

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER Intensification Planning Instruments Plan Changes (IPI)
and related Regional Policy Statement
and Plan Changes to the Auckland Unitary Plan – Operative in Part
(AUP-OP)
and **DIRECTION (26 APRIL 2023) FROM THE HEARING PANEL**
and the Council’s request to pause PC78

To Mr. Sam Otter,
Council’s Senior Hearing Advisor

I support the Council’s request to pause PC78 in recognition that more work needs to be done in the areas of natural hazards and flooding risks that affect many parts of Auckland, as these have not been properly considered in the current legislation.

These areas are experiencing ongoing issues including sewage overflow and they cannot be resolved until the infrastructure capacity in the transmission lines are improved.

There are well-founded concerns about the omission of stormwater as a qualifying matter and the potential extremely high economic and financial costs associated with allowing developments in inappropriate locations.
Same applies to geology.

It is important that initiators of legislative changes required to achieve better outcomes really understand the implications of these matters and the possible consequences of their decisions.

Council has the “Duty of Care” to protect their people from obvious risks and hazards and they are also committed to protecting the environment by avoiding, remedying and mitigating measures. They are probably aware that the provisions contained in the AUP are the international standard practices to manage stormwater quantity and quality with a “Water Sensitive Urban Design” technique that adopts climate change adaptation approaches. On the other hand, the infrastructure capacity constraints/ageing issues and the disastrous consequences of recent flooding and slips make it impossible to justify intensification without proper stormwater controls.

Raquel Francois
13B Sandspit Road
Cockle Bay
Auckland 2014
Tel: 021 101 9528

