs and demand; and

(b) The neighbourhood's planned built character.

(3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.

(4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.

(5) Subdivision and development are coordinated with the supply and capacity of sufficient adequate transport, local water supply and wastewater, energy and communications infrastructure.

(5A) Subdivision and development are co-ordinated with the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service the precinct.

(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

(7) Identified ecological values within wetland and stream habitats are protected, restored and enhanced.

(8) Development is supported by social facilities, including education and healthcare facilities.

(9) Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) cultural values and their relationship associated with the Māori cultural landscapes, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.

IX.3. Policies

...

Transport, infrastructure and staging

(4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.

(5) Require subdivision and development in the precinct to be coordinated with the provision **and capacity** of ~~sufficient~~ **adequate** stormwater, wastewater, water supply, energy and telecommunications infrastructure.

(5A) Avoid subdivision and development progressing ahead of the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service subdivision and development within the precinct.

(6) Provide for new social facilities, including education facilities, that meet the needs of the community.

...

IX.4. Activity table

All relevant overlay, Auckland-wide and zone activity tables apply in this precinct except for the following:

All Sub-Precincts

- H4 Residential – Mixed Housing Suburban Zone:
 - H4.4.1(A3) Up to three dwellings per site
 - H4.4.1(A4) Four or more dwellings per site

Sub-precinct A

- H6 Residential – Terrace Housing and Apartment Buildings Zone:
 - H6.4.1(A15) Restaurants and cafes up to 100m² gross floor area per site
 - H6.4.1(A25) Healthcare facilities up to 200m² gross floor area per site

Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.

Table IX.4.1 Activity table – Precinct-wide activities

Activity		Activity status
Development		
(A1)	New buildings prior to subdivision	RD
(A2)	Infringements to IX6.2 Road Widening Setback along Riverhead Road	D
(A2A)	Buildings for up to 3 residential dwellings per site in the Mixed Housing Suburban Zone <u>that comply with Standard IX6.16 Water Supply and Wastewater Infrastructure</u>	P
(A2B)	Buildings for more than 3 residential dwellings per site in the Mixed Housing Suburban Zone that comply with Standards IX6.7. Building	RD

	height within the Mixed Housing Suburban Zone, IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone, IX6.9. Yards within the Mixed Housing Suburban Zone, <u>IX6.16 Water Supply and Wastewater Infrastructure.</u>	
<u>(A2C)</u>	<u>Any new buildings, dwellings or development that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</u>	<u>NC</u>
Subdivision		
(A3)	Subdivision, including subdivision establishing private roads	RD
(A4)	Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades	D
(A5)	Subdivision and development that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades	RD
(A6)	Subdivision and development that does not comply with Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct	RD
<u>(A7)</u>	<u>Subdivision that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</u>	<u>NC</u>

Table IX.4.2 Activity table – Sub-precinct A activities

Activity		Activity status
Commerce		
(A7)	Restaurants and cafes up to 250m ² gross floor area per site	P
(A8)	Retail up to 100m ² gross floor area per site	P
Community		
(A9)	Healthcare facility up to 250m ²	RD
<u>(A10)</u>	<u>Any commerce or community activity that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</u>	<u>NC</u>

IX.5. Notification

- (1) Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written

approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.

(1A) Any application for resource consent that infringes the following standard will be considered without public or limited notification to any person other than Watercare or the need to obtain the written approval from any other affected parties unless the Council decides that special circumstances exist under section 95A(9) of the Resource Management Act 1991:

(a) Standard IX6.16 Water Supply and Wastewater Infrastructure.

(2) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above and which is not listed in IX.5(1) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(3) When deciding on who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

IX.6. Standards

All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:

Precinct-wide

- H4 Residential – Mixed Housing Suburban Zone Standards:

- o H4.6.4 Building height
- o H4.6.5 Height in relation to boundary
- o H4.6.6 Alternative height in relation to boundary
- o H4.6.7 Yards
- o H4.6.8 Maximum impervious area
- o H4.6.9 Building coverage
- o H4.6.10 Landscaped area
- o H4.6.11 Outlook space
- o H4.6.13 Outdoor living space

- E27.6.1 – Trip Generation

All activities, except activities listed in Activity Table IX.4.1 (A2B), listed as permitted and restricted discretionary in Activity Table IX.4.1, Activity Table IX.4.2, Activity Table H11.4.1, Activity Table H12.4.1, Activity Table H6.4.1 and Activity Table H4.4.1 must comply with the following permitted activity standards.

Activities listed in Activity Table IX.4.1(A2B) are not required to comply with standards IX6.10. Building coverage within the Mixed Housing Suburban Zone, IX6.11. Landscaped area within the Mixed Housing Suburban Zone, IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone, IX6.13. Outlook space within the Mixed Housing Suburban Zone, IX6.14. Outdoor living space within the Mixed Housing Suburban Zone, IX6.15. Windows to the street within the Mixed Housing Suburban Zone, H5.6.13 Daylight, H5.6.15 Front, side and rear fences and walls, and H5.6.16 Minimum dwelling size, but must comply with all the other following permitted activity standards.

IX.6.1. Standards

IX.6.1. Staging of development with transport upgrades

...

IX.6.16 Water Supply and Wastewater Infrastructure

Purpose:

- **To ensure bulk water supply and wastewater infrastructure with sufficient capacity is available to support the subdivision and development of the Riverhead Precinct.**
- (1) **All subdivision and / or development within the Precinct must be able to be serviced by a publicly available functioning bulk wastewater network and water supply network with sufficient capacity to service the precinct.**

...

IX.8. Assessment – restricted discretionary activities

IX.8.1. Matters of discretion

The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland wide or zones provisions:...

- (3) For four or more dwellings on a site:

...

- (c) Infrastructure and servicing.

IX.8.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions: .

- (3) For four or more dwellings on a site:

...

- (h) infrastructure and servicing:

- (i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development.
- (ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.

IX.9 Special information requirements

...

(5) Local Network Water and Wastewater Servicing Plan

(1) At the first stage of subdivision and / or development of any site existing at (date of plan change approval) within the Precinct applicants are required to provide a Local Network Water and Wastewater Servicing Plan for the Precinct Area. The Local Network Water and Wastewater Servicing Plan must:

(a) Identify the overall local water supply and wastewater network for the Precinct Area.

(b) Identify the location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.

(c) Identify the location, size and capacity of the local connections within the Precinct.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Clare Bradley
Date: Friday, 17 May 2024 5:30:21 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Clare Bradley

Organisation name: Muriwai Community Association Incorporated

Agent's full name: Clare Bradley

Email address: cb@clarebradley.nz

Contact phone number: 021447262

Postal address:
33 Domain Crescent
Muriwai
Muriwai 0881

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

We have seen the submission made on behalf of Kumeu Community Action (KCA) with respect to this proposed plan. MCA supports what KCA has submitted.

MCA's concerns are, in summary, that any such development would

1 increase pressure on the existing (already at capacity) transport infrastructure

2 need to be accompanied by adequate future transport infrastructure including public transport establishment - this is particularly with respect to the timing and capacity of such a development

3 increased pressure on the existing (already at capacity) use of the Muriwai Regional Park and Muriwai Beach environment

I or we seek the following decision by council: Decline the plan change

219.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Harshitha Murthy
Date: Friday, 17 May 2024 5:30:21 pm
Attachments: [Submission on Plan Change 100 \(Private\) Riverhead South \[EJP\]_20240517171800.220.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Harshitha Murthy
 Organisation name: Equal Justice Project
 Agent's full name:
 Email address: hmur817@aucklanduni.ac.nz
 Contact phone number:
 Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)
 Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
 Property address:
 Map or maps:
 Other provisions:
 The lack of climate consideration given.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
 This plan does not consider Aotearoa's international obligations nor domestic legislation aimed at protecting our environment and mitigating our impacts on the climate.

I or we seek the following decision by council: Decline the plan change | 220.1

Submission date: 17 May 2024

Supporting documents
 Submission on Plan Change 100 (Private) Riverhead South [EJP]_20240517171800.220.pdf

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Submission on Plan Change 100 (Private): Riverhead South Equal Justice Project

Introduction

1. The Equal Justice Project ('EJP') is a non-partisan pro bono charitable entity (CC54347) that utilises law students' legal training and knowledge to advocate for change, including the promotion of effective climate action in Auckland.
2. The EJP welcomes the opportunity to make submissions on Plan Change 100 (Private): Riverhead South.
3. By way of introduction, following the release of the third Intergovernmental Panel on Climate Change (IPCC) on 4 April 2022, the UN Secretary-General said that:¹

“We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies. We are on a pathway to global warming of more than double the 1.5°C limit agreed on in Paris. Some Government and business leaders are saying one thing but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.”

4. At COP27 on 8 November 2022, the UN Secretary-General followed this extraordinary statement above by then saying that: “We are on a highway to climate hell with our foot on the accelerator.”²
5. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament's declaration includes recognition of: “the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage.” Parliament's emergency declaration stated that “climate change is one of the greatest challenges of our time” and that “New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation.” Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.³
6. In its Report *New Directions for Resource Management in New Zealand* (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:⁴

¹ <https://www.un.org/sg/en/content/sg/statement/2022-04-04/secretary-generals-video-message-the-launch-of-the-third-ipcc-report-scroll-down-for-languages>

² <https://www.rnz.co.nz/news/world/478257/cop27-we-re-on-a-highway-to-climate-hell-un-boss>

³ https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20201202_20201202_08

⁴ Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 164.

“Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency.”

7. These Submissions are being made following the disastrous climate change induced floods and slips that have wreaked havoc across the upper North Island in early 2023. The Prime Minister at the time, Chris Hipkins, acknowledged that a cause of these floods and slips is climate change.⁵ If ever there was a ‘wake-up call’ to turn the words of the New Zealand Parliament’s declaration of a climate change emergency into action, this has to be it.

Submissions

Private Plan Change (100) seeks to rezone six hectares of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 hectares to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and apartment Building, Business – Local Centre and Business – Neighbourhood Centre Zones to align with the boundary between the proposed Rural Mixed Rural zoning and urban zones.

Our submission relates to the entire Plan Change.

The EJP opposes the entire Plan Change.

The decision the EJP seeks from the Council is to decline Plan Change (100).

Reasons for opposing the entire Plan Change

Our reasons for opposing the entire Plan Change are set out below.

Resource Management Amendment Act 2020

First, the Resource Management Amendment Act 2020 (**‘RMAA2020’**) has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022.⁶ We believe they apply to Plan Change (100).⁷

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

⁵ <https://www.youtube.com/watch?v=NScyur2wglc>

⁶ Resource Management Amendment Act 2020 Commencement Order 2021.

⁷ Although it should be noted that the Review Panel did support the Resource Management Amendment Act 2020 Bill that was before Parliament and the proposal to remove the statutory barriers to RMA consideration of greenhouse gas emissions. See Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 178.

61 Matters to be considered by regional council (policy statements)

... when preparing or changing a regional policy statement, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

66 Matters to be considered by regional council (plans)

... when preparing or changing a regional plan, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

74 Matters to be considered by territorial authority

... when preparing or changing a district plan, a territorial authority shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

We note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022).⁸ In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 – *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).⁹

Plan Change (100) does not appear to have regard to either *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022) nor *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).

Emissions Reduction and Plan Change (100)

⁸ <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf>

⁹ <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

As noted in *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022):¹⁰

“Well-functioning urban environments can reduce emissions and improve wellbeing. Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change, the potential adverse impacts of future development from Plan Change (100), mainly includes the use of additional private vehicles. Currently, the area is not sufficiently serviced by public transport, and the most realistic way to travel in the area is by car. Like any outer development proposed in Auckland, Plan Change (100) will result in an increase in Vehicle Kilometres Travelled (“Vkt”) and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't.
- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council assets, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.
- Plan Change (100) fails the ‘climate test’ because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

We cannot see Plan Change (100) suggesting anything other than an increase in Vkt and will undermine the direction towards a Quality Compact Urban Form. Plan Change (100) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

¹⁰ *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022), page 127.

Flooding Risks

As referenced in the Section 32 Report, significant portions of the land proposed for rezoning are prone to flooding. Last year's Cyclone Gabrielle was a harsh lesson in the reality of severe wet weather and the level of damage that can be caused, especially as the global climate continues to warm. Even during Cyclone Gabrielle, areas of Auckland that were not identified to be at risk of flooding were submerged, making it even more imperative that flood risks be seriously considered.

Intensifying housing on flood-prone areas will only saddle Aucklanders with greater concerns and costs in the future, as severe storms become more frequent. Urbanisation in this area is antithetical to Aotearoa's goals of climate resilience.

On behalf of the Equal Justice Project

Harshitha Murthy

hmur817@aucklanduni.ac.nz

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rebecca Stuart
Date: Friday, 17 May 2024 6:15:21 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rebecca Stuart

Organisation name:

Agent's full name: Rebecca Stuart

Email address: 1redbek@gmail.com

Contact phone number: 021554958

Postal address:

29 Jelas Drive

Auckland

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Land identified

Property address: Land identified in the Private Plan Change by Riverhead Landowners Group on the western side of Riverhead on the

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We do not oppose development, we recognise that all communities need to pull together to support the housing shortage now and in the future. But, any development should not go ahead until current infrastructure issues are remedied under the categories of roading, schooling, and stormwater.

There are 3 teenagers in our household, and my husband and I both work full time in Newmarket.

We are unable to take public transport to or from work as it takes longer than the up to 2 hours a day each way we sit in traffic. Our children go to school in Henderson and Te Atatu Peninsula as there is no schooling they can access locally. These are all choices that we make, but it is increasingly harder as we leave earlier and earlier in the morning to try to get ahead of the traffic - and the hardest part of that 2 hour trip is getting from our home to Boric. Most days Google Maps will direct us to the North Shore and over the harbour bridge which of course we are unable to do as we have to drop kids to school in 2 different suburbs along the north western motorway. Stormwater flooding devastated a number of homes around the area in the Akld Anniversary floods, and

subsequently often since. These families have spent huge amounts of money trying to restore their properties to have them flooded again and again. These families are traumatised, and experience significant anxiety any time it rains heavily now. Finally schooling is inaccessible for children at intermediate age and older. A significant number of students travel to the north shore, Kaipara and Rodney, and West Auckland and often don't get home until close to 5pm in evenings after leaving for their buses at 7am in the morning. This is too long a day for children, and with unreliable buses either public or private through the school that are either full or often don't show up. Our kids are stressed, and tired, at a time in their lives when they need to be supported to teach good life skills and work ethics.

I or we seek the following decision by council: Decline the plan change

221.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

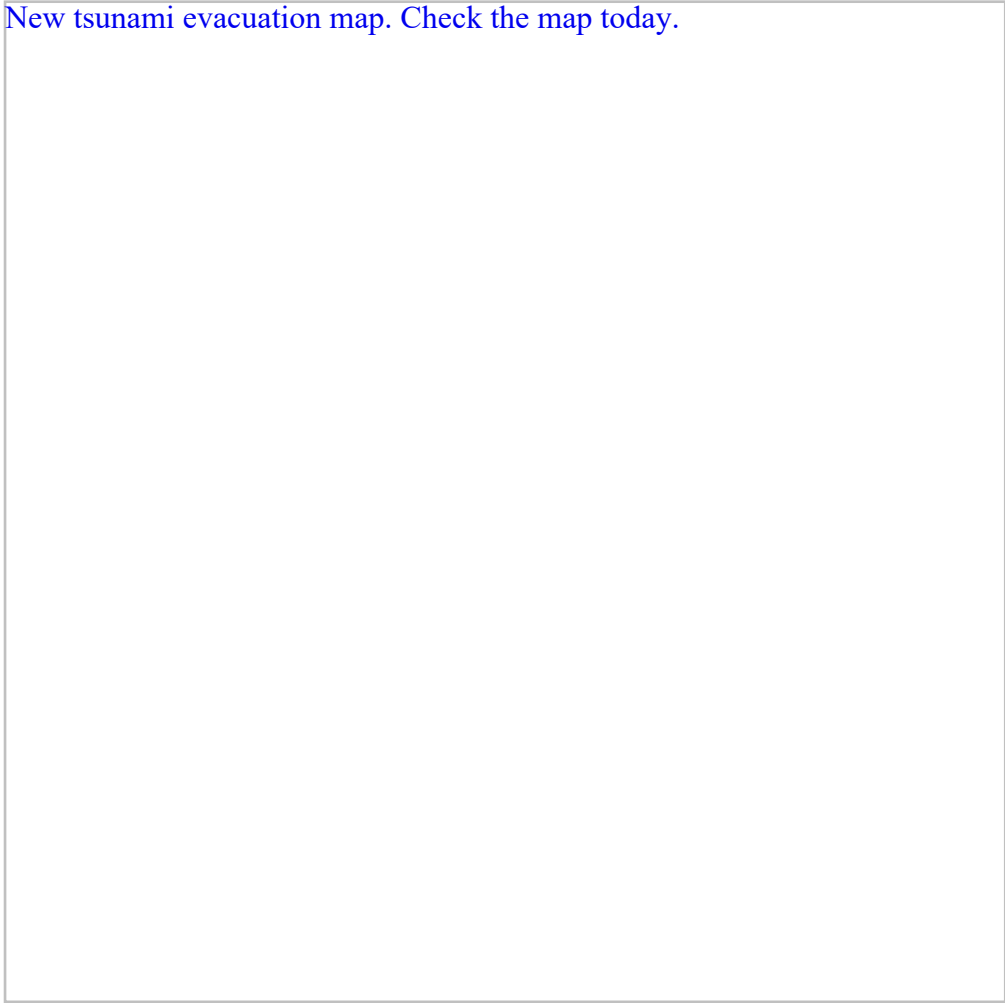
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Richard Allan
Date: Friday, 17 May 2024 6:30:12 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Richard Allan

Organisation name:

Agent's full name:

Email address: rdallan2017@outlook.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
PC100

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

RIVERHEAD as well as the Kumeu region has seen huge expansion in housing developments and there has been no thought given to local infrastructure or roading and traffic management. State highway 16 as well as coastville RIVERHEAD highway are already congested and unsafe pretty much 7 days a week. Public transport is poor, roads and surrounding areas continue to have significant weather issues.

Adding 1000's of additional housing and traffic will have a negative effect on the region and impact the environment, put immense pressure on local infrastructure which already is unable to cope.

Build the infrastructure first, get it right. Make sure the local facilities can take not only what is there now, but what is coming in the future.

I or we seek the following decision by council: Decline the plan change

222.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Kellie Christophersen](#)
To: [Unitary Plan](#)
Subject: unitaryplan@aucklandcouncil.govt.nz Riverhead
Date: Friday, 17 May 2024 6:43:21 pm

Kia Ora,

I am submitting as an owner of 1050a Coatesville-Riverhead Hwy 0820.

The storm water system on the highway is insufficient to carry enough volume in the heavy rain events.

The traffic is already congested outside the dairy and near the pedestrian crossing.

The development will add to these issues. Therefore, I am opposed to it until commitments are made to upgrade the storm water and proper traffic management is taken care of.

223.1

Regards
Kellie Christophersen

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chhitiza Basnet
Date: Friday, 17 May 2024 7:00:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Chhitiza Basnet

Organisation name:

Agent's full name:

Email address: tshetiza@gmail.com

Contact phone number:

Postal address:
16 orchard terrace
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
16 orchard terrace riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Infrastructure not ready

I or we seek the following decision by council: Decline the plan change

224.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kelvin Stuart
Date: Friday, 17 May 2024 7:00:17 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kelvin Stuart

Organisation name:

Agent's full name: Kelvin Stuart

Email address: amkel777@gmail.com

Contact phone number:

Postal address:

29 Jelas Drive

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Transport (Roding), Stormwater and Flooding

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Current roads in and out of Riverhead are severely congested in both morning and afternoon peaks and in weekends. Although there are plans to make improvements to state highway 16 through to Kumeu, these improvements have been delayed, and are focused on safety rather than capacity. Even if these changes do go ahead they will not improve access to riverhead once you turn off state highway 16. Impact on roads will be felt from when the development starts will before the population increases. Riverhead and it surrounding areas has been impacted by flooding on several occasions since 2021. it is my concern that additional built up area and impermeable surface will only increase the risk of flooding in the future. Overall I feel that bring forward this development will only put extra stress on the existing infrastructure.

I or we seek the following decision by council: Decline the plan change

225.2

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - John Cook
Date: Friday, 17 May 2024 7:45:29 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: John Cook

Organisation name:

Agent's full name:

Email address: kiwicookie@me.com

Contact phone number:

Postal address:
 113 Riverhead Road
 Kumeu
 Auckland 0892

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Coatesville Riverhead / Riverhead Road / Cambridge Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We own a business in Riverhead so spend 5/6 days per week there.

The current infrastructure isn't adequate for the population now so there would need to be significant investment by ACC to upgrade roads, infrastructure etc before any further housing was built.

I or we seek the following decision by council: Decline the plan change

226.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Timothy Mark Hillier
Date: Friday, 17 May 2024 7:45:35 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Timothy Mark Hillier

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

1. Height and Density
2. Existing Riverhead character
3. Transport infrastructure
4. Town Centre and Local Centre zoning

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. THAB zoning
 - THAB zoning is not in keeping with, or enhancing the existing character of Riverhead and the surrounding rural environment.
 - Existing transport infrastructure is extremely limited in Riverhead and not conducive to high density zoning
 - There is limited employment and schooling in riverhead, not conducive to high density zoning.I would like to see all THAB zoning removed, and height overlays applied to all areas limited to two stories.

2. Existing Character

The plan change application seems to completely disregard the existing character and built form in Riverhead in regards to height, density and built form. Riverhead is a unique semi-rural community in auckland where existing character is of vital importance to the community. Any new residential and commercial zoning should be in keeping with this character. Masterplan appears to place importance on sellable area over urban design and planning. Ideally height overlays should be applied limiting heights to two stories in all areas

3. Commercial Centres: More retail amenity is needed in Riverhead , however I would like to see a more thorough strategy around scale and locations to ensure existing retail is complemented. Proposed retail and existing retail is very spread out , Would be better if located in a walkable area.

4. I support the green walkways -

I or we seek the following decision by council: Approve the plan change with the amendments I requested

227.1

Details of amendments: No THAB zoning, Height overlays applied to all areas limiting building heights to two stories, protections around existing character/rural character, more comprehensive zoning around town centres for both sides of highway, not just developers land.

227.2

227.3

227.4

227.5

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sandi Gamon
Date: Friday, 17 May 2024 7:45:37 pm
Attachments: [Riverhead_development_submission.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sandi Gamon

Organisation name:

Agent's full name: Sandi Gamon

Email address: trevandsandi@yahoo.co.uk

Contact phone number:

Postal address:
trevandsandi@yahoo.co.uk
 Riverhead
 Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
 Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
 Significant impacts to the character of Riverhead, no realistic traffic management. Poor storm water management, poor management of trees, rivers reserves and parks

I or we seek the following decision by council: Decline the plan change | 228.1

Submission date: 17 May 2024

Supporting documents
[Riverhead_development_submission.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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I oppose the plan change for the reasons set out in this submission. I would like to see the council work with the Riverhead Community Association to be given the opportunity to work with the requestors and the council to resolve matters raised in this submission. Matters of concern and remedies sought are listed below.

Transport:

- 1.** The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
- 2.** Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. And is currently being designed to accommodate the current traffic issues only. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.
- 3.** The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
- 4.** The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
- 5.** The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts from construction traffic begins.
- 6.** Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed

prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.

7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.

8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.

9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available. Transport – remedies sought

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.

11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.

12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.

13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).

15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH. **16.** The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities. See below.

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.

19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.

20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the

area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.

21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.

22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.

23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two mini-marts or dairies, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought 25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.

26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.

27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

Residential Zoning - Mixed Housing Suburban Zone:

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.

29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.

30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the ‘unique sense of place’ described as an intension in the precinct description.

32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.

33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.

34. The precinct description also seeks to ‘enable transition from the rural to the urban environment’. It achieves this outcome abruptly, rather than a smooth transition.

35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this

outcome adopt soft non-comital language, such as ‘Encourage’ (policies 15 and 16). It is not clear how ‘encourage’ has any real influence at the resource consent stage.

36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.

37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the ‘tree-ed’ neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.

39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.

40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: “a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.” There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

Residential Zoning - Mixed Housing Suburban Zone – Relief sought

- 41.** Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
- 42.** We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
- 43.** We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.
- 44.** We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45.** To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46.** Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

Residential Zoning - Terrace Housing and Apartment Zone (THAB):

- 47.** The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48.** North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49.** The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B
- 50.** There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or wrap around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the

proposed location and extent of that zone. Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.

52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms. Mixed Rural Zone:

53. A mixed rural zone is proposed at the northern part of the plan change area.

54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.

55. The main issue with this zoning is that the land will not be able to be further developed or subdivided. **56.** The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this. Mixed Rural Zone – relief sought

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.

58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.

60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.

61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management: (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.

63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.

64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.

65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.

66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.

68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.

69. Policy 17 states: "(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: ..." It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: "This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL."

70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.

71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

Flooding and Stormwater - relief sought

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.

73. We want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."

74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.

79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.

80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.

81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?

82. Policy (13)(d) suggests “Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report: “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”

85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear

directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

88. The precinct description seeks to realise "...the opportunity to establish green corridors through the precinct". Policy (13) only requires the council to encourage "...the provision of a continuous and connected multi-purpose green corridor". The word 'encourage' is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is 'required' to be achieved. A stronger word such as 'require' is needed to ensure the overarching urban design 'key move' of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide "... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;" This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

90. The supporting Stormwater and Flooding assessment contains a 'Preliminary Masterplan' which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2. **91.** If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land at 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.

93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that its heavily weed infested margins be restored and planted, and that land be vested to the council. These

are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.

95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.

96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.

97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

98. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with 'where possible'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.

100. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa. 101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating

streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

Parks and Reserves – relief sought

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.

103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).

104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.

106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.

107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location. Retirement Village (Matvin Group land):

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.

109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.

110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being: o a connected physical environment o an integrated community o access to nature o vibrant and local o housing choice and affordability o proximity/convenience

111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: “a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section. Retirement Village (Matvin Group land) – remedies sought

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. Structure Plans and Consultation:

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.

116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.

117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.

118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.

120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?

121. The Quality Planning website outlines good practice consultation for structure planning. It says: Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed. To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes. Commencing consultation early in the process is important, and can help with:

- obtaining stakeholder buy-in to the process;

- gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;
- fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;
- incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;
- identifying constraints and opportunities.

122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.

123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Dianne Allan
Date: Friday, 17 May 2024 8:00:17 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Dianne Allan

Organisation name:

Agent's full name:

Email address: Midwife.di@gmail.com

Contact phone number:

Postal address:
 16 Munford Lane
 Riverhead
 Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Riverhead new development

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Infrastructure- the lack of existing infrastructure is problematic with the current community.
 Riverhead does not have the infrastructure to cope with turning Riverhead into a higher density area. Not all areas have footpaths. We often experience power cuts so more housing will put pressure on the grid.

Roading and traffic. It already it takes 20 minutes to get out of Riverhead on a weekday morning, with pretty much one road in and one road out. SH 16 is congested in the morning and evening with traffic coming from kumeu north. Council has done very little to improve the traffic issues. This is going to be magnified significantly if the proposal goes ahead.

Public transport is a nightmare for the existing community.

I or we seek the following decision by council: Decline the plan change

229.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Emma Hood
Date: Friday, 17 May 2024 8:00:20 pm
Attachments: [PC 100 photos of flooding.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Emma Hood

Organisation name:

Agent's full name:

Email address: emmavrhoood@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Flooding/Stormwater

Transport issues

Children's safety

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

- Flooding already occurs in the areas that are part of the proposal. Our house on Te Roera Place flooded in the Auckland Anniversary 2023 floods. With their statement that the effect on Te Roera Pl/Duke St/Mill Grove is "less than minor/less than 30mm" we will flood again. The flooding that has occurred on Te Roera Pl/Duke St roads prevented us from safely getting to or leaving our home. See pictures attached. The current stormwater systems need fixing before any new development takes place.

- There is inadequate transport infrastructure to support current traffic - there is already substantial delays in getting from Riverhead via Coatesville Riverhead Highway onto SH16 - and then flow of traffic on SH16 is slow, resulting in it often being backed up to Kumeu. This is not only during peak

weekday hours, but also in the weekends. With an increase in 1450-1750 new dwellings, the traffic issues will certainly increase. Something needs to be done to mitigate the current traffic issues, before any new development takes place in Riverhead.

- Coatesville Riverhead Highway is a busy road during school start and finish times - delaying traffic and increasing the risk to children. The crossing outside Riverhead shops is now needing to be managed by volunteers, as a child was hit last year. An increase in dwellings will increase the children walking/biking to school. The crossing needs to be made safer for the children already using the road, before any new development take place in Riverhead.

I or we seek the following decision by council: Decline the plan change

230.1

Submission date: 17 May 2024

Supporting documents
PC 100 photos of flooding.pdf

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

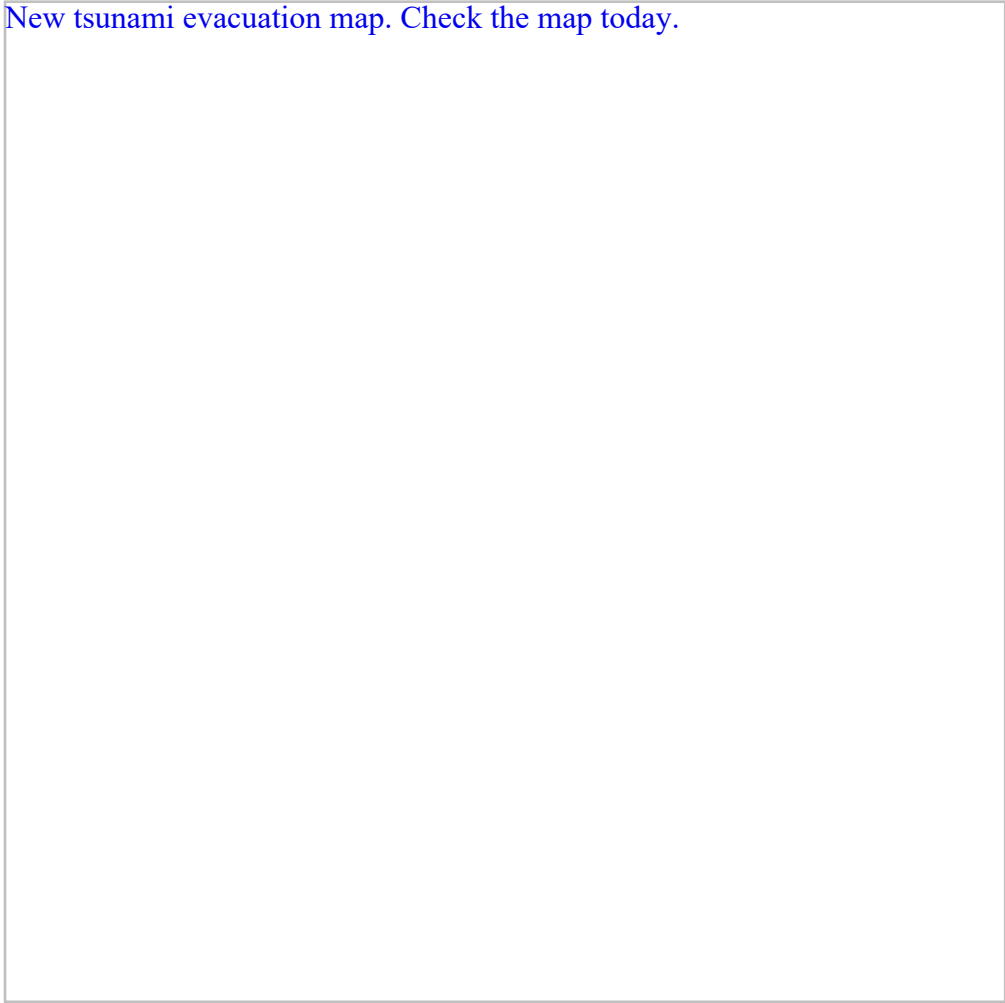
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Flooding Duke Street / Te Roera Place
Auckland Anniversary 2023



Flooding Auckland Anniversary 2023

Behind and in front
of our property,
before the property
flooded



#230

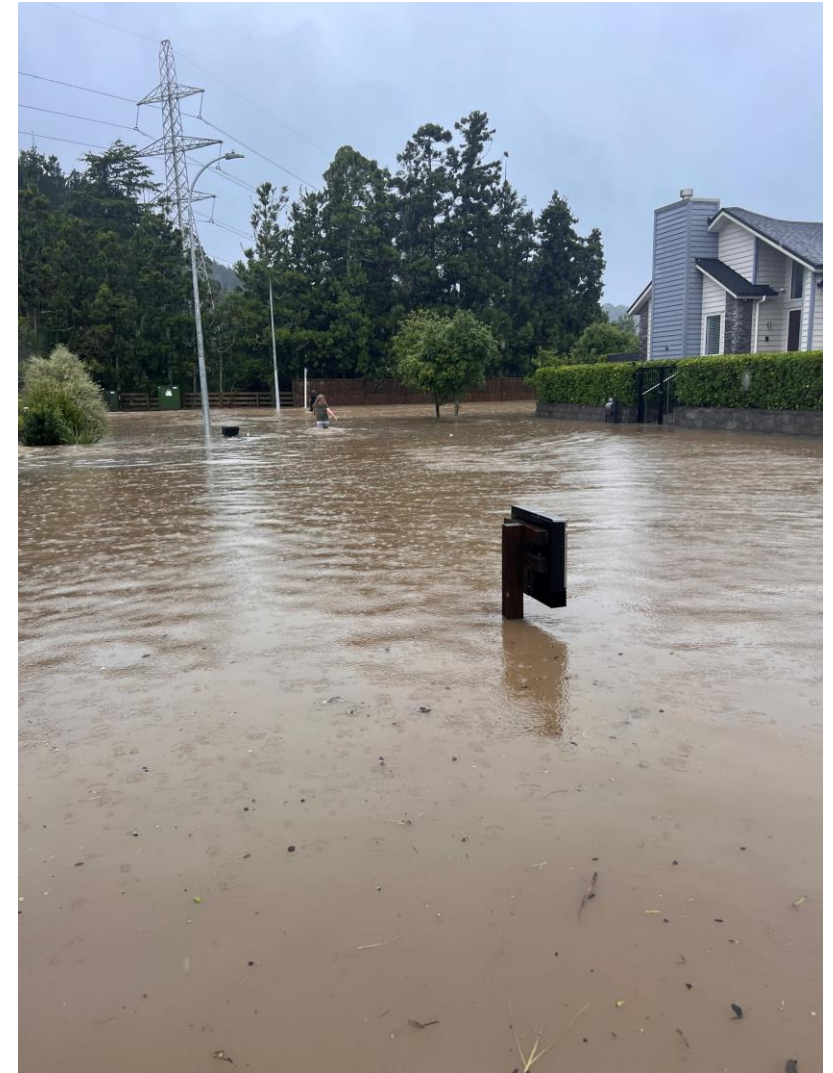
Flooding Auckland Anniversary 2023

Looking across the road to our property,
after we flooded and had to evacuate



Flooding Te Roera Place Auckland Anniversary 2023

#230



Flooding
Cyclone Gabrielle February 2023

#230

Supplied by a neighbour – we weren't yet back in our property after we flooded Auckland Anniversary



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Manav Vadhiparti
Date: Friday, 17 May 2024 8:00:21 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Manav Vadhiparti

Organisation name:

Agent's full name:

Email address: shaftdogg971@gmail.com

Contact phone number:

Postal address:
50 Pohutukawa Parade
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
Appendix 6 - Neighbourhood Design Statement

Property address: 50 Pohutukawa Parade Riverhead 0820

Map or maps: -36.767044, 174.583524

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Excess Traffic congestion without the proper upgrades to infrastructure change.

I or we seek the following decision by council: Decline the plan change

231.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Trevor Gamon
Date: Friday, 17 May 2024 8:00:29 pm
Attachments: [Riverhead_development_submission_20240517195449.449.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Trevor Gamon

Organisation name:

Agent's full name: Trevor Gamon

Email address: trevorgamon@gmail.com

Contact phone number:

Postal address:
trevorgamon@gmail.com
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Significant impacts to the character of Riverhead, no realistic traffic management. Poor storm water management, poor management of trees, rivers reserves and parks

I or we seek the following decision by council: Decline the plan change

231.1

Submission date: 17 May 2024

Supporting documents
[Riverhead_development_submission_20240517195449.449.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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I oppose the plan change for the reasons set out in this submission. I would like to see the council work with the Riverhead Community Association to be given the opportunity to work with the requestors and the council to resolve matters raised in this submission. Matters of concern and remedies sought are listed below.

Transport:

- 1.** The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
- 2.** Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. And is currently being designed to accommodate the current traffic issues only. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.
- 3.** The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
- 4.** The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
- 5.** The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts from construction traffic begins.
- 6.** Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed

prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.

7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.

8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.

9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available. Transport – remedies sought

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.

11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.

12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.

13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).

15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH. **16.** The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities. See below.

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.

19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.

20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the

area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.

21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.

22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.

23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two mini-marts or dairies, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought 25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.

26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.

27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

Residential Zoning - Mixed Housing Suburban Zone:

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.

29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.

30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the ‘unique sense of place’ described as an intension in the precinct description.

32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.

33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.

34. The precinct description also seeks to ‘enable transition from the rural to the urban environment’. It achieves this outcome abruptly, rather than a smooth transition.

35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this

outcome adopt soft non-comital language, such as ‘Encourage’ (policies 15 and 16). It is not clear how ‘encourage’ has any real influence at the resource consent stage.

36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.

37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the ‘tree-ed’ neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.

39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.

40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: “a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.” There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

Residential Zoning - Mixed Housing Suburban Zone – Relief sought

- 41.** Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
- 42.** We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
- 43.** We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.
- 44.** We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45.** To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46.** Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

Residential Zoning - Terrace Housing and Apartment Zone (THAB):

- 47.** The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48.** North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49.** The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B
- 50.** There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or wrap around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the

proposed location and extent of that zone. Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.

52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms. Mixed Rural Zone:

53. A mixed rural zone is proposed at the northern part of the plan change area.

54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.

55. The main issue with this zoning is that the land will not be able to be further developed or subdivided. **56.** The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this. Mixed Rural Zone – relief sought

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.

58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.

60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.

61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management: (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.

63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.

64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.

65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.

66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.

68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.

69. Policy 17 states: "(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: ..." It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: "This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL."

70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.

71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

Flooding and Stormwater - relief sought

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.

73. We want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."

74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.

79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.

80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.

81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?

82. Policy (13)(d) suggests “Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report: “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”

85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear

directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

88. The precinct description seeks to realise "...the opportunity to establish green corridors through the precinct". Policy (13) only requires the council to encourage "...the provision of a continuous and connected multi-purpose green corridor". The word 'encourage' is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is 'required' to be achieved. A stronger word such as 'require' is needed to ensure the overarching urban design 'key move' of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide "... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;" This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

90. The supporting Stormwater and Flooding assessment contains a 'Preliminary Masterplan' which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2. **91.** If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land at 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.

93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that its heavily weed infested margins be restored and planted, and that land be vested to the council. These

are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.

95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.

96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.

97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

98. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with 'where possible'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.

100. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa. 101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating

streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

Parks and Reserves – relief sought

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.

103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).

104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.

106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.

107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location. Retirement Village (Matvin Group land):

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.

109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.

110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being: o a connected physical environment o an integrated community o access to nature o vibrant and local o housing choice and affordability o proximity/convenience

111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: “a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section. Retirement Village (Matvin Group land) – remedies sought

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. Structure Plans and Consultation:

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.

116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.

117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.

118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.

120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?

121. The Quality Planning website outlines good practice consultation for structure planning. It says: Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed. To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes. Commencing consultation early in the process is important, and can help with:

- obtaining stakeholder buy-in to the process;

- gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;
- fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;
- incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;
- identifying constraints and opportunities.

122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.

123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rachel Pickett
Date: Friday, 17 May 2024 8:00:33 pm
Attachments: [Plan change 100 submission_20240517195439.180.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rachel Pickett

Organisation name:

Agent's full name:

Email address: damianandrachel@gmail.com

Contact phone number: 021333748

Postal address:
72 Pohutukawa Parade
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We live locally and oppose the plan change for a number of reasons - these are outlined in the attached submission

I or we seek the following decision by council: Decline the plan change

233.1

Submission date: 17 May 2024

Supporting documents
[Plan change 100 submission_20240517195439.180.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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We are a young family who live in Riverhead South and have done for the past 6 years. We love the semi-rural village feel of Riverhead and hope that any proposed development embraces this and is designed to compliment it. In its current form we oppose the plan change. We are very concerned about this proposed plan change (Plan Change 100) for a number of reasons in particular:

- Infrastructure – in particular traffic
- Schooling
- Zoning
- Master planning/green spaces

Traffic infrastructure and the upgrades to SH16

Given the nature of our work (consultant and construction) and the fact that we have young children we have no option but to drive to work (if I were to use public transport it would take half a day just to get to work). Currently during the work week, we often leave extremely early as it is difficult to predict how long it will take to get anywhere both along CRH (which can be back up as far as the golf club and Hallatau on a regular basis) and along Old North Road. Some days (in order to drop my children to daycare) to get to the Taupaki round-a-bout from Riverhead can take up to ½ hr (when in reality it is a 5 min drive). At the weekend if we have errands to run we also get up early to undertake these as CRH again regularly backs up for over a kilometre.

The plan change relies heavily on the proposed upgrades to SH16 – which are desperately needed to improve safety however do not address capacity issues and which are currently on hold due to funding issues. Even if this was completed an additional 3000 residential properties (6000 additional vehicles) will continue to aggravate this. It is also worth noting that this highway is promoted as an alternative route north and over weekends (particularly long weekends or holidays) is heavily used by non locals accessing west coast beaches, outdoor activities (e.g. mountain biking, horse riding etc) and Northland.

Under the current layout the end of the Northwestern Motorway (Brigham Creek Round-a-bout) is also subject to a significant volume of traffic and ever day has a traffic jam, not only through the round-a-bout, but more often than not stretching back almost to the retail centre (over a kilometre away) – the plan change does not take into account traffic impacts on this part of the network or further afield (Taupaki, Kumeu, Waimauku).

The plan change fails to address the impacts on the surrounding roading networks during the construction of the proposed development. In order to undertake the civil works required for such a development there will be many thousands of heavy truck movements, on local network roads which are already under stress (e.g Old North Road).

Given these concerns we would like to see provision in the plan that until the wider network issues are address development cannot proceed.

The plan change does not address how it would form roading networks within the development that embrace and compliment the existing wide feeling, safe streets and address off street parking requirements. Given the distance from the city, the reliance on vehicles to get around for work, schooling, sport, errands etc many modern developments fail to design for the number of vehicles

that are likely to be present (minimum 2/household) and allow for on street parking bays. There is no design requirements within the existing plan to plan for safe streets with clear open pathways – many of our children walk to primary school/day care, ride to the playground and local shops, in the current Riverhead South the wide open street mean that my young children can safely navigate the footpath and (due to the open nature, lack of high fences and hedges) can see cars reversing from driveways. In a country where there are so many preventable deaths from accidents in driveway/footpath space it makes sense to design street which can be navigated safely by all. We would like to see design provision within the plan to address parking and street design that compliments the existing development.

Schooling

The current Riverhead Primary school is currently nearing/or is at capacity, as parents of young children this is extremely concerning. Although the supporting document mentions that it has had discussions with MfE it does not provide any detail on how it will address the lack of capacity for primary right through to secondary schooling in the area. It also does not address the fact that a lack of intermediate or secondary schools in this area and an increase in housing will directly impact the traffic volumes and roading infrastructure which is already under pressure, as many students have to travel for schooling.

Residential zoning/Parks and Reserves

The current plan is for mixed housing suburban which allows for essential medium density housing. As opposed to the rest of Riverhead which is largely single houses. We feel that any development if should be commensurate with the existing community and “village feel” and therefore should be **single house zoned**, with integrated landscaping and linked greenspaces. Part of what is nice about the current Riverhead South is the open feeling streets, linked green spaces (parks/open spaces) and decon point walkway. As evident in other well executed residential developments (e.g. Hobsonville Point) the water side walkway, linked green space and pocket parks are well utilised by the local residents. There is very little design detail in the existing plan documents and although the plans look pretty in concept there appears no requirement for the concepts to be implemented.

Commercial zoning

Riverhead already has a commercial area which is very busy and highly utilised by the local community, with additional space also allowed for in the new development opposite Memorial Park. The proposed plan change commercial space feels disjointed given the existing commercial development. The existing commercial centre provides well for the local community, with large retail centres in Kumeu, Westgate and Albany serving all additional requirements. As stated above part of the appeal of living in Riverhead is its semi-rural village feel creating disjointed stretched out commercial centre would detract from this.

The existing plan also lacks connectivity to the existing neighbourhoods which could be improved.

The supporting documents do not adequately address many of these issues nor set out any requirements when it comes to implementing a design which feels right for the existing community. We are not out to prevent development of this land in principle, however, hope that many of the concerns around infrastructure, planning and design aspirations can be addressed and the

requirements outlined so that the developers are required to deliver on these and the eventual development feels like part of the community.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Philip Doughty
Date: Friday, 17 May 2024 8:30:15 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Philip Doughty

Organisation name:

Agent's full name:

Email address: phil@procladd.co.nz

Contact phone number: 0275805996

Postal address:

2 George street

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in private plan change by riverhead land owner group 80.5 ha

Map or maps:

Other provisions:

Traffic congestion

Storm water

Village feel & character

Parks and reserves

Infrastructure

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Riverhead is a small rural town that is already bursting at the seams. We are rapidly losing our village feel. We have had significant flooding already. Traffic is Extremely bad at generally any time of the day. Our infrastructure can't cope with existing population let alone the proposal to double it.

I or we seek the following decision by council: Decline the plan change

234.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christopher James Hull
Date: Friday, 17 May 2024 8:30:19 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Christopher James Hull

Organisation name:

Agent's full name:

Email address: chrishull1979@gmail.com

Contact phone number:

Postal address:

10 Floyd Road

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the private plan change by Riverhead Landowner Group, 80.5ha on western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We moved to Riverhead to enjoy the well thought out subdivision around Riverhead Point where the sections are all reasonable sizes, stand alone houses, open front gardens and no fences on property frontages. I have no problem with this kind of development and would happily see similar in the area designated in this proposal provided surrounding infrastructure is in place first. I do have big issues with high intensity, small sections, narrow roads etc and feel this is not in keeping with the village vibe of Riverhead currently. As far as I know there is also still no high school planned for the Kumeu/Huapai/Riverhead area which is ludicrous considering the development that has happened in the area over the last 10 years.

I or we seek the following decision by council: Decline the plan change

235.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Laura roecoert
Date: Friday, 17 May 2024 8:30:20 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Laura roecoert

Organisation name:

Agent's full name:

Email address: laura.vanwijk@hotmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: 80.5 hectares on western side of riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Will affect traffic and environment

I or we seek the following decision by council: Decline the plan change

236.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - heidi copland
Date: Friday, 17 May 2024 8:30:21 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: heidi copland

Organisation name:

Agent's full name:

Email address: heidi.copland@xtra.co.nz

Contact phone number:

Postal address:
0800

Helensville 0800

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
traffic is already a nightmare. babies being born on side of road as stuck in traffic

I or we seek the following decision by council: Decline the plan change

237.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Steve Bloxham
Date: Friday, 17 May 2024 8:45:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Steve Bloxham

Organisation name:

Agent's full name: Keryn Bloxham

Email address: stephenbloxham@hotmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps: All relevant

Other provisions:

All relevant

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Hasn't this been considered before? If so what's changed? If nothing, council's decision should remain the same. Avoid wasting time and money. Is this really a plan change that considers the interfaces with the adjoining parts of the regional plan and related impacts on ratepayer funded infrastructure or should it in fact be a resource consent application with appropriate development contributions?

I or we seek the following decision by council: Decline the plan change

238.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christina Doughty
Date: Friday, 17 May 2024 8:45:15 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Christina Doughty

Organisation name:

Agent's full name:

Email address: cm.bailey@icloud.com

Contact phone number: 0273132182

Postal address:

2 George St
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

If the plan change is approved, without thorough thought and planning, the following areas will be adversely affected:

Transport
Flooding and stormwater
Parks and reserves
Riverhead village character

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Transport -

The wider northwest area is already not managing current traffic congestion. There are often multiple kilometer backlogs at key intersections including Coatesville Riverhead highway and Sh16. There have been no significant roading upgrades to support the exploding population. The current infrastructure cannot handle the current population let alone doubling it. Many existing roads are not fit for purpose in our residential areas including open stormwater drains and no footpaths. Roading and significant upgrades to public transport access would need to be in place to fix current issues

before considering adding to our population.

Flooding and Stormwater -

The existing system is not handling current needs. Many of the recent downpours have resulted in our land flooding and/or significant flow through of water. Changes to the natural flow of water through the area and reducing green space is very concerning. Upgrades to the existing stormwater system need to be in place before construction and changing the landscape begin.

Parks and Reserves -

A big attraction of the current Riverhead village is the abundance of green space and a great new playground. This is utilised by many local families and is very popular. Growing the population will put strain on this and additional parks and reserves will need to be built to accomodate.

Riverhead Village Character -

We have been fortunate enough to be able to purchase our family property in the beautiful Riverhead Village. It is a small close nit community who know their neighbours. There is an abundance of mature trees, gardens and green space. Homes have inviting road appeal and their individuality feels welcoming. Industrial, cloned, multi-storey units will change this feel and appeal. They appear cold and institutional (as seen in the current unfinished apartments on the main road). Discretion and foresight into the feel of buildings will need to be undertaken to preserve the warm village feel.

I or we seek the following decision by council: Decline the plan change

239.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kathryn Stewart
Date: Friday, 17 May 2024 9:00:19 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kathryn Stewart

Organisation name:

Agent's full name: Kathryn Stewart

Email address: katiefaye@gmail.com

Contact phone number:

Postal address:
34 Pohutukawa Parade
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
Plan Change 100

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

There are several issues with adding further housing to Riverhead. Ultimately, it relates to infrastructure - or lack there of. Although we live in the "new" part of Riverhead, we have noticed a significant increase in traffic over the last couple of years. Even on a weekend, it can take 20+ minutes to get out for CRH onto SH16. In the morning work rush it can be 30+. Coming back into Riverhead at the end of the day, the congestion at the Brigham Creek roundabout can add another 30 minutes of crawling traffic to your day. Personally I had to change my job as the traffic was just too much to be able to commute in that direction. There needs to be significant upgrades to both CRH and SH16 before we add any more traffic to it.

My other major concern is schooling. Riverhead School is a lovely, slightly country school. It is already struggling to accomodate its growing roll by adding prefabs to the field. Adding more homes will mean more children needing access to the school. We are also without a highschool in the area, currently only zoned for Massey, which is at capacity. There are over 25 primary schools in our

electorate - and one high school - which Riverhead is not zoned for. There must be a high school or college built in this area before any further housing.

I or we seek the following decision by council: Decline the plan change

240.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mark gibson
Date: Friday, 17 May 2024 9:15:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mark gibson
Organisation name:
Agent's full name:
Email address: mark.gibson@viamedia.co.nz
Contact phone number:
Postal address:

20 Kent terrace
Riverhead 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)
Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:
Storm water
Land use
Special character
Transport

Property address: 20 Kent terrace Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Riverhead is a historic township and character needs to be maintained. One of oldest schools in the county and was originally going to be the capital city.

Land use has traditionally been used for growing fruit and vegetables will be lost for ever. Especially important to maintain our food security in this time of climate change.

Stormwatrr provisions were put in place for the latest subdivision and more than once houses around duke street have been flooded. With greater development means more impervious surfaces and more risk of flooding.

Transport is currently under developed and doesn't cater for current traffic flows especially in and out of Riverhead. At different times of the working week and also weekends the traffic can back up for over 1km. More subdivisions will mean an even higher demand on already under funded and

under developed infrastructure such as the roads and lack of cycle paths and footpaths.

I or we seek the following decision by council: Decline the plan change

241.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sarah McBride
Date: Friday, 17 May 2024 9:15:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sarah McBride

Organisation name:

Agent's full name:

Email address: sarah@mcbrides.co.nz

Contact phone number:

Postal address:

0820

Riverhead

Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Inadequate infrastructure specifically in transport.

Education

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Transport is already an issue with inadequate public transport - there is no direct link to the city where many residents work. The buses which do exist are not often enough.

We have an unused train track which could be a great solution but is consistently removed from considerations.

Education - insufficient schools - Riverhead School cannot physically grow much more and you would anticipate families to be buying into new homes. There are limited options for high schools particularly as the Massey/West Harbour area continues to grow as well.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 May 2024

242.1

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Andrew and Tania Pegler
Date: Friday, 17 May 2024 9:30:20 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Andrew and Tania Pegler

Organisation name:

Agent's full name: Andrew Pegler

Email address: galaxie63@xtra.co.nz

Contact phone number: 0275939339

Postal address:

773 Coatesville Riverhead Highway

RD3 Albany

Auckland 0793

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: (Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Transport issues is the main thing. The plan change fails to recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am weekdays & during weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Old North Road the alternative route is also back over 800-900 from SH16 each day and has serious dangerous driving done by people trying to get to the roundabout on the other side of the road. Another 3,000 residencies at Riverhead will exacerbate this greatly. The development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency. We attended a meeting at least 5 years ago when this was due to commence the following year but still nothing has happened & the accident rate is still prolific. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams. This is a every day occurrence and the weekends even more so all day. Allowing this development to commence will totally impact traffic throughout Riverhead, Kumeu and any feeder roads onto SH16. The roads themselves are in dire need of repairs and this will only impact this more as the work required to maintain the roads with the traffic it has now, does not happen. It will only create more delays in road works in the years to come let alone more traffic each day. The lost revenue from people having to sit in these traffic queues must have an impact on our economy.

The effects to stormwater with the increase of concreted areas and loss of vegetation/green areas to absorb rain water can only be detrimental to the area.

The sewage system that has installed in the "new Riverhead subdivision" is as you would know, suffers from frequent maintenance requirements (pump station outside the golf course) Residents experience problems with their property systems due to heavy rain.

Allowing the construction of housing on arable land reduces the benefits of food production on these areas.

A further 3000 homes in this area without infrastructure being in place prior to development only exasperates the situation we are now in with lack of primary/intermediate & high school facilities for the children of this area which exists at present.

These are the main concerns but there is so much more which I am sure our Riverhead Community Association has also submitted to you.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
As detailed above.

I or we seek the following decision by council: Decline the plan change

243.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tracy Smytheman
Date: Friday, 17 May 2024 9:45:18 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tracy Smytheman

Organisation name:

Agent's full name:

Email address: tracy.smytheman@xtra.co.nz

Contact phone number:

Postal address:

130 Lloyd Road

Riverhead

Auckland 0793

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: The land identified in the private plan change by Riverhead Landowner Group - which is 80+ hectares on the western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The stormwater and flooding and transport recommendations are completely insufficient for the planned development. The Riverhead township and community are already overwhelmed in both matters with the development, expanded suburbanisation and population growth over the last 10 years, not to mention the huge stress and damage incurred the the floods as a result of major storms over the last few years.

I or we seek the following decision by council: Decline the plan change

244.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rose-Muirie Cook
Date: Friday, 17 May 2024 10:30:13 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rose-Muirie Cook

Organisation name:

Agent's full name:

Email address: muirie@gmail.com

Contact phone number: 021381062

Postal address:
5 Te Roera Place
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
Plan Change PC100

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Flooding Risk, we live in part of Riverhead which was affected by the flooding in both August 21 and January 22. We had neighbours that were unable to move back into their house for over 6 months. The plan change says that the flood risk will only increase "less than minor" being 30mm - this is not acceptable for people who had houses underwater and others that were nearly underwater. The flooding assessment was also completed before the serious flooding in January 22 - so I do not believe it to be accurate.

Infrastructure and Transport - Riverhead needs a lot of investment in infrastructure before any more development is allowed. We have a school that has lost large amounts of it's green space as more and more prefab buildings take over the field, we have no local high school - the closest is Massey High which is just being expected to be able to accommodate all the complete and current development through West Hills, as well as Huapai, Kumeu and Riverhead.

We have a limited bus service that the local board needed to fight for and we currently pay a targeted rate for, there is no other public transport - despite a train line that Auckland Transport

won't use for passenger transport.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

245.1

Details of amendments: Investment in Infrastructure and a completed high school

245.2

Submission date: 17 May 2024

245.3

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jamie black
Date: Friday, 17 May 2024 10:45:15 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jamie black

Organisation name:

Agent's full name:

Email address: jamie@haighworkman.co.nz

Contact phone number:

Postal address:

166 Barrett road

Riverhead

Auckland 0794

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

84 hectars

Property address: Riverhead

Map or maps:

Other provisions:

Fletchers fast track

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Infrastructure is not sufficient, not only sh16 but Albany will be contested

I or we seek the following decision by council: Decline the plan change

246.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Deanne Chandler

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

22 Elliot St,

Riverhead

Telephone:

2102669493

Email:

chandlerdeanne@yahoo.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Land identified in the Private Plan changed by Riverhead Landowner Group. 80.5hectareson Western side of Riverhead

Or

Map

Or

Other (specify)

Submission

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

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

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

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

The reasons for my views are:

I am concerned about this development in relation to the potential for worse flooding in the area (serious flooding last year 2023)

I am concerned about traffic congestion which will result in massive delays to get to work and activities in the area. Coateville/Riverhead Highway connecting with State highway 16 already has terrible congestion and the bypass around Kumeu needs to be completed first.

And there needs to be more public transport options

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☒

247.1

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

☐

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

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

☐

Deanne C Chandler

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

05/17/2024

Date

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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

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

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

(a) adversely affects the environment; and

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

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

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Linda Barton-Redgrave

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

11 George Street, Riverhead, Auckland 0820

Telephone:

274127295

Email:

beezakiwi@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 100 (Private)

Plan Change/Variation Name Riverhead

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) objecting to PC100

Or

Property Address across the PC100 area

Or

Map

Or

Other (specify)

Submission

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

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

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

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

The reasons for my views are:

I have lived in the township of Riverhead for 37 years. There has been significant change in that time – and I feel I am well placed to comment on its character. Firstly it is actually a small village or township – it is NOT a suburb attached to other suburbs. We live here because we do want to know!

Please note that I have included the above on a separate attached sheet as it doesn't fit into the allocated space. Thank you

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☐

Decline the proposed plan change / variation ☒

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

248.1

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

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

L. Barker-Redgane

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

05/17/2024

Date

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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

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

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

(a) adversely affects the environment; and

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

I have lived in the township of Riverhead for 37 years. There has been significant change in that time – and I feel I am well placed to comment on its character.

Firstly it is actually a small village or township – it is NOT a suburb attached to other suburbs. We live here because we do want to know those around us, to feel part of a community.

The growth of Riverhead South was significant, however it did link with the existing character – largely single dwelling homes on 600 to 800 square metre sections.

The proposed development this time though does not link with the existing Riverhead township.

With its commercial space, multi-level dwellings and smaller sections, it is like another suburb just plonked down next to the existing township, and dominating the area.

I would like more consideration to be given to linking with the existing Riverhead village character.

Also, there is NOT sufficient infrastructure capacity in Riverhead.

In regard to Traffic Congestion and Safety: at present our roads are regularly at a stand still at the intersection with Highway 16. It is hard to judge how long the traffic queue will be, resulting in the necessity to add an average extra ½ to ¾ hour travel time when you plan to head out.

It is also relevant to note that the proposed improvements to the Brighams Creek intersection with Highway 16 to enable cars to exit or enter the Coatesville-Riverhead Highway have been proposed for many years and still hasn't happened.

Citizens of Riverhead are regularly subjected to angry drivers from Huapai who don't want to let Riverhead traffic merge onto state highway 16 because they are also so impacted by heavy traffic (you also can't get in at the Taupaki Road roundabout due to traffic backlog there). The situation is such that Auckland transport recently stopped cars turning right out of the Coatesville- Riverhead Rd because it is so unsafe.

I cant imagine the State Highway 16 transport improvements or the Northern Interceptor actually being completed within the next few years – it appears to be a revolving discussion, and even if it did the design will just cope with what the present problem is, without additional resident traffic.

The traffic flowing through Riverhead township itself is already very busy in mornings and afternoons, and during sport gatherings – making it quite hazardous to cross the Riverhead-Coatesville Highway within the township.

The proposed new Local Centre won't be able to be walked to by half of the town because the traffic will be too busy to cross the road. This development will physically divide our town.

It certainly is not safe to cycle any of the rural roads beyond the township (for instance toward Kumeu, Highway 16 or Albany).

Public transport is also still in development – there aren't any bus shelters in Riverhead, and Riverhead is not on a main public transport route so you need to double (or triple) bus rides to get across the city.

Id like to see a more realistic picture presented, with further detail regarding traffic management – as it stands, we will be gridlocked!

In the plan the suggestion is made that people will travel to Riverhead for shopping. Why?

Kumeu, Westgate and Albany are all well served with retail and commercial space.

I'd like to see a more thorough plan for the proposed commercial zone, a business case that justifies if we need it, and detail about what sort of retail or commercial spaces are envisioned?

I am also concerned about the limited amount of planned green space for the public, and the lack of recognition of what is already in place. For instance, there is a lovely property with established trees at 306 Riverhead Road which could be retained.

Riverhead is part of the North-West Wildlink that runs from Tiritiri Island to the Waitakeres.

I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.

This matters – we care about the environment and feeling connected to where we live.

Regarding the management of Stormwater and Flooding:

During Cyclone's Hale and Gabrielle early in 2023, the Rangitopuni River was roaring – the sheer force of the water caused huge trees to ram up against the bridge pillars, the drains throughout Riverhead township were transformed into rivers and ponds. The streets around Duke Street (which is next to the planned subdivision) were flooded. In that area I saw houses inundated with water, a car floating, and someone kayaking in the street. Lives were negatively impacted by the

Even in ordinary weather, and with farmland to absorb the rain, the stream behind Duke Street#248 flows steadily into the Rangitopuni River – where will the water overflow from a big housing development go?

Despite mitigation measures, such as building water retention tanks, there will still be a significant increase in water from impervious areas such as the paved area of new roads. Even with slow release of water, during an adverse weather event it's just not going to cope – it floods now so the proposed flood plain land is most likely to be inadequate. There can only be a negative impact for those neighbours who are downstream.

We need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).

Regarding the Riverhead Sewer System:

Our existing pressure sewer system currently has issues and does not have capacity for additional housing. At present, with heavy rain the Riverhead village sewage lines become over pressurised, resulting high level alarms going off across the township. This ultimately results in damage to the property owners mascerator pumps (as they try to pump into a higher pressure main). This adverse effect is common (as per our own experience and community Facebook comments). The cost is falling on individual property owners.

The sewer system would require significant upgrading to take further load.

Also, Riverhead primary school is in the process of having additional classrooms built, but would not have the physical site space to accommodate the additional children from the proposed subdivision. Through necessity the school field is now tiny, much smaller than when my son went there when there were only 58 kids on the roll - because now as it has additional classrooms and the hall on it that were required for the growing roll.

It takes a long time to plan and build a new school. Certainly one wouldn't be built in the next few years. Where will the new residential development children attend school?

I think its quite clear that we don't have the current infrastructure working effectively – let alone adding more. I oppose the proposed development, Plan Change 100 Riverhead, and ask that Auckland Council declines the application as a result of the hearings.

What I would like to see:

I would like to see the plan declined.

If it were to proceed. I would like consideration to be given to linking the design and layout of the proposed subdivision with the existing Riverhead village character as part of the requirements for the proposed subdivision (similar to that of Riverhead South).

248.2

I would like to see a more realistic picture presented regarding traffic management, with further detail that shows how the traffic through the town and out onto highway 16 will be managed, how the main road will be crossed at different points, and what will be done to enable more effective public transport.

248.3

I'd like to see a more thorough plan for the proposed commercial zone, a business case that justifies if we need it, and detail about what sort of retail or commercial spaces are envisioned, and where shoppers will park so that the commercial area doesn't add to yet more traffic congestion.

248.4

Riverhead is part of the North-West Wildlink that runs from Tiritiri Island to the Waitakeres. I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.

248.5

We need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).

248.6

The Riverhead sewer system would definitely require significant upgrading to take further load.

Riverhead will need another primary school as the current site is too small. I'd like to see a long term plan for where the children from the proposed development will attend school.

248.7

248.8

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Shontelle Fawkner
Date: Friday, 17 May 2024 11:00:14 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Shontelle Fawkner

Organisation name:

Agent's full name:

Email address: shontelle22@hotmail.com

Contact phone number: 0211920092

Postal address:
29 Maude Street
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address: My Submission relates to" just place text such as (Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Riverhead has experienced a huge amount of development in the past decade. Thousands of houses have been built yet the infrastructure has had little to no changes. If the proposed plan was to go ahead this would put even more pressure on an already failing infrastructure not to mention it would negatively impact the lives of everyone in the community at present. A significant issue we battle with everyday is the traffic. It is diabolical, our daily commutes take hours because traffic is so backed up. So many Riverhead families are sacrificing time together because we are all sat in endless traffic because no effort has been made to cope with the masses of houses built out her. The thought of adding thousands more cars to this is preposterous. Another reason the requested plan change should be denied is the risk to the environment. The area is severely affected by flooding during heavy rain and the proposed land has areas that are in the flood zone. Bottom line is we can't even service the current number of houses here adding more will make things immensely worse. As mentioned there is no where near enough robust infrastructure to support this. Fix what is already problematic here and then our community might be more . My street has big wide open

drains, I don't even have a footpath on my side of the road. The rates we pay here are exorbitant to not even have a footpath is ridiculous. Please do not accept the proposed changes, we as a community do not want it and more importantly our small suburb CANNOT accommodate more people when it's already crumbling as it is.

I or we seek the following decision by council: Decline the plan change 249.1

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

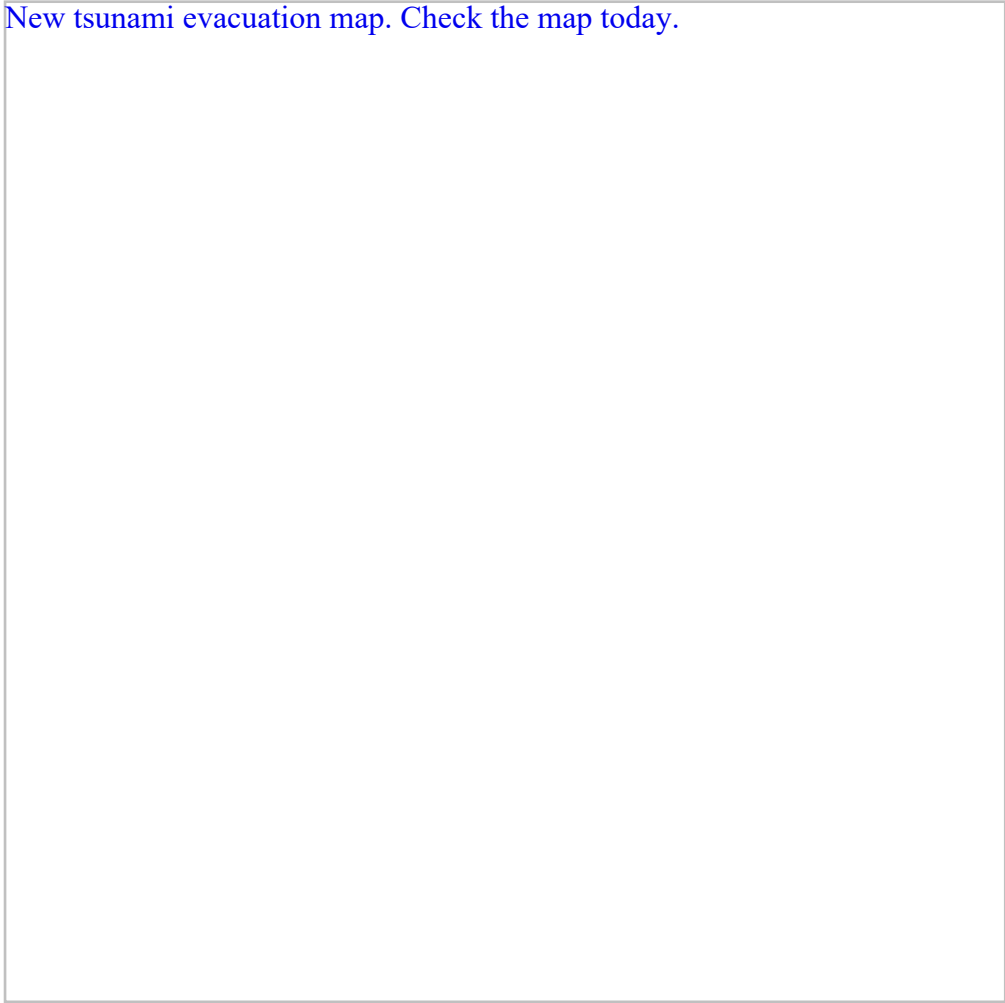
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kit Boyes
Date: Friday, 17 May 2024 11:15:12 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kit Boyes

Organisation name:

Agent's full name: Kit Boyes

Email address: kitboyes@gmail.com

Contact phone number:

Postal address:
 29 Cambridge Road
 Riverhead
 Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Introducing further high density development into an area where infrastructure for previous more than doubling in size has not been provided, area is already congested.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Introducing further high density development into an area where infrastructure for previous more than doubling in size has not been provided, will produce congestion. Geography channelises transport options into a single vulnerable point of failure. Drift is to use green fields on the periphery of the city as a site for unattractive high density that will inevitably become future slums. The uncompleted failed development in central Riverhead should be a cautionary tale. At minimum infrastructure needs to be completed BEFORE development starts - pattern of building actual development against pretty pictures good will and good intentions to build infrastructure in the future has repeatedly failed.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

250.1

Details of amendments: No development, sales or anything else until better infrastructure to support this growth is completed.

250.2

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

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

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email may be those of the individual sender and may not necessarily reflect the views of Council.

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

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Ms/Miss/Ms (Full Name)

DESMOND JOHN REID.

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

01- 24 KARAWAI STREET, RUAKAKA 0116.

Telephone:

(022) 139 4268

Email:

woodcraftbydesign@xtra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

22 DUKE STREET RIVERHEAD. (LOT 20 DP 499876)

Or

Map

Or

Other (specify)

Submission

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

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

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

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

The reasons for my views are:

Refer to attachment

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☒ 251.1

Decline the proposed plan change / variation ☐

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

REFER TO ATTACHMENT. - 6 PAGES.

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

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

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

Date

17-05-2024

Notes to person making submission:

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

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

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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

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

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

(a) adversely affects the environment; and

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

SUBMISSION - Desmond John Reid.

#251

Private Plan Change 100 (PPC 100) 17th May 2024.

My name is Desmond John Reid.

I am the owner and Managing Director of Aberdeen Adventures Limited.

Aberdeen Adventures Limited is the proprietor of 22 Duke Street, Riverhead.

22 Duke Street, is at the northern end of the Riverhead Future Urban Zone (FUZ).

The Property was included in the FUZ in 2016, by decision of the Environment Court.

Private Plan Change 100 proposes to put effect to urbanising The Riverhead FUZ.

Private Plan Change 100 proposes to substantively exclude 22 Duke Street from its plan.

It is proposed that 22 Duke Street will largely revert to a rural zoning as part of Council's Future Development Strategy (FDS) driven by PPC 100.

This submission contests that premise.

I am not against PPC 100 in principle. The problem, that I have, is that flood management, ecological, transport, and community amenity solutions, as proposed in the plan, essentially involve 22 Duke Street in an adverse manner.

I have not been consulted on these initiatives and oppose their inclusion in PPC 100, as if it is integral to the plan. In fact, the proposal to zone 22 Duke Street as Mixed Rural, alienates the property from being able to support PPC 100.

Proposed Mixed Housing Suburban zoning:

It is proposed that the substantive part of 22 Duke Street will be excluded from the Mixed Housing Suburban zoning enjoyed by the bulk of PPC 100. My land is targeted to be zoned Mixed Rural.

- That will severely impact the economic value of my property.
- It will not adequately address the needs of PPC 100.
- There are better solutions.

If my property were eventually zoned Mixed Rural, my rights and opportunities to exploit my land being in the current FUZ, would be denied me. That infers that I will no longer be able to develop an urban environment. The land will never be further developed or subdivided.

It is proposed to realign the existing Residential / Urban Boundary (RUB) to an indefensible alignment. The current RUB was established by hearing in the Environment Court. It follows defensible boundary features such as topography, geology and particularly the Waitauti stream.

Counterintuitively, excluding 22 Duke Street from the Mixed Housing Suburban zone and not integrating it into PPC 100 will deny coordinated planning opportunities and appropriate access to Waitauti stream for proposed flood control.

Excluding 22 Duke Street from the Mixed Housing Suburban zone means that there will be no esplanade reserve adjacent to Waitauti stream. This denies the opportunity to continue an existing riparian corridor.

Opportunities to integrate PPC 100's proposed 'Green Corridor' to an extended esplanade reserve will be lost.

Stormwater Perception:

Interestingly, Council's decision to exclude 22 Duke Street from its FDS, and the consequent removal from PPC 100, seems to have set aside sound reasoning and has apparently been driven by political expediency. Last year's cyclone Gabrielle and Anniversary Weekend storms were very emotive.

Both events were 1 in 200 year events, and the worst weather bombs in Auckland's recorded history.

Formulated science and engineering modelling do not support Council's view of the flooding risk over my entire property. Though some of 22 Duke Street was submerged during these events, both the farmhouse and the barn, each located in the most affected area, were not breached.

The PPC 100 Stormwater and Flooding assessment relies on the inclusion of 22 Duke Street in its modelling. By excluding this property from the plan change, the applicant's modelling, as presented, is flawed.

Transport:

22 Duke Street enjoys full width road access to Duke Street.

If the property is zoned Mixed Rural, the opportunities to enhance local road connectivity to the northern end of Riverhead, its two preschools, and its primary school, will be lost.

Risk of Adverse Development:

If this subject property were zoned Mixed Housing Suburban, there is no added risk of housing being built in flood prone areas.

Such a zoning confers density, suburban rules, and the requirements of supporting infrastructure.

Zoning a property as Mixed Housing Suburban does NOT confer any added right to build in a flood prone area.

The Resource Management Act confers that right, and that requires suitability testing and consent.

Conversely, the Mixed Rural zone confers rights on the land that allowing it to be intensively farmed.

Thoughts of pig farming, poultry farming, truck and machinery movements, noise and smells, are possibilities that need little imagination.

What I Want:

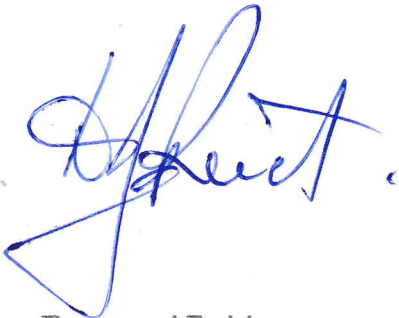
I want the current RUB to remain unchanged, and the whole of 22 Duke Street to remain in the current Future Urban Zone.

From that, I want the property to be included in PPC 100.

I then want diligent consultation with the applicants of PPC 100 to rationalise flood management, particularly around their proposed 'Green Corridor' and to optimise traffic and people movement within the wider catchment.

251.2
251.3
251.4
251.5

In closing, I must say that I am appalled that Council has not reached out directly to Aberdeen Adventures Ltd. as a significant stakeholder and land owner in these deliberations.



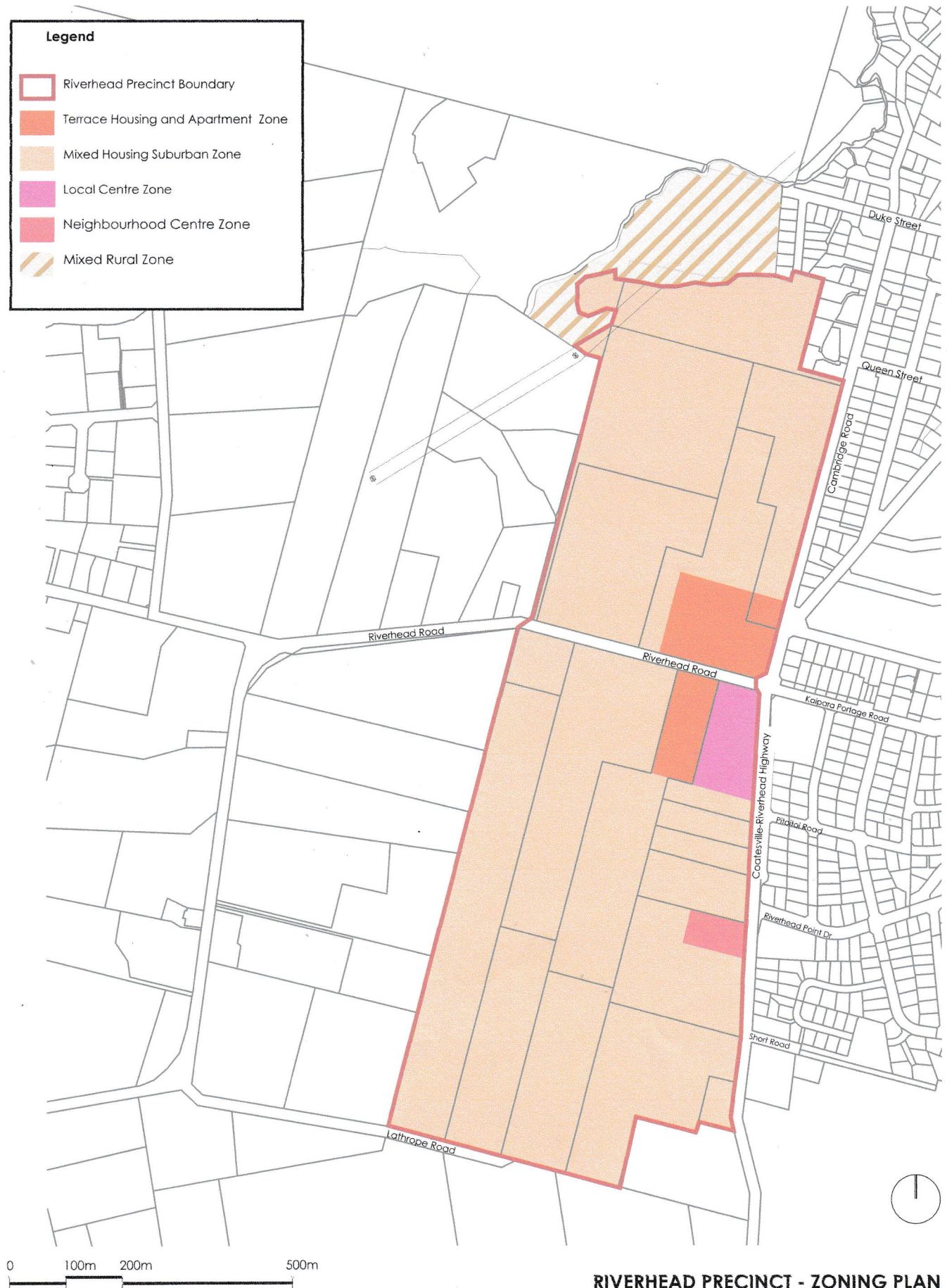
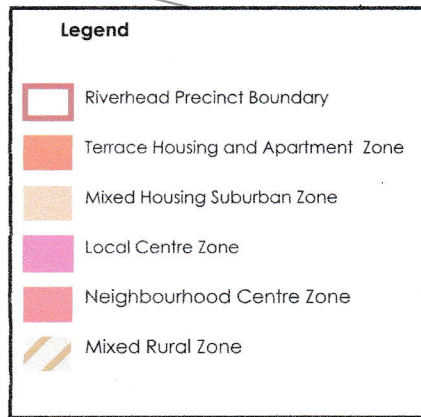
Desmond Reid.

Attachments:

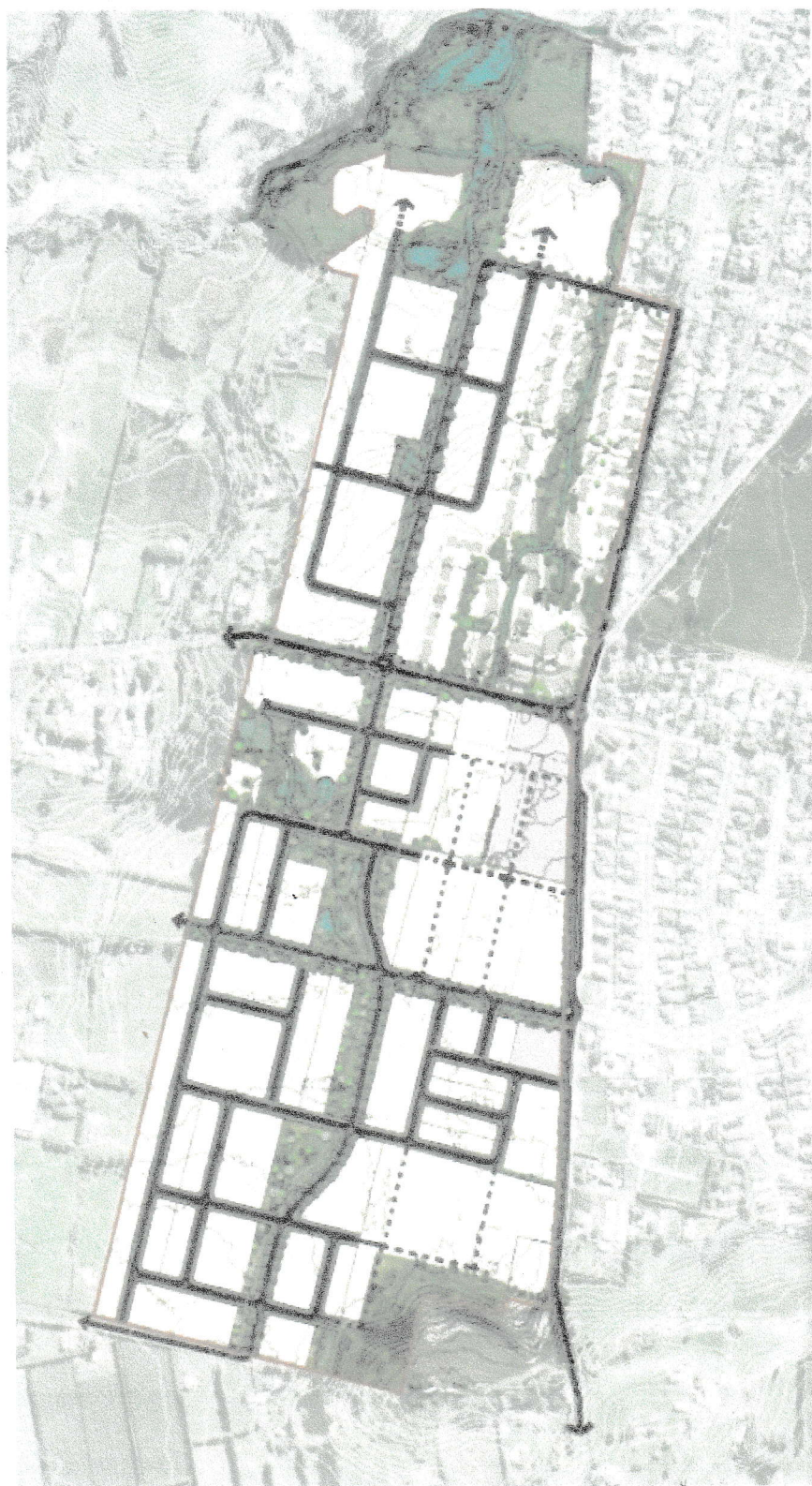
Riverhead Precinct Zoning Plan.

Rendition of PPC 100 Green Corridor.

Conceptual dual purpose Amenity / Stormwater Lake. (Aberdeen Adventures. 2015)



RIVERHEAD PRECINCT - ZONING PLAN



PPC-100 GREEN CORRIDOR.



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kathryn Boyes
Date: Saturday, 18 May 2024 12:00:17 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Kathryn Boyes

Organisation name:

Agent's full name:

Email address: kat.m.saunders@gmail.com

Contact phone number:

Postal address:
29 Cambridge Road
Riverhead
Auckland 0820

Submission details

This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

1. Plans to upgrade the transport network are inadequate.
2. Allowance for stormwater is not adequate.
3. There aren't enough provisions in the plan to maintain the character of Riverhead and create a cohesive village.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. Current roads in the area are unable to cope with the traffic that we have, let alone traffic from up to 1750 new dwellings. There should be absolutely no development done until the upgrades to the transport network have been completed. This would include the SH16/Coatesville Riverhead highway intersection. The roads around Cambridge Rd and Alice Street would need to be upgraded to cope with the extra traffic created if cars from the new buildings are going to channel through there to get to the main road. There would also need to be more footpaths to be able to get around safely with the increased traffic. Especially along the sides of Riverhead road.

2. A storm event like last year would appear to be enough to overwhelm the planned stormwater system. There needs to be specifically designated stormwater areas so that no one is tempted to

minimise the land given over to stormwater. The area dedicated to stormwater also needs to look to the future, when heavy rainfall events are likely to occur more often. The bare minimum will not suffice. Currently Cambridge Road has completely inadequate drainage, with a large overgrown ditch failing to take a lot of the water away. This sort of drainage would need to be sorted and upgraded to cope with the extra development in the area.

3. The creation of the new part of Riverhead had many regulations around what sections should look like, to create a cohesive, spacious feel to the area. There don't seem to be enough concrete provisions for this in the current plan. Any new building needs to fit in with the existing aesthetic of Riverhead, to provide a township that is cohesive. There need to be specific specifications around this to make sure that it is adhered to.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 252.1

Details of amendments: No development without infrastructure! | 252,2

Submission date: 17 May 2024

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

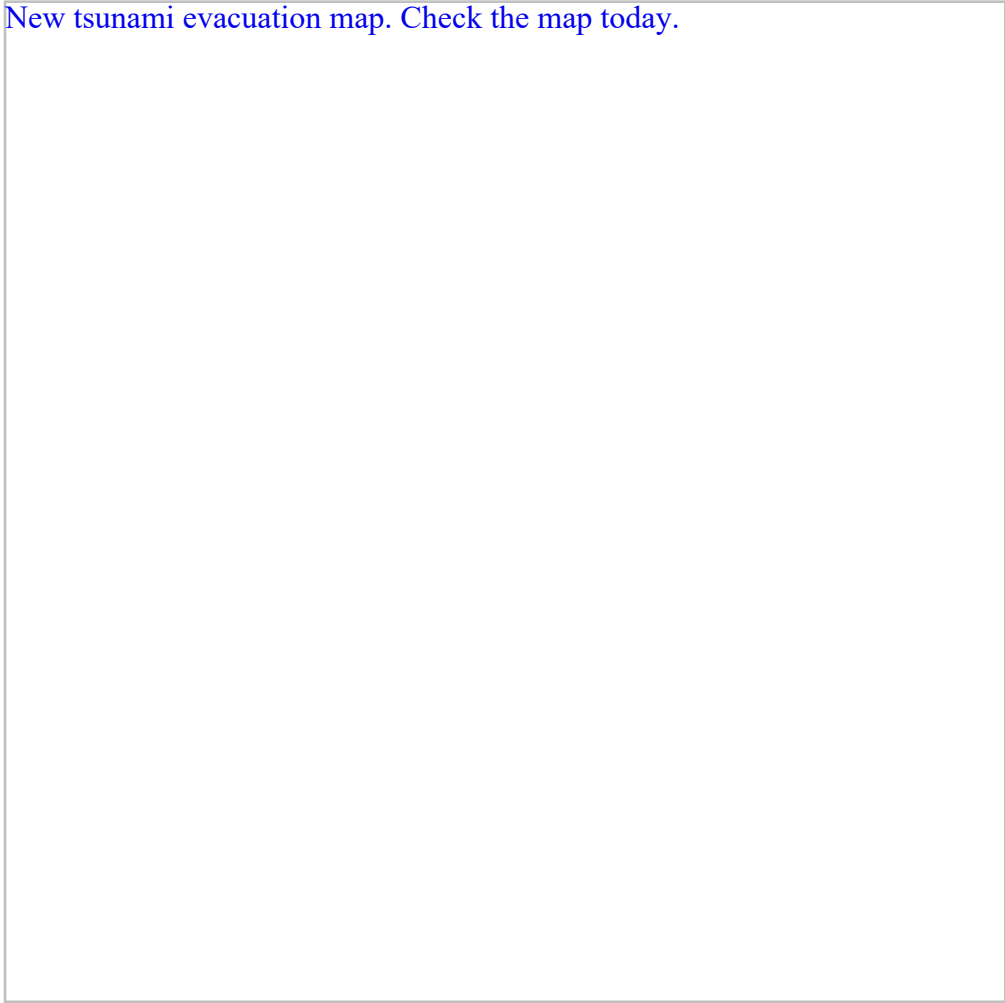
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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

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**Submission on Proposed Private Plan Change 100 (Private): Riverhead - by Riverhead Landowner
Group
to the Auckland Unitary Plan (Operative in Part) -
Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)**

To: **Auckland Council**

1. SUBMITTER DETAILS

Name of Submitter: **The Botanic Limited. Partnership**

This is a submission on Proposed Private Plan Change 100 (PPC100) to the Auckland Unitary Plan – Operative in Part (AUP).

The Botanic Limited Partnership could not gain an advantage in trade competition through this submission.

2. SCOPE OF SUBMISSION

The specific aspects and provisions of PPC100 that this submission relates to are:

- a) Support for the rezoning of the land as set out within the Plan Change Documentation and within the Riverhead Zoning Plan, including the proposed Terraced Housing and Apartment Zone and the Mixed Housing Suburban Zone.
- b) Support for the inclusion of Sub-Precinct A and B and the associated Policy framework as set out within the Plan Change Documentation and within the Riverhead Precinct Plan 4.
- c) Support for the proposed Precinct Rules as written within the Plan Change documentation, including the allowance for additional height in the sub-precincts and the provision for additional commercial activities within sub-precinct A which are appropriate to the site.

3. SUBMISSION

The Submitter has an interest in the properties within the Plan Change area at 1092 Coatesville Riverhead Highway (Legal reference Lot 1 DP 164590 and Lot 2 DP 164590).

The Submitters representatives (Matvin Group Limited) are included within the “Riverhead Land Owner Group”, being the applicant for PPC100, their interests in the Plan Change area relate to the two legal parcels referred to above.

The Submitter would like to express their overall support for the Proposed Plan Change as currently worded and outlined within the PC100 documentation and retain their right to be involved as the process progresses.

As outlined by the various technical assessments for PPC100, urban development, for residential housing in this location is an appropriate and efficient use of land.

The proposed precinct provisions ensure that the urban development of the land will be undertaken in an integrated way with the appropriate infrastructure delivered, as required, in conjunction with urban development.

4. SUMMARY

The Botanic Limited Partnership seeks that Auckland Council approve the request to rezone the Future Urban land as set out within the PPC100 documentation or similar zoning that achieves the same or similar outcome for urban residential land uses.

253.1

The Botanic Partnership Limited wishes to be heard in support of their Submission.

Yours sincerely



Burnette O'Connor
Director | Planner
The Planning Collective Limited
Ph: 021 422 346
Email: burnette@thepec.co.nz



Submission on Proposed Private Plan Change 100 (Private): Riverhead - by Riverhead Landowner Group
to the Auckland Unitary Plan (Operative in Part) -
Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

To: **Auckland Council**

1. SUBMITTER DETAILS

Name of Submitter: **Matvin Group Limited.**

This is a submission on Proposed Private Plan Change 100 (PPC100) to the Auckland Unitary Plan – Operative in Part (AUP).

Matvin Group Limited could not gain an advantage in trade competition through this submission.

2. SCOPE OF SUBMISSION

The specific aspects and provisions of PPC100 that this submission relates to are:

- a) Support for the rezoning of the land as set out within the Plan Change Documentation and within the Riverhead Zoning Plan, including the proposed Terraced Housing and Apartment Zone and the Mixed Housing Suburban Zone.
- b) Support for the inclusion of Sub-Precinct A and B and the associated Policy framework as set out within the Plan Change Documentation and within the Riverhead Precinct Plan 4.
- c) Support for the proposed Precinct Rules as written within the Plan Change documentation, including the allowance for additional height in the sub-precincts and the provision for additional commercial activities within sub-precinct A which are appropriate to the site.

3. SUBMISSION

Matvin Group Limited have an interest in the properties within the Plan Change area at 1092 Coatesville Riverhead Highway (Legal reference Lot 1 DP 164590 and Lot 2 DP 164590).

While Matvin Group Limited are included within the "Riverhead Land Owner Group", being the applicant for PPC100, their interests in the Plan Change area relate to the two legal parcels referred to above.

Matvin Group Limited would like to express their overall support for the Proposed Plan Change as currently worded and outlined within the PC100 documentation.

As outlined by the various technical assessments for PPC100, urban development, for residential housing in this location is an appropriate and efficient use of land.

The proposed precinct provisions ensure that the urban development of the land will be undertaken in an integrated way with the appropriate infrastructure delivered, as required, in conjunction with urban development.

4. SUMMARY

Matvin Group limited seeks that Auckland Council approve the request to rezone the Future Urban land as set out within the PPC100 documentation or similar zoning that achieves the same or similar outcome for urban residential land uses.

254.1

Matvin Group Limited wishes to be heard in support of their Submission.

Yours sincerely



Burnette O'Connor
Director | Planner
The Planning Collective Limited
Ph: 021 422 346
Email: burnette@thepec.co.nz