

# Further submission in support of, or in opposition to, submission on the Proposed Auckland Unitary Plan



Section 123 Local Government (Auckland Transitional Provisions) Act 2010;  
Clause 8 of Schedule 1, Resource Management Act 1991  
FORM 3 Resource Management (Forms, Fees, and Procedure for Auckland Combined Plan)  
Regulations 2013

**Return your signed further submission to Auckland Council by 22 July 2014 5:00pm**

Further submissions may be:

- posted to Attn: Unitary Plan Submission Team, Auckland Council, Private Bag 92300 Auckland 1142. Freepost Authority 237170
- lodging your further submission in person at any Auckland council office, library, service centre or local board office
- or emailed to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Note:** online further submissions can also be made at [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

For office use only

Further Submission No:

Receipt Date:

## 1. Further submitter details

**Full name of person making further submission:**

Alexander David Gibbs

**Contact name if different from above:**

David Gibbs

**Organisation or company (if relevant):**

Urban Design Forum

**Address for service of person making further submission:**

P O Box 90 451 Victoria St West Central Auckland

**Phone:** (09) 373 4900

**Fax:**

**Email:** [david@konstrukt.co.nz](mailto:david@konstrukt.co.nz)

**I live in the following Local Board area (if known):** Devonport Takapuna

## 2. Interest in the submission

**I am: (select one)**

- A person representing a relevant aspect of the public interest; or
- A person who has an interest in the Proposed Auckland Unitary Plan that is greater than the interest the general public has; or
- Auckland Council

The grounds for saying that I come within the selected category are:

Please refer to the executive summary of Urban Design Forum's primary submission

## 3. Request to be heard in support of further submission

Please indicate by ticking the relevant box whether you wish to be heard in support of your further submission

I **do** or  I **do not** wish to be heard in support of my further submission

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

**Yes**  **No**

**4 Signature of further submitter** (note a signature is not required if you make your submission by electronic means, but please type your name below)

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

David Gibbs

Date: 22.07.14

Note: Please use second page to state the scope of your further submission

**URBAN  
DESIGN  
FORUM**

**Urban Design Forum Further Submissions  
on the Proposed Auckland Unitary Plan**

**22 July 2014**

Attached are the further submissions on the Proposed Auckland Unitary Plan from the Urban Design Forum. This submission is identical but separate to that of the Auckland Branch of the New Zealand Institute of Architects Incorporated.

A copy of the further submission will be served on the original submitter within 5 working days after it is served on Auckland Council.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Auckland 2040 Incorporated, Attn: Richard J Burton**  
[rjburton@xtra.co.nz](mailto:rjburton@xtra.co.nz) 7 Park Avenue, Takapuna, Auckland 0622

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
1473 - 8 1473 - 11 1473 - 14 1473 - 19 1473 - 22	Support	B2.1 Providing for growth in a quality compact urban form	We are concerned to preserve the best of the garden suburbs, and to avoid poor quality infill across broad areas.	Because this compact city approach will optimise the choice of lifestyle available to residents and will not result in the gradual degradation of existing character.	UDF seeks that part of the submission be allowed.
1473 - 9	Oppose	RPS B2.1	Add new objective which identifies a major north south growth corridor linking Albany to Silverdale and Orewa.	We believe parts of this "corridor" merit protection from urban development.	UDF seeks that part of the submission be rejected.
1473 - 20	Support	B1.1 Enabling quality urban growth	The issue of staging urban intensification needs wider debate.	We agree greater clarity around where urban intensity is to be increased is desirable.	UDF seeks that part of the submission be allowed.
1473 - 24	Support	B2.2A A quality built environment.	The rules for greenfield development should provide for coordinated and well-designed density.	The rules for greenfield development should be very different to those applying to permitted uses in existing neighbourhoods.	UDF seeks that part of the submission be allowed.
1473 - 25 1473 - 26 1473 - 28	Support	B2.2A A quality built environment.	Greater clarity of expected design outcomes in the various zones is desirable.	Because good design and respect for context is an essential element of development.	UDF seeks that part of the submission be allowed.
1473 - 27 1473 - 29	Oppose	B2.2A A quality built environment.	The suggested policy wording will stifle the development of well-designed urban density.	There will be many areas where designing to the "planned future character" of the area will be essential to meet the Plan's objectives.	UDF seeks that part of the submission be rejected.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
1473 - 31	Support	D1.1 General objectives and policies	We support design reviews of developments that increase urban intensity.	Design review is an important tool in achieving quality intensification. However we question whether requiring a full Resource Consent, with all the associated RMA implications, is the best way of achieving this.	UDF seeks that part of the submission be allowed.
1473 - 32 to 1473 - 38	Support	D1.5 MH Suburban Zone, obs and pols.	We are not opposed to the MHS zone retaining a spacious and open suburban character.	This support is, however, contingent on the zone being carefully and sparingly applied to the maps so as to not undermine the overall objectives of the Plan.	UDF seeks that part of the submission be allowed.
1473 - 74 to 1473 - 80	Support	Development controls: MH Suburban and MH Urban zones.	Noting that the submitter's requests relate to the MH Suburban zone only.	This support is, however, contingent on the zone being carefully and sparingly applied to the maps so as to not undermine the overall objectives of the Plan.	UDF seeks that part of the submission be allowed.
1473 - 86 1473 - 87 1473 - 88 1473 - 89	Oppose		Oppose submission in part	Because Takapuna needs to develop into a true metropolitan centre.	UDF seeks that part of the submission be rejected.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Auckland Council, Attn: Stephen Town**  
[stephen.town@aucklandcouncil.govt.nz](mailto:stephen.town@aucklandcouncil.govt.nz) Private Bag 92300, Auckland 1142

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5715 - 9  (Contained in Volume 1 of the submission)	Support	B.2.3 Development capacity and supply of land for urban development.	We support the targeted assembly and release of land intended to be intensively developed.	We are concerned that the intended development of up-zoned land will, over potentially wide areas, fail to happen. This could lead to areas of urban blight where neither comprehensive redevelopment nor incremental improvements flourish.	UDF seeks that part of the submission be allowed.

Submitter: **Auckland Property Investors Association Incorporated, Attn: David Whitburn**  
[president@apia.org.nz](mailto:president@apia.org.nz) P.O Box 47-707, Ponsonby, Auckland

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
8969 - 11	Support	I3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend Rule 4.2 Building Height metro and town centres to increase height, example of 30 storeys in Takapuna is cited. Review town centre development economics to increase height to 8-12 levels and identify ridge-line	Amend this rule to provide for increased development potential for both residential and business activities in this zone.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Beacon Pathway Incorporated, Attn: Nick Collins**  
[glendal@beaconpathway.co.nz](mailto:glendal@beaconpathway.co.nz) P.O Box 74618, Greenlane, Auckland

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
6138 - 6	Support	RPS B2.1	Amend provisions to require any proposed development of satellite towns to be designed to include a vibrant local hub with amenity, social and economic activities.	Satellite towns should be self-sufficient and compact, and support public transport in both directions, rather than being distant dormitory suburbs.	UDF seeks that part of the submission be allowed.

Submitter: **Birkenhead Town Centre Association, Attn: Cherie Lane**  
[cherie@laneassociates.co.nz](mailto:cherie@laneassociates.co.nz) P.O Box 32-217 Devonport, Auckland 0744

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
6585 - 14	Support	D3.4 Town Centre zone desc, obs & pols		Mixed-use development in the town centre supports Council objectives.	UDF seeks that part of the submission be allowed.
6585 - 15	Support	D3.4 Town Centre zone desc, obs & pols		4-8 storey height limits will allow reasonable intensification without adverse effect on the character or neighbourhood of Birkenhead Village.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Stuart J and Orchid L Bracey**

[orchid@atimalalaconsulting.co.nz](mailto:orchid@atimalalaconsulting.co.nz) 87A Te Kawa Road, Greenlane, Auckland 1061

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
6193 - 21	Support	D3.9 Business Park zone desc, obs & pols	Delete Business Park zone.	The Business Park Zone is contrary to the objectives for a compact city with strong town centres.	UDF seeks that the whole submission be allowed.

Submitter: **Cabra Developments, Attn: Chris Walsh**

[chriswalsh@woods.co.nz](mailto:chriswalsh@woods.co.nz) P.O Box 6752 Wellesley Street, Auckland 1141

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
5515 - 28	Support	I.3.4 Dev Controls Centres, mixed use, Gen Bus Rule 4.9.2	Amend the Ground floor glazing Rule 4.9(2) so that it does not apply to residential activities on the ground floor in the Mixed Use zone.	Amend this rule to allow for appropriate façade treatment for residential buildings in the Mixed Use Zone.	UDF seeks that part of the submission be allowed.



## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **The Character Coalition, Attn: Sally Hughes**  
[sallyhughes1@me.com](mailto:sallyhughes1@me.com) 39 Hawea Road, Kohimarama 1071

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6370 - 1	Support	Overlay E2/J2 Historic Heritage	Appendices 9.1 9.2 and 9.3 Significant Historic Heritage Places	Inclusion in the schedule of any significant heritage places identified and vetted in a Plan Change to a legacy plan is an appropriate co-ordination of heritage assessment and recognition already undertaken.	UDF seeks that part of the submission be allowed.
6370 - 2	Support	Overlay E2/J2 Historic Heritage	Appendices 9.1 9.2 and 9.3 Significant Historic Heritage Places	Inclusion in the schedule of significant heritage places should be based on proper assessment.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 10	Support	Chapter G General provisions	G2.4 Notification	As the lead national heritage advisory agency Heritage New Zealand have an affected party interest in heritage.	UDF seeks that part of the submission be allowed.
6370 - 11	Support	Overlay E2/J2 Historic Heritage	J2.5 Special information requirements	Alignment of heritage provisions in the PAUP with other parallel legislative regimes is sensible.	UDF seeks that part of the submission be allowed.
6370 - 13	Support	C7.4/H6.3 Signs		Negative effects on heritage can arise from insensitive signage.	UDF seeks that part of the submission be allowed.
6370 - 14	Support	Auckland-wide – general	C.6 Background, objectives and policies	Negative effects on heritage can arise from insensitive subdivision. The suggested amendment aligns with the RMA Part 2 Section 6(f) provisions for heritage as a matter of national importance.	UDF seeks that part of the submission be allowed.

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6370 - 15	Support	Designations	G1.3 Designations	There appears to be potential for variations of interpretation of protection controls for recognised heritage within designated sites and rights under the designation. The amendment would provide clarification and certainty for protection of heritage from development within designated areas.	UDF seeks that part of the submission be allowed.
6370 - 16 6370 - 17	Support	General	Miscellaneous	The UDF recognise the economic benefits arising from historic heritage and its protection. The UDF also recognise the important distinction between historic heritage and the arbitrary pre-1944 Demolition Control overlays and submits its interest in this submission where it is applied only to recognised historic heritage.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 18 to 6370 - 25	Support	Chapter G General provisions	G2.4 Notification	The UDF support the submission where it is applied to historic heritage and not to special character areas.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 26 6370 - 27	Support	Issues	B1.3 Protecting historic heritage, special character & natural heritage.  B4.1 Historic heritage	The UDF support the submission and acknowledge the particular and distinctive significance of wahi Tupuna; volcanoes; and volcanic landforms to places of value. The UDF again stress the distinction required in historic heritage and special character and the relative protection regimes afforded each accordingly.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 28 6370 - 29	Support	Overlay E2/J2 Historic Heritage	Appendices 9.1.9.2 and 9.3 Significant Historic Heritage places.  Retain the Schedule (Appendix 9.1).	The UDF do not support amending the schedule to add any place identified by Heritage New Zealand as our understanding is that the Auckland Council obligations under the RMA require such schedules to be its own and not rely on those lists or registers managed by others.	UDF seeks that part of the submission be allowed and qualified as per our further submission.

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6370 - 30	Support	Miscellaneous	Operational/ Projects/Acquisition	The nomination of any historic heritage is a matter of national importance and should be publically accessible.	UDF seeks that part of the submission be allowed.
6370 - 31	Oppose	Historic heritage, special character and natural heritage	B4.1 Historic heritage	The UDF are unsure how or if future Council heritage assessments would be streamlined by adding involvement from Heritage New Zealand and Local Boards.	UDF seeks that part of the submission be rejected.
6370 - 32	Support	Historic heritage, special character and natural heritage	B4.1 Historic heritage	The appropriate identification of historic heritage values can be enhanced by the use of thematic studies.	UDF seeks that part of the submission be allowed.
6370 - 33 6370 - 38 6370 - 40	Oppose	Urban growth	B2.1 Providing for growth in a quality urban form.	The UDF ask whether Auckland has any areas that are without heritage and landscape values? This submission highlights one of the tensions within the PAUP's aspirational goals of identifying and protecting heritage and intensifying the city. The UDF believe these are not mutually exclusive aspects of Auckland's future.	UDF seeks that part of the submission be rejected.
6370 - 34 6370 - 35	Support	Historic heritage, special character and natural heritage	B4.1 Historic heritage	Best practice concerning the assessment of historic heritage values are supported by the methodologies advanced in this submission. The UDF again call for clear understanding between historic heritage and special character.	UDF seeks that part of the submission be allowed.
6370 - 36	Support	Urban growth	B2.1 Providing for growth in a quality urban form	The submission makes a complex call based on assessment for historic heritage of a much more complex architectural and urban design discipline. The UDF do not believe intensification and the recognition and protection of historic heritage are mutually exclusive.	UDF seeks that part of the submission be allowed and qualified as per our further submission.

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6370 - 37	Support	Miscellaneous	Operational/ Projects/ Acquisition	Sufficient funding for heritage identification and assessment is inextricably linked to Council's RMA obligations to identify and protect local heritage.	UDF seeks that part of the submission be allowed.
6370 - 39	Support	Miscellaneous	Consultation and engagement	The inclusion of community groups and Local Boards in developing local area plans to implement any rezoning within the Unitary Plan is supported.	UDF seeks that part of the submission be allowed.
6370 - 42 to 6370 - 44	Support	Historic heritage, special character and natural heritage	B4.1 Historic heritage Prioritise the inclusion of a heritage strategy within the PAUP. Definition of "heritage maintenance".	The UDF note that historic heritage definitions should generally align with those found in the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value to which the Auckland Council subscribes.	UDF seeks that part of the submission be allowed.
6370 - 45	Support	Overlay E2/J2 Historic Heritage	J2.2 Development controls	Rules to require maintenance of historic assets are supported, but need to be linked to an incentive rather than a requirement alone.	UDF seeks that part of the submission be allowed.
6370 - 46 6370 - 48	Support		New: Definition of "historic character", "character-defining", "character-supporting".	The UDF submit that definitions clarifying the distinction between historic heritage and special character are necessary to ensure that historic heritage and special character are not confused.	UDF seeks that part of the submission be allowed.
6370 - 49 6370 - 50 6370 - 51	Oppose	Overlay E3.2/J3.6 Pre-1944 Building demolition control. Overlay – Business and residential	E3.2 Description, objectives and policies J.3.6 Rules and mapping Overlay E3.1 Bus. & res. Special character areas	The UDF does not support the pre-1944 demolition overlay control (see UDF original submission paragraph 104) and does not support extending the overlay to all areas of Auckland, amending the notification rule as submitted, or identifying other specific areas proposed without assessment and clarity of the values to be found.	UDF seeks that part of the submission be rejected.

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6370 - 52 6370 - 53 6370 - 54	Support	Historic heritage, special character and natural heritage	B4.1 Historic heritage	The UDF agree with the submission as worded which directs focus of the objectives in the PAUP to scheduled historic places and not to areas of special character.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 55	Support	Overlay E2/J2 Historic heritage	Overlay E2 description objectives and policies	The qualifiers for A8 as opposed to Category A places seem to be linked to an ability to relocate historic heritage to another site. ICOMOS principles recognise context as an integral linkage to the values of a place and these principles are better recognised in the PAUP than in the legacy operative Plans.	UDF seeks that part of the submission be allowed.
6370 - 56 to 6730 - 62	Support	Overlay E2/J2 Historic heritage	J2.1 Activity table 1 – Significant historic heritage places  J2.2 development controls  J2.5 Special information requirements	The UDF generally support the submission, but suggest that definition (at 6370 - 62) of a “suitably qualified person” also be provided.	UDF seeks that part of the submission be allowed and qualified as per our further submission.
6370 - 63	Support	Historic heritage, special character and natural heritage	B4.1 Historic heritage	Best practice standards for the identification and protection of historic heritage arise from an holistic and interdisciplinary approach.	UDF seeks that part of the submission be allowed.
6370 - 64 6370 - 65	Support	Historic heritage, special character and natural heritage  Overlay E2/J2 Historic heritage	B4.1 Historic heritage  Appendices 9.1.9.2 and 9.3 Significant Historic Heritage Places.	The importance of interiors to the historic heritage values of a building can only be determined by way of appropriate assessment. Interiors can hold great significance to the values of a place and should be regarded.  The inclusion of all interiors as a default in the PAUP could be supported subject to qualification following appropriately qualified assessment.	UDF seeks that the submission be allowed and qualified as per our further submission.

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6370 - 66 6370 - 67	Support	Historic heritage, special character and natural heritage  Overlay E2/J2 Historic heritage	Appendices 9.1.9.2 and 9.3 Significant Historic Heritage Places	The inclusion of the concept of an historic building not existing in isolation from a context to which it relates and is definable is well recognised in historic heritage best practice. Site surrounds defined by the legal description of the site as a default in the PAUP could be supported subject to qualification following appropriately qualified assessment.	UDF seeks that the submission be allowed and qualified as per our further submission.
6370 - 68	Support	Overlay E2/J2 Historic heritage	Appendices 9.1.9.2 and 9.3 Significant Historic Heritage Places	Historic heritage is complex construct of elements that singly and collectively contribute the overall significance. The inclusion of all applicable heritage overlays to include notable trees, geological features, and significant ecological features aligns with best practice heritage standards.	UDF seeks that part of the submission be allowed.
6370 - 69 6370 - 70	Support	Eplan  Overlay E2/J2 Historic heritage	Appendices 9.1.9.2 and 9.3 Significant Historic Heritage Places	Clarity and ease of use of schedules by way of alphabetical ordering by street and the inclusion of an advice note concerning the role of Heritage New Zealand is supported.	UDF seeks that part of the submission be allowed.

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6370 - 71 to 6370 - 78	Support	Overlay – Business and residential. Overlay J3.2.1 Special character Helensville. Special character Isthmus A, B, C Overlay Special character Residential North Shore. Overlay Special character – General.	Overlay E3.1 Bus. & Res. Special character areas  J3.1.6 Maps, App, 10.1 Spec. Character Statements – Bus.  J3..3.3 Maps App. 10.4 Spec. character statements – Res Isthmus  J3.4.8 Maps App. 10.5 Spec. character statement – Res North Shore  J3.5.7 Maps App. 10.2 Spec. character statement – General	The UDF maintain their submission that historic heritage is distinct from special character and with that understanding the UDF generally support the submission.	UDF seeks that the submission be allowed and qualified as per our further submission.
6370 - 79	Oppose	Overlay E2/J2 Historic heritage	Appendices 9.1.9.2 and 9.3 Significant Historic Heritage Places	Appropriate assessment of these shops needs to be undertaken before they can be added to the schedule.	UDF seeks that part of the submission be rejected.
6370 - 80	Oppose	Overlay Business and residential	Overlay E3.1 Bus. & Res. Special character areas	In the light of submission 6370-79 appropriate assessment of these shops needs to be undertaken before they can be added to the PAUP as a Special Character Business zone.	UDF seeks that part of the submission be rejected.
6370 - 81	Support	Special character isthmus A, B & C	J3.3.3 Maps App. 10.4 Spec. character statements – Res. Isthmus.	Clarity of special character areas is important.	UDF seeks that part of the submission be allowed.
6370 - 82	Support	Overlay – Business and residential	Overlay E3.1 Bus. & Res. Special character areas	Clarity over what the special character of an area is derived from is important and should be carried over from the legacy plans where this has not already been done.	UDF seeks that part of the submission be allowed.

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6370 - 83	Oppose	Overlay – Business and residential	Overlay E3.1 Bus. & Res. Special character areas	Guidelines should not be statutory tools.	UDF seeks that part of the submission be rejected.
6370 - 84	Support	Overlay E2/J2 Historic heritage	Overlay E2 description, objectives and policies	Historic heritage should be cared for and its maintenance and repair should be incentivised.	UDF seeks that part of the submission be allowed.
6370 - 85 6370 - 99	Oppose	Urban growth	B2.2 A quality built environment	The Design Manual should not become a statutory document, but remain a tool to inspire rather than direct good design.	UDF seeks that part of the submission be rejected.
6370 - 86 6370 - 100	Support	Residential  Urban growth	D1.1 general objectives and policies  B2.2 A quality built environment	The appropriate intensification and response to local value and character of local areas warrants informed objectives derived from local area studies.	UDF seeks that part of the submission be allowed.
6370 - 87 to 6370 - 102	Oppose	B1.1 Enabling quality urban growth B2.1 Providing for growth in a quality compact urban form B2.2 A quality built environment	“Residential intensification needs to be balanced with retaining the residential character of the majority of suburbs.”  “[Intensification] is constrained by the need to preserve residential character.”	UDF recognise that many areas of Auckland have a special character, and it is precisely these areas that legitimately attract new development. It is our view that the purpose of the PAUP is to encourage good design so that new development integrates sensitively into these existing environments of character.	UDF seeks that part of the submission be rejected.
6370- 129	Support	Precincts General Content	Precincts General Content	Retain the precincts that seek to retain ‘historic character’ as a major objective.	UDF seeks that part of the submission be allowed.



## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Devonport Business Association, Attn: Cherie Lane**  
[cherie@laneassociates.co.nz](mailto:cherie@laneassociates.co.nz) P.O Box 32-217 Devonport, Auckland 0744

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6573 - 3	Support	Overlay J4.2 Additional Zone Height Control	Support whole submission	The 12.5m height will allow reasonable intensification without destroying the character of Devonport	UDF seeks that the whole submission be allowed.
6573 - 20	Support	Zoning- North and Islands	Support whole submission	Changing the Light Industry zoning in Lake Road to General Business Zoning would open up the site for a supermarket development, to the detriment of the community role of Devonport Town Centre	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Patrick Fontein**

[Patrick@studiod4.co.nz](mailto:Patrick@studiod4.co.nz) 670 Remuera Rd, Remuera, Auckland 1050

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6285 - 14	Support	I3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend Rule 4.2 Building Height of metro and town centres to increased height, example of 30 storeys in Takapuna is cited. Review Town Centre development economics to increase height to 8-12 levels and identify ridgeline	Amend this rule to provide for increased development potential for both residential and business activities in this zone.	UDF seeks that the whole submission be allowed.
6282 - 3	Support	RPS	Acknowledge the factors effecting intensification and the redevelopment likelihood of a site includes: improvement value verses capital value, parcel size, the number of existing dwellings on a site, the increase of value when re-developed. If a site is to be re-developed related to the maximum extra dwellings able to be developed, the likely capacity utilisation of owners who chose to redevelop and the development chance of properties. These constraints mean only 20 - 50 per cent of intensification potential will actually be developed. Amend rules so that parking minimums are relaxed.	Many examples, such as Pukekohe, demonstrate the truth of this analysis.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Generation Zero, Attn: Luke Christensen**  
[luke@generationzero.org.nz](mailto:luke@generationzero.org.nz) 19-26 Nicholls Lane, Auckland Central 1010

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5478 - 1	Support	RPS B2.1 Enabling quality urban growth		This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478 - 2	Support	RPS 2.1 Providing for growth in a compact urban form		This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478 - 4	Support	B2.3 Dev. capacity & supply of land for urban development	Retain the requirement for no more than 40 per cent of new dwellings to be located outside the 2010 MUL	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478 - 5	Support	B2.1 Providing for growth in a quality compact urban form	Retain the RUB within the RPS.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478 - 6	Support	B2.2 A quality built environment	Amend to recognise the importance the proposed compact city strategy plays in protecting areas of high natural and amenity value.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478-7	Support	RPS D1.1 General objectives and policies	Amend zoning to balance the need between accommodating growth and protecting the character of special areas.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5478 - 11	Support	RPS 1B2.3.O4 1B2.3.P4	Add the following to Policy 4(h): No Future Urban zoned land will be rezoned for urban development unless it can be shown that urban development in Auckland is processing at a rate that exceeds 60% of urban growth occurring within the 2010 MUL.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
5478 - 14	Support	RPS B2.6 Public open space and recreation facilities	Retain the policy in regard to open space	UDF supports this position.	UDF seeks that the whole submission be allowed.
5478 - 21	Support	Future Urban Zone - Subdivision	Retain subdivision restrictions in the Future Urban zone.	UDF supports this position.	UDF seeks that the whole submission be allowed.
5478 - 23	Support	Urban Growth App. 1.1-2 Structure Plan req. & Metropolitan Urban Area 2010	Retain, particularly provisions for structure planning and public transport.	UDF supports this position.	UDF seeks that the whole submission be allowed.
5478 - 32	Support	I.3.4.5 Amend maximum tower dimensions rules to avoid overly restrict development	Amend this rule because it is overly prescriptive	UDF supports controls that allow for innovation and flexibility.	UDF seeks that the whole submission be allowed.
5478 - 38	Support	I. 3.4.2 Building Height (in Mixed Use zone) and Local Centre Zone	Amend this rule to allow increased height in the Mixed Use and Local Centre zone	UDF supports controls that will provide for increased density and support reviewing where greater height would be appropriate dependant upon the context and proximity to public transport.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Charles R Goldie**

Richard@peddlethorp.co.nz Peddle Thorp, L5 23 Customs St, Auckland 1010

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 1	Support	City Centre Zone I 4.2 Notification	Amend Rule 4.1 'Activity table' to require the demolition of buildings to be considered as part of a consent application to construct a new building not as a restricted discretionary activity.	UDF supports this position, which will prevent the creation of unnecessary gaps in the urban fabric.	UDF seeks that the whole submission be allowed.
6496 - 5	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.1 'General height controls' to introduce minimum building heights. Buildings should be at least as high as the width of the road space, including footpath, measured from the property boundary to the property boundary on the opposite side of the street facing the principle building façade.	UDF supports a requirement for development to be built to a scale appropriate for the city centre; both in terms of urban density as well as appropriate use of the land resource of the central city.	UDF seeks that the whole submission be allowed.
6496 - 7	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.3 'Aotea Square height control plane' Figure 5 so that it allows for the build up of higher buildings to the south of Aotea Square.	UDF supports the potential development of the southern edge of Aotea Square, notwithstanding the retention of the Civic Administration Building.	UDF seeks that the whole submission be allowed.
6496 - 8	Support in part	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.4 'Harbour edge height control plane' by rewording the first bullet of the section of 'Purpose'. Amend 4.4.4(1) to increase the building height and delete Figure 1 and amend Figure 2 to include the centre of the intersection with Hobson Street to the centre of the intersection of Fanshawe Street and the frontage alignment extending along Quay Street and The Strand.	UDF supports strengthening the maritime edge of the city centre such as this submission proposes. We also support the notion that views to and from the sea to the city are between buildings –whether that is via streets or spaces between tower blocks- but not over them.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 9	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.6 'Railway Station building and gardens view protection plane'.	UDF supports the notion that the landscaping amenity is a key attribute of the former Railway Station site in the cityscape.	UDF seeks that the whole submission be allowed.
6496 - 10	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.6 'Dilworth Terrace views protection plan' Figure 4 to allow for the construction of higher buildings towards the eastern end of the proposed extension.	UDF notes the value of the Dilworth view shaft but supports development of the eastern end such that it would also enhance the strong harbour edge.	UDF seeks that the whole submission be allowed.
6496 - 11	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.7 'Measuring building height'.	This position is supported by UDF.	UDF seeks that the whole submission be allowed.
6496 - 12	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.8 'Rooftops' by retaining clauses (2), (4)(a), (4)(c); and delete (4)(b); and amend clause (1) Amend 4(3)	This position is supported by UDF.	UDF seeks that the whole submission be allowed.
6496 - 13	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.9 'Basic Floor Area Ratio' to be increased by 25% in all areas, and delete 4.9(2).	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.
6496 - 14	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.10 'Bonus Floor Area Ratio'.	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.
6496 - 15	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Delete Rule 4.11 'Bonus Floor Area Ratio - light and outlook'.	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.
6496 - 16	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.12 'Bonus floor area ratio - use of or transfer of historic heritage and special character floor space bonus'.	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 17	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.13 'Bonus floor area ratio - securing historic heritage and special character floor space bonus'.	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.
6496 - 18	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.15 'Bonus floor area ratio - bonus floor space calculation for scheduled heritage buildings'	This submission aligns with the UDF position. Bonus provision would be granted to exemplary design.	UDF seeks that the whole submission be allowed.
6496 - 20	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Delete Rule 4.17 'Bonus floor area ratio - through site links'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 21	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Delete Rule 4.18 'Bonus floor area ratio - through site links through identified blocks'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 22	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.19 'Bonus floor area ratio - work of art'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 23	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.20(1) 'Bonus floor area ratio -maximum floor area ratio so that the maximum floor area ratio on all sites is increased by 25%, and amend 4.20(2) to make any building that exceeds the maximum floor area ratio a limited discretionary activity and delete 4.4.20(3).	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 24	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.22 'Streetscape improvement and landscaping'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 25	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Delete Rule 4.23 'Maximum tower dimension, setback from street and tower separation'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 26	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.24 'Building frontage alignment and height' by: Clause (1) to require all building frontages to align with the street frontage; and retain clause (2).	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 32	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.30 'Wind'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 33	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.31 'Glare'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 34	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.32 'Special amenity yard'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 35	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.33 'Street sightlines'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 37	Support	Definitions	Amend the definition of 'net internal floor area' to read "the floor space between the finished internal surfaces of walls between residential units or adjacent common or public space".	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 38	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 4.35 'Minimum dwelling size' by retaining clause (1)(a) and deleting clause (1)(b)	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.



<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 40	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.37 'Daylight to dwellings'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 41	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.38 'Service and waste'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 42	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.39 'Dwelling mix'	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 43	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 4.40 'Outdoor living spaces' and include two new rules providing for balconies projecting over streets or public space and enclosed balconies [refer to page 9/10 for specific text].	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 45	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 5 'Assessment -Controlled Activities'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 46	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend Rule 6(5) and (6) Restricted Discretionary Activities 'Matters of discretion' to include 'proposals for redevelopment of any site proposed for demolition'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 47	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 7 'Assessment - development control infringements'	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 49	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Retain Rule 9 'Special information requirements'.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6496 - 50	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Amend the PAUP so that development contributions are not payable to areas where the 'Bonus floor area ratios and Bonus floor' apply (Rules 4.4.9 - 4.4.20).	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.
6496 - 51	Support	City Centre Zone Rules/Appendix 7.1- 7.3	Require buildings fronting a public street to have articulation of their façades.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Heart of the City, Attn: Alex G Swney**  
[alex@hotc.co.nz](mailto:alex@hotc.co.nz) P.O Box 105 331, Auckland

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6246 - 10	Support	C3 Historic heritage - Background, objectives and policies	Amend Objective 1 to read: 'Significant historic heritage places assets (being places, buildings and for the purpose of clarity bridges and other structures) that are not scheduled in the Unitary Plan are protected from the adverse effects of use and development.'	Align objective to reflect the RMA definitions of historic heritage.	UDF seeks that part of the submission be allowed.
6246 - 12	Support	Definitions	Add a new definition of [heritage] 'place' to mean 'places, buildings and for the purpose of clarity bridges and other structures'.	Align definitions to reflect the RMA definitions.	UDF seeks that part of the submission be allowed.
6246 - 13	Support	C3 Historic heritage - Background, objectives and policies	Add a new policy as follows: 'Prioritise further systematic assessment of places, buildings and for the purposes of clarity bridges and other structures, with a view of getting those places and assets most under pressure from development appropriately scheduled.'	Prioritization of places at risk targets most useful approach to the assets recognized with the resources available.	UDF seeks that part of the submission be allowed.
6246 - 15	Support	C3 Historic heritage - Background, objectives and policies	Amend Objective 1 as follows: 'A scheduled historic heritage place or asset is protected and conserved while enabling appropriate development or redevelopment, use and adaptive re- use, maintenance and repair.'	This aligns well with RMA Part 2 section 6(f) matters of national importance.	UDF seeks that part of the submission be allowed.
6246 - 16	Oppose	C3 Historic heritage - Background, objectives and policies	Add Queens Wharf as a scheduled Category A significant historic heritage place.	Disagree. This has been assessed by Council and the (then) NZHPT {now Heritage New Zealand} and was not identified as warranting this level of protection.	UDF seeks that part of the submission be rejected.

6246 - 34	Support	City Centre Zone D3.2 Objectives + Policies	Amend the second paragraph of the introduction by adding the words 'event space and' after the words 'reverse sensitivity effects on identified'.	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.
6246 - 37	Support	City Centre Zone D3.2 Objectives + Policies	Amend Objective 3 as follows: 'Development in the city centre is managed to accommodate growth and the greatest intensity of development in Auckland and New Zealand while respecting its valley and ridgeline form and waterfront setting and important view shafts.'	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.
6246 - 38	Support	City Centre Zone D3.2 Objectives + Policies	Delete Objective 5 [a hub of an integrated regional transport system is located within the city centre and the city is accessible by a range of transport modes]	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.
6246 - 39	Support	City Centre Zone D3.2 Objectives + Policies	Add a new Objective as follows: 'The city centre is accessible by a range of transport modes, with an increasing percentage of residents and workers choosing walking cycling and public transport.'	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.
6246 - 40	Support	City Centre Zone D3.2 Objectives + Policies	Amend Policy 8 as follows: 'Support the development of public transport, pedestrian and cycle networks and the ability to change transport modes while at the same time recognising the need to emphasise placemaking and sense of place in key areas.'	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.
6246 - 41	Support	City Centre Zone D3.2 Objectives + Policies	Amend Policy 11 as follows: 'Limit activities within the waterfront precincts that would have reverse sensitivity effects on established and future marine and port activities, notwithstanding that there are existing city attributes that may take priority over port activities.'	This submission aligns with the UDF position.	UDF seeks that part of the submission be allowed.

6246 - 42	Support	City Centre Zone D3.2 Objectives + Policies	Amend Policy 13 as follows: 'Encourage the retention and conservation of the city centre's historic heritage and special character through development adaptive re-uses, heritage incentives and by protection through scheduling, giving the greatest priority to the most valuable assets most under threat.'	Prioritization of places at risk targets most useful approach to the assets recognized with the resources available.	UDF seeks that part of the submission be allowed.
6246 - 43	Support		Amend Policy 14 by adding a new subparagraph (e) as follows: 'while for clarity noting that a new development may be more appropriate for an area then retaining a pre-1944 building with modest character attributes.	Areas of special character value are not in themselves necessarily of heritage value and their evolution is an important opportunity for the city's growth and the aspirational goal of intensification espoused in the PAUP.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Jasmax Urban Design Team, Attn: Alistair Ray**  
ajr@jasmax.com

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
5625 - 21	Support	Residential activity table	Support for a simpler, cheaper and less confrontational means of community consultation, outside of the RMA.	The RMA process is overly dominated by legal issues, and forces those affected by development proposals into unnecessarily defensive positions.	UDF seeks that the whole submission be allowed.
5625 - 22	Support	RPS and B2.1 Providing for growth in a quality compact urban form	Support for a more considered distribution of the zones to allow density in those places with high amenity.	Intensification of the city will be painfully slow if market-attractive areas of high amenity are excluded from the up-zoning in general.	UDF seeks that the whole submission be allowed.

Submitter: **Kiwi Income Property Trust and Kiwi Property Holdings Ltd, Attn: Douglas Allan and Joanna van den Bergen**  
Ellis Gould, PO Box 1509, Shortland Street, Auckland 1140

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
5253 - 22 And all other submissions seeking to extend Growth Corridors	Oppose	Overlay E4.5	Identify the corridors to which the Growth Corridor overlay applies, via a variation if necessary. The corridor should be applied on major arterial routes that are or are intended in the future well served by public transport; pass through business or industrial zoned land; and are in close proximity to residential areas that can be served by commercial development.	The identified Growth Corridor is a muddled concept – effectively a General Business Zone in drag – that undermines the viability of town centres.	UDF seeks that part of the submission be rejected.
5253-56	Support	Zoning	Retain the Metropolitan Centre status of Sylvia Park.	Sylvia Park is a major centre with good public transport access and should be intensified further.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Lincoln Junction Ltd, Attn: Glenn Teal**  
[glenn@teal.org.nz](mailto:glenn@teal.org.nz) 15A/4 Short St, Auckland Central 1010

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5315 - 2 And all other submissions seeking to extend Growth Corridors	Oppose	Overlay E4.5	Delete Policy 2 and replace with Policy 7 from B3.1 to read: "New commercial activities are, where appropriate, to be enabled on identified growth corridors: a) In Business, Light Industry and Mixed Use zones, having regard to:.....	The identified Growth Corridor is a muddled concept – effectively a General Business Zone in drag – that undermines the viability of town centres.	UDF seeks that part of the submission be rejected.
5315 - 1	Support	Zoning	Rezone the existing Lincoln North commercial area at the intersection of Lincoln Road and Universal Drive from Light Industry, Mixed Use and General Business to Town Centre [refer to page 4/4 volume 1 of submission for specific area]. Retain the Metropolitan Centre status of Sylvia Park.	The junction of Lincoln Rd and Universal Drive has effectively become a small Town Centre or Local Centre. The zoning should recognise this.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Minister for the Environment**

Lesley.baddon@mfe.govt.nz 45 Queen Street, P.O Box 106483, Auckland

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
318 - 1	Support	Urban Growth B2.3 Dev. capacity & supply of land for urban development	Whole submission	UDF supports adjusting the zoning, overlays, development controls and other rules to provide sufficient residential development capacity and land supply to meet Auckland's 30 year growth projections and the development objectives of the PAUP and the Auckland Plan.	UDF seeks that the whole submission be allowed.
318 - 2	Support	Urban Growth B2.2 A quality built environment	Whole submission	UDF supports removing or loosening prescriptive provisions of the PUAP where they are not well-supported or justified by evidence and analysis, particularly for those activities which also employ a flexible design-based approach to decision making (e.g. discretionary or restricted discretionary medium and high density development).	UDF seeks that the whole submission be allowed.
318 - 3	Support	Urban Growth B2.3 Dev. capacity & supply of land for urban development	Whole submission	UDF supports improving the PAUP integrity by reconciling its policies and methods with its RPS level objectives. The approach for doing this should focus on increasing development capacity to provide housing supply and choice across a wide range of new and existing locations.	UDF seeks that the whole submission be allowed.



## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Ministry of Business, Innovation & Employment, Attn: Chris Bunny**  
[paul.honeybone@mbie.govt.nz](mailto:paul.honeybone@mbie.govt.nz) 33 Bowen St, P.O Box 1473, Wellington 6011

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6319 - 1	Support	RPS Urban growth B2.1 Providing for growth in a quality compact urban form	Whole submission	UDF supports aligning policies and rules with strategic objectives to provide sufficient capacity for growth including through appropriate density provisions and zoning.  This will provide greater plan clarity.	UDF seeks that the whole submission be allowed.
6319 - 2	Support	RPS Urban growth B2.1 Providing for growth in a quality compact urban form	Whole submission	UDF supports aligning policies and rules with strategic objectives to provide sufficient capacity for growth including freeing development from complicated policies and rules.  This will provide greater plan clarity.	UDF seeks that the whole submission be allowed.
6319 - 3	Support	General Cross Plan matters	Whole submission	UDF agree that the broad brush approach of the overlays, the inconsistency in zoning between market interest and density allocations and the misalignment between density allowances and specific development controls that constrain density, all work against the overall regulatory efficiency of the PAUP in achieving its strategic objectives.	UDF seeks that the whole submission be allowed.
6319 - 4	Support	RPS Urban growth B2.1 Providing for growth in a quality compact urban form	Whole submission	UDF support amending the zoning, overlays and development controls and other rules such that they do not constrain provision of sufficient residential development to meet Auckland's long term (30 year) growth projections and proactively enable efficient growth in areas of high market demand.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6319 - 8	Support	RPS Urban growth B2.1 Providing for growth in a quality compact urban form	Whole submission	UDF support amending zoning provisions to correct the misalignment between areas of high demand and the areas where growth is provided for.	UDF seeks that the whole submission be allowed.
6319 - 9	Support	RPS Urban growth B2.1 Providing for growth in a quality compact urban form	Whole submission	UDF support reviewing the approach to consenting medium density development by removing rules, overlays and controls which will stifle innovation and good design.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **National Road Carriers Incorporated, Attn: Grant Turner**  
[grant.turner@natroad.co.nz](mailto:grant.turner@natroad.co.nz) P.O Box 12 100, Penrose, Auckland

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6135 - 4 6135 - 5	Oppose	C1.2 Policies  H1.2.3 Development controls H1.2.6 Special information requirements	Provide appropriate specifications and enabling rules to encourage the meaningful use of high productivity motor vehicles (HPMVs).  Add reasonable and practical urban design provisions that will enable the delivery of freight to every future property in Auckland, including access to shopping malls, and appropriately sized and located parking spaces and turning circles.	It should be voluntary for developers to provide the large areas of tar seal to allow extra large trucks to access city sites.	UDF seeks that part of the submission be rejected.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **New Zealand Retail Property Group Ltd, Attn: Campbell Barbour**  
[cbarbour@nzrpg.co.nz](mailto:cbarbour@nzrpg.co.nz) P.O Box 84-001, Westgate, Auckland 0657

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5165 - 9 and all points related to design controls	Oppose	F7.10 Precinct description, objectives and policies	Delete the precinct objectives and policies.	The precinct provisions set a vision for a high quality centre rather than ad hoc retail development. The precinct provisions are an important part of achieving a high quality design outcome at Westgate.	UDF seeks that part of the submission be rejected.
5165 - 10	Oppose	K7.10 Rules and Mapping	Delete the precinct rules.	The precinct provisions are an important part of achieving a high quality design outcome at Westgate.	UDF seeks that part of the submission be rejected.
5165 - 11	Support	K7.10 Rules and Mapping	Delete the requirement for a Park-and-ride within Westgate Centre and locate this at land off Northside Drive such as the Bridgeford land at 91 Fred Taylor Drive, Massey.	A metropolitan centre with good public transport access is an inappropriate location for a park and ride facility.	UDF seeks that part of the submission be allowed.
5165 - 18	Oppose	Zoning	Rezone the areas identified as Terraced Housing and Apartment Building to General Business in Westgate, Massey as identified as '1' in the submission [refer volume 1 page 26/30].	The General Business Zone is contrary to the objectives for a compact city with strong town centres.	UDF seeks that part of the submission be rejected.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Greg Nikoloff**

[greg@farsight.co.nz](mailto:greg@farsight.co.nz) 9 College Road, St Johns, Auckland 1072

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6426 - 22	Support	I3.1 Activity table 1 for Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Retain strong restrictions on retail and office activities outside of centres.	The General Business Zone is contrary to the objectives for a compact city with strong town centres.	UDF seeks that the whole submission be allowed.

Submitter: **North Harbour Business Association, Attn: Janine Brinsdon**

[janine.brinsdon@nhba.org.nz](mailto:janine.brinsdon@nhba.org.nz) P.O Box 303 126, North Harbour 0751

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6354 - 1 And all points that seek additional GBZ	Oppose	Zoning	Rezone the land located within the North Harbour Business Improvement District, refer to map page 12/12, identified as Light Industry to General Business.	The General Business Zone is contrary to the objectives for a compact city with strong town centres.	UDF seeks that the whole submission be rejected.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Oceania Group, Attn: Craig McGarr**  
[cmcgarr@bentley.co.nz](mailto:cmcgarr@bentley.co.nz) P.O Box 4492, Shortland St, Auckland 1140

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
4290 - 1	Support	RPS	Delete the Retirement Village zone and transpose the zone's objectives, policies and rules into a new Retirement Village precinct. Provide a new underlying zoning for each retirement village that reflects its context.	Retirement villages should be a normal part of the urban fabric, including in and around town centres. There should be flexibility to build and change them over time	UDF seeks that part of the submission be allowed.
4290 - 2	Support	RPS	Amend the 'Unitary Plan issue' to read 'Our growing and ageing population increases demand for housing, employment, business, infrastructure, and services. This means we must manage our growth in a way that: enhances quality of life and wellbeing for individuals of all ages and communities, optimises the efficient use and development of our existing urban area'.	The Unitary Plan should allow all age groups to find accommodation within their communities and in and around their town centres.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Ockham Holdings Ltd, Attn: Mark Todd**

[mark@ockham.co.nz](mailto:mark@ockham.co.nz) P.O Box 78 007, Grey Lynn, Auckland 1021

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6099 - 2 6099 - 10 6099 - 28	Support	General cross-plan matters	Support for deleting 'density' as a development control	There is a good case for controlling residential environments through controls related only to use, physical bulk + location and residential amenity, and not controlling the number of dwellings. Minimum land area per dwelling requirements reduces affordability. Current density rules result in large McMansions being built on small sites within cookie cutter subdivisions unrelated to the landscape or varying lifestyle needs.	UDF seeks that part of the submission be allowed.
6099 - 18 to 6099 - 20	Support	Development Controls, MH Suburban and Urban zones.	Support for increasing the density in the MH Urban zone, but subject to design review	Quality development at densities beyond those currently proposed is possible, and should be encouraged in the MH Urban zone.	UDF seeks that part of the submission be allowed.
6099 - 21 6099 - 22	Support	Development Controls, THAB zone	Support for increasing the density in the THAB zone, but subject to design review	In particular, the assessment of site specific access to daylight, for both the development and its neighbours, is supported.	UDF seeks that part of the submission be allowed.
6099 - 24	Support	B2.2 A quality built environment	Support for amending the proposed rule	The proposed rule around which, and how many, infringements of the development controls will trigger a Resource Consent needs review.	UDF seeks that part of the submission be allowed.
6099 - 7	Support	D1.1 General objectives and policies	Rezone all land within 10 minutes walking distance of train stations and transport nodes (except for Business zoned land) to Terrace Housing and Apartment Buildings zone.	Amend the zoning maps so as to obtain the best benefit for residential development proximate to public transport.	UDF seeks that part of the submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
6099 - 115	Support	I 3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend Table 1 rule 4.2 [Building height] to increase building heights in the Mixed Use zone from 16.5m (4 storeys) to 24.5m (6 storeys)	Amend this rule to provide for increased development potential for both residential and business activities in this zone.	UDF seeks that part of the submission be allowed.
6099 - 117	Support	I 3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend rule 4.4 [Building setback at upper floors} to increase building height from 16.5m and four storeys to 24.5m and six storeys; and to reduce the minimum setback from 6m to 0m.	UDF supports controls that will provide for increased density and support reviewing where greater height would be appropriate dependant upon the context and proximity to public transport.	UDF seeks that part of the submission be allowed.



## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Ports of Auckland Ltd, Attn: Simon Pilkinton**

[simon.pilkinton@russellmcveagh.com](mailto:simon.pilkinton@russellmcveagh.com) 48 Shortland St, P.O Box 8, Auckland 1140

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
5137 - 198 to 5137 - 210	Oppose	D5.1.1 Background, objectives and policies		UDF supports Auckland Council's proposal that all reclamation in the Ports Precincts be non-complying, at least until the Stage 2 Study is completed	UDF seeks that part of the submission be rejected.

Submitter: **Property Council New Zealand, Attn: Connal Townsend**

[connal@propertynz.co.nz](mailto:connal@propertynz.co.nz) P.O Box 1033, Auckland 1140

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
6212 - 85	Support	I3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend rule 4.2 [Building height] to allow a maximum building height of at least 5+ storeys in all the business zones.	Amend this rule to provide for increased development potential for both residential and business activities in this zone.	UDF seeks that the whole submission be allowed.
6212 - 89	Support	I 3.4 Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones	Amend rule 4.9 Glazing to allow for individual site circumstances and a varied approach.	Amend this rule, as it is overly prescriptive and may stifle design innovation, while noting the need for building frontages to contribute positively to the street environments.	UDF seeks that the whole submission be allowed.
6212 - 100	Support	Dev. controls Centres, Mixed Use, Gen. Bus. & Bus. Park zones General objectives and policies	Recognise that the abandonment of floor area ratio controls in favour of urban design controls will increase the need for urban design assessments and Council needs to manage this process to ensure sufficient certainty, flexibility and efficiency and ensure that it avoids unnecessary delays and costs.	This submission aligns with the UDF position.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Pukekohe Business Association, Attn: Kendyl Gibson**  
[kendyl@pukekohe.org.nz](mailto:kendyl@pukekohe.org.nz) P.O Box 1240, Pukekohe

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
8971 - 4	Support	Zoning - South		We support their commitment to the health and viability of Pukekohe Town Centre, which is of a very high quality.	UDF seeks that the whole submission be allowed.
8971 - 14	Support	RPS		We share their concern about the impact of growth around Wesley and the out-of-centre retailing it is likely to encourage.	UDF seeks that the whole submission be allowed.

Submitter: **Christina Robertson**  
[cjr.robertson@gmail.com](mailto:cjr.robertson@gmail.com) 24 Truro Road, Sandringham, Auckland

Council submission number	Position	Relevant UP Provision	Particular Parts of the Submission	Reason for Support/Opposition	Relief
6264 - 3	Support	H1.2.3 and H1.2.6	Amend rules so that parking minimums are relaxed.	This will encourage more efficient small-scale intensification.	UDF seeks that part of the submission be allowed.
6264 - 5	Support	D1.1	Amend density in the Mixed Housing zones to allow for more intensification. Density limits should be removed in Mixed Housing Urban zone and significantly relaxed in the Mixed Housing Suburban zone.	Allow the market to determine numbers and sizes of household units.	UDF seeks that part of the submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **Urban Auckland, Attn: Julie Stout**

[Julie@mitchellstout.co.nz](mailto:Julie@mitchellstout.co.nz) P.O Box 105-824, Auckland City Post Shop, Auckland 1010

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5786 - 4	Support	Pt 2 Ch D1.1 Policies 2 and 3	Amend the Business and Mixed Use zones to allow greater height particularly along transport corridors of Auckland's ridgelines (including Jervois Road, Ponsonby Road, K' Road, Remuera Road, and Great South Road).	Amend this rule to provide for increased development potential for both residential and mixed-use development along Auckland's great streets.	UDF seeks that the whole submission be allowed.
5786 - 20	Support	B2.6 Public Open space	Retain the concept of retaining and improving public open spaces within the metropolitan area.	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.
5786 - 21	Support	B2.6 Public Open space	Retain the concept of making Auckland roads, streets and lanes part of the "public open space zone" (as noted in Chapter B2.6) so that some unifying aesthetics/textures/materiality could overlay these zones.	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.
5786 - 22	Support	B4.3 Natural Heritage	Retain the recognition of the importance of street trees in the public realm.	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.
5786 - 23	Support	B4.3 Natural Heritage	Reinstate the tree protection of the former councils to protect existing character trees.	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.
5786 - 24	Support	B4.3 Natural Heritage	Update the schedule with high priority given to preserving existing character trees	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
5786 - 25	Support	B4.3 Natural Heritage	Develop an urban street planting plan in the PAUP to preserve existing character trees	The UDF supports all policies to improve the public realm.	UDF seeks that the whole submission be allowed.
5786 - 33	Support	Transport H1.2.3 and H1.2.6	Retain the absence of minimum parking requirements in the Centre zones, the Mixed Use zone and the THAB zone.	Support moves to encourage greater use of public transport and reduce parking burden for developments.	UDF seeks that the whole submission be allowed.

## UDF Further Submission on Proposed Auckland Unitary Plan

Submitter: **The Warehouse Ltd, Attn: Paula Brosnahan**

[paula.brosnahan@chapmantripp.com](mailto:paula.brosnahan@chapmantripp.com) Chapman Trip, 23-25 Albert St, Auckland, P.O Box 2206, Auckland 1140

<b>Council submission number</b>	<b>Position</b>	<b>Relevant UP Provision</b>	<b>Particular Parts of the Submission</b>	<b>Reason for Support/Opposition</b>	<b>Relief</b>
2748 - 17 and all other submissions seeking GBZ	Oppose	H1.2.3 and H1.2.6	Rezone Lunn Avenue commercial areas, i.e. on both sides of the road between Harding Avenue and Ngahue Drive/Abbotts Way, [from Light Industry] to General Business.	The General Business Zone is contrary to the objectives for a compact city with strong town centres.	UDF seeks that part of the submission be rejected.
2748 - 30 and all other submissions seeking to extend Growth Corridors	Oppose	Overlay E4.5	Amend the Growth Corridor overlay to apply it to additional arterial roads [including sections of Great North Road, New North Road, Great South Road and Ti Rakau Drive] as stated in submission [page 281132]	The identified Growth Corridor is a muddled concept – effectively a General Business Zone in drag – that undermines the viability of town centres.	UDF seeks that part of the submission be rejected.
2748 - 19	Support	D1.1	Rezone 66 and 80 Broadway, and 11 - 15 Railway Street, Newmarket [from Mixed Use] to Metropolitan Centre.	The existing and proposed activities in this part of Broadway deserve to be treated as an anchor destination within the Newmarket Metropolitan Centre.	UDF seeks that part of the submission be allowed.