

## **South Epsom Planning Group (Inc):**

### **Feedback on the Draft Unitary Plan**

The South Epsom Planning Group ('the Society') welcomes the opportunity to provide feedback on the Draft Unitary Plan and congratulates Council on seeking comment on the Draft prior to formal notification. The Society believes that this represents a sensible approach to planning - notwithstanding the high level of controversy it has engendered.

#### **(1) The Society**

The South Epsom Planning Group (Inc) is a Society comprising approximately 100 members who reside to the east of Three Kings in the South Epsom neighbourhood located on the north eastern edge of the tuff ring of the Three Kings volcanic system. Approximately 50% of our neighbourhood falls within the Puketapapa Local Board area (to the north of Landscape Rd) with the remainder falling within the Albert-Eden Local Board area (to the south of Landscape Rd).

#### **(2) A specific area of interest to the Society is the Single House Residential Zone (currently Residential 2B under the operative Plan of the former Auckland City Council)**

The area of South Epsom outlined above currently falls within the Residential 2B zone of the Operative Plan of the former Auckland City Council. This area is flanked by Empire Rd, Coronation Rd, Selwyn Rd, Buckley Avenue, Quentin Avenue, St Andrews Rd and St Leonards Rd. The Residential 2B zone boundary then ascends the 'hill area' in a diagonal south easterly direction and follows the edge of the escarpment to rejoin St Andrews Rd near the intersection with Quentin Avenue. Collectively this area constitutes the elevated area on the north-eastern rim of the tuff ring of the Three Kings volcanic system.

However the 'hill area' also provides commanding views of the current Business 7 (quarry) zone and the area to the west of the Three Kings volcanic system. Residents also access the various Council community facilities at Three Kings as well as some of the commercial activities to be found in adjacent areas.

The Society has been involved in planning issues generated by the current B7-zoned quarry land and its surrounds, dating from about 1972. We are currently involved in the Three Kings Precinct Plan development initiated by the Puketapapa Local Board (see feedback below).

**(3) The Society strongly supports the proposed controls in the proposed Single House Residential Zone and the associated overlays that recognise the heritage nature and values of our neighbourhood**

The general subdivision standards for properties within the proposed Single House Zone allow for subdivision to a minimum lot size of 500sq metres city-wide, but this minimum area is raised to 600sq metres in the 'Historic Character' area (section 4.4.3.3). We believe that it is very important to preserve these larger lot sizes because they have the space to accommodate the many mature trees found in the area as well as the notable character housing. The Society therefore *supports Rule for 4.4.3.3 and the application of Historic Character Residential Isthmus B2 to our area of Epsom - as identified in Isthmus B overlay 14*. In particular we support the 600 sq metre minimum subdivision size because it will effectively maintain the density control over the area of our neighbourhood that is currently zoned Residential 2B.

We note, nevertheless, that there remain significant numbers of lots that exceed 1200 sq metres, and thereby provide the opportunity for limited in-fill housing in future. We therefore strongly support Rule 4.4.3.3.1a and the application of Historic Character Residential Isthmus B2 to our area of Epsom.

**(4) The Precinct Plan for Three Kings should be completed prior to the implementation of zoning. Zoning should only occur once a Structure Plan has been prepared**

An unfortunate aspect of the current zoning indicated in the Draft Unitary Plan is that it has preceded completion of the planning work currently underway as part of the Three Kings Precinct Plan. The Society has made a detailed submission in response to the *Discussion Document – Three Kings Precinct Plan, Puketapapa Local Board* (May 2013), a 41-page document including the 'Addendum to Residential Development' that was made available at the planning meetings.

We believe that the appropriate course for Council to adopt is to remove the intensification zonings indicated in the Draft Unitary Plan, and for new zonings to be imposed only after completion of the Precinct Plan and a Structure Plan for the area.

We further submit that areas recently identified for intensification in the Draft Unitary Plan are inappropriately located. First, we question Three Kings being proposed as a town centre seemingly of greater scale and density than Royal Oak and Mt Roskill, which are both better established and on better transport routes. The rationale for this dramatic change to the scale of Three Kings town centre is not apparent in either the Draft Unitary Plan or the Precinct Plan Discussion Document.

The style and intensity of development proposed for the town centre should be reduced to reflect better the nature of the activities contemplated and to better match the Planning Principles adopted by the Local Board. Current and future competing service centres already operate in close proximity to Three Kings; this suggests that the proposed commercial area is unlikely to be economically viable as a major retail

area. Therefore we believe that the scale of development should be reduced somewhat and a more village-like ambience created – Three Kings Village.

Second, the intensive development proposed for the eastern side of Three Kings Rd (Mt Eden Rd) would very adversely affect the interaction of the community with Big King and destroy visual connectivity. We believe that there is much better opportunity for intensification to occur on current Housing New Zealand land to the west of the current quarry area. In both the Draft Unitary Plan and Precinct Plan Discussion Documents this Housing New Zealand is presented as zoned for single dwellings. Again, the rationale for this is unclear. In the Society's view, the current houses make very poor use of what is a large area of land that would be better suited for an exemplar higher density, low cost development.

Attached to this feedback is a copy of our full submission which draws the attention of the Local Board to the planning problems that the premature indication of intensification zones will create.

**(5) Notification of the Draft Unitary Plan should be delayed to allow a more detailed RMA S32 analysis of options and the staging of intensification**

The Society believes that there is a developing region-wide consensus that there has been insufficient time allowed by Council for planning staff to research the implications and impacts of intensification city-wide. In particular, we believe that the financial and logistical issues surrounding the provision of infrastructure have been inadequately researched.

The Society urges Council to remedy this fundamental deficiency and to defer the notification of the Plan until such time as this work can be completed. Once that work is done and there is the opportunity to stage development, we believe that the Council will be able to demonstrate the positive advantages of a more compact city. In the absence of this more considered and staged approach, we are concerned that Council risks losing the support of that section of the current community that supports an urban boundary and a more compact design-led development of our future city.

Philippa Mules, Secretary, South Epsom Planning Group Inc

29<sup>th</sup> May, 2013