

**INVITATION TO COMMENT ON FAST TRACK APPLICATION (FTAA-2511-1133)
THE POINT, MISSION BAY**

UNDER the Fast-track Approvals Act 2024

IN THE MATTER Proposed Retirement Village Rukutai Street and Aotea Street,
Orakei.

**COMMENTS OF
BRUCE HARLAND – [REDACTED]
GORDON CHONG – [REDACTED]
CHANG OH – [REDACTED]**

10 April 2026

Introduction

- 1 My name is Bruce Harland. I am an Urban Designer and Planner and hold the position of Director at Harland Urban Design & Planning and hold both Bachelor of Town Planning and a Master of Urban Design from the University of Auckland. I have been in this position since October 2025 and have over 35 years of planning RMA and Urban Design experience, including leading the strategic planning, masterplan, plan variation and implementation of the Flat Bush new town project (approximately 1500ha and 40,000 people) when I worked previously for Manukau City and Auckland Councils.
- 2 I am an owner and resident at [REDACTED] and live approximately 160m from the site subject to the fast-track application by Ngati Whatua Orakei Whai Rawa Limited and Generous Living Group Limited (File Reference : FTAA-2511-1133). These comments are written on half of myself and my neighbours Chang Oh ([REDACTED]) and Gordon Chong ([REDACTED]).
- 3 The proposal involves the establishment of a large retirement village spread across the site that traverses from the end of Kupe St, Te Arawa St, Rukutai St and Aotea St on land that is largely vacant as part of the old Eastcliffe retirement village. The proposal will face onto Takaparawhau (Bastion Point) a significant large open space that also includes an existing pathway providing direct walking access to Michael Joseph Savage Memorial and to Mission Bay including to the closest bus stop with direct services to the city along Tamaki Drive.
- 4 The proposal involves 256 apartments across 5 separate buildings that will be interconnected. To accommodate this large development the walkway access at the end of Rukutai St is to be closed and the walkway at the end of Aotea St will be relocated to the most southern and eastern boundary of the site. A new walkway connection will provide access from the end of Te Arawa St to Takaparawhau, including a proposed restricted access (daylight hours) pedestrian path inside the southern boundary of the site linking the end of Rukutai and Te Arawa cul de sac heads.
- 5 Two key issues of concern relate to the closure of the walkway at the end of Rukutai Street and excessive height of the development which is significantly higher than the 16m height limit in a location that is neither walkable to a town centre or rapid public transport.
- 6 The key documents that have informed my comments on this application are:

(a) The National Policy Statement on Urban Development, updated May 2022
(NPS-UD)

(b) Auckland Council's Urban Design Manual

(c) NZ Urban Design Protocol

(d) Auckland Open Space, Sport and Recreation Strategy

(e) Auckland Unitary Plan (AUP)

(f) Fast track Documents on the Fast Track website for 'The Point Mission Bay'
and in particular the

AEE

Urban Design & Landscape Assessment

Architectural Design Report

Urban Design and Landscape Assessment Peer Review Report

Crime Prevention Through Environmental Design Assessment (CPTED)

Proposed conditions of consent

Site context

- 7 The site is essentially a large vacant greenfields site that has the opportunity to apply high level principles to the development that is consistent with good urban design practice. Unfortunately, the first design driver is to essentially create a large gated community that prioritises rights and amenities of the proposed retirement village over those of existing and future residents (particularly on Rukutai Street). This gated community design approach reduces overall integration and connections of the wider neighbourhood to Takaparawhau and is discussed further in xx of this report.
- 8 The NZ_Urban Design Protocol acknowledges the importance of Context to understanding and achieving quality cities. Urban design has a strong spatial dimension and optimises relationships between buildings, places, spaces, activities and networks.
- 9 The land that the proposed Fast Track consent sits on is mostly zoned Terrace House and Apartment Building (THAB) with the exception of the Aotea accessway (zoned public open space) and Rukutai accessway (zoned Maori Purpose). These walkways provide direct access to Takaparawhau one of the most important open spaces in the city.
- 10 The walkway at the end of Rukutai Street is used daily by many people to access Takaparawhau, Orakei Marae and the bus on Tamaki Drive and to Mission Bay. It is a highly valued connection that provides easy and immediate access to open space, extensive views of the Waitemata Harbour and Hauraki Gulf and contributes to peoples health and wellbeing and sense of place. During Covid the park was particularly valued for its easy access, wide open spaces and connection with place. The walkway is also very popular with daily dog walkers.
- 11 The wider neighbourhood is a mix of housing types and has been undergoing a continuous gradual reinvention of itself through the replacement of older houses with infill house that includes detached and attached typologies. Typically, buildings are in the 1-3 storey height and the proposed changes in the AUP (if they do go ahead) would change the residential zoning to Mixed Housing Urban. Apart from some additional density the built form of new development is typically anticipated to be up to 3 stories high.

Poor Urban Design

Loss of connectivity both physical and visually.

- 12 The NZ Urban Design protocol discusses what makes successful cities which includes places being liveable. *“Liveable places provide choices in housing, work, transport and lifestyle opportunities. They are easy to move around, with accessible services and a variety of integrated transport options that include walking and cycling. Their public spaces are accessible, well used and safe. Liveable places are healthy places to live, and they have low levels of crime”*¹ It is my view that the community that surrounds Takaparawhau should have as much access to this culturally important open space, which serves many functions including contributing to community identity and convenient access to public transport on Tamaki Drive.
- 13 The closure of the existing Rukutai Street walkway would be a backward step in terms of the existing neighbourhood design and is inconsistent with the Council’s own urban design guidance. Best practice, would ensure that there is at least direct pedestrian access to Takaparawhau from the end of all cul de sacs in the vicinity of the park.
- 14 Given the importance of Takaparawhau to not just Iwi but the wider community, development around it should be fundamentally integrated into this open space by maximising connectivity for the wider neighbourhood.
- 15 There is already an excellent exemplar/precedent of this where roads from early subdivision patterns such as Tagalad Road and Marau Cres effectively terminated at Takaparawhau thereby creating future opportunities for pedestrian access while at the same time protecting the wider landscape understanding and legibility through revealing the landscape from far and distant views along these roads. (refer Figures 1 and 2)
- 16 The development as currently proposed, effectively cuts off the surrounding streets from direct visual and physical access to Takaparawhau. In my opinion, best practice urban design would be to extend the roads of Te Arawa, Rukutai and Aotea, such that they terminate at Takaparawhau. Carriageway formation could stop well short of the Takaparawhau leaving essentially a wider green strip that has clear visual linkage to the reserve and could be used for walking and cycle access. Such a design move would ensure that Takaparawhau is truly engaged, legible and inviting to the wider neighbourhood for centuries to come. This concept is conceptually illustrated in the following Figure 3

¹ NZ Urban Design Protocol



Figure 1: Viewshaft to Takaparawhau Looking west along Tagalad Road to Takaparawhau



Figure 2: Current Viewshaft from Rukutai St looking north to Takaparawhau

- 17 The development as currently proposed, effectively cuts off the surrounding streets from direct visual and physical access to Takaparawhau. In my opinion, best practice urban design would be to extend the roads of Te Arawa, Rukutai and Aotea, such that they terminate at Takaparawhau. Carriageway formation could stop well short of the Takaparawhau leaving essentially a wider green strip that has clear visual linkage to the reserve and could be used for walking and cycle access. Such a design move would ensure that Takaparawhau is truly engaged, legible and inviting to the wider neighbourhood for centuries to come. This concept is conceptually illustrated in the following image 3

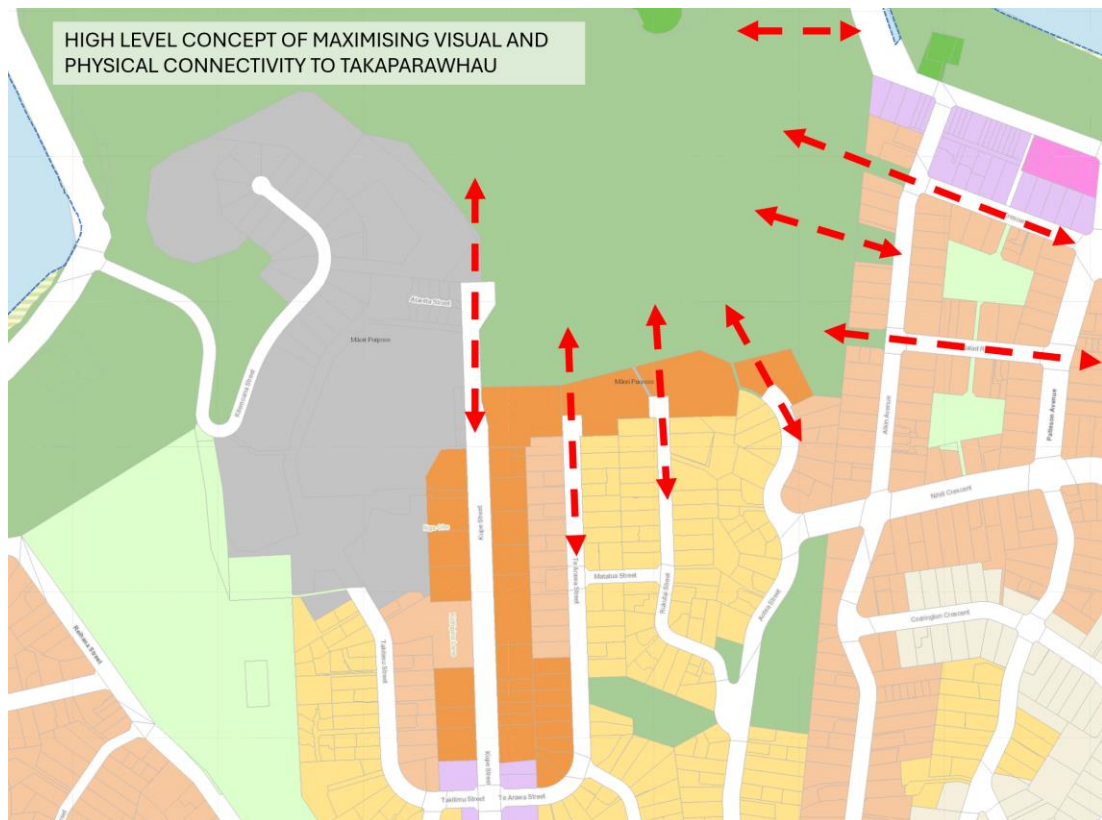


Figure 3 – High Level Concept of Neighbourhood Connectivity

- 18 The development as currently proposed does the opposite to best practice, which is illustrated by Figure 4 where in the case of Rukutai St the ground level garage door and solid wall across the end of the street is a major barrier to connecting Rukutai Street both physically and visually to the park.



Figure 4: Solid barrier wall at the end of Rukutai Street – Blocks direct physical or visual access to Takaparawhau

- 19 The loss of the current connection at Rukutai Street is inconsistent with Council own Urban Design Manual, which provides guidance under the heading of **Neighbourhood and Subdivision Design** including:

3.1(3) Subdivisions should provide a choice of routes and modes of travel by having a mix of different activities within a walkable distance, minimising the number of lots served by only one route and ensuring lots that can be accessed by multiple modes including walking and cycling

3.2 “Walkable Neighbourhood, Pedestrians are prioritised in the design of subdivisions to ensure convenience, enjoyment, and easy walking access to key destinations.”

3.2(4) “Subdivision design should maximise the area, modes of transport, local parks and mix of activities that can be accessed from each lot within a ten-minute walk.”

3.2(5). Subdivision design and layout should consider how easy it is for pedestrians to access public transport routes (existing and future) and local reserves.

- 20 Although the development is not a subdivision as such, it is a large-scale neighbourhood development that should be considered in the context of wider neighbourhood design approach.
- 21 It is acknowledged that the proposal now includes restricted pedestrian access (daylight hours only) joining the end of Rukutai and Te Arawa cul de sac heads. This is an improvement from having no access, but it is via a less direct route that is not as clear and legible compared to direct access from Rukutai St. In addition, the proposed hours that this walkway will be open are very limited as proposed by condition 69, where summer hours are restricted to 7am to 6pm. 6pm is too early and a popular time for people to access the open spaces. Although this shortens the walk to connect to the Takaparawhau path compared to no connection at all, it does result in an additional 140m to the walk to the bus stops on Tamaki Drive and Mission Bay
- 22 The CPTED report concludes that the access from Te Arawa is a better outcome than the current Rukutai St connection. The existing Rukutai St walkway is straight with direct visibility to Takaparawhau and is only a short only 35m length before it opens up into the park. The CPTED report suggest that this has no surveillance from surrounding properties and goes on to suggest that the Te Arawa access will have considerable overlooking and informal surveillance (notwithstanding it has a bend half way along that reduces legibility to the reserve) from overlooking apartments. There is no reason why this same design response could not be applied to a direct walkway from the end of Rukutai St.
- 23 The Urban Design & Landscape Assessment report included with the fast track documents focusses on the implications and CPTED issues of the relocated walkways at Te Arawa and Aotea Street. It makes no reference to the loss of amenity and access to the park or longer walking distances to Tamaki Drive that will occur for the residents of Rukutai Street.
- 24 Although I agree with the CPTED report that the route across Takaparawhau is not a safe nighttime walking route, it does provide a convenient and shortest day time route to access bus stops on Tamaki Dr and Mission Bay.
- 25 Closing the Rukutai Street walkway, so that a gated retirement village can be built at the expense of existing residents' amenity and access is a poor design outcome that is inconsistent with Council's own design guidance that pedestrians are prioritised to ensure "easy walking access to key destinations"². It is also inconsistent with

² Auckland Council Urban Design Manual

Councils own Open Space and Recreation strategy which includes a policy of Making the Most of our open space to improve accessibility and functionality by prioritising connections and linkages across all types of open space³.

- 26 A successful town or city is an equitable place where everyone feels a sense of ownership and belonging, which is reflected in their safe and dynamic public spaces. The current walkway and the direct access it enables to Takaparawhau, the Orakei Marae and public transport promotes pedestrian activity and spontaneous connections between residents in the street and wider neighbourhood. Removing this connection will be detrimental to fostering neighbourhood connections, identity and overall liveability. The proposed alternative 'restricted hours' walkway is not likely to read as a public walkway where users are likely to feel like they are intruding into private space. It is not clear from the application documents whether this alternative 'restricted hours walkway' will be clearly signposted.
- 27 I would support the retention of a walkway connection from Te Arawa to Takaparawhau as this access should always have been provided in the original Eastcliffe retirement proposal. Having the new Te Arawa connection and improvements from Aotea Street to Aitkin Ave and the wider Takaparawhau network however, should not come at the expense of closing the Rukutai Street walkway as they all provide direct convenient access and would be representative of good urban design practice.

Future Generations.

- 28 Connected streets, blocks and open spaces are the building blocks of any great city including providing for convenient walking access and are fundamental to a thriving, low carbon city that prioritises active transport and public transport over private car use. Once connections are lost they are very difficult if not impossible to get back without significant cost and interventions. In case of the walkway at the end of Rukutai Street the proposed lease for the Generus Living retirement village forms part of a 125 year lease agreement, which is more than likely to be extended beyond that time. Given the location of Rukutai St has considerable redevelopment potential and is incredibly close to Takaparawhau, one of the most spectacular and culturally significant open spaces in the city it would be incredibly shortsighted to close this walkway for the benefit of a gated community of retirees, rather than retaining the benefits for the wider community and future generations.

³ Auckland Open Space, Sport and Recreation Strategy, See Policy 1, pages 30-46

- 29 Closure of the walkway would not be consistent with a well functioning urban environment as defined in Policy 1 of the NPS-UD. In particular the closure of the walkway would be inconsistent with Policies 1(c) and (e) which read as follows:

Policy 1: Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:

(c) have good Accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport,

(e) Support reductions in greenhouse gas emissions

Height & Dominance

- 30 Residents on adjoining streets (Te Arawa, Rukutai and Aotea) enjoy elevated views across the Waitemata Harbour to Rangitoto and beyond, which forms an important part of the valued amenity in these locations.



Figure 5 Existing Outlook from [REDACTED]

- 31 As illustrated in the application documents the proposal is significantly over the 16m height limit for the THAB zone in the operative AUP. This excessive height particularly relates to Buildings 1, 2,3 and 4 which are up to 10m higher than the 16m height limit. The proposed heights of the various buildings are illustrated in the Warren & Mahoney Architectural Design Report (Fast Track Attachment 018A, page 30) which is reproduced below (Figure 6) but with a clearer red line added to illustrate the additional height over the 16m height limit.

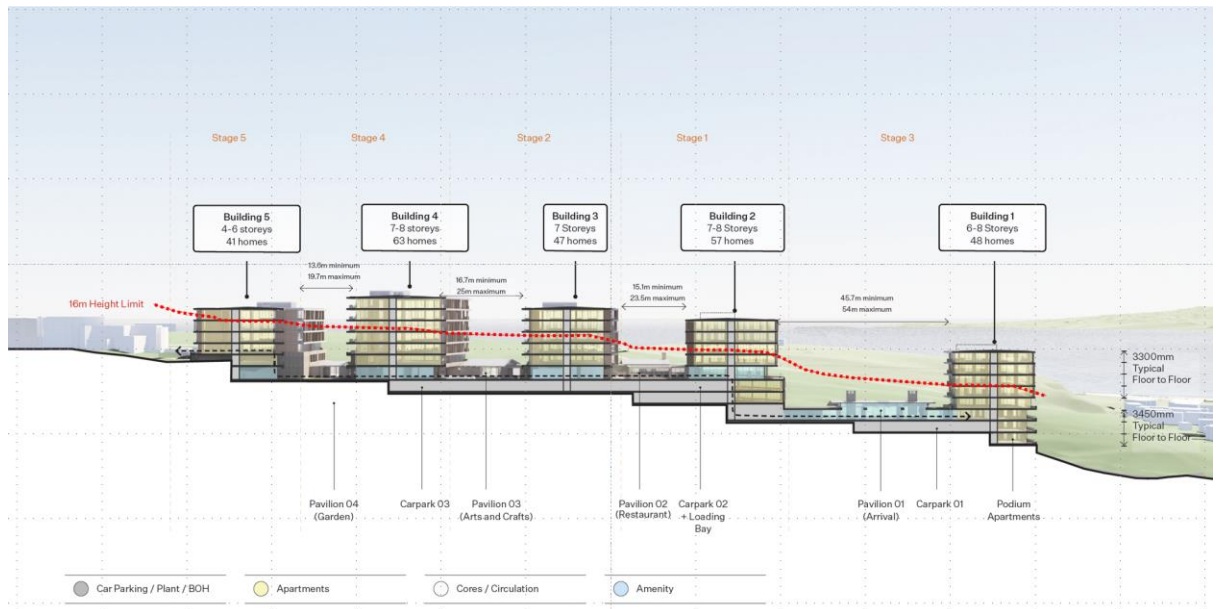


Figure 6: Height Non-compliance with 16m Height Limit

- 32 Buildings 1, 2 and 4 are circa 26m high which is 10m over the permitted height. As a result of this infringement three additional floors are enabled for these buildings with significant implications on the wider outlook amenities enjoyed by many residents and resulting in an urban massing and scale that is significantly different from that existing and anticipated in the surrounding Mixed Housing Urban zoning proposed under the PC120 and including those properties below Building 1 along Atkin Ave. Buildings 3 and 5 are over the 16m height limit by circa 7m and 3m respectively which enables an additional two and one floor respectively
- 33 A more detailed analysis of the overheight proposals is documented in the Figure 7 below which is taken from the Fast Track Attachment 018A, Architectural Design Report. This shows significant infringements of up to 13.7m for building 1 resulting in up to four additional floors for this building.

*Extract from Fast Track Attachment 018A
Architectural Design Report
Page 18, 5.2 Massing in relation to controls*

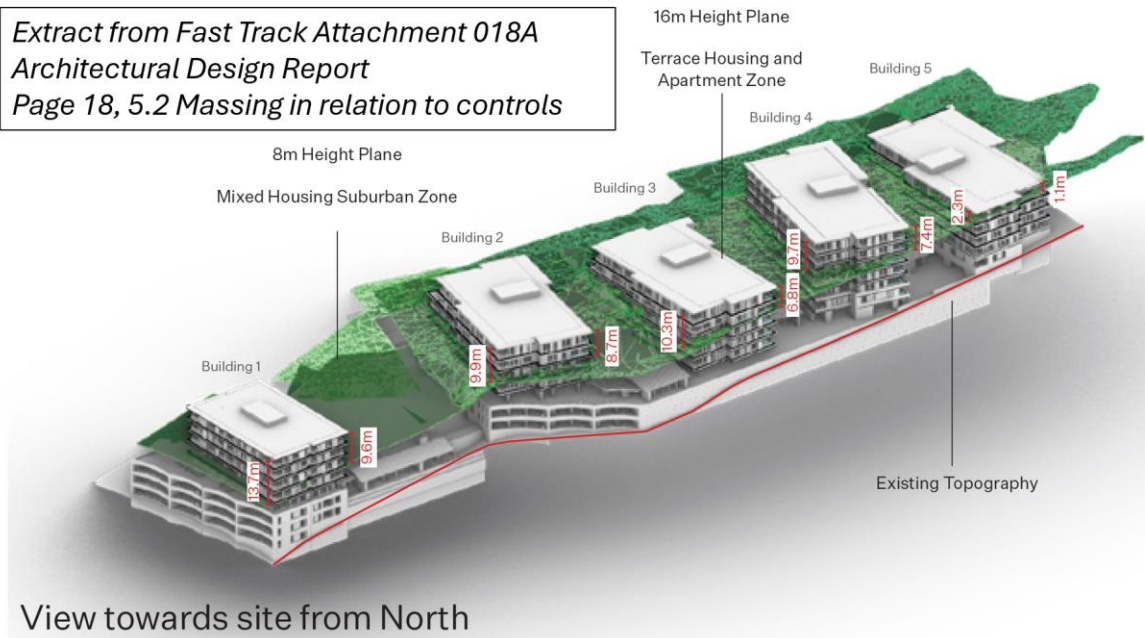


Figure 7: Height Non-compliance with 16m Height Limit

- 34 In Figures 8, 9 and 10 below, I have taken the images from the Landscape and Urban Design assessment report for the end of Rukutai St, Aotea St (and Atkin Ave) and removed the additional floors that are enabled by exceeding the 16m height limit to demonstrate a more complying development as provided in the THAB zoning.



Figure 8: View looking North Along Rukutai Street



Figure 9: View Looking north along Aotea St



Figure 10 -View looking west from Aitkin Ave/Tagalad intersection (3 floors removed)

- 35 Overall the large scale and massing of the proposal is captured by the Urban Design and Landscape and image VS9 (from Attachment 12C Urban Design and Landscape Visual Effects Assessments) I have taken a snip from this image (Refer Figure 11) looking west down Nihill Ave - an important gateway street into Mission Bay from the East.. This clearly shows a dominant built form that overwhelms the existing and anticipated development in the area.



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- 36 I disagree with the Urban Design & Landscape Assessment Report which crucially omits reference to AUP Policy H6.3(4) which reads:

(4) In identified locations adjacent to centres, enable greater building height through the application of the Height Variation Control where the additional development potential enabled:

(a) provides an appropriate transition in building scale from the adjoining higher density business zone to neighbouring lower intensity residential zones, and;

(b) supports public transport, social infrastructure and the vitality of the adjoining centre.

The site is not within a Height Variation Control and is therefore subject to the 16m height limit (Standard H6.6.5). Height Variation Control (HVC) areas in the Auckland Unitary Plan are special planning controls mapped throughout the Auckland region, predominantly located in and around town centres, metropolitan centres, and along major public transport networks.

- 37 The applicants Urban Design & Landscape Assessment appears to suggest that the additional height is acceptable in this location, when in reality the additional height is substantially over the 16m height limit, in a location where you would not normally expect this, as it has no walkable access to a town centre or rapid transport.
- 38 I do not agree with the Landscape and Urban Design peer review that states that the change to the scale and form of the development “is not unanticipated and not out of step with outcomes envisaged by the zone..” and that the “form and design of the Proposal will make a positive contribution to the character of the evolving urban environment”. The proposed additional height of the development is significantly above what the operative zone provides for and in my view will result in a scale and built form that is out of context with the wider neighbourhood and Mission Bay setting. Furthermore, the location is marginal at best for the THAB zoning and as it is not walkable to a town centre, metro centre rapid transport etc. and certainly is not a location that should be promote for higher density enabled by the infringement to the height limits.
- 39 Although most Of the THAB zoning in the AUP is identified in close proximity to the city centre, metro centres, train stations, town centres, and corridors (such as Great South Road, Remuera Rd) the Takaparawhau location is an anomaly in that it is not adjacent to a town centre or on a major corridor or rapid transit station. Access to meaningful public transport is questionable with the shortest walking distances to the Tamaki Link bus on Tamaki Drive being across a large park (via Takakpara pathway or a steep link to Aitkin Ave link neither of which would meet CPTED criteria for nighttime use. Safer walking routes from a CPTED perspective utilising the street network result in distances of circa 875-1000m depending which part of the retirement village is to be accessed and assuming that the upper reaches of the project (ie Te Arawa St) are accessed internally through the village off Aotea St. In addition, there is a steep hill to access the development via any walking route which slows down walking times and is discouraging, particularly for elderly residents.
- 40 In my opinion keeping to within the 16m height limit is appropriate given the context of the much lower existing and anticipated development of the adjoining neighbourhood (even allowing for the anticipated development anticipated by the AUP in the Mixed Housing urban zone.) and the fact that the location is not near a town centre or walkable (including nighttime) to quality public transport

Plan Change 120

- 41 Plan Change120 has been temporarily put on hold pending the governments u turn on reducing the target capacity to 1.6 million homes down from 2 million as originally proposed. PC120 was predicated on the 2m capacity, which drove considerable uplift in zoning across the city. In response to the government directives and changes to legislation, The Auckland Council Planning and Development Committee at their 10 March 2026 meeting has agreed the principles to guide how PC120 could be amended. Once this initial exercise has been undertaken it is understood that there will be further opportunity for Aucklanders to comment on the changes as part of a continuation of the PC120 process. This process could take some time, and it is likely that no decisions on PC will be made until early 2027.
- 42 Apart from those provisions of PC120 that have immediate legal effect (such as natural hazard management), it is premature to rely on or give weight to PC120 including the proposed increase in height for the THAB zone from 16m to 22m. It is noted that the proposed additional height on four of the five buildings even exceed the 22m height limit being closer to 26m high.

Conclusion

The proposed development in its current form is inappropriate having regard to its location context and zoning. In particular the proposal is not within walking distance of a town centre or rapid transit network and has compromised nighttime access across Takaparawhau due to CPTED issues.

These comments seeks the following Decision:

1. That the proposed application be amended so that there is direct pedestrian access from the end of Rukutai Street to Takaparawhau and the existing concrete path that leads to Savage Memorial and Mission Bay. The exact location of this could be flexible but it should be straight and direct to maximise legibility and safety.
2. Should 1 above not be agreed by the panel, the alternative restricted pedestrian access proposed by the applicant (between Rukutai and Te Arawa Cul de sac heads) be approved, with amendments to proposed draft condition 69 relating to bulic access hours to coincide with daylight hours as follows:

Daylight Savings 7am-8pm

Outside of Daylight savings 7.30am-5pm

3. That signage be erect at either end of the alternative pedestrian access between Te Arawa and Rukutai St cul de sacs informing of public access and hours of such access.
4. That the development generally fit within the existing 16m height limit for the THAB zone.