

**Takapuna Residents Association Submission on
48 Esmonde Road, Takapuna (Plan Change 85)
7 October 2022**

Proposed Private Plan Change 85 seeks to rezone the land around the coastal edge of 48 Esmonde Road, Takapuna to Open Space – Conservation Zone, but to retain the existing Residential – Terrace Housing and Apartment Building zone for the remainder of the land. The proposed private plan change also seeks to introduce a new Precinct, the Takapuna 2 Precinct, which contains site specific development provisions for the land at 48 Esmonde Road, Takapuna.

Introduction

We recognise that some development is appropriate for 48 Esmonde Road, Takapuna, and the public generally accepted the previous plans. However, the Takapuna Residents Association has some concerns about the new plans and residents indicate that key issues are:

- the excessive height and position of the proposed ‘tower blocks’
- lack of onsite parking for the number of residents and facilities
- the proposed cycleway to Francis Street,
- the proposed boardwalk around the headland, and
- the threat to the adjacent Special Ecological Area (SEA) and need for protection.

The new plans are *vastly* different to the previous plans, creating an overpowering imposition on the landscape that is ‘harsh to the eye’ as a solid block manmade structure. We have reviewed the supporting documentation and also note there are some errors and misleading statements which also create quite a different ‘picture’ to the actual situation. Phrases such as ‘maximum use’ can be regarded both positively and negatively. There is lack of consistency in the use of the terms “coastal margin”, “Coastal Reserve”, “Esplanade Reserve” and/or “conservation zone”. The meanings and use of the terms can carry ‘assumptions and expectations’ and can be misleading.

We oppose the new proposed Private Plan Change 85 that seeks to introduce a new Precinct, the Takapuna 2 Precinct.

Coastal Environment and Protection of the adjacent Special Ecological Area (SEA):

To date, this area of the harbour coastline has been reasonably inaccessible to the members of the public, and the church had little impact on the perimeter of the property, so in terms of conservation the natural state of the coastline has been maintained and the wildlife have been very protected from intrusion for many years.

Unfortunately, this area and coastline will now be readily accessible for a very large population of 553 households, estimated 1,400 residents (and potentially associated pets - cats and dogs), who will have easy access day and night, all year round, to the coastal area and that will obviously have consequences for the natural environment and the birds that currently frequent the area. The “Coastal Reserve” will effectively become their ‘backyard’, so it can hardly be considered a ‘conservation zone’ when it is immediately adjacent to a large development such as this. If residents and visitors want to go for a walk around the perimeter of the development, native wildlife will be impacted.

By identifying areas as Special Ecological Areas (SEAs) Auckland Council aims to protect and maintain indigenous biodiversity within the Auckland Region. Shoal Bay is a designated SEA. Therefore, the Council needs to be mindful of those responsibilities and their commitments to this SEA when considering the proposed plans for this development, because it is immediately adjacent to a SEA. We note that local conservationist Phillip Moll has already noted his concerns about the impact of the Amaia development on the SEA of Shoal Bay. It should also be kept in mind that the recently-built Patuone Reserve boardwalk removed more mangroves from the western side of that coastal estuary than had been approved - which resulted in additional loss of habitat; also that the current Housing Intensification plans for Takapuna have not allowed for space or low density housing along the eastern side of that coastal estuary to provide a buffer for wildlife. So the natural coastal fringe environment has already been markedly affected by development and/or by intended development, and the birdlife has consequently been impacted upon. The sensitivity of our coastal marine areas needs to be respected and protected.

New Buildings Planned:

1553.3 (4) “*Require that new buildings: . . . (b) are appropriate in scale to, . . .*”. Many of the residents of Takapuna have indicated that they are not in favour of 10-storey and 16-storey buildings, and would not agree that the ‘scale’ of these buildings is appropriate. Comparison photos in Appendix I – Landscape Attachments identifies very clearly the different impact on the landscape compared with the previous plans for this site. The visual impact of the new image is huge, imposing, a large ‘unbroken’ area of hard-surfaced structure, which is out-of-proportion to the environment and in complete contrast to the coastal environment, at a main ‘entry point’ to Takapuna.

See comparison photos from Appendix I – Landscape Attachments as follows.



In terms of building compliance, the Precinct at 48 Esmonde Road should meet all the requirements, without the Coastal Reserve being part of those decisions, as would any other property in Auckland. It seems that this is being used as a ‘bargaining tool’ in order to ‘squeeze more onto the site’. We believe the Coastal Reserve should be an entirely separate aspect.

1553.6.2 Maximum impervious area – *“Purpose: To provide for the intensive use of the majority of the precinct in recognition of the long coastal margin (esplanade reserve) and its capacity to mitigate the effects of stormwater runoff from the precinct’s planned urban character of multi-storey buildings surrounded by open space.”* This is a very important aspect and we disagree with this statement.

In seeking the rezoning, the development is ‘separating itself from the coastal margin’. Therefore, development should meet the same requirements as other property owners in the area, and that is for impermeable surfaces to be measured within the legal boundaries and meet the percentage requirements accordingly. In seeking this zoning change, the coastal reserve should be regarded as a separate entity, and the precinct site should meet the standard rules for impermeable surfaces. Other properties in Takapuna adjacent to parks have to meet the same criteria, so this development should be no different. It could be seen that the developers are just ‘trying to maximise their profits and minimise their responsibilities’. Permeable surfaces also have the benefit of improving the overall environment within the precinct itself – so their residents should have the benefit of that. The other aspect to that comment is that the developers expect the runoff from the buildings to wash down and over the park, and that is not appropriate or desirable. Auckland Council needs to ensure tight control of this aspect, especially in for relevant Climate Actions and Targets.

Shading: 1553.8.2 Assessment criteria – (c) *“Shading – the extent to which: (i) the location and design of buildings ensures a reasonable level of sunlight access (measured at the Equinox) to residential units (principal living rooms and private outdoor spaces) and open space areas, taking into consideration the site and building orientation and the planned built character of the precinct.”* It is good to see that access to sunlight will be ensured in this development, although with the amount of buildings planned it is hard to see how this will be achieved as it seems the newly planned buildings will shade the other proposed lower buildings along the east, south and west boundaries, clearly the 16-storeys will create more shade.

Shading of the coastal environment needs to be avoided.

Transportation and Carparking:

While we recognise the aim of Auckland Council to encourage a move away from use of private vehicles towards use of public transport, it is not realistic to encourage housing intensification AND reduce carparking spaces. We do not believe it is sensible, realistic or good long term planning to not cater adequately for parking of vehicles. We believe the Council should ensure that developers are required to provide adequate parking onsite, otherwise it is ‘short term planning’ with long term consequences. We understand that the Takapuna 2 Precinct will allow for 553 homes. There is no on-street parking available in the immediate proximity of the Precinct, so inadequate carparking provision would impact negatively on the community.

1553.6.11 Maximum on-site parking – *“Purpose: To ensure the safety, efficiency and effectiveness of the internal and local road network and to discourage single occupancy car-based trips to and from the precinct. (1) The maximum number of long term or short term parking spaces (inclusive of any stacked facility) within the precinct must not exceed 321.”*

We note the onsite parking is based on *“a car park ratio of 0.55 of all residential activities and 548 dwellings”*. The table indicates 301 car parking spaces for Residential dwellings and 20 for Commercial and healthcare facilities. On this site, apparently, it is intended that there will be 252 owners/families who do not have a carpark. Only 20 carparks are planned for the Commercial and Healthcare facilities, which we do not think is sufficient to cater for both workers (estimated to number 17) and their clients. No provision appears to have been made for visitors in general. How realistic is that from a long term functional perspective, especially given that the site is on a main road with no street parking?

There MUST be adequate provision for on-site carparking for the population housed, for the onsite facilities, and for visitors.

It is noted that the precinct *“seeks to . . . encourage the use of non-car based trips”* (Appendix C -1553.1 (paragraph 7). 1553.3 (10) *“Require the applicant/developer to consider alternative methods to support movement to and from the precinct and encourage behaviour change away from private vehicles to other transport modes . . .”*. 1553.3 (2) (a) *“promotes alternatives to, and reduces dependency on, private motor vehicles as a means of transport while taking into account he maximum number of dwellings and non-residential floorspace anticipated for the precinct.”* – How? For a development of this size, here is an opportunity to implement the initiative of ‘Car Sharing’ functionality, where members pay an annual fee and hourly rate. ‘Requiring to consider’ is inadequate - Auckland Council needs to ensure the developer ‘walks the talk’.

There seems to be a heavy reliance on the expectation of people using public transport to justify the lack of onsite parking for vehicles, which is fine, if that infrastructure exists and the appropriate public transport is available which can get a person to the range of destinations required in a timely manner.

Pedestrians will be busy ‘pushing the buzzer’ to cross Esmonde Road and Fred Thomas Drive when going to and from the Akoranga Bus Station and/or having got off the bus in Burns Avenue, which is bound to have a noticeable impact on traffic flow to Takapuna and Devonport, particularly in peak hour.

There seem to be a few ‘optimistic’ points within the Traffic Impact Assessment.

With the rapid growth of courier and grocery deliveries, given that there is minimal car parking for residents, those vehicles are also likely to be coming and going frequently and need somewhere to park while they load and unload. You either cater for delivery vehicles or for people to get into their car to drive to do their grocery shopping. It is a long way to carry groceries from Countdown on Barrys Point Road.

When you have 1500 people, that is a lot of movement.

Proposed Boardwalk:

We do not think a boardwalk is appropriate for the headland of a coastline adjacent to a Special Environmental Area. It is not necessary feature. It will be very intrusive into the coastal environment and create a separation between the land and foreshore, so it would limit the freedom of movement for birds needing safe and secure access to both those habitats. It could compromise conservation opportunities. It would also provide the opportunity for people to encroach further into a Special Ecological Area that is best 'left alone'. Auckland Council has a responsibility to protect our natural environment from unnecessary intrusion, which is what the boardwalk would be. Protection of wildlife is critical.

An expert in environmental and birdlife issues should be consulted, in order to understand the possible consequences to the coastal area and wildlife. Particular conditions should be imposed.

Proposed Cycleway to Francis Street:

1553.2 (2) *"The Takapuna 2 Precinct functions in a way that: (a) links pedestrian and cycling facilities within and around the precinct, to enhance recreation and connectivity with the wider environment including the potential Francis Street boardwalk connection"*. Plans for cycling 'around the precinct' need to be the responsibility of the developer on private land (i.e. not the Coastal Reserve. Any cycleway on the Coastal Reserve would need to go through the approval process with the Council.). We note that the site map only has the 'potential' Ped/cycle connection between Francis Street and Esmonde Road.

An expert in environmental and birdlife issues should be consulted, to understand the possible consequences for the coastal area and wildlife. Certainly particular conditions should be imposed.

Open Space – Conservation Zone

1553.3 (6) *"Ensure that the ecological and landscape values of the future esplanade reserve (Open Space – Conservation Zone) are recognised and protected from the effects of inappropriate use and development."* Trees of the Coastal Reserve must not be pruned by 'the Precinct' 'to maintain or improve views'.

1553.6.7. Front, side and rear fences and walls – It was reassuring to see reference to fencing adjacent to the 'esplanade reserve'. What provision is being made to provide a clear indication of 'boundary' between what is private land and what is 'Coastal Reserve' public land? The Precinct needs to take responsibility for fencing and/or signage so that Health & Safety issues are managed within and by the precinct, so the coastal reserve is not impacted by these requirements.

Wind:

(1553.6.6) We note that the effects of new buildings will also have an impact on the coastal environment and are concerned.

An expert in environmental and birdlife issues should be consulted, to understand the possible consequences for the coastal area and wildlife.

Takapuna Residents Association would like to receive the report regarding this requirement.

Facilities:

(1553.2 (1) (e)). *“enables a limited range and scale of ancillary non-residential activities to support residents of the precinct”*. There needs to be ‘adequate’ provision for the population on site, because with Housing Intensification Takapuna’s amenities are already under pressure.

We note that international developments of this size also incorporate an outdoor playground area for children, so this should be provided. This should be separate and additional to the Early Learning Centre that is provided.

This site is intending to provide 553 new dwellings, which will result in an estimated increase of >1,500 people to the Takapuna population. For any housing intensification there should be an associated increase in the provision of facilities and public spaces by the Council to cater for the associated increase in population. Takapuna has very limited green, grassy, level, open spaces.

Infrastructure:

For such a large scale development, where is the detail of the infrastructure contribution to water, waste water and other services by the developer to ensure the local infrastructure continues to function well?

Have reports been provided by Vector and Chorus for their networks, confirming that they can handle this addition load?

The Plan change questions for and comments from Mana Whenua:

“Point 6 – Water reuse was discussed. How can the development maximise the utilisation of the resource? Mana whenua strongly encouraging sustainable and resilient development”. How has this been progressed?

To Conclude:

The new plans differ too much from those previously approved. The excessive height and immense size of the overall development is intrusive on the natural form of the coastal environment, the issue of inadequate onsite parking, the fact that the plan relies on the proposed cycleway to Francis Street to ‘sway’ opinion but is not ‘a given’, and because the proposed boardwalk around the headland unfortunately clashes with the critical need for protection of the adjacent Special Ecological Area (SEA).

We oppose the new proposed Private Plan Change 85, and request Auckland Council to consider the points raised and to be stringent in their protection of that coastal area.