



Eden Park Neighbours' Association  
PO Box 10-283, Dominion Rd  
Auckland. New Zealand  
Email: [mark.donnelly@xtra.co.nz](mailto:mark.donnelly@xtra.co.nz)  
Web: [www.epna.org.nz](http://www.epna.org.nz)

Draft Unitary Plan submission 31/5/13

1. To give effect to the “liveable city” goal, the UP needs to clearly set in place definitions and protection of “Residential Amenity”, this then leads to better outcomes.

### **Specific area issues**

#### **2. Up-zoning.**

We oppose such broad based up zoning unrelated to likely demand, and the ability for all types of infrastructure to cope.

The UP should not put in place up zoning across such a wide area. The UP should leave in place existing zone density and height rules, until such time as there is demonstrable demand for these properties, and when infrastructure is in place to cope with population growth ie school capacity, storm water/sewage etc.. When that occurs, a Local area plan (master plan) should be prepared to provide quality outcomes, and not based on just intensification requirements.

As background, in our area, Morningside and large parts of Kingsland have been able to build 4 storey apartments for approx 10-12 years, through previous Business 4 and Mixed Use zonings. In that period (approx 25% of the proposed time period of this plan), only a few have been developed. The Kingsland area is ideally suited to these developments, and current commercial use is limited and easily re-developed, however current supply would easily last for 40 years as zoned now.

So there is no need to up-zone areas such as Onlsow Rd, and wider areas along New North Rd, Sandringham and Dominion roads, as adequate growth capacity exists to meet future demand.

It is also highly irresponsible to up zone land, with no adequate or funded infrastructure plan in place. Much of Mt Eden is not stormwater/sewage separated, and in fact the 100+ year old system, sees pipes weave around the area avoiding major basalt issues, and traverse many private properties. We have seen no information on when this system will collapse under any extra growth. Even a small increase, may see immediate issues demanding a rapid upgrade. This upgrade would need to entail new major pipes down the road centre, and connections to every property. It would need to break through substantial basalt rock areas. This would be not only extremely expensive, but also entail major community and business cost in the disruption over many years.

Again, up-zoning cannot happen without a proper plan in place.

Also local schools are already at capacity. They are extremely desirable schools, which attract people to the area. Any child population increase will lead to the need for 2 new schools in the area. We note land has not been designated.

### **3. Specific zoning issues.**

- 3.1. North side of Onslow Rd, Kingsland is designated as apartment/Terrace. This should be single dwelling.
- 3.2. Sandringham Rd should not have strips of apartment/terraced, as it has not been demonstrated this amount of area is needed, and environmental adverse impacts are significant. Large apartments will impact on near-by residential amenity through such issues as shading, noise and the over-powering of heritage character areas.
- 3.3. We oppose Dominion Road Mixed use as suggested. It may be appropriate at a height limit of 2 storey, in keeping in character with the historical nature of the Eden Valley/Balmoral town centres. However it should also be released over time, as we are concerned with economic impacts on struggling town centres, if too much new/cheap retail and commercial capacity is released too quickly. This is also impacted by likely earthquake strengthening issues. It is also part of a key PT route, which would be slowed with increased local development.
- 3.4. We oppose the Mixed housing zone. This is a blatant return to the "Sausage flat" period which caused major destruction of Mt Eden heritage. The zone should remain similar as today at 375m, and no amalgamation of sites. The 1200m2 proposed unlimited dwellings at 30m is abhorrent. The design rules are inadequate and lend themselves to side site developments mimicking the sausage flats. They are a clumsy rule based approach, and don't lead to good design outcomes.
- 3.5. Balmoral is a key character area, and is unsuitable for apartments and terrace housing. It too has limited school growth ability, and is a congested area due to through traffic. It is also part of a key PT route, which would be slowed with increased local development.
- 3.6. The Mt Eden Village area is a crucial hub and feature of the wider Mt Eden area. We oppose the inappropriate 4 storey apartment/Terraced housing proposed around the village.

### **4. Other issues**

#### **4.1. Minimum parking.**

We oppose the removal of minimum parking requirements. This will lead to off site parking issues, in an already congested area of central Auckland. As a central area in a congested and constrained isthmus environment, we have not only local traffic, but also large flows of vehicles through and around the area. Off street parking requirements are needed to manage impacts of new developments – whether residential or commercial.

#### **4.2. Activity status**

We oppose the move of a large number of activities away from Discretionary to Restricted Discretionary. In our view this reduces the ability under the RMA to address all effects from an application. And relies on a full understanding now of every likely impact. To limit effects to be considered is irresponsible. As an example Drive-through facilities don't consider odour issues currently. There will no doubt be many more examples.

Specifically we oppose the large range of Permitted activities in the Mixed Use zone, such as Drive through facilities, entertainment facilities etc. The mixed use zone, is often only one property deep along Dominion Rd, and directly abuts residential properties.

### **4.3.**

### **Noise**

In order to protect residential amenity Noise limits must be no higher than current limits. In our view noise is a key component of residential amenity – especially in an area with many young children.

### **4.4. Heritage overlay.**

We appreciate the attempt to continue with Res 1 protection. However, we are concerned with the conflicts between base zoning and the overlay, ie which takes priority. We are also concerned with the introduction of costs to renovate, when considering demolition. It will always be more expensive to renovate. This could well lead to many more demolitions. Again we also oppose the use of Restricted Discretionary activity status.

In our view the old Res1 heritage area, was in affect a contract between neighbours, to maintain the character of an area, and each property benefited from that overall character. There was an acknowledgement that consents and costs of renovation would be more costly, but that part of a property's value was based on the areas intactness.

Based on the above, we also believe demolition, should be discretionary, so all effects can be addressed, and that in recognising the community element of a character area, that all applications should be notified. We suggest this should be to an area of say 100m from a site. This would give the people impacted a chance to comment. They are best placed to see if a proposal reduces the over-all character or not.

### **4.5. Temporary Activities. 4.2.5.5**

This rule must reinstate the old Auckland City change which prevented sites, such as Open Space 5 from “double dipping”, where an activity was covered under its Concept plan, and then the Temporary Activity rule could not be used to get around site specific requirements. Sites such as Eden Park, through Concept plans and Consents have defined appropriate levels of activities. It is inappropriate for a Temporary activity rule to also apply, as it undermines the Concept plans and consents, which have taken into account all site specific issues, including cumulative effects.

The Temporary Activity status also has too many fully Permitted activities, which will have major impacts, eg use of public space for 5 days – which removes others right of access. These need to be reduced substantially, and longer periods need Discretionary status.

## **5. Eden Park**

We are extremely disappointed that we have not been given access to the site specific concept plan for Eden Park.

We would however comment that at the regional policy level, 3.4.8.3, mention is made of “managing” impacts. This is inadequate, and we request be amended to address the importance of local residential amenity, in support a liveable environment for the surrounding area, and the commuters etc impacted over a much wider area. The UP should be clear about the need to “avoid” adverse effects.