

**BEFORE AN INDEPENDENT HEARINGS PANEL
OF THE AUCKLAND COUNCIL**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Plan Change 78:
Intensification to the
Auckland Unitary Plan

**SUBMISSIONS ON BEHALF OF FREEMANS BAY RESIDENTS ASSOCIATION INC IN
RESPONSE TO AUCKLAND COUNCIL'S MEMORANDUM REQUESTING A PAUSE OF ALL
HEARINGS AND ALTERNATIVE DISPUTE RESOLUTION PROCESSES**

1 MAY 2023

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MAY IT PLEASE THE PANEL:

1. Freemans Bay Residents Association Inc is Submitter No. 2201 on Plan Change 78.
2. Amongst various issues raised is the appropriateness of applying a qualifying matter in respect of roading to Freemans Bay on the basis that the already congested and undersized traffic network is not capable of servicing development or occupation of the area at the levels required by the 2020 NPS-UD and 2021 "Enabling" Act.
3. As previously advised to the Panel, Auckland Council has now acknowledged that the qualifying matter work relating to transport at Beachlands was part of the outcome in which "100 Zones" were analysed in relation to their possible QM Transport status.
4. At some stage it will be necessary for the Panel to understand the traffic multiplier that Auckland Council has employed for the purposes of its QM Transport analysis at Beachlands and in the "100 Zones". The methodology applied by Auckland Council in undertaking its assessment of QM Transport requirements could usefully be litigated in the hiatus period during which the other infrastructure assessments are being undertaken. It could inform any further s32 analysis that should be completed.



R E Bartlett KC
Counsel for Emerald Group Ltd
1 May 2023