

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of an application by Panuku Development Auckland for discretionary resource consent for upgrades to Queens Wharf in order to provide for the safe berthing of cruise ships up to 362m (Oasis Class Vessels)

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**JOINT SUBMISSION ON PUBLICLY NOTIFIED APPLICATION FOR ALTERATIONS TO  
QUEENS WHARF  
RESOURCE CONSENT CST60323353**

**Dated 8<sup>th</sup> October 2018**

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**To: Auckland Council**  
By email

**To: Panuku Development Auckland**  
By email: qwcruiseupgrade@russellmcveagh.com

**To: Ministry of Business, Innovation and Employment on behalf of Crown  
(co-owner)**  
By email

**Name of Submitter**

**QUEENS WHARF SUBMITTERS:**

Urban Auckland - The Society for the Protection of Auckland City and Waterfront Inc.

Auckland Architecture Association Inc.

Auckland City Centre Residents' Group Inc.

Character Coalition Inc.

Civic Trust Auckland Inc.

Devonport Heritage, 2017 Inc.

Parnell Community Committee Inc.

Stop Stealing Our Harbour Inc.

(Collectively **Submitter**)

This is a submission on an application (**Application**) from Panuku Development Auckland (**Panuku**) for resource consents as follows:

**Site address**

Queens Wharf (northern end)

**Application number**

CST60323353

**Name of applicant**

Panuku Development Auckland

**Applicant's email address**

QWcruiseupgrade@russellmcveagh.com

**Proposal**

Panuku has applied for resource consent for upgrades to Queens Wharf in order to provide for the safe berthing of cruise ships up to 362m (Oasis Class Vessels). Upgrades involve construction of two mooring dolphins located at distances of 49m and 82m (to the centres of the dolphins), to a total length of 90m, from the end of Queens Wharf into the Coastal Marine Area, a gangway connection to Queens Wharf including hydraulic retractable gangway and security gates, strengthening of the southern end of Queens Wharf, seven new additional wharf bollards on the eastern side at the southern end of Queens Wharf, and additional fender clusters on the eastern side at the north end of Queens Wharf. Overall it is a discretionary activity (**proposal**).

**This submission opposes the whole application.**

**This submission relates to the entire application.**

**The submitter is not a trade competitor of the applicant.**

**The submitter wishes to be heard in support of the submission.**

**If others make a similar submission, the submitter will not present a joint case with them at the hearing.**

**The specific parts of the Application that the submission relates to are:**

- Entire Application

The submitter says that the Application should be **declined**.

## REASONS FOR SUBMISSION

1 The entire application is opposed for the general and specific reasons given below:

### General Reasons

- 2 The proposal does not promote social, economic and cultural wellbeing, is inconsistent with Part 2 RMA,<sup>1</sup> sections 104 and 104B RMA, and the relevant statutory and planning instrument provisions.
- 3 The proposal is inconsistent with relevant objectives and policies of the NZCPS, sections 7 & 8 Hauraki Gulf Marine Park Act 2000, and relevant provisions of the partly operative Auckland Unitary Plan.
- 4 The proposal results in significant adverse effects to values of national and regional importance. Environmental costs exceed benefits by a significant margin.
- 5 Queens Wharf is a publicly owned asset with nationally and regionally important values. Future planning (including resource consent proposals) should adopt a strategic approach that enhances, and does not adversely affect, those values. The proposal is inconsistent with regional values identified in long term planning and strategy documents, including (but not limited to) the Central Wharves Strategy.
- 6 The proposal involves planning by outlier.<sup>2</sup> Most cruise ships can be accommodated by existing wharf structures. Occasional visits by the largest (Oasis Class) cruise ships should not dictate the length of Queens Wharf, and the extent to which it is extended or modified into the harbour. Tourists visiting by cruise ship are here to enjoy the natural values of the Waitematā, not spoil those values by unreasonably extending infrastructure beyond the water's edge.
- 7 Reasonably available (or more appropriate) alternatives exist for management of the largest cruise ships, including (but not limited to) status quo options (anchor at harbour, not port). Other alternatives that do not involve extension of Queen's wharf should be preferred.
- 8 Queens Wharf is a publicly owned asset with nationally and regionally important values. Regional planning should include environmental bottom lines, beyond which Queens Wharf is not extended for the convenience of cruise ships too large to dock within existing facilities. The proposal breaches this line.
- 9 It is a reasonable community expectation to avoid further wharf extensions to Queens Wharf; reflecting the outstanding and iconic significance of the inner Waitematā to the Auckland region, including the perceived water's edge at Queens Wharf (where wharf meets water).

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<sup>1</sup> The application acknowledges that Part 2 RMA should be considered under the rule in *Davidson*; references to Part 2 RMA in this submission should be read as including the planning framework that sits below Part 2.

<sup>2</sup> Accommodating the exceptional, and largest in the category of cruise ship.

- 10 Economic benefits of the proposal are overstated and exceed costs. Economic and alternatives evaluation is superficial and does not factor in all relevant variables. Evaluation of alternatives is inadequate in relation to management of valued public commons.

### **Specific Reasons**

#### **Natural character**

- 11 The proposal is an inappropriate extension to the “end point” of Queens Wharf. This results in significant adverse natural character impacts to the inner Waitematā. Infrastructure advances and intrudes beyond the perceived “harbour’s edge” at Queens Wharf into the “water’s edge”.

#### **Public access to the CMA**

- 12 Dolphin structures create new and exclusionary areas of Queen’s Wharf that cannot be accessed by the public at any time. “New” parts of the dolphin footprint able to be accessed by the public provide an inferior experience that does not outweigh negative impacts. Public access is not “maintained or enhanced”.

#### **Historic heritage & special character**

- 13 Queens Wharf has significant historic heritage values, reflecting Auckland’s early post-contact history and subsequent development of Auckland City. This is recognized by the relevant Unitary Plan overlay, including Category B historic heritage place, scheduled extent of place, and Historic Heritage overlay.<sup>3</sup> Values include associative, aesthetic, built element and form, intactness and representativeness. The proposal adversely affects and does not protect historic heritage values, including intactness (by altering the form and footprint of Queens Wharf).
- 14 Extremely large cruise ships should not be enabled to berth at Queens Wharf, at the expense of existing heritage and character values. Character, intensity and scale of the largest cruise ships has a negative and disproportionate effect on protected values; other alternatives are available that do not affect these values.

#### **Stewardship**

- 15 The inner Waitematā has spiritual, tangible and intangible values to Aucklanders. Active protection is required of these values from intrusion by infrastructure. Guardianship of the Waitematā requires recognition of brightline areas not compromised through alterations to Queens Wharf to accommodate arguably small numbers of cruise ships that can reasonably be accommodated by other means.

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<sup>3</sup> Built Heritage and Character: Historic Heritage Overlay Extent of Place – 2735, Queens Wharf

### **Amenity, quality of environment, finite characteristics, coastal processes, navigation**

- 16 The proposal adversely impacts amenity and quality of environment, on, around, and above Queens Wharf. The experience of the edge of Queens Wharf, both landward and seaward, should not be compromised by more infrastructure continuously extending into the water.
- 17 Both landward and seaward, the recreational, aesthetic and perceptual experience is adversely affected by the Dolphins' intrusion into water, compromising existing natural, built and cultural heritage.
- 18 The proposal compromises the aesthetic and symbolic value of Michael Parekowhai's Lighthouse; located, for obvious reasons, at the finite end of Queens Wharf. Public art and symbols should be protected from infrastructure creep.
- 19 The proposal results in potential adverse impacts to coastal processes and navigation effects for recreational and other water-based vessels.

### **Reasonable or more appropriate alternatives**

- 20 Other alternatives (both methods and locations) are reasonably available or more appropriate, without commensurate adverse impacts of the proposal on national and regional values.

### **Public domain / public expectation**

- 21 Queens Wharf is Auckland's regional park in the CMA<sup>4</sup>. The Cloud was built in 2011 as a 'Fanzone' for the Rugby World Cup, symbolising greater access to the Waterfront and our downtown public space. Queens Wharf is visited and treasured daily by both Aucklanders and visitors.
- 22 Acquisition by Council and the Crown was to enable public access and enjoyment while accommodating most cruise ships (294m long on the eastern side, 205m on the western side). Declining the proposal will still enable most cruise ships to dock at Queens Wharf or adjacent facilities. The proposal adversely affects the balance between public and port space; compromises regional park values and (once constructed) reduces public access to part of an extended (both physically and perceptually) Queens Wharf.

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<sup>4</sup> Coastal marine area

**RELIEF SOUGHT**

23 For the reasons stated, the entire application should be declined.

**Dated this** 8th day of October 2018

**Signed for and on behalf of the Submitter**

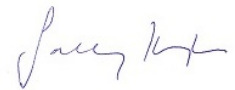
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