
I hereby give notice that a hearing by commissioners will be held on:

Date: Monday 6 October 2025 with Tuesday 7 October as an overflow day
Time: 9.30am
Meeting room: Leslie Comrie Room
Venue: Level 1, Franklin The Centre
12 Massey Avenue, Pukekohe 2120, Auckland

HEARING REPORT

PRIVATE PLAN CHANGE 110

HEIGHTS ROAD, PUKEKOHE

GBAR PROPERTIES LIMITED

COMMISSIONERS

Chairperson Richard Blakey
Commissioners Vaughan Smith
Bridget Gilbert

Sam Otter
Kaitohutohu Mataamua Whakawā /
Senior Hearings Advisor

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WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure is:

- **The chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses and experts in support of the application. After the applicant has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and ~~may can~~ call witnesses and experts to support their submission on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- **The applicant** or their representative has the right of reply to matters raised at the hearing. Hearing panel members may further question the applicant at this stage. The applicant's reply may be provided orally, in writing after the hearing has adjourned, or a combination of both.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

Please note

- that the hearing will be recorded using Teams and an audio recording device. The recording will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PRIVATE PLAN CHANGE TO THE AUCKLAND UNITARY PLAN (operative in part) BY GBAR PROPERTIES LIMITED

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Reporting officer, Joy LaNauze, Planner

Reporting on proposed Private Plan Change 110 - Heights Road, Pukekohe to rezone 5.35 hectares of land at Pukekohe from Future Urban Zone to Business - Light Industry Zone, and apply the Stormwater Management Area Flow 1 – “SMAF1” control to the plan change land.

APPLICANT: GBAR PROPERTIES LIMITED

SUBMITTERS:	
Page 242	Peter Fa’afiu
Page 244	Ngāti Te Ata
Page 246	Auckland Transport
Page 250	New Zealand Transport Agency
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Page 265	Gerald Baptist



Hearing Report for Proposed Private Plan Change PC110 for Heights Road (9, 33, and 49 Heights Road), Pukekohe to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to: Hearing Commissioners

Hearing Date/s: **????**

File No:

File Reference:

Report Author: Joy LaNauze, Senior Policy Planner, Central - South Planning, Auckland Council

Report Approvers: Craig Cairncross, Team Leader, Central - South Planning, Auckland Council

Report produced: **26 August 2025**

Summary of Proposed Plan Change PC110 for Heights Road (9, 33, and 49 Heights Road), Pukekohe

Plan subject to change	Auckland Unitary Plan (Operative in part), 2016
Number and name of change	Proposed Plan Change PC110 for Heights Road (9, 33, and 49 Heights Road), Pukekohe to the Auckland Unitary Plan
Status of Plan	Operative in part
Type of change	Private Plan Change
Lodgement date	3 July 2023
Clause 23 request(s) and responses	Requests for further information were made in 2023 and 2024. Information has been progressively provided by the applicant, with an updated version of the plan change being received in October 2024, and final requested information was provided in November 2024
Clause 25 decision outcome	Accepted: Proposed PC110 for Heights Road (9, 33, and 49 Heights Road), Pukekohe was accepted for processing by the council under Clause 25 of Schedule 1 of the Resource Management Act (RMA) on 20 February 2025 https://infocouncil.aucklandcouncil.govt.nz/Open/2025/02/20250220_PEPCC_MIN_11325.PDF
Parts of the Auckland Unitary Plan affected by the proposed plan change	Maps (zoning and overlay) Chapter I Precincts South
Pre-notification of iwi authorities completed	Pre-notification requirements apply to council-initiated plan changes rather than private plan changes. However, the applicant has advised that they engaged with Ngāi Tai Ki Tāmaki, Ngāti Maru, Ngāti Tamaoho, Ngāti Te Ata, Te Ahiwaru Waiohua, Te Ākitai Waiohua, and Waikato-Tainui in the preparation of the proposed plan change request.
Date of notification of the proposed plan change and whether it was publicly notified or limited notified	Publicly notified 27 March 2025

Submissions received (excluding withdrawals)	6
Date summary of submissions notified	22 May 2025
Number of further submissions received (numbers)	None
Legal Effect at Notification	No legal effect at notification
Main issues or topics emerging from all submissions	<ul style="list-style-type: none"> • Light industrial use • Zoning • Mana whenua iwi consultation • RMA • Cemetery Buffer • Stormwater • Wastewater servicing • Water supply servicing • Traffic – Heights Road frontage, Heights Road capacity, Paerata Road (State Highway 22), safety • Environmental noise • Environmental pollution • Safety

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Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
AUP or Unitary Plan	Auckland Unitary Plan (operative in part)
AT	Auckland Transport
CIA	Cultural Impact Assessment
Council	Auckland Council
FDS	Future Development Strategy
FULSS	Future Urban Land Supply Strategy
GDP	Gross Domestic Product
Heritage NZ	Heritage New Zealand Pouhere taonga
IHP	Independent Hearing Panel
ITA	Integrated Traffic Assessment
MfE	Ministry for the Environment
NES	National Environmental Standards
NPS-UD	National Policy Statement on Urban Development
NZCPS	New Zealand Coastal Policy Statement
PC78	Plan Change 78- Auckland Council Intensification Plan Change
PC80	Plan Change 80- RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters
PC110	Private Plan Change 110
PPC110	Proposed Private Plan Change 110
RMA	Resource Management Act 1991
RPS	Regional Policy Statement (within the Auckland Unitary Plan)
SDR	Summary of Decisions Requested

SH22	State Highway 22
SMAF-1	Stormwater Management Area Flow 1
SMP	Stormwater Management Plan
TERP	Transport Emissions Reduction Pathway
TMP	Travel Management Plan
VKT	Vehicle Kilometres Travelled
WSL	Watercare Services Limited (Watercare)

Attachments

Attachments	
Attachment 1	Plan Change 110 (as notified) including specialist reports https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=280
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Attachment 9	Section 32AA Analysis for PC110 Heights Road Precinct Provisions

2 INTRODUCTION AND EXECUTIVE SUMMARY

2.1 Section 42A report

1. In preparing for the hearing on PC110, this hearing report has been prepared in accordance with section 42A of the RMA.
2. This report considers the PC110 private plan change request as notified and the issues raised by submissions on PC110. The discussion and recommendations in this report are intended to assist the Hearing Commissioners (**the Panel**), the applicant, and those persons or organisations that lodged submissions on PC110. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
3. This report also forms part of council's ongoing obligations to consider the appropriateness of the proposed provisions, as well as the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised submissions on PC110.
4. To clarify for all parties, the conclusions and interim recommendations in this report are not binding on the Panel. The Panel will consider all the information submitted in support of PC110, information in this report, and the information in submissions together with evidence presented at the hearing.

2.2 Report Author

5. This S42A report has been prepared by Joy LaNauze. I am a Senior Policy Planner at Auckland Council with a BTP qualification from Auckland University. I have more than 30 years local body planning and resource management experience. I am a full member of the New Zealand Planning Institute. My experience includes planning for the Pukekohe area, and I was the technical lead for the Pukekohe-Paerata Structure Plan 2017.
6. While this is not an Environment Court proceeding, I have read the code of conduct for expert witnesses contained in the Environment Court Practice Note (2023) and agree to comply with it. Except where I state that I am relying on the specified advice of another person, the opinions expressed in this report are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
7. I was involved from the first stage of the request for this private plan change being made. I have visited the site on several occasions.
8. This report is informed by and, where stated, relies on the reviews and advice from the following experts (topics listed alphabetically) in Table 1. The specialist reports are in **Attachment 3** of this report.

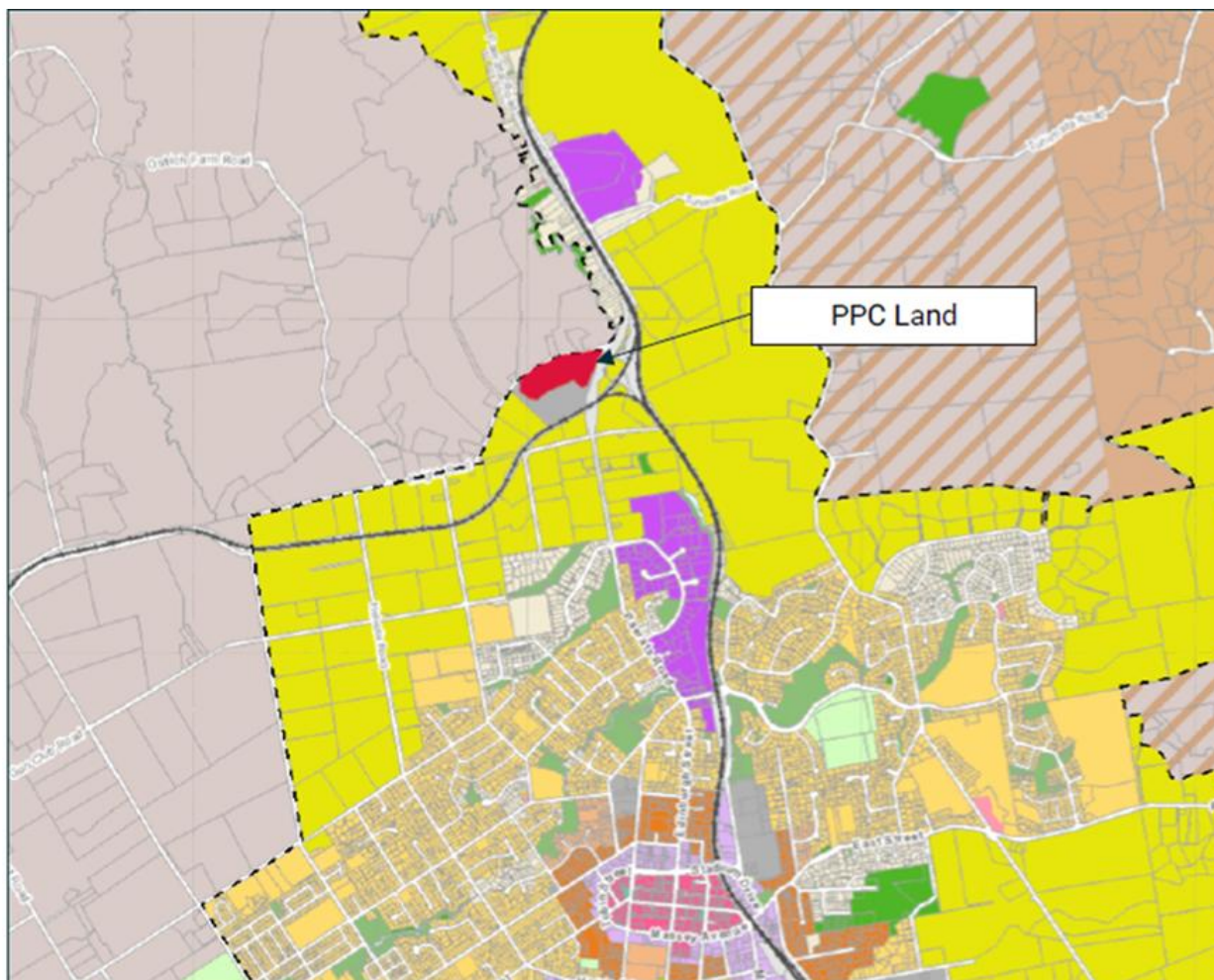
Table 1: Council specialist input to s42A report

Matter	Reviewing Specialist
Cemetery Services	Nikki Nelson, Manager Cemetery Services, Parks and Community Facilities, Auckland Council Email dated 17 July 2025
Contaminated Land	Ruben Naidoo, Specialist, Contamination Air Noise, Planning and Resource Consents, Auckland Council “Private Plan Change 110 – 9, 33 and 49 Heights Road Pukekohe: Contamination Assessment (D.002328.01)” 11 July 2025
Ecology	Sanaz Safavian, Ecologist, Ecological Advice, Environmental Services, Auckland Council “Heights Road, Pukekohe – Private Plan Change request – Ecology” 22 July 2025
Economics	Derek Foy, Director, Formative Limited “Technical Expert S.42A Report for Proposed Plan Change 110 – 9, 33 and 49 Heights Road Pukekohe” 11 July 2025
Engineering	Abhi Pandith, Development Engineer, Regulatory Engineering South 2, Planning and Resource Consents, Auckland Council “Technical Expert S.42A Report / Memo Template for Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe” 24 July 2025
Geotechnical	Nicole Li, Geotechnical Practice Lead, Engineering, Assets and Technical Advisory, Resilience and Infrastructure, Auckland Council “Geotechnical review of Private Plan Change Application 110 at 9, 33 and 49 Heights Road, Pukekohe, Auckland” 30 June 2025
Landscape Visual	Rebecca Skidmore, R. A. Skidmore Urban Design Limited “Peer Review Comments Proposed private plan change for land at 9, 33 and 49 Heights Road, Pukekohe” 23 July 2025
Parks Consents	Daniel Kinnoch, Resource Management Planner, CoLab Planning “Technical Expert S.42A Memo for Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe” 6 July 2025
Stormwater	Sameer Vinnakota, Environmental Planner, Jacobs New Zealand Jack Thompson, Senior Healthy Waters Specialist, Catchment Planning, Healthy Waters and Flood Resilience, Resilience and Infrastructure, Auckland Council “Private Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe (PC110) Specialist Review (Stormwater and Flooding) on behalf of Auckland Council” 11 July 2025
Traffic and Transport	Wes Edwards, Director, Arrive Limited “Transport Technical Expert S.42A Report for Proposed Plan Change 110 9, 33 and 49 Heights Road Pukekohe” 16 July 2025

2.3 Summary of Plan Change

9. This is a private plan change request from GBar Properties Limited to:
 - a) rezone 5.35 hectares of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone and
 - b) apply the Stormwater Management Area Flow 1 – “SMAF-1” control to the plan change land.
10. Text amendments and precinct provisions are not proposed by the applicant.
11. The plan change land is on the northern edge of Pukekohe as shown in Figure 1. It consists of three sites with frontage to Heights Road, totalling 5.35ha as shown in Figure 4.

Figure 1: Site Context (Source: Auckland Council)



12. The purpose and objective of PC110 as outlined in Section 4.1 of the applicant’s AEE is to enable the ongoing operation, intensification and expansion of light industrial activities on the plan change land to meet current and future demand for industrial growth, consistent

with Pukekohe-Paerata Structure Plan 2019, whilst avoiding, remedying or mitigating adverse effects on the environment.

13. The following proposed plan change map and a SMAF-1 overlay map are in Appendix 1 of the request.

Figure 2: PC110 Proposed zoning from PC110 Appendix 1

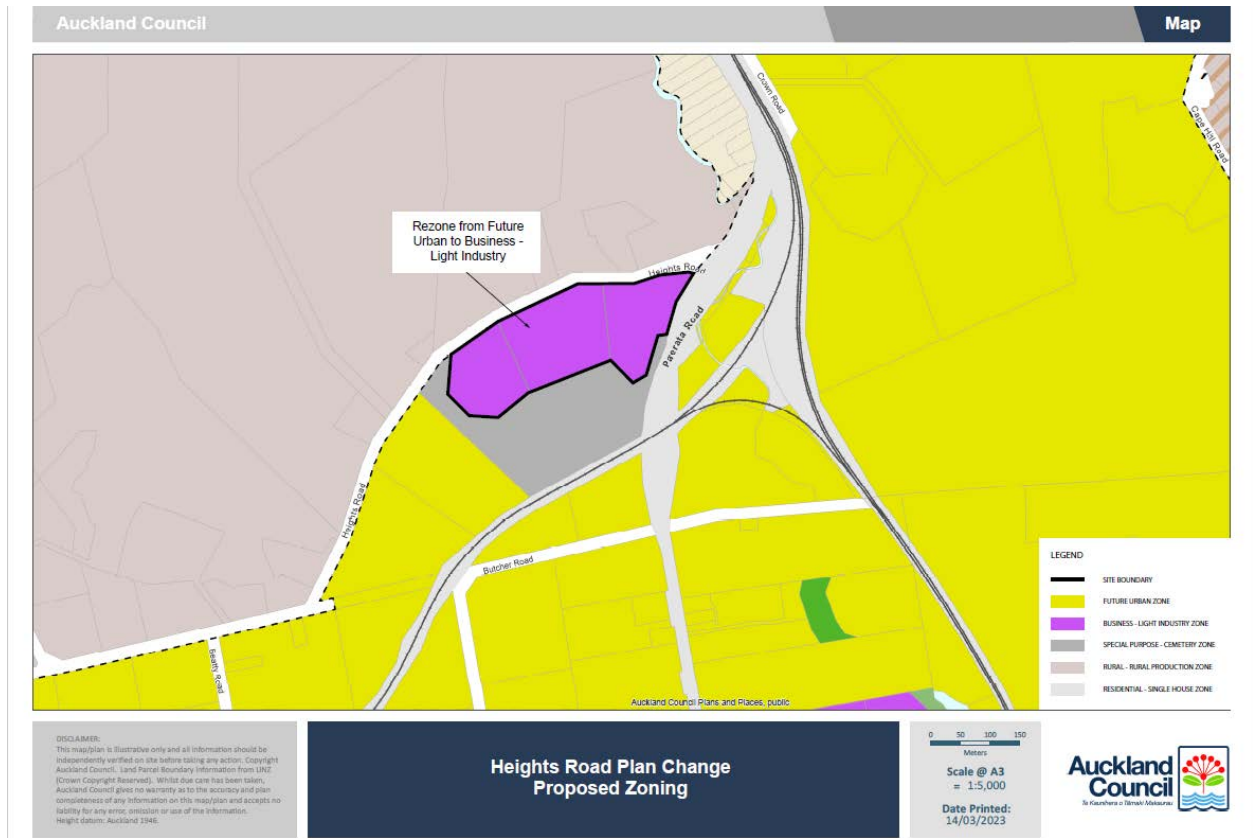
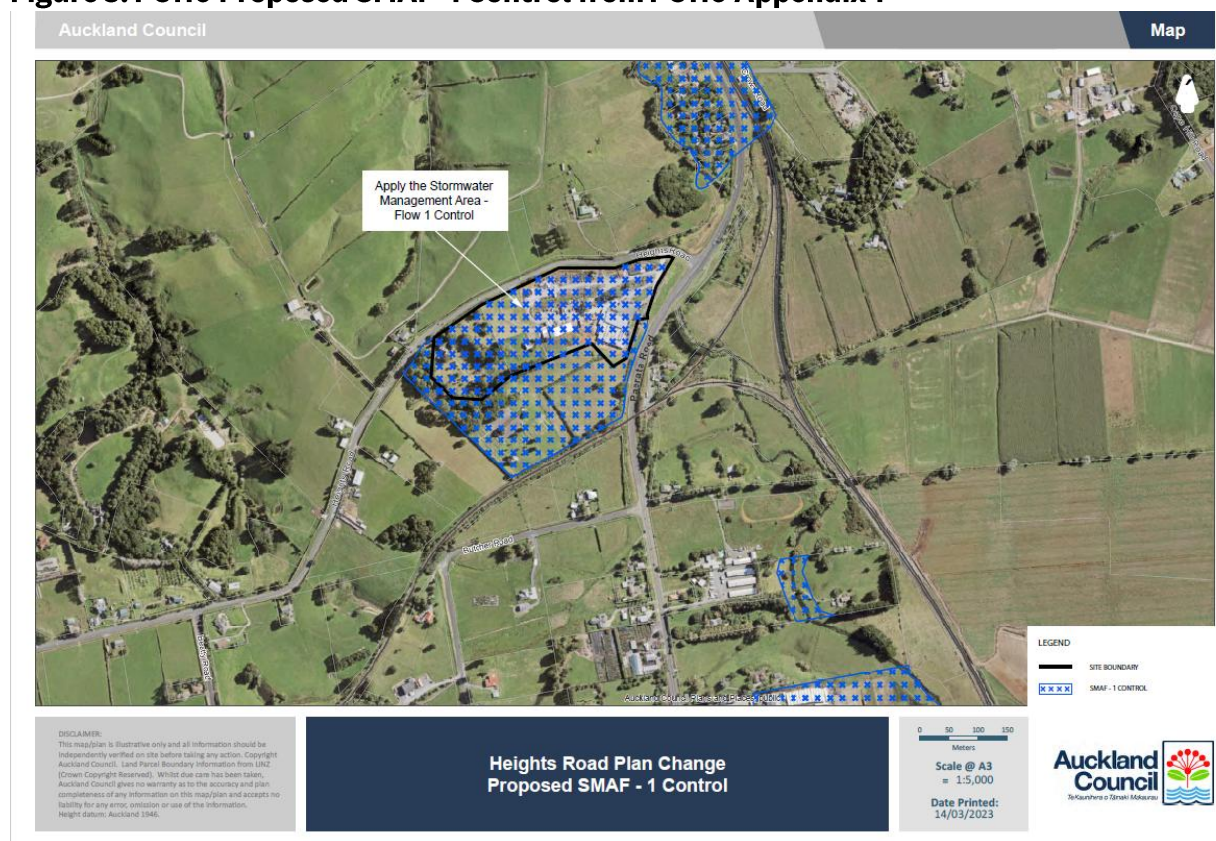


Figure 3: PC110 Proposed SMAF- 1 Control from PC110 Appendix 1



14. The proposed plan change maps together with the plan change AEE and s32 evaluation are in **Attachment 1**. The Applicant has provided a wide range of supporting technical reports as appendices, all of which have been reviewed by a council team of staff and appointed consultants. The request includes an “Indicative Masterplan” (Appendix 3) for future further industrial development of the land.¹

Table 2: PC110 list of application documents and appendices

	“PPC Lodgement Letter” Woods 21 October 2024
	“Proposed Plan Change Request Heights Road Plan Change Planning Report 9, 33 and 49 Heights Road, Pukekohe, GBar Properties Limited, 18/10/2024 Clause 24 revision – Final” Woods and Partners Consultants Ltd (Woods) 18 October 2024
Appendix 1	Proposed Plan Change “Heights Road Plan Change Proposed Zoning” Map printed 14 March 2023

¹ <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=280>

	“Heights Road Plan Change Proposed SMAF- 1 Control” Map printed 14 March 2023
Appendix 2	AUP:OP Regional Policy Statement Assessment “Assessment against Auckland Unitary Plan Regional Policy Statement” Woods 18 October 2024
Appendix 3	Indicative Masterplan and Perspectives “9-49 Heights Road Proposed Plan Change Indicative Masterplan” Woods 29 June 2023
Appendix 4	Integrated Transport Assessment “Proposed Plan Change 9, 33 and 49 Heights Road, Pukekohe Integrated Transport Assessment” Commute Transportation Consultants 2 August 2024
Appendix 5	Civil Infrastructure Report “Heights Road Plan Change Civil Infrastructure Report 9-49 Heights Road , Paerata, Auckland, G Bar Properties Ltd Plan Change – Clause 24 Revision” Woods 31 July 2024
Appendix 6	Geotechnical Investigation Report “Geotechnical Investigation Report 9, 33 and 49 Heights Road, Pukekohe, Auckland Submitted to GBar Properties Limited” ENGEO Limited, Project #21253.000.001, 23 June 2023
Appendix 6A	Geotechnical Addendum (Site Soakage Testing) “Site Soakage Testing 9, 33 and 49 Heights Road, Pukekohe, Auckland” ENGEO Limited, Project #21253.000.001_03, 9 June 2023
Appendix 7	Preliminary Site Investigation “Preliminary Environmental Site Investigation Site Investigation 9, 33 and 49 Heights Road, Pukekohe, Auckland Submitted to GBar Properties Limited” ENGEO Limited, Project #21253.000.001, 23 June 2023
Appendix 8	Stormwater Management Plan “Heights Road Plan Change 9, 33 and 49 Heights Road, Pukekohe, GBar Properties – Final Clause 23 Revision V7” Woods 27 November 2024

Appendix 9	Ecology Report “9, 33 and 49 Heights Road, Pukekohe, Auckland: ecological values” RMA Ecology Ltd 31 July 2024
Appendix 10	Landscape and Visual Effects Assessment Private Plan Change 9-49 Heights Road, Pukekohe “Assessment of Landscape and Visual Effects” LA4 Landscape Architects 14 February 2023
Appendix 11	Economic Assessment “Economic Assessment of Proposed Industrial Plan Change in Pukekohe Prepared for: GBar” Insight Economics 29 August 2024
Appendix 12	Summary of Iwi Consultation “Summary of Iwi Consultation” Woods
Appendix 13	Ngāti Tamaoho Report Report from Ngāti Tamaoho Trust to Woods
Appendix 14	Summary of Consultation with Stakeholders “Summary of Consultation with Stakeholders” Woods
Appendix 15	Summary of Consent History “Summary of Consent History” Woods
Appendix 16	Record of Titles

2.4 Consultation

15. A summary of the consultation undertaken in preparing PC110 is provided in Section 6 of the AEE. Parties recorded as having been consulted include Mana Whenua, Waka Kotahi NZ Transport Agency Limited, Auckland Transport (AT), Auckland Council (Plans and Places, Cemetery Services, Healthy Waters), Watercare Services Limited (WSL), and the Franklin Local Board.
16. Appendix 12 of the applicant’s AEE provides a summary of iwi consultation that has been conducted by the applicant. The applicant sent emails to Ngāi Tai Ki Tāmaki, Ngāti Maru, Ngāti Tamaoho, Ngāti Te Ata, Te Ahiwaru Waiohua, Te Ākitai Waiohua, and Waikato-Tainui. A cultural report was prepared by Ngāti Tamaoho in May 2023. Te Ahiwaru Waiohua advised that they supported submissions by Ngāti Tamaoho.
17. The applicant’s 21 October 2024 lodgement letter states that the applicant provided a revised Stormwater Management Plan to Ngāti Tamaoho for comment in July 2024, that no

formal feedback had been received, and that the applicant would continue liaison with Ngāti Tamaoho.

2.5 Local Board views

18. Following the close of submissions, Auckland Council planning staff sought feedback from the Franklin Local Board (Local Board). The Franklin Local Board considered its feedback at the Board's business meeting on 24 June 2025 and the feedback appears in **Attachment 4**. The matters raised by the board are:
- local board support for rezoning from Future Urban Zone to Business - Light Industry Zone on the basis that light industry is needed to support local jobs and economic development opportunity in the wider Pukekohe area i.e. so local people do not need to travel for employment.
 - noting that Watercare seeks that the plan change be declined, but if approved, seeks amendments. Watercare encourages the applicant to work with Watercare to address Watercare concerns.
 - noting the opposition from Ngāti Te Ata and recommending that the applicants work with Iwi to address any cultural impact concerns.
 - not sharing the concerns expressed by an adjacent property owner and consider the land appropriate for light industrial use, noting it was zoned in the Pukekohe Structure Plan.
 - suggestion that in considering the plan change, that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer, noting that in the future, for those working at this site, accessing the Heights Road Cemetery or moving through the area should be enabled to walk, cycle and access public transport.
19. The Local Board feedback is addressed in this report through the analysis undertaken under the relevant sub-headings in Section 9 of this report.

2.6 Plan change process to date

20. PC110 was lodged with the council on 3 July 2023. Requests for further information were made in 2023 and 2024. Information has been progressively provided by the applicant, with an updated version of the plan change being received in October 2024. Further information relating to the updated application version was requested in the form of an updated Stormwater Management Plan, which was received in November 2024.
21. The private plan change request was accepted by Auckland Council's Planning and Policy Committee pursuant to Clause 25(2)(b) of Schedule 1 of the RMA on 20 February 2025.
22. PC110 was publicly notified on 27 March 2025, with original submissions closing on 29 April 2025. The further submissions period opened on 22 May 2025 and closed on 6 June 2025.

2.7 Submissions

23. Relevant submissions have been addressed by topic in Section 9 of this report. Council specialists' comments include consideration of relevant submissions. The analysis of submissions is based on themes rather than as a response to each individual submission point. The table in **Attachment 6** gives a recommendation on each submission point.
24. As necessary and appropriate further analysis will be given of detail provided by submitters in evidence.

2.8 Main Issues Raised and Interim Assessments made in this s42A report

25. The issues addressed in this report are:
 - Light industrial Zoning and Use
 - Mana whenua values
 - Terrestrial Ecological Effects
 - Geotechnical Effects
 - Contaminated Land Effects
 - Parks and Open Space Effects
 - Landscape and Visual Amenity Effects
 - Economic Effects
 - Stormwater and Flooding Effects
 - Water and Wastewater Infrastructure, Development Engineering Effects
 - Transport Infrastructure and Traffic Effects
 - Infrastructure Timing and Funding
 - Other matters (Environmental noise, environmental pollution, and safety)
26. These issues and submissions and local board views that relate to them are evaluated in Section 9 of this report. This evaluation follows a sequence for each topic as follows:
 - Key issues
 - Applicant's assessment of effects as set out in the PC110 documents
 - Submissions relating to the topic
 - Franklin Local Board views relating to the topic

- The council's specialist's comments (which include consideration of relevant submissions and/or local board views)
- My planning assessment

27. Having considered the PC110 documents, the submissions, the council specialist comments and statutory requirements, I consider that PC110 is appropriate subject to the imposition of precinct provisions.

2.9 Summary of recommendations

28. In order to confirm that the proposed rezoning of the plan change land to Business – Light Industry is the most appropriate way of achieving the objectives of the AUP and the purpose of the RMA, I have proposed amendments in the form of proposed precinct provisions and precinct plans in **Attachment 8**. The precinct provisions relate to:

- Water supply and wastewater infrastructure provision and timing,
- Transport infrastructure provision and timing
- The interface of the plan change land with Heights Park Cemetery

29. **Attachment 8** contains the new precinct provisions, and precinct plans, marked-up with underlining of proposed text and then also shown without track changes in a 'clean' version for ease of reading.

30. The recommended amendments to the provisions arise from the assessments carried out in this report, including from the input of the council's specialists.

31. This report recommends precinct provisions as a new mechanism to provide for future transport, water supply, and wastewater infrastructure servicing or upgrades to be at the applicant's cost if required, in order to address the costs and timing of future infrastructure servicing. This is considered necessary in order to avoid unanticipated public expenditure on infrastructure servicing or upgrades which may be required for development on the plan change land. Precinct controls for amenity purposes are also required at the Heights Park Cemetery interface.

32. I consider that subject to these amendments and subject to any evidence presented at the hearing, PC110 would be the most appropriate way of achieving the objectives of the AUP and the purpose of the RMA. Accordingly, it is recommended that PC110 be approved with modifications.

3 HEARINGS AND DECISION-MAKING CONSIDERATIONS

33. Schedule 1 of the RMA (Clause 8B read together with Clause 29) requires that a local authority must hold hearings into submissions on its proposed private plan change.

Auckland Council's Combined Chief Executives' Delegation Register delegates to hearing commissioners all powers, duties and functions under s34 of RMA. This delegation includes the authority to determine decisions on submissions on a plan change, and the authority to approve, decline, or approve with modifications, a private plan change request. The Panel will not be recommending a decision to the council but will be making the decision directly on PC110.

34. Private plan change requests can be made to a council under Clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as council-initiated plan changes.
35. The RMA requires territorial authorities to consider a number of statutory and policy matters when developing proposed plan changes. PC110 mainly relates to district plan matters.
36. The statutory framework within which the Panel will consider the plan change is outlined in **Attachment 5**. In brief, Section 32(1)(a) of the RMA requires an assessment of whether the objectives of a plan change are the most appropriate way for achieving the purpose of the RMA in Part 2. Section 72 also states that the purpose of the preparation, implementation, and administration of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of the Act and Section 74 provides that a territorial authority must prepare and change its district plan in accordance with the provisions of Part 2 and requires that a plan change must have particular regard to an evaluation prepared in accordance with Section 32.
37. Section 32 requires an evaluation report examining the extent to which the objectives of the plan change are the most appropriate way to achieve the purpose of the act and requires that report to examine whether the provisions are the most appropriate way of achieving the objectives. Section 32AA requires a further evaluation for any changes that are proposed to the notified plan change after the s32 evaluation was carried out. The applicant has prepared a Section 32 assessment.
38. In accordance with s42A(1) of the RMA, this report considers the information provided by the applicant and summarises and discusses submissions received on PC110. Submissions from six submitters have been received. As discussed earlier, the analysis of submissions is based on themes and generally discussed in experts' reports rather than as a response to each individual submission point. This report makes recommendations on whether to accept, in full or in part; or reject; each submission point (see **Attachment 7**).
39. The report identifies what amendments to PC110 provisions are recommended, if any, to address matters raised in submissions.
40. Finally, the report makes an interim recommendation on whether to approve, decline or approve with modifications, PC110.

41. This 42A report provides the background and context to the plan change. Then, having regard to the statutory framework outlined in **Attachment 5**, the report is structured to provide an analysis of:

- The information provided in the application, including the submitted supporting s32 and other assessments
- Relevant National Planning Instruments (Policy Statements and Standards)
- Relevant parts of the AUP Regional Policy Statement, Regional Plan and District Plan
- Other relevant planning instruments
- Effects (including consideration of submissions)
- Recommendations on PC110 submissions (detailed in **Attachment 7**)
- Recommended PC110 precinct provisions (detailed in **Attachment 8**)
- Section 32AA requirements (detailed in **Attachment 9**)

4 CONTEXT

4.1 Site and surrounding area

42. The plan change land consists of three sites:

- 9 Heights Road – Lot 1 DP 73273 – 1.62ha
- 33 Heights Road – Lot 2 DP109824 - 2.28ha
- 49 Heights Road – Lot 1 DP109824 – 1.45ha

Figure 4: Location of PPC Land Extent over Aerial Photo (Source: Grip Map)



43. Figure 5 maps AUP zoning and designations. To the north, the land is bordered by Heights Road, which forms the Rural Urban Boundary (RUB). Land zoned Rural - General Rural is on the northern side of Heights Road. To the east, the land is bordered by the Paerata Road section of State Highway 22.
44. The council's Heights Park Cemetery borders the land to its west and south. The cemetery is zoned Special Purpose - Cemetery Zone. The cemetery access runs parallel to the western boundary of the plan change land. The cemetery extends as far east as Paerata Road, and the eastern section of the cemetery is not yet occupied by graves.
45. The Glenbrook railway branch line borders the south of the cemetery.
46. The plan change area is roughly rectangular. It generally slopes downhill from Heights Road, with a drop of up to 15 metres, rising again to the cemetery site.

4.2 Background

47. Two of the three sites subject to the plan change have a history of industrial use. Approximately 90 per cent of the area of the two eastern sites subject to the plan change is developed with buildings or storage and parking, as shown on the aerial photograph in Figure 4.

48. The eastern site, 9 Heights Road (1.62ha) was the site of a meat processing works from the 1970s to the 1990s. Number 9 Heights Road accommodates “The Tractor Centre”. This was consented in 2001, partly in the former meat works building. “The Tractor Centre” has a showroom, and provides tractor hire, and agricultural machinery sales and service. “Totalspan” accessory buildings sales (consented 2005) are also on the site. The eastern site has frontage to Heights Road and to the Paerata Road section of State Highway 22.
49. Consent was granted in 2017 for expansion of activities from the eastern site onto the middle site, 33 Heights Road (2.28ha) and the construction of a large shed (approximately 2300m²). The majority of this site is developed with this building and light industrial storage and parking.
50. The western site, 49 Heights Road (1.45ha) contains a residential dwelling and cleared grass. Council records show there has been previous horticultural use on the site.

Existing Stormwater

51. Section 3.6.1 of the AEE states that the plan change land is currently serviced by a private stormwater network located at the eastern portion of the plan change land. A piped private network collects runoff from impervious surfaces on the plan change land including buildings and hard stand areas, and discharges to the upper catchments of the Whangapouri Stream via a 600mm culvert beneath the Paerata Road section of State Highway 22. The ultimate receiving environment is the Manukau Harbour.
52. The AEE states that stormwater from the roof of the northern shed and associated hardstand area is treated by a recently established bio-retention raingarden device prior to discharge to the stormwater network. Stormwater flows from the roof are also mitigated through aboveground detention tanks located to the east of the building.

Existing Wastewater

53. Section 3.6.2 of the AEE states that the private plan change land is currently serviced by a private wastewater pump and a rising main that discharges to a public gravity system adjacent to the Possum Bourne Reserve (south of the railway, to the south of Lough Bourne Drive). The application states that capacity of this pump station is relatively large given the private plan change land’s historical use as a meat works and is therefore sufficient to cater for the proposed light industrial use.

Existing Water Supply

54. Section 3.6.3 of the AEE states that there is a 300mm diameter public network installed at the Paerata Road section of State Highway 22 frontage of the plan change land, and a 100mm connection to the plan change land from this line. The application states that the existing business activities are currently serviced by private supply in the form of a consented groundwater take and use working in conjunction with storage tanks.

4.3 Existing AUP Provisions

55. 9, 33 and 49 Heights Road are zoned Future Urban Zone in the AUP.
56. The purpose of this zone is described in AUP H18.1: *“The Future Urban Zone is applied to greenfield land that has been identified as suitable for urbanisation. The Future Urban Zone is a transitional zone. Land may be used for a range of general rural activities but cannot be used for urban activities until the site is rezoned for urban purposes.”*
57. Section 4.2 of the AEE states that PC110 seeks to:
- rezone 5.35ha of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone;
 - apply the Stormwater Management Area Flow 1 – “SMAF-1” control to the plan change land;
 - retain the existing Macroinvertebrate Community Index - Rural control;
 - retain the existing aquifer overlays; and
 - retain existing NZTA Designation 6705
58. The plan change land is also subject to the following AUP controls:

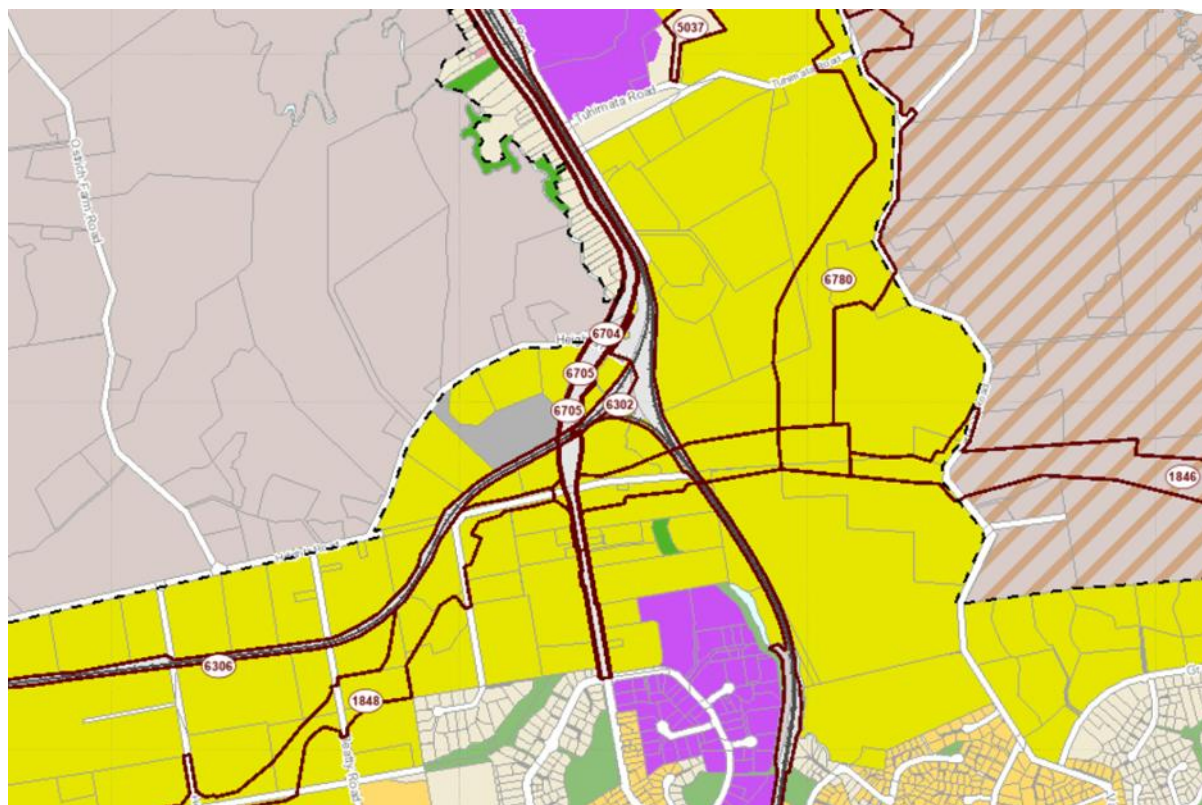
Table 2: AUP controls applying to plan change land

	9 Heights Road	33 Heights Road:	49 Heights Road:
Natural resources: High-Use Aquifer Management Areas Overlay [rp] – Pukekohe Kaawa Aquifer	√	√	√
Controls – Macroinvertebrate Community Index – Rural	√	√	√
Other site features: 1% Annual Exceedance Probability Flood Plain	√	√	√
Other site features: Overland Flowpath	√	√	√

Natural resources: High-Use Aquifer Management Areas Overlay [rp] – Pukekohe Central Aquifer	√	√	
Natural resources: High-Use Aquifer Management Areas Overlay [rp] – Franklin Volcanic Aquifer	√	√	
Designations – 6705, State Highway 22: Karaka to Pukekohe – Road widening, Designations, New Zealand Transport Agency [Land for road widening – 5 metres, to a minimum width of 30m of road reserve]	√		

59. Auckland Transport Designations 1846 and 1848 for strategic and arterial transport routes were confirmed on 13 December 2024 in the vicinity of proposed plan change land.

Figure 5: AUP Zoning and Designation Map



60. Designation 1846 (Pukekohe North East Arterial) confirms a new transport corridor including active mode facilities between SH 22, Paerata on the northwest and Pukekohe East Road, Pukekohe in the southeast.
61. Designation 1848 (Pukekohe North West Arterial) proposes a 2.4km long transport corridor south of the Glenbrook branch railway line between Helvetia Road and State Highway 22 including active transport facilities and associated infrastructure. It is proposed to form a new connection between Beatty Road and Butcher Road to SH22. Designation 1848 upgrades Helvetia Road in the south and provides a new section of road between Helvetia/Gun Club/Heights Roads to Paerata Road in the north-east.
62. KiwiRail's existing designation 6306 relates to the Mission Bush Branch Railway Line from Mission Bush Road, Glenbrook to Paerata Road, Pukekohe

5 NATIONAL PLANNING INSTRUMENTS

5.1 Legislation

Resource Management (Enabling Housing Supply) Amendment Act 2021

63. The Resource Management (Enabling Housing Supply) Amendment Act came into law in December 2021. The Act requires the introduction of new standards - the Medium Density Residential Standards (MDRS). This is being done in Auckland through the current Plan Change 78 and associated Intensification Planning Instrument (IPI) plan change processes. As PC110 does not relate to a relevant residential zone under s2 RMA 1991, PC110 does not trigger the requirement to incorporate MDRS.

5.2 National Policy Statements

64. Section 75(3) of the RMA requires that a district plan must give effect to any national policy statement and the NZCPS.

National Policy Statement on Urban Development 2020 (NPS-UD)

65. The NPS-UD came into effect in July 2020. The NPS-UD aims to provide significantly more housing capacity, choice and jobs in “well-functioning urban environments”. The intensification plan change required under the NPS-UD was notified by council on 18 August 2022 as Plan Change 78 (PC78).
66. Hearings for submissions on PC78 started in March 2023. The council requested a partial pause of hearings in April 2023 to address various issues including natural hazards and the Light Rail Corridor. The Independent Hearings Panel (IHP) confirmed a partial pause in hearings in May 2023.
67. At the time of writing this report, hearings have been completed for the Business – City Centre Zone and related provisions, with the IHP releasing recommendations on this. In turn

the council made its decisions on the IHP recommendations on the Business – City Centre Zone on 22 May 2025 and the City Centre provisions became operative on 6 June 2025. Council’s Policy and Planning Committee resolved on 24 July 2025 to request the Independent Hearings Panel (IHP) on Proposed PC78 to complete hearings and release recommendations on submissions on the Business – Metropolitan Centre Zone (BMCZ) and related provisions.

68. Policy 6(a) and (b) of the NPS-UD relate to “RMA planning documents that have given effect to” the NPS-UD. Clause 1.4(1) of the NPS-UD defines “RMA planning document” as a regional policy statement, a regional plan, or a district plan. The RMA s43AA definitions of these terms indicate that these are operative documents approved under Schedule 1 of the RMA and include operative changes.
69. The NPS-UD is assessed in Section 8.1 of the applicant’s AEE.
70. Section 8.1.1 of the AEE states that PC110 will positively contribute to a well-functioning urban environment for the following reasons:
 - the plan change supports the anticipated land use in the Pukekohe-Paerata Structure Plan 2019;
 - the plan change land provides for small and medium scale industrial activities, contributing to a variety of sites suitable for different sectors in the Pukekohe district;
 - additional development capacity is enabled to meet business land supply demands
 - proximity of the plan change land to a main transport route (SH22) and logistics services at Pukekohe provides good accessibility for movement of freight;
 - public transport options and services for the plan change land will improve;
 - creation of local employment opportunities;
 - supporting reductions to greenhouse emissions;
 - building in climate change resilience
71. Section 8.1.2 of the AEE states that the plan change land can be serviced by the existing transport network and can be serviced by existing and planned water and wastewater infrastructure.
72. Section 8.1.3 of the AEE refers to Policy 6 of the NPS-UD and considers that decision making on the merits of the plan change should have regard to the Future Development Strategy (FDS), the actual and potential effects on amenity values, whether a well-functioning urban environment will be achieved, whether the Business-Light industry Zone will contribute to development capacity, and have regard to climate change.

73. Section 8.1.3 of the AEE also quotes Policy 8 of the NPS-UD which includes that local authority decisions that affect urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:
- (a) unanticipated by RMA planning documents; or
 - (b) out-of-sequence with planned land release.
74. Section 8.1.3 of the AEE states that, *“Whilst in sync with the planned infrastructure and sequencing of the Structure Plan, the recently adopted FDS (August 2023) has amended the timing of the Pukekohe North West delivery through to 2040. Both the NPS-UD and FDS recognise that land can be brought online sooner than planned, provided a well-functioning urban environment and infrastructure capacity can be achieved.”*
75. I generally agree with the applicant’s assessment that PC110 gives effect to the relevant provisions of the NPS-UD, subject to the opinions I express later in this report. As further discussed in Section 8.1 below, however, the council’s FDS has moved back the “development ready” timing for Pukekohe North West, which includes the plan change land, to 2040+. An assessment of effects relating to infrastructure provision and its timing and funding is provided in Section 9 of this report.

National Policy Statement for Freshwater Management 2020 (updated October 2024)

76. There are no streams or watercourses within the PC110 plan change land. As discussed in the application, a watercourse on the land was piped as part of consents for “The Tractor Centre”. The stormwater network from the plan change land diverts to a culvert under SH22 which discharges into the Manukau Harbour via an upper catchment of the Whangapouri Stream. There are also high use aquifers beneath the plan change land.
77. The government has announced an intention to revise the NPS-FM 2020 and to restrict plan changes that implement the NPS-FM until 31 December 2027. The council has amended its NPS-FM programme in response to these changes. This private plan change must give effect to the current version of the NPS-FM.
78. The NPS-FM endeavours to implement Te Mana o te Wai by prioritising first the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
79. The relevant provisions of the NPS-FM are assessed in Section 8.2 of the applicant’s AEE. In summary, the applicant finds that the proposed plan change will give effect to the NPS-FM because:

- it provides for a whole of catchment approach to stormwater treatment to mitigate adverse effects on the hydrology and quality of freshwater. The stormwater approach relies on flood modelling based on the entire catchment and takes into account the best available data with respect to climate change, including adopting a warming scenario of 3.8°C. A suite of stormwater and hydrology and flooding mitigations are proposed to manage the effects of increased impervious coverage on the surrounding area.
- the SMP recognises the importance of High-Use aquifers underneath the plan change land and [proposed retention function vis infiltration to ensure there are no adverse effects caused by the increase in impervious surfaces proposed by PC110.
- iwi groups recognised as having mana whenua in this area were consulted on the plan change and engagement with Ngāti Tamaoho has been ongoing during the preparation of the plan change. In particular, Ngāti Tamaoho have reviewed the SMP supporting the application and have not raised any fundamental concerns, noting their support for rainwater re-use from roofs, which is proposed to be implemented where there is sufficient water demand,
- water quality treatment will be employed to improve the quality of stormwater discharging from the plan change land.

80. The SMP submitted with the application has been reviewed by council's stormwater and flooding specialists Mr Vinnakota and Mr Thompson, who conclude that PC110 can be supported from a stormwater and flooding perspective. Their analysis is discussed in Section 9.9 below. I therefore generally agree with the applicant's assessment.

New Zealand Coastal Policy Statement 2010

81. The applicant acknowledges that, while the plan change land is not on or adjoining the coast, the plan change land is within the Whangapouri Creek catchment which drains into the Manukau Harbour. The stormwater network from the plan change land diverts to a culvert under SH22 which discharges into the Manukau Harbour via an upper catchment of the Whangapouri Stream. Section 8.3 of the AEE assesses PC110 against the NZCPS.
82. In summary, the applicant finds that, as discussed in the SMP, best practice stormwater management will be adopted for the plan change land. In particular, water quality for existing roof areas will be re-used, and any new or redeveloped roofs will be constructed with inert roofing. A stormwater basin will be used to meet hydrology mitigation and provide further water quality enhancement. The SMAF-1 overlay is also proposed for the land for stream hydrology purposes.
83. I generally agree with the applicant's assessment that together, these measures will ensure any potential effects on the coastal receiving environment are avoided or mitigated.

National Policy Statement for Highly Productive Land 2022 (NPS-HPL)

84. The NPS-HPL requires the protection of highly productive land that is zoned either general rural or rural production, and is predominantly Land Use Class 1, 2, or 3 land, and forms a large and geographically cohesive area. As the plan change area is zoned Future Urban Zone, it has already been specifically identified for urban development and therefore is not subject to protection under the NPS-HPL. Accordingly, the NPS-HPL is not considered relevant to the consideration of the proposed plan change.

National Policy Statement for Indigenous Biodiversity 2023 – Amended October 2024

85. The National Policy Statement for Indigenous Biodiversity directs the protection, maintenance and restoration of indigenous biodiversity in New Zealand. It provides direction to councils to protect, maintain and restore indigenous biodiversity requiring at least no further reduction nationally. Section 8.5 of the AEE states that the proposed plan change will not trigger the thresholds for adverse effects on non-Significant Natural Area habitat for indigenous biodiversity.
86. I generally agree with this assessment, but note that the council's ecologist, Ms Safavian has reviewed PC110. Her analysis is discussed in Section 9.3 below, and she addresses the potential ongoing presence of native copper skinks.

5.3 National environmental standards or regulations

87. Under section 44A of the RMA, local authorities must observe national environmental standards in their district/ region. No rule or provision may be duplicate or in conflict with a national environmental standard or regulation.
88. The national environmental standard relevant to this plan change is the NES for assessment and managing contaminants into soil to protect human health (NES-CS).
89. Section 3.3 of the AEE has concluded that contaminants may be present within the shallow soils, therefore those excavated soils may require testing/approval from council. The applicant's contaminated land expert recommends that a detailed site investigation is undertaken to assess the contaminated land provisions of the AUP.
90. The council's contaminated land specialist Mr Naidoo has reviewed PC110. His analysis is discussed in Section 9.5 below and he concludes that PC110 is considered to be consistent with the purpose of the NES-CS and the relevant objectives and policies of the Contaminated Land Rules of the AUP, Regional Policy Statement, and the NPS-F. Subsequent change of use, subdivision and resource consent stages will be the appropriate time to assess the detailed management of soils.

6 REGIONAL POLICY STATEMENT

91. Section 75(3)(c) of the RMA requires that a district plan must *give effect to* any regional policy statement (RPS).
92. The RMA requires that any change to the district plan and regional parts, must give effect to the Regional Policy Statement.
93. In addition, under section 74(2)(a)(i) regard shall be had to any proposed RPS. The Council notified PC80 to the RPS on 18 August 2022. PC 80 became fully operative on 13 December 2024 and provides policy direction on well-functioning urban environments, qualifying matters and resilience to climate change.
94. Section 8.6 of the applicant's AEE, in particular Appendix 2 "AUPOP RPS Assessment 2024" provides an assessment against the following RPS Chapters:
 - B2 Urban Growth;
 - o B2.2 Urban Growth and form
 - o B2.3 A quality built environment
 - o B2.5 Commercial and industrial growth
 - B3- Infrastructure, Transport and Energy;
 - o B3.2 Infrastructure
 - o B3.3 Transport
 - B6 Mana Whenua;
 - B7 Natural Resources;
 - o B7.2 Indigenous biodiversity
 - o B7.3 Freshwater systems
 - o B7.4 Coastal water, freshwater and geothermal water
 - B10 Environmental Risk
 - o B10.2 Natural hazards and climate change
95. The applicant's conclusion is that the plan change gives effect to the RPS.
96. I generally agree with the assessments made against these provisions in the application documents. Where I have considered there is a potential issue or provision that should be

emphasised in relation to potential effects that arise, I comment later in this report. I consider that PC110 is generally consistent with the RPS and will give effect to the relevant RPS policies subject to the amendments that I recommend in **Attachment 8** to this report in relation to infrastructure.

97. The plan change area is within the Rural Urban Boundary. Part B2 of the Regional Policy Statement (RPS) sets out the urban growth and form objectives and policies that must be given effect to. The objectives and policies in B2.2 are of particular relevance to PC110. Amongst other matters, these provisions seek to ensure that sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth (Objective 3) and that urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages (Objective 4).
98. The objectives and policies relating to Infrastructure B3.2 and Transport in B3.3 are also of relevance to PC110.
99. Importantly, the council has prepared a structure plan for Pukekohe-Paerata and the subject land is within the structure planned area. As discussed in Section 8.1, the plan change is generally consistent with the structure plan.

7 REGIONAL PLAN AND DISTRICT PLAN

100. The applicant's AEE and associated expert reports consider the plan change against the following key regional plan and district provisions of the AUP, which are considered to be of particular relevance to the plan change and for future development of the plan change land:
 - E8 – Stormwater – Discharge and diversion
 - E9 Stormwater quality - High contaminant generating car parks and high use roads
 - E10 Stormwater management area - Flow 1 and Flow 2
 - E12- Land disturbance- District
 - E14 Air quality
 - E27 - Transport
 - E30 – Contaminated Land
 - E36 Natural hazards and flooding
 - E38 Subdivision - Urban
 - H17 Business - Light Industry Zone

- J1 Definitions

101. I generally agree with the assessments made against these provisions in the application documents, but I have proposed amendments in the form of proposed precinct provisions and precinct plans in **Attachment 8**. The precinct provisions relate to
- Water supply and wastewater infrastructure provision and timing,
 - Transport infrastructure provision and timing
 - The interface of the plan change land with Heights Park Cemetery
102. The reasons for these changes are discussed in Sections 9.7 (Landscape and Visual Amenity Effects), 9.8 (Economic Effects), 9.10 Water and Wastewater Infrastructure, Development Engineering Effects) 9.11 (Transport Infrastructure and Traffic Effects), and 9.12 (Infrastructure Timing and Funding) of this report, where council's experts have challenged the conclusions of the applicant's experts' reports relating to these topics.
103. Subject to:
- any evidence presented at the hearing, and
 - the amendments I recommend in **Attachment 8**
104. I consider that PC110 does not give rise to inconsistencies with relevant regional plan provisions and integrates with the district plan.

8 ANY RELEVANT MANAGEMENT PLANS AND STRATEGY PREPARED UNDER ANY OTHER ACT

105. Section 74(2)(b)(i) of the RMA requires a territorial authority must have regard to plans and strategies prepared under other Acts. The other plans and strategies relevant to PC110 are discussed below.

8.1 The Auckland Plan 2050 including the Future Development Strategy

106. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in the preparation of PC110 alongside the Future Development Strategy 2023 (FDS). Among other matters, they address the growth of Tāmaki Makaurau / Auckland. Both documents promote the consolidation of growth within Auckland's urban area and set a sequence for further growth including greenfield areas. Emphasis is placed on areas that are not subject to natural hazards, and where infrastructure can cope with growth.
107. The Auckland Plan 2050 is council's spatial plan and contains a 30-year high level development strategy for the region based on a quality compact approach to

accommodating growth. This approach anticipates most growth through intensification within existing urban areas, with managed expansion into the region's future urban areas and limited growth in rural areas.

108. It sets out how Auckland will grow over the next 30 years to achieve a quality compact urban form, and anticipates growth focused in existing urban areas (62%) and future urban areas (32%) with some remaining growth in rural areas (6%).
109. Significant growth is anticipated in the Pukekohe area which is identified as a “satellite town” with the potential to accommodate up to 14 000 additional dwellings by 2050.

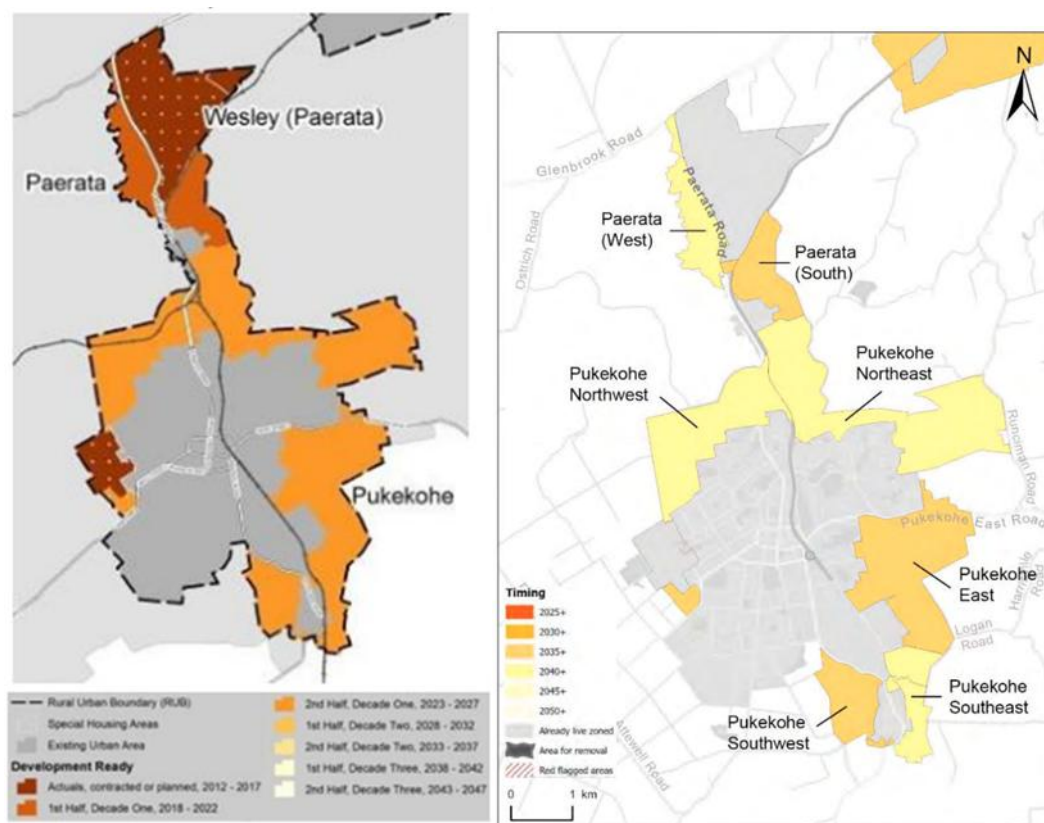
Future Development Strategy 2023 (FDS)

110. The FDS was finalised and published on 22 December 2023 and replaced the Future Urban Land Supply Strategy 2017 (FULSS). The FDS expresses concern about the timing of development and the number and spread of areas being rezoned from future urban to urban, particularly as a result of private plan changes that have not followed the proposed FULSS sequence. Development in an increasing number of future urban areas has put more pressure on the council's ability to obtain financing and provide funding to service development, especially when there are already severe affordability constraints.
111. This plan change was lodged prior to council's Future Development Strategy (FDS) being published on 22 December 2023. The FDS replaced the Future Land Supply Strategy (FULSS) 2017 and resulted in amendments to various aspects of past planning directions and development timing. The FDS identifies the plan change land within an area identified as being “development ready” in 2040+, based on the time by which bulk infrastructure will be available. “Development ready” means that urban zoning and bulk infrastructure is provided. Under the council's Future Urban Land Supply Strategy 2017 (FULSS), the land in Stage Two of the Pukekohe Future Urban zoned land (which includes the plan change land) was scheduled to be development ready in the second half of Decade One (2023 to 2027).
112. There is no intention in the FDS to change the FUZ zoning of the plan change land, however as timing of its development has moved out to 2040+ as shown in Figure 6 below, the proposed plan change proposes development about 16 years ahead of the “development ready” time horizon in the FDS.

Figure 6: Future Urban Land Supply Strategy and Future Development Strategy comparison maps

FULSS 2017 map

FDS Map



113. The FDS leaves open the possibility for the council to consider private sector initiatives which find practical ways to provide infrastructure either through direct provision, or funding council to accelerate its own infrastructure provision where that contributes significantly to housing and business capacity and meets the requirements of a well-functioning urban environment.
114. The FDS lists several “infrastructure prerequisites” for Pukekohe North West, which are addressed later in this report, these being:
- Pukekohe North West Arterial
 - Isabella Drive Pump Station
 - New Reservoir Adams Road South.

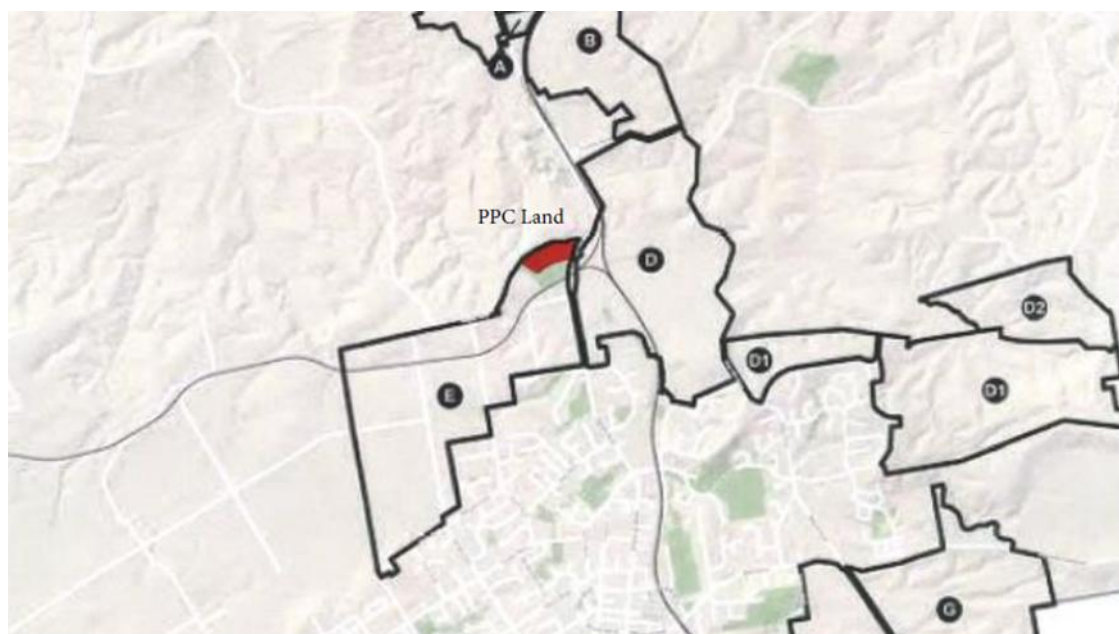
Pukekohe-Paerata Structure Plan 2019

115. The Pukekohe-Paerata Structure Plan 2019 was prepared under the relevant provisions of the Local Government Act 2002, including those related to consultation, and in accordance with the structure plan guidelines as set out in Appendix 1 of the AUP. It is intended to

guide future development of this area over 30 year period, consistent with the FULSS. Development in accordance with the plan was estimated to provide about 12,500 houses/dwellings with a population of almost 34,000 people and over 5,000 jobs. The population increase would approximately double the existing population of Pukekohe.

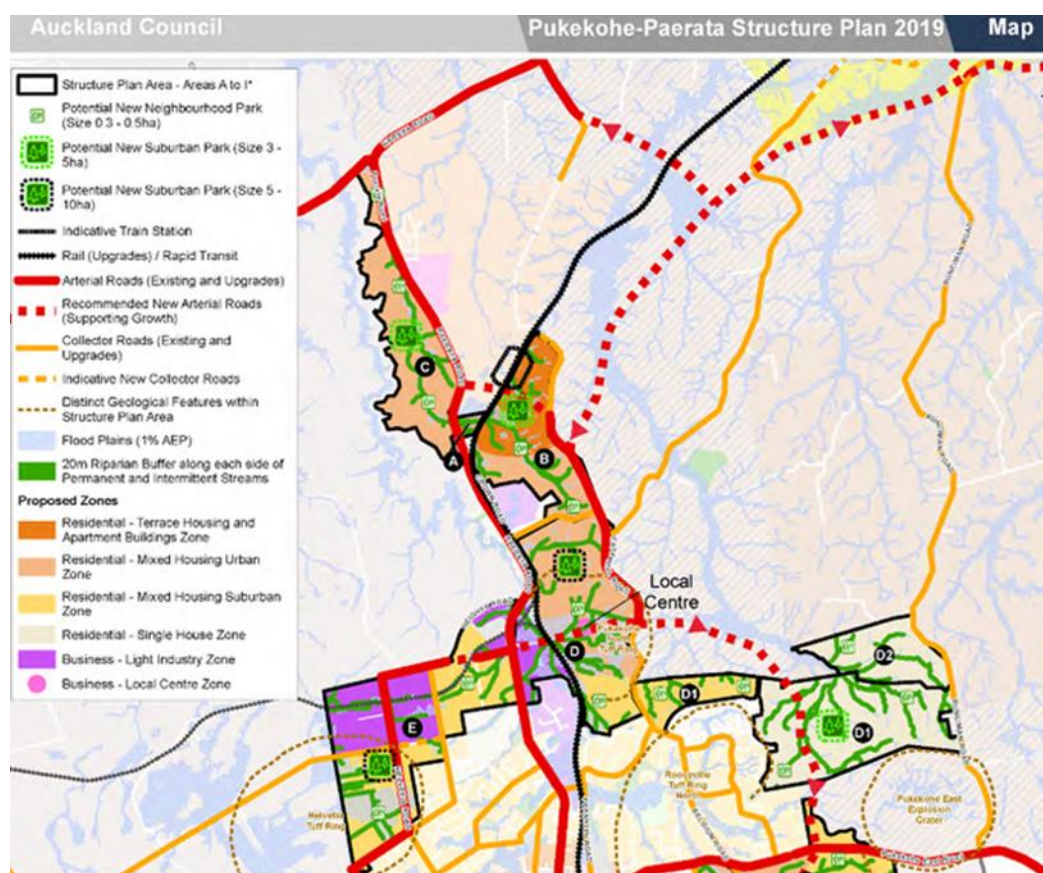
116. Development of the Pukekohe-Paerata Structure Plan 2019 commenced in August 2017 and concluded in August 2019 when the final version of the plan was approved by council's Planning Committee. The Pukekohe-Paerata Structure Plan 2019 was supported by a number of background studies and reports, including Business land demand and location (2018), Stormwater, flooding and freshwater management (updated 2019), Transport (2019), Water and wastewater supply (2019), Open space and recreation (updated 2019), Landscape values (2017), Heritage and archaeology (2017), Ecology (updated 2019), Geotechnical hazards (updated 2018), Contaminated land (2018), and Urban design (2018). There is also a Neighbourhood Design Statement which is intended as an implementation tool to guide future development.
117. By itself, the Pukekohe-Paerata Structure Plan 2019 has no statutory weight. However, when introduced, it was intended to inform the basis for the development and assessment of plan change/s under the RMA. As a specifically prepared plan for this area, it clearly has relevance and is recognised as a major basis for planning in the PC110 application documents.
118. The plan change land is in the north-eastern corner of Area E in the Pukekohe-Paerata Structure Plan.

Figure 7: Plan change land mapped on extract from Pukekohe-Paerata Structure Plan Map 10: location of structure plan areas



119. Section 4.4.8 of the Pukekohe-Paerata Structure Plan describes Area E as follows:
120. *“Area E falls steeply from Heights Road in the north-east to a flat area in a dip and then rises again, flattening out to the west and south. The eastern part of the area is undulating, becoming flat as it nears SH22 (Paerata Road). The Glenbrook railway branch line traverses the land more or less east to west. The area is traversed by the headwaters of the Whangapouri Creek, with some steep contours. The area includes Significant Ecological Areas. The Helvetia Tuff Ring stretches over the south-western part of Area E. This part is also subject to flooding. There are also areas of flooding near the railway line in the north-eastern part between Butcher Road and Paerata Road.”*
121. *“Area E also has geotechnical constraints that give it a rating of predominantly low development premium with small areas of high development premium in the northern part aligning with the streams and gullies. There is a large block identified as medium development premium in the eastern portion as it meets Area D and an area identified as high development premium surrounding the North Island Main Trunk railway line.”*
122. *“The north-western and north-eastern corners of Area E are proposed to be zoned Business-Light Industry. This reflects the existing rural business operations in this area and the area’s proximity to the railway line and northern road routes in and out of Pukekohe.”*
123. *“The remaining part of Area E is proposed to be zoned Residential – Mixed Housing Suburban (medium density). This is an extension to the existing predominantly Mixed Housing Suburban zoning in north-western Pukekohe.”*
124. The proposed Structure Plan zoning of 9, 33 and 49 Heights Road is Business-Light Industry Zone as shown in Figure 8:

Figure 8: extract from Pukekohe-Paerata Structure Plan 2019: Structure Plan Map



125. When the Pukekohe-Paerata Structure Plan was prepared, 1262 hectares of land around Pukekohe were zoned Future Urban Zone. The structure plan proposes approximately 95ha (net developable) of land to be zoned Light Industry, including the plan change land. The plan change land is noted as an existing land use more suited to the Light Industry zone.
126. The Structure Plan shows the plan change land as subject to a 20 metre (subject to refinement) Riparian Buffer along each side of Permanent and Intermittent Streams, and shows part of the land subject to a 1 per cent Annual Exceedance Probability (AEP) flood.
127. The Pukekohe-Paerata Structure Plan shows a proposed wastewater gravity main running from further west along Heights Road to a new wastewater asset to the east of the Paerata Road section of State Highway 22 (the Isabella Drive Pump Station).
128. PC110 when lodged was prepared in accordance with the growth timings used in the Pukekohe-Paerata Structure Plan 2019.

8.2 Auckland's Urban Ngāhere (Forest) Strategy

129. The Urban Ngāhere (Forest) Strategy sets out a number of social, environmental, economic and cultural strategies relating to the values of urban trees and vegetation. Much of south Auckland, particularly Mangere-Otahuhu and Otara Papatoetoe is identified in an area of low

vegetation cover. The Franklin Local Board Plan 2023 states that the urban areas of Franklin do not meet the 30 per cent canopy cover target of the Urban Ngāhere (Forest) Strategy.

130. The strategy states that, without properly recognising the value of trees and understanding the benefits they provide, urban growth is likely to occur at the expense of the urban ngāhere. The concept is that Aucklanders are proud of their urban ngāhere, that Auckland has a healthy and diverse network of green infrastructure, that is flourishing across the region and is celebrated, protected and cared for by all. By increasing tree canopy cover across Auckland, the effects of urban heat islands will be reduced, residents will be provided with shade and amenity. This outcome can best be achieved by private developers and Council/CCOs planting and maintaining trees.
131. PC110's AEE does not refer to this strategy. PC110 does not enable any development that would conflict with any protected trees, nor does it propose to add any identified trees to the notable tree schedule. In my view, given the proposed Business – Light Industry zoning of the plan change land, other future urban zoned areas within the Pukekohe Structure Plan area provide better opportunities for achieving the outcomes sought by the strategy.

8.3 Te Tāruke- ā -Tāwhiri: Auckland's Climate Plan

132. Auckland's Climate Plan was adopted by council in 2020. It is a roadmap to a zero-emissions, resilient and healthier region. The core goals are:
- To reduce greenhouse gas emissions by 50 per cent by 2030 and achieve net zero emissions by 2050
 - To adapt to the impacts of climate change by ensuring we plan for the changes we face under our current emissions pathway
133. Carbon Dioxide emitted by road transport modes is identified as the primary greenhouse gas impacting the Auckland Region. The plan points out that integrating land use and transport planning is vital to reduce the need for private vehicle travel and to ensure housing and employment growth areas are connected to efficient, low carbon transport systems. The plan seeks a 12 per cent reduction in total private vehicle kilometres travelled by 2030 against a 'business-as-usual' scenario through actions such as remote working and reduced trip lengths.
134. Section 8.1.1 of the AEE comments that it anticipates that the provision of locally based jobs, future road upgrades, public transport infrastructure and strategic active mode links will provide additional modal choice to the plan change land, and will together contribute to reduction in greenhouse gas emissions. The AEE refers to the PC110 stormwater approach in the SMP relying on flood modelling based on the entire catchment and taking into account the best available data with respect to climate change, including adopting a precautionary warming scenario of 3.8°C.

135. In his expert report (see **Attachment 3**), council's transport expert, Mr Edwards, considers PC110 against Te Tāruke- ā -Tāwhiri: Auckland's Climate Plan and the associated Transport Emissions Reduction Pathway (TERP) document, endorsed by Auckland Transport and adopted by Auckland Council, which is intended to give effect to the climate plan. Mr Edwards notes that PC110 enables a reduction in travel distance, but does not ensure it.
136. In their expert report (see **Attachment 3**) council's stormwater experts, Mr Vinnakota and Mr Thompson, confirm that the SMP has demonstrated that two proposed centralised wetlands can be sized to attenuate the 1% AEP flows with a climate change factor of 3.8°C.
137. In my view it is difficult to consider the emissions reduction component of the Te Tāruke- ā -Tāwhiri: Auckland's Climate Plan against PC110 when PC110 is a small individual plan change in relation to the total urban area and emissions. Many emission altering decisions e.g. petrol versus electric car use, working from home versus commuting, building standard, and carbon proving are not directly within the applicant's domain (and not within council's RMA domain).
138. PC110 is also notably in an area identified by the council for urban development, and the proximity of the proposed light industrial zoning to the residences of potential employees and customers, other light industrial land in northern Pukekohe, proposed public transport networks and upgraded roads, will assist in reducing transport emissions. The flood modelling approach has demonstrated that development on the PC110 plan change land can assist in alleviating flooding.

8.4 Franklin Local Board Plan 2023

139. Section 9.5 of the AEE provides an assessment of PC110 against the Franklin Local Board Plan 2023.
140. The Franklin Local Board Plan 2023 is focussed on:
- *Our Community*
 - *Support the community to plan and deliver activities celebrating local history, engaging new residents in community life, promoting healthy active lifestyles, environmental sustainability and local resilience. Improving access to Auckland council services and facilities.*
 - *Our people*
 - *We are focusing on empowering and enabling all people in our community, with a focus on key groups, young people, and the aged and disabled communities.*
 - *Our environment*

- *To support both urban and rural Franklin communities in their efforts to reduce greenhouse gas emissions, improve the health and function of waterways, increase canopy cover and eradicate pest species.*
- *Our places*
 - *Make changes to our current facilities network so that our parks, libraries, community halls and recreational facilities are fit for purpose, and deliver to future need and budget constraints.*
- *Our economy*
 - *Facilitate Franklin-centric economic development initiatives that leverage local opportunity from growth, leverage local opportunity from our unique attributes and that are a platform for future prosperity.*

141. The Franklin Local Board's views are attached to this report (**Attachment 4**). The local board's views on employment land, Watercare infrastructure, cultural impact concerns of iwi, appropriateness of the plan change land for light industrial use, and pedestrian, cycling and public transport infrastructure considerations are assessed where appropriate in Section 9 of this report.

8.5 Pukekohe Area Plan 2014

142. The potential rezoning of the plan change land for future light industrial urban activities was signalled in the Franklin Local Board's Pukekohe Area Plan 2014. Key Move 2 of the Pukekohe Area Plan 2014 was to enable at least 100ha of new business land, which included the plan change land. The plan change land was part of Pukekohe Area Plan Growth Area E (Pukekohe northwest), which was anticipated to be subject to structure planning in the next 10 to 30 years.

9 ASSESSMENT OF EFFECTS

143. This section of the report addresses effects². It is structured under the following topic headings:

- Light industrial Zoning and Use
- Mana Whenua Values
- Terrestrial Ecological Effects

² Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the Plan Change, taking into account clause 6 and 7 of the Fourth Schedule of the RMA.

- Geotechnical Effects
- Contaminated Land Effects
- Parks and Open Space Effects
- Landscape and Visual Amenity Effects
- Economic Effects
- Stormwater and Flooding Effects
- Water and Wastewater Infrastructure, Development Engineering Effects
- Transport Infrastructure and Traffic Effects
- Infrastructure Timing and Funding
- Other Matters (Environmental noise, environmental pollution, and safety)

144. This evaluation follows a sequence for each topic as follows:

- Key issues
- Applicant's assessment of effects as set out in the PC110 documents
- Submissions relating to the topic
- Franklin Local Board views relating to the topic
- The council's specialist's comments (which include consideration of relevant submissions and/or local board views)
- My planning assessment.

145. It is important to note that while the "Indicative Masterplan" (Appendix 3) provided by the applicant for future further industrial development of the plan change land is useful to demonstrate one possible development outcome for the plan change land, and how development effects could be controlled, other outcomes are also enabled by the proposed zoning. No mechanism is proposed to ensure that development of the plan change land is undertaken in accordance with the "Indicative Masterplan".

9.1 Topic: Light Industrial Zoning and Use

Key Issues

146. This section addresses the appropriateness of the rezoning of the land from Future Urban Zone to Business – Light Industry Zone, and whether precinct provisions should be imposed in addition to the AUP Business – Light Industry Zone provisions.

Applicant's Assessment of Effects

147. The Executive Summary of the AEE states that the plan change seeks to rezone the 5.35ha of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business – Light Industry Zone.
148. Section 4.1 of the applicant's AEE sets out the purpose of the plan change, which is to enable the ongoing operation, intensification and expansion of light industrial activities on the plan change land to meet current and future demand for industrial growth, consistent with Pukekohe-Paerata Structure Plan 2019, whilst avoiding, remedying or mitigating adverse effects on the environment.
149. Section 4.2.1 of the AEE outlines the AUP description of the Business- Light Industry Zone in H17.1: *"The Business – Light Industry Zone anticipates industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. The anticipated level of amenity is lower than the centres zones, Business – General Business Zone and Business – Mixed Use Zone. Due to the industrial nature of the zone, activities sensitive to air discharges are generally not provided for."* Section 4.2.1 of the AEE also summarises the development standards in the zone.
150. Section 5.3.1 of the AEE refers to the proposed zoning plan being consistent with the Pukekohe-Paerata Structure Plan, and refers to the applicant's Section 32 evaluation, which assesses the benefits and costs of alternative industrial and commercial zonings, stating that the Business – Light Industry Zone is the most efficient and effective way to give effect to the objectives of the plan change.
151. Section 6.1 of the AEE states that the plan change request is considered to be consistent with the policy directives set out by the NPSUD, stating that the proposed rezoning from Future Urban Zone to Business- Light Industry Zone enables more businesses to be located in an area of high demand for light industrial activities, will be in proximity to public transport improvements, provide for small and medium scale industrial activities, and provide additional development capacity to meet business demands, concluding that: "The site is ideally located for industrial activity, being located adjacent to existing and planned strategic transport networks and planned future business areas, and well-separated from sensitive residential receiving activities."
152. Section 9.2 of the AEE notes that the plan change land is a discrete parcel of business land on the outskirts of Pukekohe and part of the land is already used for longstanding rural business activities.

Submissions

153. **Submission 1.1 –(Peter Fa’afiu)** Approve plan change without amendment as Light industrial use confirms site history
154. **Submission 6.4 (Gerald Baptist)** - Decline the plan change, but if approved, make amendments requested. Rezoning from Future Urban to Light Industry is questioned. Wants urban environmental standards to apply to 1173 Paerata Road and other properties on eastern side of State Highway 22. Wants buffer between plan change site and housing.

Franklin Local Board views

155. The Franklin Local Board does not share the concerns expressed by an adjacent property owner [inferred that this comment relates to Submission 6.4 (Gerald Baptist)] and considers the land appropriate for light industrial use, noting it was [proposed to be so] zoned in the Pukekohe Structure Plan.

Planning assessment

156. The potential rezoning of the plan change land for future light industrial urban activities was signalled in the Pukekohe Area Plan 2014. The plan change land was proposed to be zoned Future Urban Zone in the Proposed Auckland Unitary Plan which was notified in 2013. Its Future Urban zoning was confirmed when the AUP decisions version was notified in August 2016.
157. The plan change land is within the Rural Urban Boundary and within an area that has been structure planned. The Pukekohe-Paerata Structure Plan proposes approximately 95ha (net developable) of land to be zoned Light Industry, including the plan change land. The plan change land is noted in the structure plan as an existing land use more suited to the Light Industry zone. Two of the three sites subject to the plan change have a history of industrial use. Approximately 90 per cent of the area of the two eastern sites subject to the plan change is already developed with buildings or storage and parking.
158. As outlined in Section 4.1 of the applicant’s AEE, the purpose of the plan change is to enable the ongoing operation, intensification and expansion of light industrial activities on the plan change land to meet current and future demand for industrial growth, consistent with Pukekohe-Paerata Structure Plan 2019, whilst avoiding, remedying or mitigating adverse effects on the environment.
159. Council’s specialists’ opinions are summarised in the following sections of this report. While most of council’s specialists support the proposed rezoning in their reports, council’s Economics, Development Engineering, and Transport specialists raise concerns about rezoning without infrastructure provision and timing being resolved.
160. The effects of rezoning on 1173 Paerata Road and other properties on the eastern side of Paerata Road are raised in Submission **6.4 (Gerald Baptist)**, with a buffer between the plan

change land and houses sought. The existing provisions of the Business-Light Industry Zone require development adjacent to open space zones, residential zones and some special purpose zones to manage adverse amenity effects on those zones. While in residential use however, the submitter's site at 1173 Paerata Road on the eastern side of SH22, across the road from the plan change land is also zoned Future Urban Zone (which is not a residential zone) under the AUP. Number 1173 Paerata Road is part of Area D West in the Pukekohe-Paerata Structure Plan 2019. SH22 separates Structure Plan Areas D and E in this location, and the proposed future zoning of 1173 Paerata Road shown in the Pukekohe-Paerata Structure Plan 2019 is also Business- Light Industry Zone.

161. The plan change land and the submitter's site are therefore both currently subject to the existing provisions of the Future Urban Zone. Both the Future Urban Zone and the Business-Light Industry Zone contain standards relating to signage, lighting, noise and vibration to protect other property in AUP chapters E25, E26, and E27. Visual effects experienced from 1173 Paerata Road are addressed in council's specialist's report relating to Landscape and Visual Amenity Effects- appended to this report as **Attachment 3**. Council's landscape specialist considers that adverse visual effects experienced from 1173 Paerata Road will be low-moderate, and that no modifications to the plan change are required in relation to that interface. I therefore consider that no additional buffer controls are required to the interface of the plan change land with 1173 Paerata Road, across SH22 from the plan change land.
162. I support the proposed rezoning of the plan change land to Business - Light Industry. The rezoning would provide for light industrial business land in an area that has been generally identified for such development, and part of the plan change land is already being used for such activities. It would complement other growth within the wider Pukekohe area and is accordingly generally consistent with the Pukekohe-Paerata Structure Plan 2019.
163. As discussed in the following sections of this report, I do however recommend amendments in the form of proposed precinct provisions and precinct plans in **Attachment 8**. These provisions are in addition to imposition of the Business – Light Industry AUP zone provisions. The precinct provisions relate to:
- Water supply and wastewater infrastructure provision and timing,
 - Transport infrastructure provision and timing
 - The interface of the plan change land with Heights Park Cemetery

9.2 Topic: Mana Whenua Values

Key Issues

164. This section addresses mana whenua values, degree of mana whenua engagement by the applicant, and mana whenua input to the plan change.

Applicant's Assessment of Effects

165. Section 3.7 of the AEE states that the plan change land is not identified as being subject to any sites of significance to mana whenua or historic heritage places or extents of places under the AUP. In addition, no cultural heritage items are identified on the plan change land on the Cultural Heritage Inventory, with the nearest being the Heights Park Cemetery (ID: 19278).
166. Section 3.7 of the AEE states that the wider Pukekohe area is identified by Ngāti Tamaoho as an area with historically fertile soil, important pa and strategic maunga which all contributed to the settlement of the area. Prominent settlement, including Pukekohekohe housed prominent tupuna from Ngāti Tamaoho history.
167. Section 6.1 of the AEE comments that a May 2023 cultural report by Ngāti Tamaoho which was lodged with the plan change (Appendix 13) emphasised the necessity to retroactively improve the stormwater system for the entire site to protect waterways. The report listed cultural and sustainable recommendations and requirements relating to water tanks for the reuse of rainwater off roofs, accidental discovery protocols, sediment and silt controls, and planting palette. In section 6.1 of the AEE, the applicant advises that they provided a revised Stormwater Management Plan to Ngāti Tamaoho for comment in July 2024.
168. Section 10.9 of the AEE states that overall, the plan change is broadly aligned with the aspirations, cultural and kaitiaki values of Ngāti Tamaoho, and that in addition, engagement was undertaken with local mana whenua as part of the development of the Pukekohe – Paerata Structure Plan. The AEE states that overall, any adverse effects on mana whenua values from the plan change will be avoided, remedied and mitigated, and there will be positive effects associated with application of SMAF-1 to the plan change land.
169. Section 11.2 of the AEE provides an assessment against Part 2 of the RMA.
170. Appendix 12 of the PC110 AEE provides a summary of the iwi consultation that has been conducted by the applicant. The following iwi groups were sent a memo describing the plan change and Indicative Masterplan, setting out the potential effects of the proposal, and offering a site meeting: Ngāi Tai Ki Tāmaki, Ngāti Maru, Ngāti Tamaoho, Ngāti Te Ata, Te Ahiwaru Waiohū, Te Ākitai Waiohū, and Waikato-Tainui. A cultural report was prepared by Ngāti Tamaoho in May 2023, and was lodged as Appendix 13 to PC110. Te Ahiwaru Waiohū advised that they supported submissions by Ngāti Tamaoho.

Submissions

171. Ngāti Te Ata have lodged submissions which relate to mana whenua iwi consultation and RMA alignment.
172. Mana Whenua iwi consultation:
- **Submission 2.1 (Ngāti Te Ata)** – Opposes the plan change – with the submission stating that Ngāti Te Ata have not been consulted regarding the application, and

little attempt at engagement was made by the applicant. Cultural values and environmental preferences of Ngāti Te Ata are unknown

- **Submission 2.2 (Ngāti Te Ata)** – Opposes the plan change. Ngāti Te Ata seek to be better informed during the course of the hearing
- **Submission 2.3 (Ngāti Te Ata)** - Opposes the plan change with the submission seeking that a comprehensive cultural impact assessment report (CIA) should be undertaken by Ngāti Te Ata
- **Submission 2.4 (Ngāti Te Ata)** - Opposes the plan change.- Ngāti Te Ata want further discussions so matters raised in their submission and cultural impact assessment report (CIA) are fully understood

173. RMA:

- **Submission 2.1 (Ngāti Te Ata)** - Opposes the plan change. Plan Change does not meet Resource Management Act Section 6(e), Section 7(1), Section 8 or Fourth Schedule Section 33(d).

Franklin Local Board views

174. The Franklin Local Board notes the opposition from Ngāti Te Ata and recommends that the applicants work with Iwi to address any cultural impact concerns.

Planning assessment

175. An important objective in part B.6 of the AUP's Regional Policy Statement is that the principles of the treaty of Waitangi / Te Tiriti o Waitangi are recognized through mana whenua participation in resource management processes. This in turn recognises mana whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga.

176. Through the development of the Pukekohe-Paerata Structure Plan, the council engaged with four iwi with mana whenua customary interests over the structure plan area, being Ngāi Tai Ki Tāmaki, Ngāti Tamaoho, Ngāti Te Ata and Te Ākitai Waiohū. Huakina Development Trust was also involved with this engagement. The subject land is within a Ngāti Tamaoho Whangapouri Statutory Acknowledgement area.

177. Ultimately, mana whenua values, mātauranga and tikanga need to be properly reflected and accorded sufficient weight in resource management decision making. An applicant should engage with iwi authorities in preparing a private plan change request, as matter of best practice. It is also best practice for an applicant to document changes to the private plan change request and / or supporting technical information arising from iwi engagement.

178. Appendix 12 of the PC110 AEE provides a summary of the consultation that has been conducted by the applicant.

179. I note that the May 2023 cultural report by Ngāti Tamaoho emphasised the necessity to retroactively improve the stormwater system for the entire site to protect waterways, and

that the recommendations and requirements in that report are matters that would need to be considered at the resource consent stage.

180. A 21 July 2025 letter addressed to council from Ngāti Te Ata has been forwarded by the applicant in which Ngāti Te Ata advise that since lodging their submission they have engaged constructively with the applicant, including undertaking a site visit, providing a CIA and having further discussions and correspondence regarding the matters raised in the CIA and that they have reached agreement on how these can be addressed in the future (i.e. at the resource consent stage). Consequently Ngāti Te Ata advise that the concerns raised in their submission have been addressed and that they no longer request to be heard at the hearing. This letter is attached to this report as **Attachment 6A**.
181. With respect to Ngāti Te Ata's submission, I expect that further comment and clarification can be provided by the applicant in hearing evidence and potentially also by Ngāti Te Ata, should they choose to appear at the hearing.

9.3 Topic: Terrestrial Ecological Effects

Key Issues

182. This section addresses ecological effects of PC110.

Applicant's Assessment of Effects

183. Section 10.6 of the AEE addresses ecological effects) of PC110. An ecological assessment has been submitted with the application: Appendix 9: "9, 33 and 49 Heights Road, Pukekohe, Auckland: ecological values" RMA Ecology Ltd 31 July 2024.
184. The applicant's Ecology report finds that the plan change is of low to nil ecological value as it lacks the habitat features to support indigenous species. There are no streams or wetlands on the plan change land. Whilst the rear of 49 Heights Road supports an overland flow path, this does not exhibit characteristics consistent with AUP definition of a stream.
185. Section 3.2 of the AEE states that the plan change land supports 15 retained native trees on Heights Road within a ridge between driveway accessways. Section 10.6 of the AEE notes that "Recently, several mature trees and low shrub and garden vegetation was removed from the western portion of the PPC land (both permitted and/or authorised works), which has removed remnant low habitat area. A stand of some 15 trees remains." Other than those trees, the AEE states that there is no native vegetation on the plan change land, and no habitat for lizards, birds and bats. A bat survey was undertaken which confirmed there were no bats present on the plan change land.
186. Section 10.6 of the AEE concludes that, overall, the Ecology report finds that the removal of all vegetation would have:
- Nil effects on wetlands, streams and indigenous vegetation; and

- Nil or very low effect on bat habitat, lizard habitat and native bird resources.

and, “Based on this assessment, the effects of the plan change on ecology values, particularly on streams, wetlands, indigenous flora and fauna and their habitats, are considered to be avoided, remedied or mitigated.”

Submissions

187. No ecological issues were raised in submissions.

Franklin Local Board Views

188. No local board views relate directly to ecological matters.

Council specialist’s comments

189. Ms Sanaz Safavian, Ecologist, Ecological Advice, Environmental Services, Auckland Council, has prepared a technical memo on behalf of council covering her assessment of the notified documents, response to relevant submissions and recommendations: “Heights Road, Pukekohe – Private Plan Change request – Ecology” 22 July 2025 (see **Attachment 3**).

190. Ms Safavian identifies the key terrestrial ecological issues in PC110 as:

- Clearance of habitat previously occupied by copper skinks, and lack of proposed mitigation for habitat loss and translocation
- Potential adverse effects on bat habitat following vegetation clearance
- Absence of significant ecological constraints for rezoning following updated surveys

191. Ms Safavian has reviewed the applicant’s ecological assessment. She notes that the ecological values were appropriately described, and generally agrees with the findings of the ecological assessment, noting that the presence of bats was ruled out based on formal survey results. She remains concerned about the removal of copper skinks and their habitat without mitigation or follow-up management, and considers that the presence of additional copper skinks cannot be ruled out. Skink protection typically occurs at the resource consent stage where relevant AUP rules are triggered, or through adherence to the Wildlife Act 1953, even if no consent is required under the AUP.

192. Ms Safavian concludes that:

- There are no residual ecological effects that would prevent the rezoning of the site from Future Urban Zone to Light Industry Zone.
- Clearance of lizard habitat remains a minor outstanding matter and that if this plan change proceeds, any future vegetation clearance should be subject to ecological oversight, including the preparation of a Lizard Management Plan (LMP), to address the potential ongoing presence of copper skinks.
- Any restoration or planting associated with future development should incorporate features suitable for copper skinks to support long-term habitat provision.

- She supports PC110 from an ecological perspective and recommends no amendments to the plan change itself from an ecological standpoint.

Planning assessment

193. I note Ms Safavian’s advice that even where resource consent is not required, fauna protection obligations under the Wildlife Act 1953 still apply, and any handling or relocation of protected species (including indigenous lizards) requires approval from DOC. This would address the potential ongoing presence of copper skinks.
194. I rely on the expert opinion of Ms Safavian making my planning assessment in relation to ecology, and agree that there are no residual ecological effects that would prevent the rezoning of the site from Future Urban Zone to Light Industry Zone.

9.4 Topic: Geotechnical Effects

Key Issues

195. This section addresses the extent to which the PC110 plan change land is subject to land instability and other geotechnical hazards and whether it is suitable for the proposed urban light industrial uses in that context. The geotechnical hazards considered are:
- Slope instability
 - Consolidation settlement
 - Ground rupture by faulting
 - Liquefaction and lateral spreading
 - Soil erosion

Submissions

196. No submissions views relate directly to geotechnical matters.

Franklin Local Board views

197. No local board views relate directly to geotechnical matters.

Applicant’s Assessment of Effects

198. Geotechnical effects are addressed in Section 10.3 of the AEE which refers to the applicant’s geotechnical assessment: Appendix 6 “Geotechnical Investigation 9, 33 and 49 Heights Road, Pukekohe, Auckland” Project Number 21253.000.001 report by ENGEO Limited dated 23 June 2023. Appendix 3, Woods Limited’s “Indicative Masterplans” drawing numbers P18-188-UD101 to P18-188-UD104 dated 29 June 2023 is also relevant.
199. The applicant’s geotechnical assessment finds that the land is generally suitable for light industrial activities, noting that:

- The site is not subject to global instability as the naturally occurring slopes are generally flatter than 10 degrees. However, there are areas of localised instability due to over-steepened banks, which would need to be assessed by future land development;
- The soils observed on the site are stiff to very stiff cohesive soils that are unlikely to be susceptible to consolidation settlements under lightweight industrial building loads;
- There are no active faults mapped within the site or immediate surrounds, so the risk of ground rupture associated with faulting is assessed to be negligible;
- A low to moderate risk of liquefaction may be expected due to the geological setting which includes cohesive volcanic soils which are not normally subject to liquefaction, underlain by young alluvial deposits which may liquefy under seismic loads. These risks can be managed by conventional mitigation measures such as limiting foundation embedment depths; and
- No obvious soil scouring at overland flow paths was observed, however evidence for uncontrolled surface water overtopping banks was observed. Civil design should take into account the potential scouring and soil erosion effects associated with concentrations of surface waters in high rainfall events.

200. The AEE discusses AUP Chapters E38 Subdivision – Urban, E12 Land Disturbance and E36 Natural Hazards in relation to land stability at the subdivision and land development stages, and considers that the AUP framework is sufficient to manage potential adverse geotechnical effects on the site and surrounding land. The AEE notes that further assessment of detailed structural design of buildings in relation to the ground conditions will be required through future building consent processes.

Submissions

201. No submissions relate specifically to geotechnical effects.

Council specialist's comments

202. Ms Nicole Li, Geotechnical Practice Lead, Engineering, Assets and Technical Advisory, Resilience and Infrastructure, Auckland Council, has prepared a technical memo on behalf of council covering her assessment of the notified documents, response to relevant submissions and recommendations: “Geotechnical review of Private Plan Change Application 110 at 9, 33 and 49 Heights Road, Pukekohe, Auckland” 30 June 2025 (see **Attachment 3**).

203. Ms Li concludes that at the plan change stage it is appropriate to comment on the suitability of the land for rezoning. She considers that the plan change land is suitable from the geotechnical perspective to support the proposed private plan change, provided that detailed assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate methodologies are submitted for proposed works once the scope is decided. Ms Li considers that the resource consent stage

is the most appropriate time to assess the specific geotechnical issues on the site, and that inputs from council geotechnical specialists will be required at the future resource and building consent stages.

Planning assessment

204. I rely on the expert opinion of Ms Li in making my planning assessment. Therefore in my opinion the extent of any geotechnical risk is low enough that the proposed Business - Light Industry zoning of the plan change land is appropriate, and any potential adverse geotechnical effects can be avoided, remediated, or mitigated at the time of subdivision, resource consent, or building consent.

9.5 Topic: Contaminated Land Effects

Key Issues

205. This section addresses the extent to which the PC110 plan change land is subject to land contamination issues and whether it is suitable for the proposed urban light industrial uses in that context. Part of the plan change land has a history of industrial use, and the remainder of the land has been used for rural activities.

Applicant's Assessment of Effects

206. Contaminated land effects are addressed in Section 3.3 of the AEE which refers to the applicant's contaminated land assessment: Appendix 7: "Preliminary Environmental Site Investigation 9, 33 and 49 Heights Road, Pukekohe, Auckland" Project Number 21253.000.001, report by ENGEO Limited dated 23 June 2023.
207. A Preliminary Site investigation (PSI) report has been, undertaken, the main objective of which was to identify the main actual or potential contamination issues within the project site and confirm whether the plan change area is suitable or can be made suitable for the proposed land use. The PSI report has identified the following current and past historical Hazardous Activities and Industries list (HAIL) activities with a potential for site contamination:
- HAIL (A 10) – historical horticultural purposes across the northern part of the site Persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds.
 - HAIL Item (A17) presence of a 10,000L UST at 9 Heights Road, as well as activities associated with a tractor maintenance and repair centre.
 - HAIL (D5)- An engineering firm is present on-site, as well as the Totalspan Steel Building site.

- HAIL (F5)- tractor maintenance and repair centre, and an automotive parts shop have been identified as present on-site.
- HAIL(I)- potential for contamination associated with lead-based paints and / or asbestos in former and current buildings and stormwater network.
- HAIL (G5)- fill material on site

208. While no detailed site investigation has been completed, the presence of contamination hotspots is anticipated, and therefore the report recommends that further intrusive environmental investigation will be required prior to the future subdivision and development of the project site.

Submissions

209. No submissions views relate directly to contaminated land matters.

Franklin Local Board views

210. No local board views relate directly to contaminated land matters.

Council specialist's comments

211. Mr Ruben Naidoo, Specialist, Contamination Air Noise, Planning and Resource Consents, Auckland Council, has prepared a technical memo on behalf of council covering his assessment of the notified documents (including the contaminated land and geotechnical reports), response to relevant submissions and recommendations: "Private Plan Change 110 – 9, 33 and 49 Heights Road Pukekohe: Contamination Assessment (D.002328.01)" 11 July 2025 (see **Attachment 3**).

212. Mr Naidoo considers the documentation submitted in support of PC110 to be sufficient to identify the relevant potential effects of the implementation of PC110 on human health and the environment. He considers that the applicant's Preliminary Site Investigation Report and Geotechnical Report provided adequate description of the potential contamination issues and relevant risks. He comments that there appear to be no significant issues of concern with regards to contamination within the project area, that would affect the plan change.

213. From the perspective of the inferred contamination status of the project site and the potential adverse effects on human health and the environment, Mr Naidoo recommends that the proposed plan change be supported, subject to the following recommended actions to be taken prior to any future change of use, subdivisions and land-disturbance activities associated with the land development:

- Undertaking a detailed site investigation within the plan change land (9, 33 and 49 Heights Road, Pukekohe) to identify the potential risks to human health and the

environment, and enable to determine the relevant mitigation options (remediation or management of contaminated soil)

- Undertaking targeted remediation or implementing the long-term management of those selected areas, where soil contamination in concentrations exceeding the relevant Soil Contaminant Standards for protection of human health and/or environmental guidelines for protection of the receiving environment has been confirmed to be present.

Planning assessment

214. I rely on the expert opinion of Mr Naidoo in making my planning assessment. Given that Mr Naidoo concurs with the conclusions of the AEE and contamination report, it is considered that any potential risk to human health and the environment can be appropriately managed. The AUP requirements for the plan change area to demonstrate compliance at the time of future land use change, subdivision, or the consenting stage will avoid, remedy, or mitigate any potential adverse contaminated land effects.

9.6 Topic: Parks and Open Space Effects

Key Issues

215. This section addresses whether PC110 plan triggers requirements relating to parks and open space.
216. The council's Heights Park Cemetery borders the plan change land to its west and south. The cemetery is zoned Special Purpose - Cemetery Zone. Potential noise and vibration effects on the cemetery are also considered.

Applicant's Assessment of Effects

217. Section 5.3.3 of the AEE notes that there are no parks or paths identified on the plan change land in the Pukekohe Paerata Structure Plan. Section 5.3.3 of the AEE also notes that a watercourse on the plan change land was piped in the 1980s and no longer exists.
218. Section 6.4.2 of the AEE states that a meeting was held with Council's Cemetery Services in respect of the interface between the plan change land and Heights Park Cemetery, and that Cemetery Services' sole concern was the potential noise and vibration from future industrial activities on the plan change land. In response to those concerns, the AEE notes:
- Future industrial activities are anticipated to be warehousing and servicing of agricultural machinery, rather than heavy manufacturing or similar activities that may generate significant noise and vibration. This is in line with the Business – Light Industry Zone purpose and permitted activities; and
 - Any future buildings that establish on or near the boundary with Heights Park Cemetery are likely to face away from the cemetery, with noise directed across the plan change land rather than the cemetery site.

- The plan change is in line with the Pukekohe-Paerata Structure Plan which anticipates Business – Light Industry Zoning for the land. The Indicative Masterplan also demonstrates a form of development that will adequately address concerns raised by Cemetery Services.

Submissions

219. **Submission 1.2 – (Peter Fa’afiu)** provide sufficient buffer to cemetery

Franklin Local Board views

220. The Franklin Local Board suggests that in considering the plan change, that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer, noting that in the future, for those working at this site, accessing the Heights Road Cemetery or moving through the area should be enabled to walk, cycle and access public transport.

Council specialist’s comments

Auckland Council Parks Planning

221. Mr Daniel Kinnoch, Resource Management Planner, CoLab Planning, has prepared a technical memo on behalf of council’s Parks Planning team, covering his assessment of the notified documents, response to relevant submissions and recommendations: “Technical Expert S.42A Memo for Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe” 6 July 2025 (see **Attachment 3**).
222. His assessment relates to:
- Zoning Consistency – the sites proposed for rezoning align with the Pukekohe Paerata Structure Plan’s designation for Business - Light Industry Zone.
 - Riparian buffer - the Pukekohe Paerata Structure Plan shows a 20 metre riparian buffer on the site, but the applicant’s assessment indicates that no stream exists on this site. Mr Kinnoch therefore does not see that there would be any future esplanade reserve requirements in this location, and has no further comment in that regard.
 - Open Space requirement – Mr Kinnoch advises that there is no envisaged requirement for open space in the area of the plan change.
223. Mr Kinnoch notes that no matters have been raised in submissions which necessitate Parks Planning input. Mr Kinnoch notes the Franklin Local Board’s suggestions that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer. While this is outside the direct scope for Parks Planning, Mr Kinnoch supports initiatives that improve connectivity and access to public spaces.
224. Mr Kinnoch concludes that overall the plan change does not raise significant concerns from a parks and open space perspective.

225. Mr Kinnoch notes that the plan change land adjoins the Heights Park Cemetery. He notes that it is not his purview to comment on potential effects on the cemetery, as cemeteries function under council's Regional Operations.

Cemetery Services

226. Ms Nikki Nelson, Manager Cemetery Services, Auckland Council, has provided an email dated 17 July 2025 [see **Attachment 3**], stating that,

"The site adjoins Heights Park Cemetery. Nikki Nelson, Manager Cemetery Services, has noted that reverse sensitivity around cemetery use and development is a concern with development adjoining cemetery land. Council has a legal obligation to ensure there is suitable provision of cemetery land for the burial of bodies under the Burial and Cremation Act 1964. Cemetery Services would like to ensure there is a suitably dense buffer along the boundary of the development to create a respectful visual and acoustic barrier that maintains the cemetery's peaceful atmosphere is essential. Planting along the cemetery boundaries in particular needs to be selected mindfully as big trees with expansive root systems can over time encroach on graves, damage concrete burial beams, and damage headstones."

Planning assessment

227. I rely on the expert opinion of Mr Kinnoch in making my planning assessment in relation to Parks Planning, and agree that the plan change does not raise significant concerns from a parks and open space perspective, excluding potential effects on the Heights Road Cemetery.
228. With respect to Ms Nelson's comments about acoustic barriers, I note that Rule E25.6.12 of AUP Chapter E25 Noise and vibration already exists to specifically control noise levels in the Special Purpose – Cemetery Zone. Ms Nelson's comments are also considered in my assessment in relation to landscape and visual effects (Section 9.7) of this report).

9.7 Topic: Landscape and Visual Amenity Effects

Key Issues

229. This section addresses landscape and visual effects resulting from the rezoning of the plan change land. The plan change land is already partially developed with business activities.

Applicant's Assessment of Effects

230. Section 10.7 of the AEE addresses landscape and visual effects. A Landscape and Visual Effects Assessment has been submitted with the application: Appendix 10: "Assessment of Landscape and Visual Effects" LA4 Landscape Architects 14 February 2023. The Landscape and Visual Effects Assessment has relied on the provisions of the Business - Light Industry Zone as a basis for understanding the potential landscape character and visual effects arising from PC110.

231. The Landscape and Visual Effects Assessment assesses the plan change topography as having a south easterly slope from Heights Road, and containing a number of commercial activities supported by large storage yards, access drives and manoeuvring areas, as well as a two-storey dwelling located at 49 Heights Road with vegetated and grassed grounds.
232. The Landscape and Visual Effects Assessment reports the surrounding environment as a mix of activities including rural lifestyle and commercial and glasshouse type horticulture, as well as infrastructural elements including the North Island Main Trunk railway, the Glenbrook railway branch line and SH22. The Heights Park Cemetery is described as located immediately to the south and west of the plan change land (primarily adjoining 49 Heights Road) and containing burial plots, gardens, toilets, access drive and car parking areas. The cemetery is described as characterised by a large number of mature tree plantings located throughout the gardens.
233. Landscape Character effects are summarised in Section 10.7.1 of the AEE, with the Landscape and Visual Effects Assessment described as finding that the plan change land and surrounds exhibit relatively low landscape values and sensitivity due to the plan change land being highly modified and lacking any significant landscape and natural character values. Short term effects associated with earthworks and construction activities would be for a brief duration. Section 10.7.1 of the AEE also notes that whilst the receiving environment currently comprises rural-residential activities, the plan change land and land to the south and west is anticipated to be urbanised under the AUP and Pukekohe Paerata Structure Plan. It is noted that the plan change land sits within a natural basin and therefore any future development on the plan change land undertaken in accordance with the Business - Light Industry Zone will sit within the plan change land and not be prominent when viewed amongst the landscaped context of the wider area.
234. Visual effects are summarised in Section 10.7.2 of the AEE. The Landscape and Visual Effects Assessment has assessed the potential development of the plan change land as enabled by the plan change provision and depicted by the Indicative Masterplan. Five viewpoints are selected and discussed in the Landscape and Visual Effects Assessment:
- Viewpoints 1 and 2 represent views from motorists using Paerata Road towards the plan change land. The visual effects of PC110 are considered to be low, given the prominence of existing business activities located within the plan change land, the utilitarian characteristics of the road network, the presence of high traffic volumes, and the nature of road users not being particularly sensitive to future development as they have only fleeting views of the plan change land;
 - Viewpoint 3 is from a private property at 1173 Paerata Road, to the southeast of the plan change land. The visual effects of PC110 from this viewpoint are considered to be low, given the existing environment is already characterised by commercial activities and roading and rail infrastructure, and the majority of built development would be largely screened by landform and vegetation;

- Viewpoint 4 represents views from Heights Road looking in an easterly direction towards the plan change land and encompasses the recently established shed towards the north of the plan change land, storage sheds, the NIMT railway line and embankment, rural properties beyond that, and a portion of the Heights Park Cemetery site. The visual effects of PC110 from Viewpoint 4 are considered to be below-moderate. Whilst the road provides a large viewing audience, road users are unlikely to be sensitive to the effects of future development, as they have only fleeting views of portions of the plan change land. Future built elements within the plan change land will sit at a lower elevation to Heights Road, and the Business Light Industry Zone requires a two metre front yard planted with a mixture of trees, shrubs or ground cover plants, which will assist to soften and partially screen the development and;
- Viewpoint 5 represents views from the Heights Park Cemetery immediately south of the plan change land at 9 Heights Road and encompasses several built elements within the plan change land, including buildings, retaining walls, earthworked building platform, manoeuvring areas and storage yards. The visual effects of PC110 are considered to be low-moderate. Whilst the outlook from this plan change land would change noticeably from a partially developed site to a comprehensive build-out, this is not totally unexpected within the planning context of the area by the AUP and Pukekohe Paerata Structure Plan, and adverse visual effects will be partially screened by mature plantings within the cemetery grounds. Sightlines to the plan change land will be limited due to the lower elevation of the plan change land in relation to the cemetery.

235. Section 10.7.2 of the AEE elaborates on Viewpoints 4 and 5 where effects in the Landscape and Visual Effects Assessment have been assessed as low-moderate:

- In respect of Viewpoint 4, whilst the current environment includes a peri-urban backdrop that includes rural-residential activities with large, landscaped areas, the future receiving environment will be that of a light industrial area. Within this context, light industrial development within the plan change land as enabled by the Business Light Industry Zone will appear to be relatively unobtrusive, particularly when combined with front yard landscaping to soften the effects of built and paved elements on the plan change land.
- In respect of Viewpoint 5, the Indicative Masterplan demonstrates that the establishment of a building alongside the southern site boundary with the cemetery could occur, which would partially screen views from the carparking area, gravestones, and footpaths within the cemetery. When combined with the existing mature plantings on the cemetery site, the adverse visual effects of the plan change on users of the cemetery site are likely to be significantly softened and screened by these features. Section 6.4 of the Landscape and Visual Effects Assessment is referred to, stating that the plan change has been discussed with Council's Cemetery Services team, who did not express any fundamental concerns regarding the visual effects of future development on the plan change land.

236. Section 10.7 of the AEE concludes that from a planning perspective, any visual changes are considered to be acceptable within the context of the changing environment from rural to urban as anticipated by the Future Urban zoning, Pukekohe Paerata Structure Plan and other strategic planning documents. It concludes that overall the adverse landscape and visual effects will be avoided, remedied and mitigated.

Submissions

237. **Submission 1.2 – (Peter Fa’afiu)** provide sufficient buffer to cemetery
238. **Submission 6.4 – (Gerald Baptist)** Decline the plan change, but if approved, make amendments requested. Rezoning from Future Urban to Light Industry is questioned. Wants urban environmental standards to apply to 1173 Paerata Road and other properties on eastern side of State Highway 22. Wants buffer between plan change site and housing.

Franklin Local Board views

239. The Franklin Local Board does not share the concerns expressed by an adjacent property owner [inferred that this comment relates to Submission 6.4 (Gerald Baptist)] and considers the land appropriate for light industrial use, noting it was zoned in the Pukekohe Structure Plan.

Council specialist’s comments

Landscape and Visual Effects

240. Ms Rebecca Skidmore, from R. A. Skidmore Urban Design Limited has prepared a technical memo on behalf of council covering her assessment of the notified documents, response to relevant submissions and recommendations: “Peer Review Comments Proposed private plan change for land at 9, 33 and 49 Heights Road, Pukekohe” 23 July 2025 (see **Attachment 3**).
241. Ms Skidmore generally agrees with the assessment provided in the PC110 application, apart from an outstanding matter relating to visual effects experienced by users of the adjacent Heights Park Cemetery.
242. Ms Skidmore notes that while the Indicative Masterplan imagery is helpful to demonstrate how a development scenario could be accommodated on the site in accordance with Business – Light Industry zone provisions, it is just one possible outcome, so her review has been guided by the range of activities and scale of development that can be achieved within the parameters enabled by the zone.
243. Ms Skidmore considers that the applicant’s Landscape and Visual Effects Assessment sets out a suitably detailed assessment with appropriate methodology. In relation to Landscape Character effects, she agrees that development in accordance with the proposed Business – Light Industry zoning would result in low adverse landscape character effects.

Visual Effects

244. In relation to Visual Effects, Ms Skidmore agrees with the Landscape and Visual Effects Assessment's identification of the viewing audience. She notes however that:

- the zone could accommodate buildings with considerably greater prominence than the recently constructed building at the front of 33 Heights Road;
- for Viewpoint 3 (1173 Paerata Road) the adverse effects could be low-moderate (depending on the development scenario) rather than low as assessed in the applicant's Landscape and Visual Effects Assessment. **Submission 6.4 – (Gerald Baptist)** relates to this property.
- With respect to the Cemetery Interface:
 - for Viewpoint 5 (views from the Heights Park Cemetery immediately south of the plan change land at 9 Heights Road), the applicant's Landscape and Visual Effects Assessment finds, overall, that for this viewing audience the adverse visual effects will be 'low-moderate with views from large parts of the cemetery screened or filtered by the mature tree plantings'.
 - Ms Skidmore, having revisited the plan change land in July 2025, notes that since the applicant's Landscape and Visual Effects Assessment was prepared, there has been clearance of a large amount of vegetation within the plan change area adjoining the cemetery. She states (in 3.15 of her report) that, "In addition to the large, deciduous, mature trees, it was the evergreen and lower, dense vegetation that provided effective visual screening, particularly along the main entrance in to the cemetery and the area of plots adjacent to the PPC boundary. There are now very open views into the PPC area." [see photos in Ms Skidmore's report].
 - Ms Skidmore therefore does not consider that the applicant's landscape report confirms a significant buffer between the plan change land and the cemetery as suggested in **Submission 1.2 – (Peter Fa'afiu)**.
- Ms Skidmore notes that the Business-Light Industry zone includes a number of controls for buildings that adjoin a more sensitive zone, but that these controls do not apply to the Special Purpose – Cemetery zone. She notes that 20 metre high buildings are a permitted activity on Business-Light Industry zone sites which have boundaries with the Special Purpose – Cemetery zone. Ms Skidmore notes that this could result in moderate-high adverse visual effects in relation to viewers visiting the adjacent cemetery.
- To reduce adverse visual effects to a low-moderate level for those using the neighbouring cemetery, Ms Skidmore considers that it would be appropriate to apply the controls that apply in the Business-Light Industry zone when it adjoins a more sensitive zone (including residential, open space, Special Purpose – Māori Purpose

and Special Purpose School zones). These controls relate to height in relation to boundary and yard controls, including landscape requirements for side and rear yards.

245. Ms Skidmore agrees with the overall conclusion of the applicant's Landscape and Visual Effects Assessment that, while the proposed zoning will enable development that may result in significant visual change, that change is anticipated and in accordance with the change indicated by the Future Urban Zone and the Pukekohe Paerata Structure Plan. She agrees that, in terms of landscape values, the proposed zone change is appropriate in relation to the plan change land's current character and its surrounding context.

Planning assessment

246. Ms Nikki Nelson, Manager Cemetery Services, Auckland Council, has provided an email dated 17 July 2025 see (see **Attachment 3**), stating that Cemetery Services would like to ensure there is a suitably dense buffer along the boundary of the development to create a respectful visual and acoustic barrier that maintains the cemetery's peaceful atmosphere.
247. Ms Nelson's comments are also considered in my assessment in relation to Parks and Open Space Effects (Section 9.6) of this report.
248. I rely on the expert opinions of Ms Skidmore and Ms Nelson in making my planning assessment.
249. Ms Skidmore's comments take into account that some vegetation on the plan change land has been removed since the application was lodged.
250. I agree with Ms Skidmore that the cemetery interface is sensitive to visual effects and in order to reduce adverse visual effects to a low-moderate level for those using the neighbouring Heights Park Cemetery, it would be appropriate to apply the controls that apply in the Business-Light Industry zone when it adjoins a more sensitive zone (including residential, open space, Special Purpose – Māori Purpose and Special Purpose School zones). These controls relate to height in relation to boundary and yard controls, including landscape requirements for side and rear yards.
251. I consider that this should be done through the imposition of these provisions in precinct controls (as set out in **Attachment 8** to this report), with the interface standards from the Business- Light Industry Zone incorporated as standards in the precinct, with a cross reference to the existing Assessment Criteria in the Business- Light Industry Zone.

9.8 Topic: Economic Effects

Key Issues

252. The Pukekohe-Paerata Structure Plan 2019 proposes approximately 95ha (net developable) of land to be zoned Light Industry, including the 5.35ha plan change land. In the Pukekohe-

Paerata Structure Plan 2019, the plan change land is noted as an existing land use more suited to the Light Industry zone.

Applicant's Assessment of Effects

253. Economic effects are addressed in section 10.8 of the AEE which refers to the applicant's economics land assessment: Appendix 11 "Economics Assessment of Proposed Industrial Plan Change in Pukekohe, Prepared for GBar" report by Insight Economics dated 29 August 2024.
254. The applicant's economics report finds there is significant demand and need for industrial land within Pukekohe and Paerata. The report also finds that there is significant market demand from industrial occupiers, particularly for warehousing to support online retailing and distribution, and demand from industrial investors.
255. The applicant's economics report finds that the plan change land is a good fit with industrial site and location criteria set out in the Pukekohe Paerata Structure Plan 2019, having:
- access to major transport routes, being SH22 and SH1,
 - a relatively large contiguous site with the ability to buffer adverse effects to minimise reverse sensitivity,
 - visibility from Paerata Road,
 - good proximity to planned public transport services (Paerata Rail Station),
 - relative closeness to ports (including Auckland Airport and Ports of Auckland),
 - relative closeness to other planned industrial land, workforce catchment and complementary business services and having access to the NIMT rail corridor.
256. The applicant's economics report identifies the likely economic effects of the proposal which are that it:
- meets short term need for additional supply to demand from occupiers and investors;
 - improves the responsiveness of land supply to growth in demand over time, thereby flattening the growth in industrial land prices, and helping to control the cost of goods and services;
 - provides for direct and indirect benefits to Gross Domestic Product (GDP), jobs and wages through planning, design, development and buildings construction, which are estimated to total \$20.6m in GDP and \$11m in wages;

- provides for ongoing employment, which is estimated to constitute permanent employment for 125 people, based on the average workplace ratio of 1 person per 100m² for South Auckland;
- higher and better use of land, thereby maximising economic efficiency; and
- requires the provision of infrastructure such as roads, water, wastewater and parks reserves. However, it is noted that all works within the plan change land will be the responsibility of the applicant, with the costs of works beyond the plan change land borne by the developer via development contributions levied on future industrial development infrastructure costs and risks to council are deemed negligible.

257. Section 10.8 of the AEE concludes that no adverse economic effects are anticipated, and overall the plan change will have positive effects, as the proposed rezoning meets short and long term demand for industrial activities, and provides economic benefits from employment during design, development and construction and from ongoing employment on the plan change land.

Submissions

258. Two submitters identify challenges associated with the timing of the proposed rezoning being in advance of the timing anticipated in the FDS:
259. **Submission 3.1 (Auckland Transport)** - Amendments requested. In absence of completion of private agreement and covenant with applicant and Auckland Transport, Heights Road frontage upgrades are sought as part of initial development of site to support safe and efficient connections for active modes.
260. **Submission 3.2 (Auckland Transport)** - Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time.
261. **Submission 3.3 (Auckland Transport)** - Where amendments are proposed, would consider alternative wording or amendments to like effect, which addresses the reasons for the submission. Also seeks any consequential amendments required to give effect to the amendments and decision requested.
262. **Submission 5.1 – (Watercare Services Limited)** - Plan change should be declined unless a new precinct is required [wording supplied] to manage development sequencing in the plan change area. Plan change is out of sequence with the timing for development set out in council's Future Development Strategy, and therefore out of sequence with Watercare's planned bulk wastewater infrastructure for the Pukekohe Northwest Future Urban Area.

263. **Submission 5.2 – (Watercare Services Limited)** - Decline the plan change, but if approved, make amendments requested. Subdivision and development should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development. Any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion of the Pukekohe North Wastewater Project.
264. **Submission 5.3 – (Watercare Services Limited)** - Decline the plan change, but if approved, make amendments requested. Generally not opposed to interim private onsite treatment and discharge for this area, provided the plan change area connects to Watercare's wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project.
265. **Submission 5.4 – (Watercare Services Limited)** - Decline the plan change, but if approved, connect the current private water supply and servicing for this area to Watercare's water supply network.

Franklin Local Board views

266. The Franklin Local Board support rezoning from Future Urban Zone to Business - Light Industry Zone on the basis that light industry is needed to support local jobs and economic development opportunity in the wider Pukekohe area i.e. so local people do not need to travel for employment.

Council specialist's comments

267. Mr Derek Foy, from Formative Limited has prepared a technical memo on behalf of council covering his assessment of the notified documents, response to relevant submissions and recommendations: "Technical Expert S.42A Report for Proposed Plan Change 110 – 9, 33 and 49 Heights Road Pukekohe" 11 July 2025 (see **Attachment 3**).
268. Mr Foy identifies the key economic issues as:
- i. Demand for industrial land
 - ii. Efficient land use
 - iii. Consistency with future anticipated land use and timing
 - iv. Infrastructure and servicing costs
 - v. Benefits of proposed zoning.
269. Mr Foy agrees with the applicant's economics report's assessment of:
- a) The site description and attributes, and indication of the potential development capacity of the plan change area.
 - b) The strategic and planning context.

- c) The current state of the industrial land market, being a market in which demand is high and current supply in and around Pukekohe is constrained. Mr Foy notes industrial land research updated to the second half of 2024 (post-dating the applicant's IEL report) indicates a continuation of low vacancy rates and high consent numbers, although slightly lower than in the previous year.
- d) The positive economic effects of the plan change request, including increasing industrial land supply and affordability, making efficient use of the plan change land, increasing employment, GDP and wages in Pukekohe in both the construction and operational phases,

270. Mr Foy considers that two matters in the applicant's economics report require further response and focuses on these:

- a) Timing of the proposed development in relation to that anticipated by the Future Development Strategy (FDS). Mr Foy considers that the challenge to infrastructure servicing may be more significant than the applicant's economics report anticipates, and identifies infrastructure matters insofar as they may be potential economics issue.
- b) Costs associated with providing infrastructure to service the plan change land. Mr Foy considers that given that the FDS does not envisage the plan change area to be development ready until 2040+, the applicant's economics report summary relating to infrastructure servicing is too simplistic. Mr Foy considers that there may be infrastructure-related reasons to have concern about the potential economic effects of the proposal, including in relation to both waters and transport infrastructure

271. Auckland Transport's submission points relating to Heights Road frontage upgrades are discussed by Mr Foy, who considers that if the required upgrades are privately funded, there would be no economic implications in relation to road infrastructure. However, without private funding, the out of sequence development of the plan change area would place some unanticipated (as to timing) funding burden on Auckland Transport, which Mr Foy considers would be a negative economic effect of the application, because it would require spending to be brought forward to achieve an appropriate standard of service.

272. Mr Foy also discusses Watercare's submission points, and notes the submission contains the following excerpt from the FDS, which well sums up the issues of out of sequence development from an economics perspective:

The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are

supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS. [FDS, Appendix 6, page 41]

273. Mr Foy notes that while ultimately the infrastructure servicing issues identified in the submissions of Watercare and Auckland Transport are matters that may be able to be resolved, from an economics perspective it is important that that resolution should be achieved in a manner that minimises or avoids unanticipated and out of sequence public expenditure on infrastructure, so as to minimise the adverse economic effects of the plan change request, including those identified in the applicant's economics report.
274. Mr Foy notes that the Franklin Local Board resolved to support the plan change request, including on the basis that local employment opportunities would result. Mr Foy agrees with the local board's observation on that matter, and notes that that benefit is also identified in the applicant's economics report, making employment provision a positive economic effect of the application.
275. Mr Foy concludes that he supports the application from an economics perspective, on the condition that infrastructure servicing concerns identified by Auckland Transport and Watercare are able to be resolved, and the plan change does not require unanticipated public expenditure on infrastructure to service the plan change area. He notes that he also defers to other infrastructure providers that may make recommendations at the hearing as to any other required infrastructure servicing or upgrades which may be recommended by them to enable PC110 to proceed, also so as to avoid unanticipated public expenditure on infrastructure to service the plan change area.

Planning assessment

276. I rely on the expert opinion of Mr Foy in making my planning assessment. Therefore I support the rezoning of the plan change land to Business – Light Industry zone from an economics perspective because it will have positive economic effects, including responding to the identified need for light industrial land in north western Pukekohe as identified in the Pukekohe-Paerata Structure Plan 2019, being an efficient land use, increasing industrial land supply and affordability, and increasing employment, GDP and wages in Pukekohe in both the construction and operational phases.
277. I agree with Mr Foy's opinion that unanticipated public expenditure on required infrastructure servicing or upgrades which may be recommended to enable PC110 to proceed could create adverse economic effects. I therefore recommend that site-specific provisions in the form of precinct provisions are required to address the costs and timing of future infrastructure servicing in order to avoid, remedy, or mitigate any potential adverse economic effects
278. Infrastructure timing and funding are discussed further in Section 9.12 of this report. Proposed precinct provisions are set out in **Attachment 8** to this report.

9.9 Topic: Stormwater and Flooding Effects

Key Issues

279. This section of the report addresses whether development enabled by PC110 can provide appropriate stormwater infrastructure and is susceptible to flood hazards or would exacerbate flood hazards elsewhere.

Applicant's Assessment of Effects

280. A Stormwater Management Plan (SMP) has been submitted with the application: Appendix 8: "Heights Road Plan Change 9, 33 and 49 Heights Road, Pukekohe, GBar Properties – Final Clause 23 Revision V7" Woods 27 November 2024. Further geotechnical investigations undertaken to confirm ground infiltration rates are attached as Appendix 6A to the application: "Site Soakage Testing 9, 33 and 49 Heights Road, Pukekohe, Auckland" ENGEO Limited, Project #21253.000.001_03, 9 June 2023.
281. Section 3.6.1 of the AEE advises that the plan change land is currently serviced by a private stormwater network located at the eastern portion of the plan change land. A piped private network collects runoff from impervious surfaces on the plan change land including buildings and hardstand areas, and discharges to the upper catchments of the Whangapouri Stream via a 600mm culvert beneath Paerata Road/SH22. The ultimate receiving environment is the Manukau Harbour.
282. The AEE lists the plan change land's stormwater consent history. Stormwater from the roof of the northern shed and associated hardstand area is treated by a recently established bio-retention raingarden device prior to discharge to the stormwater network. Stormwater flows from the roof are also mitigated through aboveground detention tanks located to the east of the building.
283. Section 4 2.2 of the AEE outlines the plan change proposal to extend the Stormwater Management Area – Flow 1 Control (SMAF -1) overlay across all of the plan change land extent to manage stormwater discharge from the plan change land through retention and detention. This approach is supported by the SMP, which recommends a flood storage option for the plan change land. The SMAF-1 overlay is subject to regional AUP rules.
284. Section 10.5 of the AEE addresses stormwater and flooding effects. The SMP addresses two possible scenarios – the first is retention of two existing consented buildings with development on the remainder of the plan change land. The second scenario enables full redevelopment of the plan change land. The indicative concept plan for future further industrial development of the land submitted with PC110 includes stormwater management devices (ponds). Water quality treatment is addressed in the SMP.
285. The plan change land contains a flood plain and overland flowpaths. Flood modelling has been undertaken for the plan change land and surrounding area and is addressed in the SMP. The model shows that there may be some surface flooding within accessways in the 100 year

event, but these can be resolved with detailed design in the future. Section 7.5 of the AEE concludes that overall the SMP confirms that there will be no flooding effects anticipated to arise on SH22 or any properties upstream or downstream of the plan change land as suitable flood attenuation devices can be accommodated within the plan change land extent to address the 10 year and 100 year Average Recovery Interval (ARI) storm events to existing peak flow rates.

Submissions

286. **Submission 1.1 – (Peter Fa’afiu)** Approve plan change without amendment as stormwater concerns have been resolved
287. **Submission 4.2 (NZTA)** No stormwater discharge to the state highway culverts, although it is noted that runoff cannot be avoided in some instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts.

Council specialist’s comments

288. Mr Sameer Vinnakota, Environmental Planner, Jacobs New Zealand, and Mr Jack Thompson, Senior Healthy Waters Specialist, Catchment Planning, Healthy Waters and Flood Resilience, Resilience and Infrastructure, Auckland Council, have prepared a technical memo on behalf of council covering their assessment of the notified documents, response to relevant submissions and recommendations: “Private Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe (PC110) Specialist Review (Stormwater and Flooding) on behalf of Auckland Council” 11 July 2025 (see **Attachment 3**).
289. Mr Vinnakota and Mr Thompson identify the following key stormwater issues:
- The applicant has indicated that they wish to continue to discharge both their existing and any new stormwater flows from the plan change area to a 600mm diameter culvert under State Highway 22, which is an asset owned by the New Zealand Transport Agency – Waka Kotahi. Additionally, the applicant has indicated that any future private drainage infrastructure within the plan change area is intended to remain in private ownership. As such, the stormwater discharge cannot be authorised under Auckland Council’s Regionwide Network Discharge Consent (NDC) and any subsequent development at resource consent stage will be subject to a private discharge consent under Chapter E8 of the AUP.
 - Parts of the plan change area are legally established within existing developed impervious areas, but details around the sizing or current performance of these devices have not been made available for the assessment of PC110. Additionally, the indicative masterplan (Appendix 3 Indicative Masterplan and Perspectives) shows that the existing stormwater management devices noted in the background consents are to be removed. This could compromise stormwater management for these existing impervious areas or fragment the management of stormwater across the entire plan

change area leading to a range of effects such as compromised water quality, increasing both onsite and downstream flood risk.

- Stream Hydrology and Erosion: The increase in impervious surfaces that PC110 enables will result in an increase in the peak flow rate and volume of stormwater discharging from the site. This has the potential to result in erosion in watercourses (particularly in the Whangapouri Catchment) if unmitigated.
 - Mr Thompson supports the applicant's approach for requiring further geotechnical testing and investigation at resource consent stage. He also supports the applicant's approach to observe the retention hierarchy. Mr Thompson considers this a reasonable approach to ensuring aquifer recharge and that base flows of streams are maintained
 - Mr Thompson also considers the application of SMAF-1 controls is appropriate to address the issue of exacerbating stream bank erosion.
- Water Quality: Runoff from new building and cladding materials as well as impervious surfaces can result in contaminants leaching into the receiving environment if unmitigated.
 - The applicant has demonstrated that adverse effects in relation to water quality can be mitigated.
 - As the new development or redevelopment of this plan change area will likely be greater than 5,000m² due to the overall site size and will therefore trigger a discretionary activity resource consent, council is not limited in its discretion when assessing adverse effects related to stormwater and flooding. As Council will not be limited to matters of discretion, requiring water quality treatment of stormwater runoff from all impervious surfaces can be considered at resource consent stage without the need for specific precinct provisions.
- 10% and 1% AEP Conveyance of Upstream Flows: The current private stormwater infrastructure does not have sufficient capacity to convey either primary or secondary flows from the catchment directly upstream of the plan change area. Allowing for an increase of impervious surface without ensuring secondary flows can be conveyed safely though the plan change area could result in onsite flooding within the plan change area.
- Onsite Flooding Risk: The existing 600mm diameter culvert underneath State Highway 22 is confirmed to have insufficient conveyance capacity for both the 10% AEP and the 1% AEP event . Due to this limitation, flooding can occur within the plan change area during storm events, as State Highway 22 is topographically higher and prevents runoff from escaping efficiently. Without mitigation, flood depths within the plan change area are likely to be 580mm during the 10% AEP event and 890mm for the 1% AEP event.
 - Mr Thompson is satisfied with the measures the applicant has undertaken to manage onsite flood risk.
 - Mr Vinnakota also notes that the plan change area is subject to the 1% AEP floodplain and overland flowpaths going through the plan change area as per Auckland Council GeoMaps. Chapter E36 of the AUP will therefore apply and

impose restrictions on development activities affecting overland flowpaths and the 1% AEP floodplains. PC110 is not proposing to override these provisions. There will be an opportunity at resource consent stage to assess detailed design.

- Recharging Aquifers: There are three underlying high use aquifers within the plan change area. Increasing impervious area will result in a change in the rate at which these aquifers recharge and will impact base flows of streams.

290. In relation to Submission 1.1, Mr Vinnakota and Mr Thompson agree that the stormwater management identified and demonstrated in the SMP is appropriate.

291. In relation to Submission 4.2, Mr Vinnakota agrees that the applicant has addressed NZTA's concerns.

292. Mr Vinnakota and Mr Thompson conclude that:

- PC 110 has sufficiently demonstrated that stormwater can be appropriately managed to ensure that stormwater discharge effects of future developments can be avoided or mitigated. The SMP has sufficiently demonstrated that based off a conceptual design in the Business – Light Industry Zone, water quality treatment can be achieved. In addition to this, the SMP also demonstrates that hydrological mitigation comprising retention (5mm runoff to be removed from the discharge through reuse and/or infiltration) and detention (discharge of the 95th percentile rainfall event over a 24-hour period) can be provided. Based off the conceptual design, the SMP has demonstrated that the two centralised wetlands can be sized to attenuate the 1% AEP flows with a climate change factor of 3.8 degrees.
- Future development of the plan change area will require a private stormwater discharge consent under Chapter E8 of the AUP to authorise their stormwater discharges and is likely to be a discretionary activity based on site size. The stormwater management measures can be finalised and reviewed at the resource consent stage and will be implemented when development and/or redevelopment occurs. As such, no precinct provisions are considered necessary.
- Based on the above, PC110 can be supported from a stormwater and flooding perspective.

Planning assessment

293. The AUP in Chapter E10 Stormwater management area – Flow 1 and Flow 2 describes the SMAF-1 control as seeking to protect and enhance Auckland's rivers, streams and aquatic biodiversity in urban areas. I agree with the application of SMAF- Flow 1 to the plan change land for the reasons Mr Vinnakota and Mr Thompson have given.

294. I rely on the expert opinion of Mr Vinnakota and Mr Thompson in making my planning assessment, that PC110 can be supported from a stormwater and flooding perspective. No stormwater or flooding precinct provisions are considered necessary.

9.10 Topic: Water and Wastewater Infrastructure, Development Engineering Effects

Key Issues

295. This section of the report addresses whether appropriate water and wastewater infrastructure can be provided for development enabled by PC110. Transport infrastructure is addressed separately in Section 9.11 of this report.
296. Because the proposed plan change proposes to enable development ahead of the FDS sequencing, infrastructure timing and funding are important matters to be considered, and are discussed further in Section 9.12 of this report.

Applicant's Assessment of Effects

297. A Civil Infrastructure Report has been submitted with the application as Appendix 5: "Heights Road Plan Change Civil Infrastructure Report 9-49 Heights Road , Paerata, Auckland, G Bar Properties Ltd Plan Change – Clause 24 Revision" Woods 31 July 2024.

Wastewater

298. Section 3.6.2 of the AEE notes that the plan change land is not serviced by the public wastewater network, with the nearest public reticulation rising mains on Paerata Road. The plan change land is currently serviced by a private wastewater pump and a rising main that discharges to a public gravity system adjacent to the Possum Bourne Reserve (south of the railway, to the south of Lough Bourne Drive). The application states that capacity of this pump station is relatively large given the private plan change land's historical use as a meat works and is therefore sufficient to cater for the proposed light industrial use.

Water Supply

299. Section 3.6.2 of the AEE states that there is a 300mm diameter public network installed at the Paerata Road section of State Highway 22 frontage of the plan change land, and a 100mm connection to the plan change land from this line. The application states that the existing business activities are currently serviced by private supply in the form of a consented groundwater take and use working in conjunction with storage tanks.

Infrastructure

300. Section 5.3.6 of the AEE states that the Pukekohe Paerata Structure Plan demonstrates that there is satisfactory water, wastewater and utility infrastructure either in place or proposed within proximity to the plan change land, and that therefore the plan change request will not impact the provision of infrastructure in accordance with the Structure Plan.
- “The expert reporting has confirmed that there either existing site-specific private infrastructure solutions already in place , or there is sufficient capacity in the network to accommodate the scale of the proposed PPC development, particularly given that a large portion of the land is already utilised for rural business activity uses.”*
301. Details of the applicant’s engagement with Watercare Services Limited between 2022 and 2024 are set out in Section 6.5 of the AEE.
302. The AEE states that at a meeting held with Watercare Services Limited representatives in December 2022, Watercare Services Limited did not express any concerns with the applicant’s approach to wastewater and water servicing of the plan change land. The AEE states that In April 2023, Watercare Services Limited provided the applicant with an update on key network improvements relevant to the proposed plan change including proposed resilience improvements to water supply and the Isabella Drive wastewater pump station.
303. The AEE states that Watercare Services Limited advised the applicant in 2022 and 2023 that the existing watermain along SH22 could cater for further development, but that a resilience option planned for late 2025/2026 would be required to service the plan change land. The AEE states that at the time, Watercare Services Limited did not express any fundamental concerns with relying on the private bore currently servicing the plan change land.
304. Section 6.5 of the AEE states that Watercare Services Limited advised that the current public wastewater network is at capacity until the Isabella Drive Pump Station is completed. The applicant intends to use an existing onsite wastewater pump in the interim. The AEE states that in July 2024, council advised the applicant that the Isabella Drive Pump Station was delayed from 2025 until 2028. The AEE states that the applicant has since had further discussions with Watercare Services Limited and that Watercare Services Limited confirmed it had no objections in principle to the applicant using the existing onsite pump station until the Isabella Drive Pump station came online, assuming there was no increased discharge into the network.
305. Section 9.2 (FDS Infrastructure Prerequisites) of the AEE states the Civil Infrastructure Report confirms that the existing private water supply (water permit) will be used in the meantime if the plan change timing is ahead of Watercare Services Limited’s proposed Adams Road South Reservoir.
306. Section 10.2 of the AEE sets out Infrastructure Effects and discusses the contents of the Civil Infrastructure Report, noting that:

- Discussions with Watercare Services Limited have been undertaken confirming that a new pump station at Isabella Drive will be completed by 2028, which will be available to service the plan change land.
- In the interim, the Civil Infrastructure Report recommends that the existing private wastewater system is utilised, and notes that its lifespan can be prolonged through on-site treatment of wastewater flows, repair / rehabilitation of the existing rising main, and on-site treatment and disposal.
- The Civil Infrastructure Report recommends that water demand from future industrial activities utilises water from the existing private consented borehole working in conjunction with storage tanks until a public connection becomes available as there is sufficient capacity within the permit requirements to service proposed development. The Civil Infrastructure Report notes that water saving measures can be implemented to comply with the consented draw down rate.

307. In terms of utilities, Section 10.2 of the AEE states that the Civil Infrastructure Report notes that gas, power and telecommunications (including fibre) networks are available to service the plan change land.

Submissions

308. **Submission 3.3 – (Auckland Transport)** Where amendments are proposed, would consider alternative wording or amendments to like effect, which addresses the reasons for the submission. Also seeks any consequential amendments required to give effect to the amendments and decision requested.
309. **Submission 4.2 – (NZ Transport Agency Waka Kotahi)** No stormwater discharge to the state highway culverts, although it is noted that runoff cannot be avoided in some instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts.
310. **Submission 5.1 – (Watercare Services Limited)** - Plan change should be declined unless a new precinct is required [wording supplied] to manage development sequencing in the plan change area. Plan change is out of sequence with the timing for development set out in council's Future Development Strategy, and therefore out of sequence with Watercare's planned bulk wastewater infrastructure for the Pukekohe Northwest Future Urban Area.
311. **Submission 5.2 – (Watercare Services Limited)** Decline the plan change, but if approved, make amendments requested. Subdivision and development should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development. Any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion of the Pukekohe North Wastewater Project.
312. **Submission 5.3 – (Watercare Services Limited)** Decline the plan change, but if approved, make amendments requested. Generally not opposed to interim private onsite treatment and discharge for this area, provided the plan change area connects to Watercare's

wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project.

313. **Submission 5.4 – (Watercare Services Limited)** Decline the plan change, but if approved, connect the current private water supply and servicing for this area to Watercare's water supply network.

Franklin Local Board views

314. The Franklin Local Board notes that Watercare seeks that the plan change be declined, but if approved, seeks amendments. The Franklin Local Board would encourage the applicant to work with Watercare to address Watercare concerns

Council specialist's comments

315. Council does not provide water and wastewater specialists. Watercare Services Limited are a submitter to the plan change.
316. Mr Abhi Pandith, Development Engineer, Regulatory Engineering South 2, Planning and Resource Consents, Auckland Council, has prepared a technical memo on behalf of council covering his assessment of the notified documents, response to relevant submissions and recommendations. His memo covers network utility and development engineering matters: "Technical Expert S.42A Report / Memo Template for Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe" 24 July 2025 (see **Attachment 3**).
317. Mr Pandith agrees with Auckland Transport's submission that kerb and channel, footpath, berm, and lighting upgrades need to be provided during the initial part of development on the plan change land.
318. In relation to NZTA's submission seeking the upgrade of the culvert beneath SH22, Mr Pandith comments that the flooding is severe and when the light industry zone becomes active 100% of the land can be impervious and the culvert underneath SH22 is undersized and needs to be upgraded to ensure safe stormwater discharge and to avoid flooding.
319. Mr Pandith identifies the main development engineering issue is servicing the plan change land for water supply and wastewater due to the timing of availability of bulk infrastructure, and that interim solutions do not work.
320. In relation to wastewater servicing, Mr Pandith comments that the applicant has proposed four servicing options; however, he does not support any of them due to the lack of adequate bulk infrastructure. He advises that:
- the existing private pump station does not have sufficient capacity,
 - the proposed new pump station is not feasible and would not be maintained by Watercare Services Limited (WSL),

- there is inadequate space for on-site wastewater treatment fields, and tankering of wastewater is not an acceptable option.
- tankering poses a significant nuisance to the local community, and numerous case studies have shown that it is not a reliable long-term solution—for example, at Clarks Beach Stage 7, where a similar arrangement was not managed well and created ongoing operational issues.

321. Mr Pandith considers that the key risk in granting the plan change without bulk infrastructure is that the applicant may be unable to obtain resource consent and will be forced to wait until servicing becomes available, as was the case at Kohe in Pukekohe. Mr Pandith has been directly involved with the Isabella Drive Pump Station and the associated rising main across Pukekohe. While resource consent has recently been granted for this infrastructure, Mr Pandith requests that Watercare provide an update on the Engineering Plan Approval (EPA) process and the expected timing for the commencement of physical works.
322. In relation to water supply servicing, Mr Pandith comments that the plan change land is currently serviced by a private borehole. A connection to the public 300mm PE watermain is proposed, and WSL has confirmed there is sufficient capacity within the existing network to service the catchment. Planned infrastructure upgrades in the area include the Wesley–Paerata Watermain (anticipated to commence post-2030) and a new reservoir at Adams Road South. Although the reservoir was initially identified as a prerequisite for PC110 (refer to Section 2.15 of the WSL submission), WSL has since clarified that both the reservoir and associated upgrades are intended to improve network resilience and are not required for enabling development of the plan change land.. Mr Pandith supports WSL’s position that the private borehole should be decommissioned for potable supply purposes.
323. Mr Pandith concludes that he supports the position of council’s Healthy Waters experts and considers that PC 110 has sufficiently demonstrated, at a conceptual level, that stormwater effects can be appropriately managed through a combination of water quality treatment, hydrological mitigation (including 5mm retention and 95th percentile detention), and flood attenuation using two centralised wetlands designed to accommodate 1% AEP flows under a 3.8°C climate change scenario. Detailed stormwater management measures can be finalised and assessed at the resource consent stage, and as such, Mr Pandith agrees that PC110 can be supported from a stormwater and flooding perspective.
324. Mr Pandith states that he agrees with the position of Watercare Services Limited (WSL) that PC 110 should not be supported in its current form due to the lack of available bulk wastewater infrastructure. The proposal is out of sequence with the development timeline set out in the Future Development Strategy, and advancing the plan change without this infrastructure in place would likely result in delays at the resource consent stage. If PC 110 is to be approved, Mr Pandith supports WSL’s recommendation that a new precinct be introduced to manage the staging and sequencing of development, and that appropriate

provisions be included to ensure development does not proceed ahead of the required bulk infrastructure.

Planning assessment

325. I rely on the expert opinion of Mr Pandith and Watercare in making my planning assessment, and I note that Mr Pandith has capacity and servicing concerns about onsite wastewater expansion, and that Watercare have proposed precinct provisions for PC110.
326. I note that public infrastructure delivery issues appear to be possible to physically resolve by 2028, given that the existing bulk water supply network has sufficient current capacity to service development of the plan change, and that the delivery of the Isabella Transmission Wastewater Pump station is due in 2028.
327. Watercare's preference is that while initial stages may use on site treatment the private plan change area is connected to the public water supply and wastewater networks once capacity is available. Watercare have therefore proposed objectives and policies in their precinct wording saying that subdivision and development is restricted until the precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development, "except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed".
328. As they are the bulk water supply and public wastewater infrastructure provider, I acknowledge Watercare's request for precinct provisions. I have included Watercare's proposed precinct wording in **Attachment 8** to this report.
329. Having reviewed Watercare's proposed precinct wording, I note that it does not however contain activity status or standards relating to interim solutions and associated decommissioning for water and/or wastewater servicing. While Special Information requirements relating to interim solutions are specified in Watercare's proposed precinct provisions, it is unclear what status an application for a proposed interim solution has.
330. It may be helpful also for the hearing commissioners for Watercare to provide further detail at the hearing regarding requiring development on the plan change land which currently uses on-site water supply and wastewater treatment to connect to public water supply and wastewater networks. At the hearing, Watercare may also wish to:
- provide an update on the Engineering Plan Approval (EPA) process and the expected timing for the commencement of physical works for the Isabella Pump Station.
 - provide additional precinct wording supporting their proposed objectives and policies which seek to restrict subdivision and development until the precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed,

- specify the actual amount of wastewater that “XXX” in Special Requirement (a) (i)(b) of the precinct wording in their submission is meant to refer to.

9.11 Topic: Transport Infrastructure and Traffic Effects

Key Issues

331. This section of the report addresses whether development enabled by PC110 can provide appropriate transport infrastructure. The FDS lists the Pukekohe North-West Arterial as an “infrastructure prerequisite” for Pukekohe North West.

Applicant’s Assessment of Effects

332. Transport effects are addressed in Section 10.1 of the AEE which refers to the applicant’s transport assessment: Appendix 4 “Proposed Plan Change 9, 33 and 49 Heights Road, Pukekohe, Integrated Transport Assessment” [ITA] report by Commute Transportation Consultants, 2 July 2024.
333. Section 3.4 of the AEE describes the current transport environment. Currently, the eastern sites at 9 and 33 Heights Road are primarily accessed from a vehicle crossing located towards the northeast extent of the plan change land, approximately 35 metres from the intersection with Paerata Road (SH22). A secondary access is further west on Heights Road. The western site at 49 Heights Road has a separate access and crossing.
334. Heights Road is a rural road, with one lane in each direction, limited shoulders and an 80km/hour speed limit. Paerata Road is identified as an Arterial Road in the AUP and is also classified as a Limited Access Road (SH22) by NZTA, with a speed limit of 60km/hour adjacent to the plan change land. An NZTA road widening designation applies to the frontage of 9 Heights Road with SH22.
335. No new roads are proposed within the plan change area.
336. The key findings of the applicant’s ITA relate to
- Existing Environment
- Future Environment
- a new Paerata train station [due to open in 2026³] and the upgrade and electrification of the rail line between Papakura and Pukekohe
 - the Pukekohe arterials, which form a ring road around Pukekohe and will connect to SH22.
 - a new strategic walking and cycling corridor along Paerata Road / SH22

Traffic Generation Effects

³ https://www.kiwirail.co.nz/assets/DRS_FAQs_-_February-2025.pdf

337. The ITA has undertaken traffic modelling using the Indicative Masterplan as an example of a future development in order to demonstrate the potential traffic generation associated with a possible Business – Light Industry Zone build out of the plan change land. Trip numbers and routing, heavy vehicle movements, and intersection modelling for the Paerata Road/ Heights Road intersection are included. Section 10.1.3 of the AEE states that the extent of development enabled by the plan change is expected to have minimal effect on the operation of the existing Paerata Road/ Heights Road intersection, but that discrete improvements to Heights Road have been identified as being necessary to support the urbanisation of the land.

Access and Internal Network

338. Section 10.1.4 of the AEE states that, for the purposes of the plan change, the ITA has identified the most appropriate access points as being the existing access to Heights Road proximate to the Paerata Road intersection, and a new access to Heights Road approximately 35 metres from the western site boundary. The plan change land is not of a scale which would support a future public road network and the ITA considers that future parking and loading requirements can be met.

Improvements

339. Section 10.1.5 of the AEE recommends the following improvements to Heights Road to mitigate the effects of PC110:

- Sequenced upgrading to the frontage of Heights Road (southern side) for the length of the plan change land to an urban standard, including kerb and channel, with sufficient space to accommodate a future footpath (noting no footpath is initially considered necessary as there is no destination available); and
- Shoulder widening on the northern side opposite the access points to enable through vehicles to safely pass a vehicle waiting to turn right into the plan change land.

340. Section 10.1.5 of the AEE states that the applicant intends to work with Auckland Transport to develop a private agreement and land use covenant requiring an urban frontage to be constructed.

341. Section 10.1 5 of the AEE concludes that, “The ITA provides a comprehensive and robust assessment of the transportation related effects arising from the proposal. Overall, the adverse transport effects are avoided, remedied and mitigated.”

342. Section 9.2 of the AEE states that while the timing of the plan change will be ahead of the provision of the completed road infrastructure in the surrounding Pukekohe area, it is important to note that the arterial upgrades project is intended to service the full build out of the Pukekohe-Paerata area. The AEE notes that the plan change land is a discrete parcel of business land on the outskirts of Pukekohe and part of the land is already used for longstanding rural business activities. The AEE states that the Heights Road / Paerata Road intersection will continue to operate safely and efficiently, and it is appropriate for the plan

change to proceed ahead of the Pukekohe North West arterials, concluding that “No additional transport infrastructure provision is required to service the PPC.”

Submissions

343. **Submission 1.3 – (Peter Fa’afiu)** Confirm Heights Road traffic capacity
344. **Submission 3.1- (Auckland Transport)** – Amendments requested. In absence of completion of private agreement and covenant with applicant and Auckland Transport, Heights Road frontage upgrades are sought as part of initial development of site to support safe and efficient connections for active modes.
345. **Submission 3.2 - (Auckland Transport)** - Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time
346. **Submission 3.3 - (Auckland Transport)** - Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time
347. **Submission 4.1 (NZTA)** - Locate all development where it does not encroach into the NZTA designation, or obtain consent from NZTA under s176 of the Resource Management Act 1991, and a License to Occupy.
348. **Submission 4.3 (NZTA)** - Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.
349. **Submission 4.4 (NZTA)** - Applicant should investigate further road signage options Heights Road / Paerata Road intersection.

Franklin Local Board views

350. The Franklin Local Board suggests that in considering the plan change, that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer, noting that in the future, for those working at this site, accessing the Heights Park Cemetery or moving through the area should be enabled to walk, cycle and access public transport.

Council specialist’s comments

351. Mr Wes Edwards, from Arrive Limited has prepared a technical report on behalf of council covering his assessment of the notified documents, response to relevant submissions and recommendations: “Transport Technical Expert S.42A Report for Proposed Plan Change 110 9, 33 and 49 Heights Road Pukekohe” 16 July 2025 (see **Attachment 3**).
352. Mr Edwards does not support PC110 as notified,

353. Mr Edwards considers that the modelling presented in the applicant's ITA should not be relied on, and has undertaken additional traffic modelling to support his position. Mr Edwards concludes that the existing transport infrastructure is insufficient to support development that would be enabled by the proposed plan change.
354. In his report, Mr Edwards considers that the following key transport issues are in contention (as set out in Table 1 of his report):
355. Effects on transport efficiency
- forecasting of future traffic volumes
 - estimating of vehicle movements from development
 - effects on efficient operation of Paerata Road / Heights Road intersection
356. Effects on transport safety
- sight distances at potential access locations
 - road widening at potential access locations
 - effects on safety along Heights Road
 - effects on road safety at Paerata Road / Heights Road intersection
357. Ensuring upgrades
- means of ensuring that appropriate mitigation works are undertaken
358. In relation to these key issues, Mr Edwards concludes that:
- in relation to effects on transport efficiency:
 - any adverse effects of the proposal on transport efficiency are largely confined to the Paerata Road (SH22) / Heights Road intersection. Rezoning and further development of the plan change area should be delayed until the Pukekohe North West Upgrade is operational (as per the FDS), or the Paerata Road / Heights Road intersection should be upgraded to either a dual-lane roundabout or traffic signals with widening of Paerata Road.
 - in relation to effects on transport safety:
 - the existing Paerata Road (SH22) / Heights Road intersection is inadequate, and rezoning and further development of the plan change area should be delayed until the Pukekohe North West Upgrade is fully operational (as per the FDS), or the intersection is upgraded.
 - controls on Heights Road access points are necessary to avoid potential adverse safety effects.
 - any further development of the plan change area should require the prior implementation of road safety improvement measures at the Heights Road bend east of Beatty Road, the intersection with Beatty Road, and the bend north of the railway level crossing.
 - in relation to ensuring upgrades:

- additional and more significant upgrading than requested by AT is required, and that the required upgrades could be ensured through precinct provisions.
359. Mr Edwards disagrees that Paerata Station itself makes public transport access to the plan change land more viable as people can already use Pukekohe Station and the Wesley College bus to get to the nearest bus stop, and the nearest bus stop is expected to remain more than 1km away until new arterials and new bus services are provided.
360. Until planned arterial road projects are completed, Mr Edwards expects walking and cycling to be relatively unsafe and unattractive travel options for the plan change land. He would expect most travel to and from the plan change area to rely on private vehicles.
361. Mr Edwards notes that significant development could occur on the plan change land without resource consent if the plan change land is rezoned to Business – Light Industry Zone. The Council and AT may therefore have no ability to assess or control matters such as access location or sight distance if the plan change is approved as notified. For that reason, Mr Edwards considers additional controls must be introduced as part of this plan change, including limitations on access locations.
362. Mr Edwards considers that the plan change area could be rezoned as requested provided:
- (a) The Pukekohe North-West Upgrade is fully operational, or the Paerata Road (SH22) / Heights Road intersection is upgraded with a dual-lane roundabout or traffic signals with additional lanes. Mr Edwards notes that no funding is currently confirmed for the Pukekohe North-West Upgrade, and based on the FDS this project may not be implemented before 2040.
 - (b) The speed limit on Heights Road is reduced, or access points are located to provide sight distances sufficient to meet the Austroads Safe Intersection Sight Distance standard for measured operating speeds;
 - (c) Heights Road is upgraded to provide a right turn bay (or flush median) at any access point, and to provide an auxiliary left-turn lane at the eastern-most access point;
 - (d) Road safety improvements to achieve a minimum of 10% reduction in crashes (potentially including improved road surfacing, road markings, or road signage) are carried out at and near the bend in Heights Road east of Beatty Road, the intersection with Beatty Road, and at the bend in Heights Road north of the railway level crossing .
 - (e) Heights Road is upgraded to an urban form including a footpath along the Plan Change frontage .
 - (f) Precinct provisions are added to ensure that the above upgrades are completed prior to any further development of the site.
363. Mr Edwards notes that item (a) requires the approval of NZTA, and items (b) to (e) require the approval of AT.

364. In summary, Mr Edwards states that it is his view that there are viable solutions to ensure that the plan change area once rezoned will be supported by the local transport network, and recommends the following:

- a precinct with an appropriate set of ‘transport triggers’ to provide certainty that the transport infrastructure required to support development of the plan change area will be delivered.
- a precinct plan showing the locations of transport infrastructure (such as the new collector road) to ensure consistency with long term planning documents, and
- precinct provisions (objectives, policies, standards, assessment criteria, matters of discretion and special information requirements) which provides the necessary integration between land use and infrastructure.

365. Mr Edwards has therefore provided a possible set of precinct provisions in Annexure C to his report. These provisions are modelled on provisions in recent precincts elsewhere in Pukekohe. Mr Edwards provides references to similar provisions in other AUP southern precincts in Annexure D of his report.

366. In considering activities that might be implemented as interim activities ahead of industrial development, Mr Edwards notes that residential activities are Non-Complying in the Business- Light Industry Zone, and some other activities would be permitted.

Planning assessment (Outstanding Issues/conclusions and recommendations)

367. I rely on the expert opinion of Mr Edwards in making my planning assessment.

368. I agree that given Mr Edward’s concerns about:

- transport efficiency
- transport safety
- means of ensuring that appropriate mitigation works are undertaken

there could be possible adverse transport effects of development on the plan change land. I therefore support the precinct provisions proposed by Mr Edwards. Proposed precinct provisions are set out in **Attachment 8** to this report.

369. I agree with Mr Edwards that once rezoned, development could occur on the plan change land without requiring resource consent and that the precinct provisions would provide for assessment of whether the scale of a proposed activity or development is such that it produces adverse transport effects.

9.12 Infrastructure Timing and Funding

Key issues

370. Because the proposed plan change proposes to enable development ahead of the FDS sequencing, infrastructure timing and funding are important matters to be considered.

371. Infrastructure requirements for PC110 have been discussed in Sections 9.9, 9.10, and 9.11 of this report, and precinct provisions have been recommended by council's Development Engineering and Transport experts and by submitters who are public infrastructure providers. This section of the report considers whether future infrastructure timing and funding are uncertain enough to require precinct provisions as a mechanism to provide for infrastructure servicing or upgrades to be at the applicant's cost.

Applicant's Assessment of Effects

372. Section 5.3.6 of the AEE states that while the FDS timeframes have expanded and additional infrastructure is required to service the wider / large scale transition of Pukekohe Paerata to live urban zoning, the timing of that infrastructure is not a constraint to the live zoning and development of the plan change land. The AEE states that, "The expert reporting has confirmed that there either existing site-specific private infrastructure solutions already in place, or there is sufficient capacity in the network to accommodate the scale of the proposed PPC development, particularly given that a large portion of the land is already utilised for rural business activity uses."
373. The AEE states that the applicant has also discussed Watercare Services Limited's policy position that it generally does not support out of sequence development that impacts Watercare Services Limited's ability to deliver its planned infrastructure programme, and states in Section 6.5 that, "As outlined throughout this report and in supporting expert reports, the PPC will not impact WSL's ability to deliver their planned infrastructure programme."
374. Section 8.1.3 of the AEE notes that, "Whilst in sync with the planned infrastructure and sequencing of the Structure Plan, the recently adopted FDS (August 2023) has amended the timing of the Pukekohe North-West delivery through to 2040. Both the NPS-UD and FDS recognise that land can be brought online sooner than planned, provided a well-functioning urban environment and infrastructure capacity can be achieved." Section 8.1.3 of the AEE states that the plan change will contribute to a well-functioning environment and that the plan change will ensure that the necessary infrastructure solutions are in place to service wastewater, water and stormwater and expert reporting confirms that the transportation network has capacity to service the development. "Therefore, the plan change will positively contribute to the Pukekohe North-West area without impacting the infrastructure capacity and funding models of the wider area."

Submissions

375. **Submission 3.1 (Auckland Transport)** - Amendments requested. In absence of completion of private agreement and covenant with applicant and Auckland Transport, Heights Road frontage upgrades are sought as part of initial development of site to support safe and efficient connections for active modes.

376. **Submission 3.2 (Auckland Transport)** - Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time.
377. **Submission 3.3 (Auckland Transport)** - Where amendments are proposed, would consider alternative wording or amendments to like effect, which addresses the reasons for the submission. Also seeks any consequential amendments required to give effect to the amendments and decision requested.
378. **Submission 5.1 – (Watercare Services Limited)** - Plan change should be declined unless a new precinct is required [wording supplied] to manage development sequencing in the plan change area. Plan change is out of sequence with the timing for development set out in council's Future Development Strategy, and therefore out of sequence with Watercare's planned bulk wastewater infrastructure for the Pukekohe Northwest Future Urban Area.
379. **Submission 5.2 – (Watercare Services Limited)** Decline the plan change, but if approved, make amendments requested. Subdivision and development should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development. Any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion of the Pukekohe North Wastewater Project.
380. **Submission 5.3 – (Watercare Services Limited)** Decline the plan change, but if approved, make amendments requested. Generally, not opposed to interim private onsite treatment and discharge for this area, provided the plan change area connects to Watercare's wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project.

Planning assessment

381. Both Auckland Transport and Watercare have made submissions seeking that infrastructure upgrades are funded by the applicant.
382. Watercare have also advised that local network upgrades required to support the development of the plan change land would be assessed at the time of resource consent application and engineering plan approval. Any upgrades/upsizing of the existing local network required to accommodate the demand created, would be required to be provided by the developer at their cost.
383. Watercare Services Limited's submission on PC110 advises that the proposed private plan change is out of sequence with the FDS. They advise that out of sequence and unanticipated growth creates significant challenges for infrastructure delivery, potentially impacting service to existing customers and constraining growth in live zoned areas.

384. Whilst acknowledging the direction provided by the Council's FDS, inclusive of sequencing, I note that the rezoning of the plan change land has been 'anticipated' in other council planning documents, having been signalled in the Pukekohe-Paerata Structure Plan 2019 and the Pukekohe Area Plan 2014 before that. In physical terms, Watercare have advised that it is technically feasible to service the plan change land for bulk water supply and bulk wastewater ahead of the 2040 timing in the FDS. Bulk water supply is immediately available, and public wastewater is expected to be available within the next three years when the Isabella Drive Pump Station, which is funded in the Watercare FY25 -FY34 [2025 to 2034] Asset Management Plan with completion currently forecast for mid-2028, is constructed.
385. I note Mr Pandith's comments that the applicant has proposed four wastewater servicing options. However, he does not support any of them due to the lack of adequate bulk wastewater infrastructure. I agree that if sufficient wastewater servicing is not available for the development of the plan change land until bulk wastewater is supplied, that this can be managed through precinct provisions.
386. Mr Edwards' Transport advice in Section 9.11 of this report is that contrary to the conclusions in the applicant's AEE, a number of transport infrastructure upgrades are required for transport efficiency and safety reasons. These reasons include that if the Paerata Road (SH22) / Heights Road intersection is not upgraded with a dual-lane roundabout or traffic signals with additional lanes, then the Pukekohe North West Upgrade needs to be fully operational. Mr Edwards notes that no funding is currently confirmed for the Pukekohe North-West Upgrade, and based on the FDS this project may not be implemented before 2040.
387. I note Mr Foy's economic advice in Section 9.8 of this report that unanticipated public expenditure on required infrastructure servicing or upgrades which may be recommended to enable PC110 to proceed could create adverse economic effects. It is important that the delivery of land use and development on the plan change land can be supported by infrastructure. I therefore recommend that site-specific provisions in the form of precinct provisions are required to address the costs and timing of future infrastructure servicing in order to avoid, remedy, or mitigate any potential adverse economic effects.
388. I therefore recommend proposed precinct provisions relating to water supply, wastewater, and transport infrastructure delivery as set out in **Attachment 8** to this report. As set out in Section 9.10 of this report, some clarification of Watercare's proposed precinct wording is sought, specifically that at the hearing, Watercare are requested to:
- provide an update on the Engineering Plan Approval (EPA) process and the expected timing for the commencement of physical works for the Isabella Pump Station.
 - provide additional precinct wording supporting their proposed objectives and policies which seek to restrict subdivision and development until the precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with

sufficient capacity, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed,

- specify the actual amount of wastewater that “XXX” in Special Requirement (a) (i)(b) of the precinct wording in their submission is meant to refer to.

9.13 Topic: Other Matters (Environmental noise, environmental pollution, and safety)

Key Issues

389. This section of the report addresses submission matters not addressed elsewhere in the report.

Applicant’s Assessment of Effects

The applicant is invited to address the matters raised in the submissions at the hearing.

Submissions

Zoning

390. **Submission 6.4 (Gerald Baptist)** - Decline the plan change, but if approved, make amendments requested. Rezoning from Future Urban to Light Industry is questioned. Wants urban environmental standards to apply to 1173 Paerata Road and other properties on eastern side of State Highway 22. Wants buffer between plan change site and housing.

Environmental noise

391. **Submission 6.1 (Gerald Baptist)** – Decline the plan change, and resolve noise problems with existing development and activities on site, including dog training and gym events.

Environmental pollution

392. **Submission 6.2 (Gerald Baptist)** - Decline the plan change, and resolve environmental pollution caused by open fires on site.

Safety

393. **Submission 6.3 (Gerald Baptist)** - Decline the plan change, and resolve safety concerns about security of existing activities. Includes safety concerns about potential chemical spills. Is sufficient water available for fire fighting?

Franklin Local Board views

394. The Franklin Local Board does not share the concerns expressed by an adjacent property owner [inferred that this comment relates to Submission 6.4 (Gerald Baptist)] and considers the land appropriate for light industrial use, noting it was zoned in the Pukekohe Structure Plan.

Planning assessment

395. The appropriate zoning for the plan change land and its effects as raised in Submission 6.4 are discussed in Section 9.1 (Light Industrial Zoning and Use) of this report.
396. Submissions 6.1, 6.2, and 6.3 relate to concerns with the existing operations on the plan change land, specifically:
- noise problems with existing development and activities on site, including dog training and gym events,
 - environmental pollution caused by open fires on the plan change land,
 - security of existing activities on the plan change land (e.g. potential chemical spills and sufficiency of fire fighting water)
397. Any non-compliance with AUP rules or bylaws is not able to be addressed as part of the assessment of PC110, but is a matter to be raised with council enforcement officers, with council's website providing online forms to use to report problems.

10 ALTERNATIVES AND METHODS

398. A s32 evaluation is given in Section 11 of the submitted AEE. This was updated since original lodgement with further information provided in response to council requests. The s32 evaluation addresses objectives of PC110, evaluation of the plan change objectives against Part 2 of the RMA, assessment of the options against the plan change provisions, and the risk of acting or not acting.
399. The applicant's s32 options analysis concludes that the existing AUP provisions are the most efficient and effective way to achieve the plan change objective. The analysis considers that the Business – Light Industry Zone (Option 2) is the best option for achieving the urban growth and development objectives of the plan change request, and involves the application of the Business – Light Industry Zone and SMAF-1 provisions to the plan change land.
400. The applicant's s32 analysis groups options into five key topics:
- S32 11.3.1 Topic One: Urban Growth and Land Use Development
 - “Option 2 balances the economic growth drivers, the strategic policy framework, and social, cultural and environment benefits and costs, whilst ensuring that effects on the environment are managed appropriately.”
 - S32 11.3.2 Topic Two: Transportation
 - Option 2 “...enables the land to be developed for future BLIZ activities, ensures that sufficient and acceptable transportation solutions are in place to service future development in a timely manner, and any effects can be appropriately managed or avoided.”

- S32 11.3.3 Topic Three; Infrastructure Provision and Delivery
 - Option 2 “...enables the land to be developed for future BLIZ activities, ensures that sufficient and acceptable infrastructure solutions are in place to service future development in a timely manner, and any effects are appropriately managed or avoided.”
- S32 11.3.4 Topic Four: Natural Hazards
 - Option 2 “...enables the land to be developed for future BLIZ activities, whilst ensuring that the objectives pertaining to the natural hazards are addressed, and any effects can be appropriately managed or avoided.”
- S32 11.3.5 Topic Five: Natural Environment
 - Option 2 “...enables the land to be developed for future BLIZ activities, whilst ensuring that the objectives pertaining to the natural environment are addressed, and any effects can be appropriately managed or avoided.”

401. The applicant’s s32 analysis does includes consideration of the necessity of site-specific precinct provisions (Option 3), but concludes that these are unnecessary.

402. In relation to transportation, in Topic 11.3.2 of the applicant’s S32 analysis a precinct to address the release of land timed in accordance with the delivery of transport infrastructure and to address recommendations around the Heights Road frontage improvements is considered unnecessary given the applicant’s ITA reporting.

403. In relation to infrastructure provision and delivery, in Topic 11.3.3 of the applicant’s s32 analysis, a precinct is considered unnecessary because the applicant’s expert reporting is considered to demonstrate that the plan change land can adequately function with the existing and proposed infrastructure put forward by the applicant. The analysis notes that the existing wastewater system is able to service the development until the Isabella Pump Station comes on line in 2028 and the proposal has a private bore water supply available.

404. I have reviewed the alternatives and methods analysis in the applicant’s s32 document in Section 11 of the AEE and consider it to be generally sound. However I have proposed amendments in the form of proposed precinct provisions and precinct plans in **Attachment 8**. The precinct provisions relate to

- Water supply and wastewater infrastructure provision and timing,
- Transport infrastructure provision and timing
- The interface of the plan change land with Heights Park Cemetery

405. The reasons for these changes have been discussed in Sections 9.7 (Landscape and Visual Amenity Effects), 9.8 (Economic Effects), 9.10 Water and Wastewater Infrastructure, Development Engineering Effects) 9.11 (Transport Infrastructure and Traffic Effects), and 9.12 (Infrastructure Timing and Funding) of this report, where council's experts have challenged the conclusions of the applicant's experts' reports relating to these topics.
406. Along with the proposed rezoning of the plan change land and the imposition of the SMAF-1 overlay, I therefore consider these new precinct provisions in **Attachment 8** are the most appropriate methods to achieve the objective of PC110 as outlined in Section 4.1 of the applicant's AEE, which is to enable the ongoing operation, intensification and expansion of light industrial activities on the plan change land to meet current and future demand for industrial growth, consistent with Pukekohe-Paerata Structure Plan 2019, whilst avoiding, remedying or mitigating adverse effects on the environment.

11 RISK OF NOT ACTING

407. Section 11.4 of the AEE states that the specialist reports supporting the plan change request demonstrate that there is sufficient information to understand the effects of the plan change. The AEE states that if a private plan change was not undertaken, the rezoning would be delayed until a public plan change was advanced by the Council. The AEE states that no such plan change is proposed and therefore this would lead to a delay in future industrial land supply and employment, and secondary effects on the prices of goods and services.
408. While I consider that some matters about water supply and wastewater infrastructure, transport infrastructure, and interface controls relating to the Heights Road Cemetery still need to be addressed, in my view these are capable of resolution through the imposition of precinct controls.
409. The plan change land has been identified for Business – Light Industry Zoning in the Pukekohe-Paerata Structure Plan 2019. With the inclusion of proposed precinct provisions, I consider that PC110 is likely to contribute to a well-functioning urban environment by providing more local employment options within the Pukekohe area, even if the development capacity is now out of sequence with planned land release in the FDS. Policy 8 of the NPS-UD provides for plan changes with development capacity is that is out-of-sequence with planned land release.

11.1 Section 32AA Analysis of Recommended Changes

410. The changes recommended by me require an additional assessment in accordance with s32AA of the RMA. This additional assessment is included in **Attachment 9**.
411. This further evaluation is only made in respect of the changes I have proposed in **Attachment 8** to this report and which are discussed above. The s32AA assessment is at a level of detail which, in my opinion, corresponds to the scale and significance of the

proposed changes. This evaluation is informed by council's experts' reports and these sections of the applicant's s32 assessment:

- 11.3.1 Topic One: Urban Land Growth and Land Use Development
- 11.3.2 Topic Two Transportation
- 11.3.3 Topic Three Infrastructure Provision and Delivery

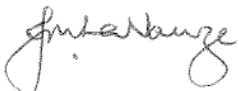
12 CONCLUSIONS

412. Having considered all of the information provided by the applicant, carried out an assessment of effects, reviewed all relevant statutory and non-statutory documents and made recommendations on submissions, my interim recommendation is that PC110 should be approved, subject to the imposition of precinct provisions for a new Heights Road Precinct for 9. 33 and 49 Heights Road Pukekohe as set out in the amendments in **Attachment 8** to this report.
413. PC110, with its recommended amendments will assist the council in achieving the purpose of the RMA, and be consistent with National Policy Statements, including the NPS-UD. PC110 is generally consistent with the Regional Policy Statement (RPS) and will give effect to the relevant provisions of the RPS. In particular, PC110 will be consistent with the Pukekohe-Paerata Structure Plan 2019, which identifies the plan change land as an existing land use more suited to the Light Industry zone.

13 RECOMMENDATIONS

414. That, the Hearing Commissioners accept or reject submissions relating to PC110 as outlined in **Attachment 7** to this report.
415. That, as a result of the recommendations on the submissions, the Auckland Unitary Plan be amended by:
- rezoning 5.35 hectares of land at 9. 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone
 - the application of the Stormwater Management Area Flow 1 – “SMAF-1” control to 9, 33 and 49 Heights Road Pukekohe ,
 - the imposition of precinct provisions for a new Heights Road Precinct for 9, 33 and 49 Heights Road Pukekohe, as set out in the amendments in **Attachment 8** to this report.

14 SIGNATORIES

	Name and title of signatories
Authors	 Joy LaNauze, Senior Policy Planner, Central / South Planning, Planning and Resource Consents, Auckland Council
Reviewer / Approved for release	 Craig Cairncross, Team Leader, Central / South Planning, Planning and Resource Consents, Auckland Council

ATTACHMENT 3

SPECIALIST PEER REVIEW REPORTS

From: [Nikki Nelson](#)
To: [Joy LaNauze](#)
Subject: Re: Heights Park Cemetery Pukekohe - any comments relating to private plan change next door?
Date: Thursday, 17 July 2025 12:25:18 pm

No, I just tidied up the para below .. here you go.

The site adjoins Heights Park Cemetery. Nikki Nelson, Manager Cemetery Services, has noted that reverse sensitivity around cemetery use and development is a concern with development adjoining cemetery land. Council has a legal obligation to ensure there is suitable provision of cemetery land for the burial of bodies under the Burial and Cremation Act 1964. Cemetery Services would like to ensure there is a suitably dense buffer along the boundary of the development to create a respectful visual and acoustic barrier that maintains the cemetery's peaceful atmosphere is essential. Planting along the cemetery boundaries in particular needs to be selected mindfully as big trees with expansive root systems can over time encroach on graves, damage concrete burial beams, and damage headstones.

From: Joy LaNauze <Joy.LaNauze@aucklandcouncil.govt.nz>
Sent: Thursday, July 17, 2025 11:01 AM
To: Nikki Nelson <nikki.nelson@aucklandcouncil.govt.nz>
Subject: RE: Heights Park Cemetery Pukekohe - any comments relating to private plan change next door?

Hi Nikki
Did you forget to attach your updated wording?

Joy LaNauze
Senior Policy Planner: Central/South
Planning and Resource Consents - Planning and Governance, Auckland Council
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Level 16, 135 Albert Street Auckland
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Auckland 1142
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Specialist Memo (technical report to contribute towards Council's section 42A hearing report)

To: Joy LaNauze

From: Ruben Naidoo: Specialist – Contaminated Land.

Date: 11 July 2025.

Subject: Private Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe:
Contamination Assessment (D.002328.01)

1.0 Introduction

- 1.1** I have undertaken a review of the request for the above Private Plan Change, on behalf of Auckland Council in relation to potential adverse effects on human health and the receiving environment, associated with the potential soil and groundwater contamination.

The area of the proposed Private Plan Change (further referred to as 'the project site') covers 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe and is located in north Pukekohe, approximately 3km north of the Pukekohe town centre.

The Private Plan Change request proposes to rezone land from Future Urban Zone ('FUZ') to Business – Light Industry. It is noted that the PPC land has a long history of light industrial use, where a substantial portion of the PPC land is currently utilised for existing consented rural business activities including the Tractor Centre, machinery hire, building businesses, and storage facilities, supporting the local rural sector'.

1.2 Summary of qualifications and experience.

I hold a B. Tech - Environmental Health Degree from the Durban University of Technology (South Africa).

I am a Specialist – Contaminated Land within the Contamination, Noise & Air Team, in the Specialist Unit, in the Planning and Resource Consents Department. I have held this role at Auckland Council and formerly Auckland City Council since 2007. I have extensive experience within contaminated land management, resource consenting, and consent compliance monitoring, relevant to contaminated land.

1.3. Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

1.4 In writing this memo, I have reviewed the following documents lodged in support of the proposed Private Plan Change:

- *Proposed Plan Change Request- Heights Road Plan Change Planning Report- 9,33 and 49 Heights Road, Pukekohe, GBar Properties Limited, prepared by Woods & Partners Ltd, dated 18 /10/2024. (AEE)*
- *Preliminary Environmental Site Investigation – 9, 33 & 49 Heights Road, Pukekohe, Auckland, Engeo, June 2023. (PSI)*
- *Indicative Masterplan & Perspectives, Woods, June 2023.*
- *Geotechnical Investigation 9, 33 & 49 Heights Road, Pukekohe, Auckland, Engeo, June 2023.*

2 Key contamination issues (relevant to protection of human health and the environment)

I consider the following regulations, plans, and policy statements to be relevant to the assessment of the proposed Private Plan Change request, in the context of contamination of the land and the associated effects on human health and the environment:

- *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations, Ministry for the Environment, 2011 (NES:CS)*
- Chapter E30 of the Auckland Unitary Plan (Operative in Part) (AUP(OP)), Objective E30.2(1) and Policies E30.3.(1 and 2)
- *The Auckland Council Regional Policy Statement*, particularly Section 17, Objectives 17.3.1-3, and Policies 17.4.1.1-4
- *The National Policy Statement for Freshwater Management*, updated in 2020, particularly Part 2, Objectives 2.1(1) (a-c), and Policies 2.2(1-5 and 13).

The NES:CS regulations, AUP(OP), and policy statements listed above will be applicable once again during the consenting process, and at that stage the remaining investigation and remediation of the land, where required, will be carried out. The regulations of the NES:CS and Contaminated Land Rules of the AUP(OP) will be relevant to those pieces of land within the subject site, which have formerly been affected by any contaminating activities, and they will be considered in the consenting process.

The current assessment of the Private Plan Change request and supporting documentation is focused on identifying any major constraints, associated with the contamination status of the project area, which would present an impediment to the proposed re-zoning of the land. Any other than major constraints, associated with potential contamination of the project area can be dealt with at a later stage, under the requirements of the relevant regulatory consenting process, associated with the future development.

A Preliminary Environmental Site Investigation (PSI) has been undertaken at the three parcels of land relevant to this Private Plan Change. The main objective of the PSI was to identify the main actual or potential contamination issues within the project site and confirm whether the Private Plan Change area is suitable or can be made suitable for the proposed land use.

A Geotechnical Investigation has been undertaken within the project site to assess the geotechnical conditions, with the aim to confirm whether the Proposed Plan Change area is suitable or can be made suitable for the proposed land use. Parts of the report contain information relevant to the potential contamination issues and have been reviewed to identify any potential hazardous materials in soil, contamination hotspots, waste dumps, and landfills.

3 Applicant's assessment

Based on the review of the historical and current records of the land use within the project site, provided in the PSI and evident from photographs in 1942, the site comprises primarily grassed fields partitioned into 4-5 paddocks, and close inspection of the photographs suggests sheep are grazing on the land. A dwelling is present in the southeast corner of the site, with a shed present immediately north. Additional structures (likely agricultural sheds) are evident in the northeast portion and southwest portions of the site. The surrounding area appears to be used for rural residential purposes.

Currently the site is used for commercial / industrial purposes, containing a tractor dealership and service station, an engineering firm (BMC Engineering), Totalspan Steel Building office, an agricultural spray supplier, storage sheds, and yard areas containing storage of tractor parts, lawnmowers, small jeeps, tyres, piping, timber and general rubbish.

A wash station, waste oil bath and a spray room are located on the western side of the tractor centre.

Multiple above ground petrol / diesel fuelling stations were observed across the site. Hazardous substances included drums of fuel and compressed gases (nitrogen, argon) were located across the site (indoor and outdoor).

The site at 49 Heights Road is used for residential purposes. The site comprises a single dwelling and a shed, comprising timber, steel and potential asbestos containing materials (PACM) within the soffits. Two stockpiles were observed in the southern portion of 49 Heights Road - one comprising soil, and the other felled vegetation, timber (crates) and plastic.

The PSI has identified the following current and past historical HAIL activities with a potential for site contamination:

- HAIL (A 10) – historical horticultural purposes across the northern part of the site
Persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds.
- HAIL Item (A17) presence of a 10,000L UST at 9 Heights Road, as well as activities associated with a tractor maintenance and repair centre.
- HAIL (D5)- An engineering firm is present on-site, as well as the Totalspan Steel Building site.
- HAIL (F5)- tractor maintenance and repair centre, and an automotive parts shop have been identified as present on-site.
- HAIL(I)- potential for contamination associated with lead-based paints and / or asbestos in former and current buildings and stormwater network.
- HAIL (G5)- fill material on site

In accordance with the PSI the project site is considered as being suitable for the proposed Private Plan Change, subject to a detailed site investigation being carried out prior to any future subdivision or land-disturbance works. Once the investigation has been completed, the contamination status of the site can be confirmed to inform the consenting requirements relevant to the NES:CS and Contaminated Land Rules of the AUP(OP).

A detailed assessment of the suitability of those areas within the site, which have been identified in the PSI Report to have likely been affected by HAIL activities will need to be undertaken prior to obtaining relevant resource consents required for carrying out the future subdivisions, land disturbance activities or the actual change of land use.

The above recommendations have been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 7.0 of this Specialist Memo.

The Geotech Report, provided in support of the request for the proposed Private Plan Change indicated undocumented Fill was encountered in three boreholes across the site, comprising a combination of site-won soils mixed with topsoil and imported fill (e.g. hardfill) and occasional

building refuse debris. The fill material has been stockpiled across all three properties, as well as used to form the terraces currently in use as storage / laydown areas

The Geotech Report has concluded that based on the desktop review and site investigation, it considers the site generally suitable for a future light industrial development of a nature broadly comparable to that already completed at the site.

The PSI acknowledges that the NES:CS Regulations and Contaminated Land Rules of the AUP(OP) set out an appropriate framework to manage the potential adverse effects associated with any contamination within the project site and confirms they are anticipated to be implemented through the future resource-consent process, associated with the site subdivision and development. While no detailed site investigation has been completed, the presence of contamination hotspots is anticipated, and therefore a further intrusive environmental investigation will be required prior to the future subdivision and development of the project site.

The above recommendation has been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 7.0 of this Memo.

4. Comment on the Assessment of Effects by the applicant

I have reviewed the applicant's assessment of effects in relation to contamination and concur that the adverse effects of land contamination will be avoided, remediated and mitigated by undertaking a detailed site investigation of the potential HAIL activities identified and addressing the requirements of the *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations*, Ministry for the Environment, 2011 (NES:CS); and the provisions of Chapter E30 of the Auckland Unitary Plan (Operative in Part) (AUP(OP)) during the resource consenting process.

5. Assessment of the effects on human health and the environment, and management methods

The purpose of my review was to obtain an understanding of the potential constraints affecting the proposed Private Plan Change and the relevant future subdivision and development, associated with the potential contamination of soil and groundwater within the subject site.

My review included the assessment of the reports submitted in support of the Private Plan Change request, and the compliance of the proposed Private Plan Change with the purpose of the NES:CS regulations, and the objectives and policies of the AUP(OP), Auckland Council Regional Policy Statement, and National Policy Statement for Freshwater Management, relevant to the contaminated land management.

I consider the information provided in support of the Private Plan Change request as being adequate for obtaining general understanding of the scale and significance of the adverse effects and positive effects on human health and the environment, anticipated from the implementation of the proposed Private Plan Change. I consider it being sufficient for the purpose of this review. However, the actual extent of the areas affected by contamination, if any, will only be able to be assessed at a later stage, prior to the subdivision and development process.

I consider the proposed Private Plan Change as being generally consistent with the purpose of the NES:CS regulations, and the objectives and relevant policies of the AUP(OP), Auckland Council Auckland Regional Policy Statement, and National Policy Statement for Freshwater Management, and anticipate the land subject to the Private Plan Change as being generally suitable for the intended future residential and commercial development.

6. Submissions

I have reviewed all submissions received with regards to the proposed Private Plan Change. None of the submissions expressed any concerns relevant to the potential or actual contamination of soil or groundwater within the project site, that may affect human health or the environment as a result of the proposed Private Plan Change.

7. Conclusions and recommendations

I consider the documentation submitted in support of the Private Plan Change request to be sufficient to identify the relevant potential effects of the implementation of the proposed Private Plan Change on human health and the environment. The Preliminary Site Investigation Report and Geotech Report provided adequate description of the potential contamination issues and relevant risks.

There appear to be no significant issues of concern with regards to contamination within the project area, that would affect the Private Plan Change.

The Preliminary Site Investigation report identified a number of potentially contaminating activities, described on the Ministry for the Environment's HAIL list, formerly or currently taking place within selected parts of the project area. Those areas are considered to require further environmental assessment in order to determine the contamination status of the subsurface soils and inform the relevant remediation or management requirements prior to the future subdivisions and land development.

From the perspective of contamination and the associated potential effects on human health and the environment, the proposed Private Plan Change is considered to be consistent with the purpose of the NES:CS, and relevant objectives and policies of the Contaminated Land Rules of the AUP(OP), Auckland Council Regional Policy Statement, and National Policy Statement for Freshwater Management.

None of the submissions received have raised an issue of concern relevant to the contamination of the soil, surface water, or groundwater, associated with either current or historical land use within the project area.

Overall, from the perspective of the inferred contamination status of the project site and the potential adverse effects on human health and the environment, I recommend that the proposed Private Plan Change be supported, subject to the following recommended actions to be taken prior to any future change of use, subdivisions and land-disturbance activities associated with the land development:

- Undertaking a detailed site investigation within the site (9, 33 and 49 Heights Road, Pukekohe) to identify the potential risks to human health and the environment, and enable to determine the relevant mitigation options (remediation or management of contaminated soil)
- Undertaking targeted remediation or implementing the long-term management of those selected areas, where soil contamination in concentrations exceeding the relevant Soil Contaminant Standards for protection of human health and/or environmental guidelines for protection of the receiving environment has been confirmed to be present.

TECHNICAL EXPERT S.42A REPORT / MEMO TEMPLATE FOR PROPOSED PLAN CHANGE 110 - 9, 33 AND 49 HEIGHTS ROAD PUKEKOHE

1. Introduction

My name is Abhiram Ravi Pandith, and I am a Development Engineer at Auckland Council. I hold a Master's degree in Engineering Studies (Civil Engineering). I have been working in this role for the past 3 years and 9 months, during which I have been responsible for reviewing engineering assessments for a range of developments—from small to large-scale subdivisions. These assessments typically include stormwater management, flooding analysis, wastewater and water supply capacity checks, and traffic assessments.

I took over the assessment of this application after another Development Engineer, Sai Kumar, went on leave. As part of my review, I have examined the Integrated Transport Assessment (ITA), Stormwater Management Plan (SMP), and Civil Infrastructure Reports, and have also considered submissions from Watercare Services Limited (WSL), Auckland Transport (AT), and Waka Kotahi NZ Transport Agency (NZTA).

1.1 Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

2. Scope and Structure

2.1 Subject Matter

This report / memo relates to Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe, which is a private plan change request from GBar Properties Limited to:

- a) Rezone 5.35 hectares of land at Pukekohe from Future Urban Zone to Business - Light Industry Zone,
- b) And apply the Stormwater Management Area Flow 1 – “SMAF1” control to the plan change land.

- 2.2 I do not address any planning, ecology, streamworks matters.
- 2.3 My memo will be structured as Stormwater, Wastewater, , Traffic, Flooding,

3. Summary of key issues

3.1 The subject site that is being rezoned has a civil infrastructure report prepared by woods , geotechnical report by ENGEO and ITA prepared by commute- the application documents provide details how the site can be serviced and work- the main issue is regarding WW and WS – due to the timing of the availability of bulk infrastructure;

3.2 key issues in contention

Key issues	DE Assessment
<ul style="list-style-type: none"> Existing Stormwater Devices: Details about the size and performance of existing stormwater devices are missing. The masterplan shows some of these devices may be removed, which could lead to poor stormwater management, reduced water quality, and increased flooding both on-site and downstream. Stream Erosion Risk: The plan change will increase impervious surfaces, raising the volume and speed of stormwater runoff. Without proper mitigation, this could cause erosion in nearby streams, especially in the Whangapouri Catchment. Water Quality Concerns: New buildings and hard surfaces can introduce pollutants into stormwater runoff if not properly treated. 	<p>Retention Requirements:</p> <p>The site is located within SMAF 1, which requires retention of the first 5 mm of rainfall and detention of runoff from the 95th percentile storm event. The applicant has proposed three mitigation approaches for retention:</p> <ul style="list-style-type: none"> Primary Option: Retention via infiltration to aquifers, as soakage is available. However, the applicant's engineer notes that further on-site investigations are needed at the proposed locations of soakage devices to confirm suitability. Alternative Options: Retention through existing rain gardens and/or the use of retention tanks for new impervious areas. Fallback Option: If retention is not feasible on-site, the applicant proposes offsetting the retention volume to the two proposed wetlands, which are designed with extended detention capabilities. <p>2</p>

	<ul style="list-style-type: none"> • Detention Strategy:Roof areas will discharge to detention tanks. • Existing impervious areas will be serviced via an existing rain garden. • The proposed wetlands will also contribute to detention and provide capacity for the 100-year storm event. • 10-Year Storm Event Conveyance:Stormwater from the 10-year event will be conveyed through a private piped network up to the existing NZTA culvert. • Downstream of the culvert, the stormwater will discharge to the public network. • Healthy Waters supports this approach. <p>Water Quality Treatment:</p> <ul style="list-style-type: none"> • The applicant proposes a centralized proprietary treatment device to remove total suspended solids and heavy metals from stormwater runoff. • This device will require prior approval from Healthy Waters. • In addition, the two proposed wetlands are expected to provide supplementary water quality treatment
<p>Wastewater & WatersupplyThe main key issue is that Plan Change 110 is proposed ahead of the planned development timeline, with the Future Development Strategy (FDS) indicating the area is not intended for development until after 2040. Critical infrastructure, such as the Isabella Drive Wastewater Pump Station, is not expected to be delivered until 2028, and there is concern that development could proceed before this is in place. Additionally, no new precinct is proposed to manage the timing of development and relying solely on the existing Business – Light Industry Zone provisions may not adequately control the sequencing to ensure bulk infrastructure is available before subdivision or development occurs.</p>	<p>Wastewater</p> <p>The applicant has proposed four servicing options; however, I do not support any of them due to the lack of adequate bulk infrastructure. The existing private pump station does not have sufficient capacity, the proposed new pump station is not feasible and would not be maintained by Watercare Services Limited (WSL), there is inadequate space for on-site wastewater treatment fields, and tankering of wastewater is not an acceptable option. Tankering poses a significant nuisance to the local community, and numerous case studies have shown that it is not a reliable long-term solution—for example, at Clarks</p>

	<p><i>Beach Stage 7, where a similar arrangement was not managed well and created ongoing operational issues. The key risk in granting the Plan Change without bulk infrastructure is that the applicant may be unable to obtain resource consent (RC) and will be forced to wait until servicing becomes available, as was the case at Kohe in Pukekohe. I have been directly involved with the Isabella Drive Pump Station and the associated rising main across Pukekohe. While RC has recently been granted for this infrastructure, WSL will need to provide an update on the Engineering Plan Approval (EPA) process and the expected timing for the commencement of physical works</i></p> <p>Watersupply</p> <p><i>The subject site is currently serviced by a private borehole. A connection to the public 300mm PE watermain is proposed, and WSL has confirmed there is sufficient capacity within the existing network to service the catchment. Planned infrastructure upgrades in the area include the Wesley–Paerata Watermain (anticipated to commence post-2030) and a new reservoir at Adams Road South. Although the reservoir was initially identified as a prerequisite for this Plan Change (refer to Section 2.15 of the WSL submission), WSL has since clarified that both the reservoir and associated upgrades are intended to improve network resilience and are not required for enabling development of the Plan Change area. I support WSL’s position that the private borehole should be decommissioned for potable supply purposes.</i></p>
The effect of traffic on local road and Vehicle crossing width	<p><i>The Integrated Transport Assessment (ITA) provided with the application assesses the effects of the proposal on both the local road network and the State Highway.⁴ However, this assessment will require</i></p>

	<p><i>further review and acceptance by Auckland Transport (AT) and Waka Kotahi NZ Transport Agency (NZTA). Key design elements such as vehicle crossing widths will be finalised based on tracking curves at the resource consent stage. Additionally, all internal traffic management matters—including lighting, road markings, and signage—will be reviewed and confirmed during the RC stage</i></p>
<p>Flooding</p> <ul style="list-style-type: none"> • <i>Upstream Flow Capacity:</i> <p><i>The existing private stormwater network does not have enough capacity to carry flows from upstream areas. Without upgrades, this could cause flooding within the PPC area.</i></p> <ul style="list-style-type: none"> • <i>Onsite Flooding Risk:</i> <p><i>The 600mm culvert under State Highway 22 cannot handle large storm events. Since SH22 sits higher than the site, runoff gets trapped, causing potential flood depths of:</i></p> <p><i>580mm in the 10% AEP event</i></p> <p><i>890mm in the 1% AEP event</i></p>	<p><i>A major Overland Flow Path is traversing east to west. GIS data does not account for the culvert underneath the highway which belongs to NZTA- NZTA has raised multiple concerns the culvert is undersized and needs to be upgraded to bring the flooding from 700mm to 225mm HW have indicated to mitigate the flood before it reaches the culvert- the proposal is to have detention wetlands and use them as storage nodes to control the flooding to 3.8degree climate change, velocity X depth assessment was carried out and the output value is safe for both pedestrian and vehicular traffic</i></p>

Table 1: Key *Development Engineering* Issues in Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe

4. Comment on the assessment of effects by the applicant

The proposal can be serviced by existing and planned wastewater infrastructure, as outlined in the Civil Infrastructure Report. Watercare Services Limited have advised that a new pump station at Isabella Drive in Pukekohe is currently in the design phase, and will be completed by 2028. This is anticipated to align with the timing of the PPC, as the infrastructure is likely to be available to connect to at the time of development.

However, in the event that development of the land occurs prior to the pump station being available, the existing private pump system located on the site can be relied on as an interim solution to service development enabled by the PPC.

4.1

4.2 *The main issues are with the WW and Water supply for the site and the timing for bulk infrastructure- interim solutions do not work*

5. Submissions

Topic Issues	Number of Submissions
Traffic	2
Wastewater and Watersupply	1

Table 2 **Topic** Issues raised in Submissions

Submission Point Number	Submitter Name	Issue	Relief Sought	Technical Assessment
3.3	Auckland Transport	Improvements to frontage	Provide Kerb and channel, footpaths berms lighting	I agree with AT's comments these needs to be provided during the initial part of the development
4.2	NZTA	Improvements to culvert	Upgrade the culvert underneath SH22	The flooding is severe and when the light industry zone become active 100% can be impervious and the culvert underneath SH22 is undersized and needs to be upgraded to ensure safe SW discharge and to avoid flooding
5.2,5.3,5.4	WSL	Decline PC due to the fact Bulk services cannot be delivered by the time they	Wait or stage the development, new precinct wording to be added to ensure staging can happen	Wastewater: The applicant has proposed four servicing options; however, I do not

		start this development		<p>support any of them due to the lack of adequate bulk infrastructure. The existing private pump station does not have sufficient capacity, the proposed new pump station is not feasible and would not be maintained by Watercare Services Limited (WSL), there is inadequate space for on-site wastewater treatment fields, and tankering of wastewater is not an acceptable option. Tankering poses a significant nuisance to the local community, and numerous case studies have shown that it is not a reliable long-term solution—for example, at Clarks Beach Stage 7, where a similar arrangement was not managed well and created ongoing operational issues. The key risk in granting the Plan Change without bulk infrastructure is that the applicant may be unable to obtain resource consent (RC) and will be forced to wait until servicing becomes available, as⁷ was the case at Kohe</p>
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			<p>in Pukekohe. I have been directly involved with the Isabella Drive Pump Station and the associated rising main across Pukekohe. While RC has recently been granted for this infrastructure, WSL will need to provide an update on the Engineering Plan Approval (EPA) process and the expected timing for the commencement of physical works</p> <p>Watersupply</p> <p>The subject site is currently serviced by a private borehole. A connection to the public 300mm PE watermain is proposed, and WSL has confirmed there is sufficient capacity within the existing network to service the catchment.</p> <p>Planned infrastructure upgrades in the area include the Wesley–Paerata</p> <p>I support the idea of having a its own Precinct and staging the development to allow for the bulk infrastructure to develop first</p>
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Table 3 Assessment of Development Engineering Issues Raised in Submissions

6 Conclusion / Recommendations

Based on the information provided, I support the position of Healthy Waters and consider that Plan Change 110 (PPC 110) has sufficiently demonstrated, at a conceptual level, that stormwater effects can be appropriately managed through a combination of water quality treatment, hydrological mitigation (including 5mm retention and 95th percentile detention), and flood attenuation using two centralised wetlands designed to accommodate 1% AEP flows under a 3.8°C climate change scenario. Detailed stormwater management measures can be finalised and assessed at the resource consent stage, and as such, I agree that PPC 110 can be supported from a stormwater and flooding perspective.

However, I also agree with the position of Watercare Services Limited (WSL) that PPC 110 should not be supported in its current form due to the lack of available bulk wastewater infrastructure. The proposal is out of sequence with the development timeline set out in the Future Development Strategy, and advancing the plan change without this infrastructure in place would likely result in delays at the resource consent stage. If PPC 110 is to be approved, I support WSL's recommendation that a new precinct be introduced to manage the staging and sequencing of development, and that appropriate provisions be included to ensure development does not proceed ahead of the required bulk infrastructure.

Date24/07/2025.

Memorandum

To: Joy LaNauze, Senior Policy Planner, Central/South Planning Team, Plans and Places, Auckland Council

From: Sanaz Safavian, Ecologist, Environmental Services

Date: 22 July 2025

Subject: Heights Road, Pukekohe - Private Plan Change request – Ecology

Introduction

My name is Sanaz Safavian, and I am an Ecologist at Auckland Council's Environmental Services unit. My role in relation to this private plan change request (PPC110) is to provide technical ecological advice. In preparing this evidence, I undertook a site visit to the subject site and reviewed the following documents: the ecological assessment report titled "9, 33 and 49 Heights Road, Pukekohe, Auckland: ecological values" (RMA Ecology Ltd, 2023); all Clause 23 response documents submitted by the applicant (dated 2023 and 2024); and all associated application documents, including the masterplan, stormwater management plan, and planning assessment. This memo constitutes my technical evidence on Proposed Plan Change 110.

2.0 Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

3.1 Subject Matter

This memo relates to Proposed Plan Change 110, a private plan change request by GBar Properties Limited to:

- Rezone approximately 5.35 hectares of land at 9, 33 and 49 Heights Road, Pukekohe from Future Urban Zone to Business – Light Industry Zone; and
- Apply the Stormwater Management Area Flow 1 (SMAF1) control.

3.2 Exclusions

This memo does not address freshwater ecology, detailed stormwater engineering effects, or noise/traffic matters.

3.3 Structure

The memo is structured under the following headings:

- Summary of Key Issues
- Comment on the Assessment of Effects
- Submissions
- Conclusions and Recommendations

4.0 Summary of Key Issues

4.1 This memo addresses terrestrial ecological effects associated with the proposed rezoning and anticipated future development of the site. It focuses on habitat removal for indigenous lizards and potential bat habitat.

4.2 The key terrestrial ecological issues in Proposed Plan Change 110 are:

- Clearance of habitat previously occupied by copper skinks, and lack of proposed mitigation for habitat loss and translocation.
- Potential adverse effects on bat habitat following vegetation clearance.
- Absence of significant ecological constraints for rezoning following updated surveys

5.0 Comment on the Assessment of Effects by the Applicant

5.1 I have reviewed the ecological assessment prepared by RMA Ecology Ltd (2023) and the associated Clause 23 response from February 2024. The ecological values were appropriately described, and the assessment concluded that:

- There are no areas of indigenous vegetation or wetlands present on site;
- Long-tailed bat surveys (January 2024) detected no bat activity, and no further mitigation was proposed;

- Copper skinks were confirmed on site and were relocated during vegetation clearance without landowner approval or consent from Council;
- No mitigation was proposed for the permanent loss of lizard habitat or post-translocation management.

5.2 I agree with the general findings of the ecological assessment. While the presence of bats was ruled out based on formal survey results, the removal of copper skinks and their habitat without mitigation or follow-up management remains a concern. Where resource consent is not required, fauna protection obligations under the Wildlife Act 1953 still apply, and any handling or relocation of protected species (including indigenous lizards) requires approval from DOC.

Wildlife Act 1953:

"All native birds, lizards and specific invertebrates are absolutely protected under the Wildlife Act 1953 under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation. This includes the deliberate disturbance of potential habitat even if presence of native species has not been specifically surveyed."

As such, skink protection would typically occur at the resource consent stage where relevant Auckland Unitary Plan (Operative in part) rules are triggered, or through adherence to the Wildlife Act, even if no consent is required under the Plan.

5.3 Notwithstanding the above, the presence of additional copper skinks cannot be ruled out.

5.4 I consider the ecological effects associated with the proposed rezoning to be low overall, and that no significant ecological constraints remain that would prevent rezoning. However, the applicant should provide some form of mitigation by way of habitat improvements within the site, for the confirmed loss of lizard habitat to align with national direction under the NPS-IB.

6.0 Submissions

Based on the submission summary, no ecological issues were raised in the original submissions. If any relevant ecological matters are later identified in the submissions, supplementary comment can be provided if needed.

7.0 Conclusions and Recommendations

Based on my review of the application and supporting ecological information, I consider that:

- There are no significant residual ecological effects that would prevent the rezoning of the site from Future Urban Zone to Light Industry Zone.
- Clearance of lizard habitat without mitigation remains a minor outstanding matter. If this plan change proceeds, any future vegetation clearance should be subject to ecological oversight, including the preparation of a Lizard Management Plan (LMP), to address the potential ongoing presence of copper skinks.
- Any restoration or landscape planting associated with future development should incorporate features suitable for copper skinks to support long-term habitat provision.
- I support the proposed plan change from an ecological perspective and recommend no amendments to the plan change itself from an ecological standpoint.

Regards

Sanaz Safavian



Ecologist – Environmental Services

Ecological Advice | Environmental Services

TECHNICAL EXPERT S.42A REPORT FOR PROPOSED PLAN CHANGE 110 - 9, 33 AND 49 HEIGHTS ROAD PUKEKOHE

1. Introduction

- 1.1 My full name is Derek Richard Foy. I am a Director of Formative Limited, an independent consultancy specialising in economic, social, and urban form issues. I have held this position for four years, prior to which I was an Associate Director of research consultancy Market Economics Limited for six years, having worked there for 18 years.

Qualifications and experience

- 1.2 I hold the qualifications of a BSc in Geography and an LLB from the University of Auckland. I have 25 years consulting and project experience, working for commercial and public sector clients. I specialise in retail analysis, assessment of demand and markets, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.
- 1.3 I have applied these specialties in studies throughout New Zealand, across most sectors of the economy, notably assessments of retail, commercial, services and industrial demand, urban form, land demand, housing, tourism and local government.
- 1.4 I have worked for many Councils, assisting them with assessing and reviewing consent and plan change applications and providing input into development planning and policy development. My private sector clients include large national retail chains, residential land developers, infrastructure providers and industry bodies.
- 1.5 I have undertaken assessments for plan change requests and District Plan reviews throughout New Zealand, including throughout Auckland, and have broad experience assessing developments under the national policy statements on urban development and highly productive land.
- 1.6 I am a member of the New Zealand Association of Economists, the Population Association of New Zealand, and the New Zealand Association for Impact Assessment.

Involvement with this application

- 1.7 In July 2023 Auckland Council (**Council**) requested that I provide economic services for the assessment of the private plan change (**PPC**) application on behalf of Council.
- 1.8 I have subsequently reviewed various application materials and provided input to guide Council's clause 23 requests for further information, as follows.
- 1.9 I produced a memo dated 10 August 2023 to provide Auckland Council with guidance on further information I considered was required to adequately assess the likely economic effects of the PPC application. In preparing that memo I reviewed:
- a. The economic effects assessment prepared by Insight Economics Limited titled "Economic Assessment of Proposed Industrial Plan Change in Pukekohe" (22 February 2023).
 - b. The Section 32 assessment report, prepared by Woods and Partners Consultants Ltd (4 July 2023), and titled "Private Plan Change Request Assessment of Environmental Effects and Section 32 Report, 9, 33 and 49 Heights Road, Pukekohe".
 - c. Various other technical reports provided as part of the application package.
- 1.10 I was then asked to provide a new memo to assist a revised clause 23 request following the receipt of an amended application. I produced a memo dated 30 October 2024 which revised and updated my August 2023 memo to refer to the revised application. In preparing that memo I reviewed:
- a. The economic effects assessment prepared by Insight Economics Limited titled "Economic Assessment of Proposed Industrial Plan Change in Pukekohe" (29 August 2024) (**IEL report**).
 - b. The Section 32 assessment report, prepared by Woods and Partners Consultants Ltd (18 October 2024), and titled "Proposed Plan Change Request Heights Road Plan Change Planning Report, 9, 33 and 49 Heights Road, Pukekohe" (**s32 report**).

- c. Various other technical reports provided as part of the application package.

- 1.11 My review of the application has been undertaken as a desktop review. I have visited the site on an informal basis in August 2023 to understand the general location and site surrounds, but not as part of an organised site visit.
- 1.12 In the first half of 2025 I have reviewed material relevant to enable me to complete this specialist review of the application, including reviewing submissions.

Code of Conduct

- 1.13 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the panel. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

2. Scope and Structure

- 2.1 This report is my expert technical evidence on Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe and submissions relevant to my area of expertise (economics). The PPC is a private plan change request from GBar Properties Limited to:
 - a. Rezone 5.35 hectares of land at Pukekohe from Future Urban Zone (**FUZ**) to Business - Light Industry Zone (**BLIZ**),
 - b. And apply the Stormwater Management Area Flow 1 – “SMAF1” control to the plan change land.
- 2.2 In the following sections of this report I:
 - a. Summarise the key issues from an economics perspective (section 3).

- b. Comment on the applicant's assessment of economic effects (section 4).
- c. Comment on submissions (section 5).
- d. Provide a conclusion on the overall merits of the PPC request from an economics perspective, and provide recommendations relating to the application (section 6).

3. Key economics issues

3.1 From my assessment the key economics issues are:

- i. Demand for industrial land
- ii. Efficient land use
- iii. Consistency with future anticipated land use and timing
- iv. Infrastructure and servicing costs
- v. Benefits of proposed zoning.

4. Applicant's Assessment of Effects

4.1 I accept and adopt the site description provided in the s32 report, including the zoning and description of existing activities.

4.2 I accept the methodology applied in the applicant's economic assessment (the IEL report) in relation to how to assess the demand for and supply of industrial land. Overall, I agree with the IEL report's assessment of:

- a. The site description and attributes, and indication of the potential development capacity of the PPC area.
- b. The strategic and planning context.
- c. The current state of the industrial land market, being a market in which demand is high and current supply in and around Pukekohe is constrained. I note industrial land research updated to the second half of 2024 (post-dating the IEL report) indicates a continuation of low

vacancy rates and high consent numbers, although slightly lower than in the previous year.

- d. The positive economic effects of the PPC request, including increasing industrial land supply and affordability, making efficient use of the PPC area's land, increasing employment, GDP and wages in Pukekohe in both the construction and operational phases,

4.3 There are two aspects of the IEL report's assessment that I wish to provide some response on. In the rest of this statement I provide only limited expansion on the matters in the application with which I agree, and focus most of my response in on those other matters that I consider require some response. Those matters are:

- a. Timing of the proposed development in relation to that anticipated by the Future Development Strategy (**FDS**).
- b. Costs associated with providing infrastructure to service the PPC area.

Timing of development

4.4 The IEL report identifies that the PPC area is

located within the Pukekohe-Paerata FUA cluster and is part of the Pukekohe North-West node. The reassessment of this cluster does not identify any significant challenges that would make development inappropriate, provided plan changes occur in line with the associated structure plan and after all infrastructure provisions are met.¹

4.5 The IEL report does not identify that the PPC area is within "Pukekohe Northwest", an area which is not planned to be serviced by bulk infrastructure until "2040+".² The IEL report does, however, recognise that the timing of infrastructure provision will be relevant to the appropriateness of development on the PPC area, but concludes that that timing is not a 'significant challenge'.

4.6 As discussed below in relation to infrastructure servicing, and in my response to submissions, the challenge related to infrastructure servicing may be more significant than the IEL report anticipates. I am not an infrastructure expert, so in my commentary about this matter I defer to the appropriate infrastructure

¹ IEL report, page 4

² FDS, Appendix Page 53

agencies and experts, and limit my assessment to identification of infrastructure matters insofar as they may be a potential economics issue.

Infrastructure servicing

4.7 There are potential economic consequences arising from infrastructure servicing of the PPC area. As discussed above, the PPC area is not envisaged by the FDS to be development ready until 2040+, which potentially means that agencies responsible for servicing the PPC area and its surrounds do not anticipate having all the required infrastructure in place for some time yet, and potentially up to 15 years.

4.8 The IEL report identifies this as a relevant issue:

A potential economic downside of the proposal is the cost and risk of providing the infrastructure needed to enable it, such as roads, water, wastewater, and parks/reserves. However, all works within the boundary of the development are the sole responsibility of the applicant, with the cost and risk of works beyond the subject site also able to be (mainly or largely) transferred to them via development contributions levied on future industrial land use development. Accordingly, any infrastructure costs and risks on the Council should be negligible.³

4.9 In my opinion that summary is too simplistic, and the IEL report does not recognise the consequences related to when infrastructure might be required, and the fact that the rezoning is earlier than the FDS development ready timing might result in servicing issues. I recognise that the applicant's s32 Civil Infrastructure report⁴ has investigated servicing of the PPC area, including waters infrastructure, and concludes that "the proposed development can be fully serviced utilising either public or private infrastructure, so therefore there is no reason to consider that the civil infrastructure should constrain the proposed plan change."⁵

4.10 If that assessment is accurate, then the PPC request should not, as the IEL report concludes, give rise to material financial risks to Council. However, two submissions indicate that there may be infrastructure-related reasons to have concern about the potential economic effects of the proposal, including in relation

³ IEL report, page 14

⁴ "Heights Road Plan Change Civil Infrastructure Report, 9-49 Heights Road, Paerata, Auckland", Woods and Partners Ltd, Clause 24 revision, 31 July 2024

⁵ Ibid page 15

to both waters and transport infrastructure. I discuss those submissions more in the next section.

- 4.11 In response to those submissions I note that infrastructure challenges extend beyond the boundaries of the PPC area, and there can be challenges with funding the servicing of out of sequence developments. Notwithstanding the observations of the applicant's civil engineering assessment, the submissions identified below indicate that it is difficult to be confident that public funding will not be required to supplement funding shortfalls arising out of unanticipated infrastructure should the PPC application be approved. The Watercare and Auckland Transport submissions allude to that potential, and to the possibility that changes to infrastructure requirements can occur beyond the boundaries of the PPC area.
- 4.12 It is important that these requirements are understood and, if necessary, are appropriately captured in any private funding agreements established, although my understanding is that no such agreements have been proposed by the applicant. If any private funding agreement comes to be proposed during the course of the hearing, it will be very important that it appropriately captures a sufficiently broad range of infrastructure funding so as to avoid unintended future public funding liabilities.
- 4.13 I defer to infrastructure specialists on the adequacy of current infrastructure, and the timeliness of future infrastructure to service the PPC area, but note that infrastructure matters may give rise to economic effects, and from the submissions received those effects do not appear to have been fully identified or planned for yet. I consider that this is a matter that the applicant should address in evidence at the hearing.

5. Submissions

- 5.1 Six submissions were received, of which the submissions by Auckland Transport (#3), and Watercare Services Limited (#5), contain matters relevant to my economics area of expertise.
- 5.2 Those submissions are relevant because, as identified above, they identify that there are some challenges associated with the timing of the proposed rezoning being in advance of the timing anticipated in the FDS.

5.3 Auckland Transport's submission notes that:

While discussions with the applicant continue to progress, the agreement and covenant has not been finalised by the submission close date. AT recognises there is a possibility that this agreement may not be finalised and enforced via a covenant. Therefore, in the absence of a finalised private agreement and covenant, AT requests that the plan change includes appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure the frontage upgrades are delivered at an appropriate time.⁶

5.4 The crux of that submission appears to be that Auckland Transport believes that the applicant should be required to undertake frontage upgrades, and those are required to support safe and efficient connections as adjacent land become urbanised in the future. If the required upgrades are privately funded, there would be no economic implications in relation to road infrastructure. However, without private funding the out of sequence development of the PPC area would place some unanticipated (as to timing) funding burden on Auckland Transport, which would be a negative economic effect of the application, because it would require spending to be brought forward to achieve an appropriate standard of service.

5.5 Watercare's submission notes that the PPC area is not currently serviced by the public water supply network, and is concerned that:

the technical feasibility of the proposed water and wastewater servicing is addressed and that the potential adverse effects of the future development enabled under Plan Change 110 on Watercare's existing and planned water and wastewater networks, and the services they provide, are appropriately considered and managed⁷

5.6 Watercare is also concerned that development of the PPC area should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development being constructed and commissioned.⁸

5.7 The Watercare submission contains the following excerpt from the FDS, which well sums up the issues of out of sequence development from an economics perspective:

The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk

⁶ Submission point 3.2, page 3

⁷ Submission 5, paragraph 2.6

⁸ Submission 5, paragraph 2.17

*infrastructure and able to deliver the quality urban outcomes anticipated in this FDS.*⁹

- 5.8 Overall, Watercare opposes the PPC as currently proposed “on the basis that it is out of sequence with the expected timing for development of the Pukekohe Northwest FUA, in advance of the required bulk wastewater infrastructure and does not propose a precinct with provisions to manage effects on the bulk wastewater infrastructure.”¹⁰
- 5.9 Ultimately the infrastructure servicing issues identified in the submissions of Watercare and Auckland Transport are matters that may be able to be resolved, but from an economics perspective it is important that that resolution should be achieved in a manner that minimises or avoids unanticipated and out of sequence public expenditure on infrastructure, so as to minimise the adverse economic effects of the PPC request, including those identified in the IEL report.
- 5.10 The Franklin Local Board resolved to support the PPC request, including on the basis that local employment opportunities would result. I agree with the Local Board’s observation on that matter, and note that that benefit is also identified in the IEL report, making employment provision a positive economic effect of the application.

6. Conclusion / Recommendations

- 6.1 Overall, I support the application from an economics perspective, on the condition that infrastructure servicing concerns identified by Auckland Transport and Watercare are able to be resolved, and the PPC does not require unanticipated public expenditure on infrastructure to service the PPC area. I defer to those two agencies on the matter of what modifications might be required to avoid the concerns raised in their submissions.
- 6.2 I also defer to other infrastructure providers that may make recommendations at the hearing as to any other required infrastructure servicing or upgrades which may be recommended by them to enable the PPC to proceed, also so as to avoid unanticipated public expenditure on infrastructure to service the PPC area.

⁹ FDS, Appendix 6, page 41

¹⁰ Submission 5, paragraph 3.1

- 6.3 Apart from those potential infrastructure-related effects which arise from the proposed timing of the PPC rezoning, the economic effects of the proposed rezoning are positive, and if infrastructure matters are able to be appropriately addressed, I support the application from an economics perspective.

Derek Foy

11 July 2025

Memo

30/06/2025

To: Joy LaNauze, Senior Policy Planner, Auckland Council

From: Nicole Li, Engineering, Assets and Technical Advisory (EATA), Auckland Council

Subject: Geotechnical Review of Private Plan Change Application 110 at 9, 33 & 49 Heights Road, Pukekohe, Auckland

Status: Issued for Information

Version: 1

1 Introduction

We have been requested by Joy LaNauze, planner for Auckland Council Plans & Places to review geotechnical aspects of a private plan change application at 9, 33 and 49 Heights Road, Pukekohe. It is understood that the developer is seeking to rezone land at 9, 33 and 49 Heights Road, Pukekohe from 'Future Urban to Business' to 'Light Industry' to enable consolidation of existing activity and development of new light industrial activities. No earthworks concept has been submitted to Auckland Council at the time of this geotechnical memo preparation.

The following documents have been attached to the application and reviewed by us:

- ENGEO Limited "Geotechnical Investigation - 9, 33 & 49 Heights Road, Pukekohe, Auckland", reference: 21253.000.001 and dated 23 June 2023
- Woods Limited "Indicative Masterplans", drawing numbers: P18-188-UD101 to P18-188-UD104 and dated 29 June 2023
- Franklin Local Board "Franklin Local Board Open Minutes", dated 24 June 2025

We understand that the above documents were prepared to support the private plan change application. Our findings and recommendations are summarised in the following sections. Please note that the EATA geotechnical team has not undertaken a site walkover inspection as part of this review. Our findings and recommendations are based on a review of the submitted and existing available geotechnical information only. Our review is of geotechnical matters arising from the proposal, it excludes assessment of any other engineering components.

2 Proposed Plan Change

It is understood that the conceptual new light industrial activities proposed in this private plan change comprise of new warehouse buildings, landscaped areas, and two proposed stormwater ponds. The general layout of the proposal is shown in Figure 1 below.



Figure 1: Proposed Indicative Masterplan Layout (from Woods Limited)

3 Geological Setting

The site is situated on a mixture of volcanic derived and alluvial materials. These include undifferentiated Kerikeri Volcanic Group tuff and basalt lava of the South Auckland Volcanic Field (SAVF) and recent alluvium of the Puketoka Formation from the Tauranga Group. The Kerikeri Volcanic Group tuff typically comprises of pre-volcanic materials with basaltic fragments, and unconsolidated ash and lapilli deposits. The Kerikeri Volcanic Group basalt lava generally consists of fine-grained and coarse-grained, porphyritic, olivine basalt, basanite and hawaiite lava flows.

The alluvial material (Holocene alluvium) in reference to its relatively young geological age at the time of deposition, typically comprises compressible clay, silt, and organic material. Holocene alluvium is typically found in isolated low-lying areas adjacent to streams and gullies.

4 Review of Aerial Photographs and Terrain Map

A review of aerial photographs available through the Council Geomap has been undertaken by the EATA geotechnical team to identify any significant geomorphic features at 9, 33 and 49 Heights Road, Pukekohe that may affect the proposed plan change. The terrain map available on the Council Geomap has also been reviewed for the same purpose. No large scale, obvious instability features were identified at 9, 33 and 49 Heights Road, Pukekohe through review of the abovementioned aerial images and terrain map.

5 Assessment of Geotechnical Effects

A review of the provided geotechnical investigation report prepared by ENGEO indicates that the following geohazards have been assessed and considered:

- Slope instability
- Consolidation settlement
- Ground rupture by faulting
- Liquefaction and lateral spreading
- Soil erosion

Slope Instability

The ENGEO report states that the site does not appear to be subject to global slope instability based on their site observations and review of historical aerial photographs. This assessment conclusion is consistent with the findings from our desktop review discussed in Section 3 above.

ENGEO further states that *“Evidence for shallow-seated, local instability was observed on some of the man-made batter slopes and is attributed to the oversteepened slope angles together with uncontrolled surface water flows. Future land development work would need to address the potential for instability in the existing uncontrolled batters, as well as for future cuts and fills that may be proposed”*. We concur with this recommendation, and detailed stability assessment and /or further field investigations should be undertaken based on site-specific development to support future resource consent application(s).

Consolidation Settlement

The ENGEO report states that *“the native ground identified at the site typically comprises stiff to very stiff cohesive soils that are unlikely to be susceptible to consolidation settlements under lightweight industrial building loads. However, these soils may be susceptible to settlement where they are subjected to fill loads in conjunction with building loads, and / or where heavily loaded buildings are proposed”*. We consider the justification made by ENGEO generally adequately captures the likely hazard. Therefore, specific settlement analysis of the Holocene alluvium should be included in the future resource consent application(s). The analysis should consider both total and differential settlements. Further field investigation and laboratory testing should also be considered to differentiate horizons of potentially compressible soils. In addition, structures that are sensitive to settlement or structures on high compressibility defined areas will require specific investigation and engineering design.

Ground Rupture by Faulting

The ENGEO report states that *“there are no active faults mapped within the site or immediate surrounds, so the risk of ground rupture associated with faulting is assessed to be negligible”*. We have no objection to this assessment conclusion.

Liquefaction and Lateral Spreading

The ENGEO report states that *“a low to moderate risk of soil liquefaction may be expected in this geological setting, and a future development should be supported by a site-specific liquefaction analysis to confirm the level of risk and inform the land development proposals”* and *“conventional mitigation measures (e.g. limiting foundation embedment depths) can be adopted to manage this risk”*. The ENGEO’s assessment conclusion is considered appropriate. Whilst isolated areas of the recent alluvial deposits may be subject to potential liquefaction, it is considered these will likely have little impact on the overall developability of the land and can be mitigated via specifically geotechnical and/or structural designs.

Soil erosion

The ENGEO report states that *“evidence for surface water scour was observed away from the overland flow path, where uncontrolled surface water appears to have overtopped batter slopes”*. We consider the control of surface water can be addressed via civil design during the development. This is unlikely to be an issue for the overall proposed private plan change.

6 Public Submissions

A review of the public submissions indicates that no opinion has been provided either in support of or in opposition to the geotechnical conditions at the site. As such, the submissions received to date do not affect the geotechnical conclusion outlined in this memo.

7 Franklin Local Board Views

A review of the Open Minutes (dated 24 June 2025) from the Franklin Local Board shows that no geotechnical related agenda was discussed. Therefore, the geotechnical conclusion outlined in this memo remain unchanged.

8 Recommendations and Conclusions

At the plan change stage, it is appropriate to comment on the suitability of the land for rezoning. We consider that the site is suitable from the geotechnical perspective to support the proposed private land change, provided that detailed assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate construction methodologies are submitted for proposed works once the scope is decided. We recommend that the resource consent stage is the most appropriate time to address the specific geotechnical issues on the site. Inputs from the Council geotechnical specialists will be required at the future resource and building consent stages.

9 Quality assurance

Reviewed and approved for release by

Reviewer

Frank Zhou, Senior Geotechnical Specialist, EATA

This memo is satisfactorily completed to fulfil the objectives of the scope. I have reviewed, and quality checked all information included in this memo

Author

Nicole Li, Geotechnical Practice Lead, EATA

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Auckland Council

Peer Review Comments

Peer Reviewer:	Rebecca Skidmore
Area of Expertise:	Urban Design Landscape and Visual Effects
Date:	23 rd July 2025
Application Details:	Proposed private plan change for land at 9, 33 and 49 Heights Road, Pukekohe
Peer Reviewers Reference:	Council Ref. PPC 110 My ref.: 23012

1 Introduction and Area of Expertise

Qualifications and Experience

- 1.1 I am an Urban Designer and Landscape Architect. I hold a Bachelor of Science degree from Canterbury University, Christchurch, a Bachelor of Landscape Architecture (Hons.) degree from Lincoln University, Christchurch and a Master of Built Environment (Urban Design) degree from Queensland University of Technology in Brisbane, Australia. I am a director of the consultancy R. A. Skidmore Urban Design Limited and have held this position for approximately fifteen years.
- 1.2 I have approximately 30 years' experience in practice in both local government and the private sector. In these positions I have assisted with district plan preparation and I have reviewed a wide range of resource consent applications throughout the country. These assessments relate to a range of rural, residential and commercial proposals.
- 1.3 In my current role I regularly assist local authorities with policy and district plan development in relation to growth management, urban design, landscape, and amenity matters. I also have considerable experience in carrying out character assessments.
- 1.4 I am an independent hearings commissioner.
- 1.5 I have extensive experience providing expert evidence in the Environment Court. I have appeared as the Court's witness in the past.

Scope of evidence

- 1.6 I have been engaged by Auckland Council to carry out a landscape review of PPC 110. My review primarily relates to the Assessment of Landscape and Visual Effects by LA4 (dated 14th February 2023 and included in Appendix 10 of the updated PC request Planning report (dated 18/10/24).
- 1.7 My review has also been informed by considering the following:
 - The Planning report by Woods (18/10/24);
 - AUPOP: RPS Assessment 2024 (Appendix 2 of Planning report);
 - Indicative masterplan and perspectives (Appendix 3 of Planning report);
 - Summary of Iwi consultation (Appendix 12 of the planning report);
 - Summary of Stakeholder consultation (Appendix 14 of planning report);

- Submissions received;
- Comments received from Franklin Local Board (24 June 2025).

1.8 I visited the site and surrounding environs on the 8th August 2023 and the 15th July 2025.

1.9 The following memo sets out my expert evidence on Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe and submissions relevant to my area of expertise.

Code of Conduct

1.10 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

1.11 For completeness, I also note that I have not used any artificial intelligence tools in preparing this evidence.

2 Summary of Key Issues

2.1 Having carried out a full review of the PPC and, in particular, the Assessment of Landscape and Visual Effects ("ALVE") by LA4 Landscape Architects, I generally agree with the assessment provide. The only outstanding matter relates to visual effects experienced from users of the adjacent Heights Road Cemetery.

2.2 An overview of the ALVE and comments in relation to it are set out in the following section.

3 Assessment of Effects by the Applicant

3.1 Appendix 3 of the Planning report contains an Indicative Masterplan and perspective images. I note that this imagery is helpful to demonstrate how a development scenario could be accommodated on the Site in accordance with the Business: Light Industry (B:LI") zone provisions. However, this is just one possible outcome. My review has been guided by the range of activities and scale of development that can be achieved within the parameters enabled by the zone.

- 3.2 The Plan Change request is accompanied by an Assessment of Landscape and Visual Effects (“ALVE”) report by LA4 Landscape Architects (dated 14th February 2023, Appendix 10 of the Planning report). In my opinion, the report sets out a suitably detailed assessment and the methodology used is in accordance with Te Tangi a te Manu – Aotearoa New Zealand Landscape Assessment Guidelines (Tuia Pito Ora NZILA, 2022). Following is a brief overview and comment on the assessment provide.
- 3.3 Section 4 of the report sets out a description of the Site and its landscape setting. I agree with that description. Key features include:
- The sloping topography of the Site;
 - The existing commercial activities established on the Site;
 - Established mature trees both on the Site and in the immediately surrounding context (particularly within the neighbouring Heights Park Cemetery);
 - The location and characteristics of surrounding transport infrastructure, including streets and the North Island Main Trunk Railway line;
 - The land-use pattern in the area including rural production activities, rural residential properties and proximity to the urbanized area of North Pukekohe.
- 3.4 As noted in the ALVE, the Site is located within the Pukekohe North Tuff Ring. However, it is not identified in the AUP as being an Outstanding Natural Feature or Outstanding Natural Landscape.
- 3.5 Section 5 of the report provides a summary of relevant statutory considerations and refers to the AEE for a more extensive description. In assessing the PPC, I consider the RPS provisions of the AUP(OiP) to be of particular relevance (B2.2 – Urban Growth and Form, and B2.3 – A quality Built Environment).
- 3.6 The report also provides a brief overview of the Landscape Assessment by Opus Consultants that was used to inform the Pukekohe-Paerata Structure Plan (the “SP”). While the SP is not a statutory document, it provides important context as it sets out Auckland Council’s strategic direction for growth in the Pukekohe-Paerata area. It has been prepared in accordance with the Appendix 1 Structure Plan Guidelines set out in the AUP (OiP). The Opus Landscape Assessment assessed Landscape Character Area 7 (including the Site) as having a low sensitivity to change.
- 3.7 Heights Road forms the boundary to the SP area. I note the SP identifies the Site as suitable as being zoned B:LI.

3.8 Section 6 of the ALVE sets out an evaluation of the Proposal in terms of landscape effects, and visual effects. The latest guidance provided in Te Tangi a te Manu, notes that “visual effects” are a subset of an overarching consideration of “landscape effects”. Therefore, a better characterization of the two parts of the assessment is “landscape character effects” and “visual effects” both sitting under the umbrella of “landscape effects”. This doesn’t alter my opinion, that the content of the assessment itself is appropriate.

3.9 In relation to landscape character effects, I agree with the observation that:

Development enabled by the PC would not introduce new elements or features that would adversely influence the landscape values and character of the area. There would be short term effects associated with earthworks and construction activities, however these would be for a brief duration.¹

3.10 When taking into account the planned built character indicated by the Future Urban zoning and SP, I agree that development in accordance with the proposed B:LI zoning would result in low adverse landscape character effects.

3.11 In terms of visual effects, I agree with the identification of the six groups that comprise the viewing audience.² The assessment that follows in the ALVE is informed by photographs from a number of representative viewpoints (from public locations). These are contained in Annexure 2 of the report.

3.12 The assessment makes numerous references to the character of the Site created by the established use of the land. In particular, it highlights the recently constructed GMC Engineering building, noting the way it successfully sits into its landscape setting with a recessive colour finish and location below the adjacent ridgeline.³ I agree. However, I note that the zone enables a range of different development scenarios including buildings as a permitted activity meeting development standards (including a 20m height standard). Therefore, the zone could accommodate buildings with considerably greater visual prominence.

3.13 When considering the transient nature of views for people travelling on the surrounding transport network, I agree that adverse visual effects will range from low to low-moderate. For the more static views experienced from the property at 1173 Paerata Road (represented by Viewpoint 3), I consider the adverse effects could be low-moderate (depending on the development scenario) rather than low as assessed in the ALVE. I agree with the assessment that visual effects experienced from the neighbouring Heights Park Cemetery would be, at most, low-moderate.

¹ Para. 6.14, p.12, Assessment of Landscape and Visual Effects, LA4, 02/23

² Para. 6.22, p.13, *ibid*.

³ Para. 6.44, p.17, Assessment of Landscape and Visual Effects, LA4, 02/23

- 3.14 In relation to users of the neighbouring Heights Road Cemetery, the ALVE provides an assessment in relation to Viewpoint 5 (contained in Annexure 2)⁴. The assessment notes that the existing outlook would change noticeably from the current partially developed outlook, however this would not be unexpected within the planning context of the area. The report finds, overall, that for this viewing audience the adverse visual effects would be 'low-moderate with views from large parts of the cemetery screened or filtered by the mature tree plantings'⁵.
- 3.15 I note that since that report was prepared, there has been clearance of a large amount of vegetation adjoining the Cemetery within the PPC area. In addition to the large, deciduous, mature trees, it was the evergreen and lower, dense vegetation that provided effective visual screening, particularly along the main entrance into the Cemetery and area of plots adjacent to the PPC boundary. There are now very open views into the PPC area (see Figure 1 and 2 below).



Figure 1: View from Cemetery entranceway with PPC land on left of image (August 2023)

⁴ Para. 6.44 – 6.46, p. 16-17, Assessment of Landscape and Visual Effects, LA4, 02/23

⁵ P.ara. 6.46, *ibid*.



Figure 2: Views towards PPC area from Cemetery accessway (July 2025)

- 3.16 The B:LI zone includes a number of additional controls for buildings that adjoin more sensitive zones (including residential, open space, Special Purpose – Maori Purpose and Special Purpose – School zones) including a height in relation to boundary control and yard controls (including landscape requirements for rear and side yards). However, these controls do not apply to the Special Purpose – Cemetery zone. 20m high buildings are enabled on the boundary as a permitted activity. In my opinion, this could result in moderate-high adverse visual effects in relation to viewers visiting the adjacent Cemetery.
- 3.17 In my opinion, it would be appropriate to apply the additional controls that apply to other sensitive zone interfaces, in order to reduce adverse visual effects to a low-moderate level for those using the neighbouring Cemetery.
- 3.18 The assessment conclusions are set out in Section 7 of the ALVE. I agree with the overall conclusion that, while the proposed zoning will enable development that may result in significant visual change, that change is anticipated and in accordance with the change indicated by the current FUZ and SP. I agree that, in terms of landscape values, the proposed zone change is appropriate in relation to the Site's current character and its surrounding context. As set out above, I agree with the assessment of visual effects provided, except in relation to visitors to the neighbouring Heights Road Cemetery.

4 Submissions

- 4.1 I have reviewed the submissions received in relation to the PPC. There were no further submissions received. No submissions directly raise any landscape effects issues.
- 4.2 The submission by Peter Fa'afiu (#1) support the PPC. However, notes the proximity of the land to the Heights Cemetery which is 'well known to the Pukekohe community'. The submission notes that the landscape report confirms a significant buffer between the site and cemetery. I don't think this is the case, and I have set out above my opinion regarding the interface between the PPC land and the adjacent Cemetery.
- 4.3 The submission by Gerald Baptist (#6) raises concerns about the amenity effects on his property at 1173 Paerata Road, but these are focused on effects such as noise and environmental pollution rather than landscape (including visual effects). As noted above, I consider the adverse visual effects experienced from this property will be low-moderate.
- 4.4 I have also reviewed the comments provided by the Franklin Local Board (dated 24th June 2025). The Local Board support the rezoning and consider that it is appropriate for light industrial use, noting that it is indicated for this use in the SP.

5 Conclusions and Recommendations

- 5.1 The PPC is supported by a suitably detailed ALVE. From my review of the assessment, together with other documentation lodged with the PPC request (updated in 2024), site visit and review of relevant statutory and non-statutory planning documents and submissions and comments received, I am in agreement that the proposed B:LI zone is appropriate in relation to its setting from a landscape effects perspective.
- 5.2 In my opinion, when taking into account the planned built character indicated by the Future Urban zoning and SP, development in accordance with the proposed B:LI zoning would result in low adverse landscape character effects.
- 5.3 Adverse visual effects will differ for the various groups that comprise the viewing audience. Depending on the development scenario that eventuates within the B:LI zone parameters, I conclude that adverse visual effects will vary for the different groups that comprise the viewing audience. For most, these will be at most low-moderate. However, for those visiting the Heights Road Cemetery, I consider adverse visual effects may be moderate-high unless additional controls area applied.
- 5.4 As set out above, I recommend that the same interface controls that apply to other sensitive zone boundaries should apply to the boundary with the Special Purpose – Cemetery zone boundary (the Heights Road Cemetery).



Rebecca Skidmore

Urban Designer/Landscape Architect
July 2025

TECHNICAL EXPERT S.42A MEMO FOR PROPOSED PLAN CHANGE 110 - 9, 33 AND 49 HEIGHTS ROAD PUKEKOHE

To: Joy LaNauze, Senior Policy Planner: Central/South

From: Daniel Kinnoch, Consultant Parks Planner, CoLab Planning

Date: 6 July 2025

Subject: Parks Specialist Input on Private Plan Change 110 – 9, 33 and 49 Heights Road, Pukekohe

1. Introduction

- 1.1 My name is Daniel Kinnoch, and I am a Consultant Planner at CoLab Planning. I have been engaged by the Auckland Council Parks Planning team to provide specialist input into the private plan change (PPC) proposed by GBar Properties Limited for the rezoning of land at 9, 33, and 49 Heights Road, Pukekohe.
- 1.2 I have reviewed the application documents, submissions, and the Franklin Local Board's views on this matter. This memo constitutes my final specialist comments.

2. Code of Conduct

- 2.1 I have read the Code of Conduct for Expert Witnesses in the Environment Court of New Zealand Te Kōti Taiao o Aotearoa Practice Note 2023 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on the advice of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

3. Subject Matter

- 3.1 This memo relates to Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe, which is a private plan change request from GBar Properties Limited to:
 - a) Rezone 5.35 hectares of land at Pukekohe from Future Urban Zone to Business - Light Industry Zone, and
 - b) Apply the Stormwater Management Area Flow 1 – “SMAF1” control to the plan change land.

6 Parks and Open Space Assessment of the Private Plan Change

- 3.2 Zoning Consistency: The sites proposed for rezoning align with the structure plan's designation for Business – Light Industry Zone.
- 3.3 Riparian Buffer: A 20m riparian buffer is shown on the structure plan, but the applicant's assessment indicates that no stream exists on this site. Their expert ecological assessment and Auckland Council GeoMaps appears to support this,

and their planning report (see Sections 3.2, 3.7 and 6.6.3) includes background information about a stream that was piped in 2002 under resource consent. In this regard, I do not see that there would be any future esplanade reserve requirements in this location, and have no further comment in that regard.

3.4 Cemetery Interface: The PPC area adjoins Heights Park Cemetery. Cemeteries function under Auckland Council's Regional Operations, so it's not my purview to comment on potential effects on the cemetery. Though if helpful:

- a) The applicant's assessment at Section 8.4.2 suggests that the Auckland Council Cemetery Services team raised concerns about noise and vibration. There are existing standards in AUP(OP) E25 that control noise from the Business – Light Industry Zone to the Special Purpose Cemetery Zone. See Standards E25.6.12 and E25.6.22.
- b) The Business – Light Industry Zone lacks specific boundary controls with the Special Purpose – Cemetery Zone. This could allow buildings to be constructed along the cemetery boundary as a permitted activity, with no requirement for yards, and no height in relation to boundary.

3.5 Open Space Requirement: I have undertaken an internal check and review of the structure plan, and confirm that there is no envisaged requirement for open space in the area of the PPC.

4. Submissions

4.1 I have reviewed all submissions and can confirm that none raise any matters relevant to my area of expertise. I am advised that no further submissions were received.

5. Franklin Local Board Input

5.1 The Franklin Local Board has suggested that pedestrian, cycling, and public transport infrastructure considerations are addressed by the developer. While this is outside the direct scope of Parks Planning, I support initiatives that improve connectivity and access to public spaces.

6. Conclusion

6.1 Overall, the PPC doesn't raise significant concerns from a park and open space perspective. No matters have been raised in submissions or the Local Board comments that necessitate any additional input beyond that which has been previously provided. My earlier comments on this plan change remain unchanged.



Daniel Kinnoch
Parks Planning Consultant

Private Plan Change 110 – 9, 33 and 49 Heights Road, Pukekohe (PPC110)
Specialist Review (*Stormwater and Flooding*) on behalf of Auckland Council
(*Sameer Vinnakota and Jack Thompson*)

Introduction

1. This memo has been written by Sameer Vinnakota, Environmental Planner at Jacobs and Jack Thompson, Senior Healthy Waters Specialist assessing stormwater and flooding effects on behalf of Auckland Council Healthy Waters and Flood Resilience (Healthy Waters).
2. Sameer Vinnakota has worked as a Consultant Planner for Healthy Waters since 2021 and holds a Bachelor of Urban Planning (Honours) from University of Auckland. Mr Vinnakota's experience includes preparing and processing resource consent applications, providing planning/policy input in relation to stormwater and flooding for plan change applications. Mr Vinnakota's experience also includes undertaking environmental audits to assess for compliance with consent conditions. With respect to PPC110, Mr Vinnakota will be providing planning input with respect to the applicant's stormwater management approach.
3. Jack Thompson has worked as a Senior Healthy Waters Specialist for Healthy Waters since 2024 and holds a New Zealand Diploma in Engineering (Civil) from the New Zealand Institute of Highway Technology. Mr Thompson's experience includes providing technical input in relation to stormwater and flooding for plan change and resource consent applications. Mr Thompson's experience also includes undertaking flood hazard assessments and reviewing stormwater management plans. With respect to PPC110, Mr Thompson will be providing technical input with respect to the applicant's stormwater management approach.
4. Mr Vinnakota was engaged by Healthy Waters at the time PPC110 was lodged in 2023. Mr Thompson has had involvement with PPC110 since 2024, and has taken over the role of Catchment Manager from the incumbent Catchment Managers, Ms Charlotte Arcus and Ms Sarah Basheer.
5. Our role has been to:
 - Review the original plan change application documents;
 - Identify matters, within our area of expertise, that required further information from the applicant, and assessing the applicant's response;
 - Review the submissions and further submissions;
 - Identify issues relevant to our area of expertise;
 - Give our expert opinion on the issues, with recommendations where appropriate;
 - Provide this Review as part of Council's RMA s42A reporting process to the Commissioners.

6. In preparing this memorandum, we have read the code of conduct for expert witnesses contained in the Environment Court Practice Note (2014) and agree to comply with it. Except where we state that we are relying on the specified evidence of another person, the content of this memorandum is within our area of expertise. We have not omitted to consider material facts known to us that might alter or detract from the opinions we express. Where there is an opinion expressed in this memorandum, it is clearly stated whose opinion it is.
7. In writing this memorandum, we have reviewed the following documents:
 - Stormwater Management Plan titled: Heights Road Plan Change – 9, 33 and 39 Heights Road – GBar Properties, Final – Clause 23 Revision, Version 7, prepared by Woods and dated 27/11/2024.
 - Submissions received (and particularly any focussing on stormwater related issues)
8. The following sections are provided to assist the reporting planner's consideration of the plan change proposal in terms of stormwater and flooding effects.

Key Stormwater Issues

9. The PPC110 Applicant has indicated that they wish to continue to discharge both their existing and any new stormwater flows from the PPC area to a 600mm diameter culvert under State Highway 22, which is an asset owned by the New Zealand Transport Agency – Waka Kotahi. Additionally, the Applicant has indicated that any future private drainage infrastructure within the PPC area is intended to remain in private ownership. As such, the stormwater discharge cannot be authorised under Auckland Council's Regionwide Network Discharge Consent (NDC) and any subsequent development at resource consent stage will be subject to a private discharge consent under Chapter E8 of the Auckland Unitary Plan (Operative in Part) (AUP(OP)).
10. We rely on the reporting planner to explain PPC110 including its location and what the plan change is seeking. We would like to add that the PPC is within the Whangapouri Creek Catchment. Stormwater from the PPC area discharges to a culvert underneath SH22 before flowing into Whangapouri Creek and then into the Manukau Harbour. It is noted that portions of the PPC area are legally established with existing developed impervious areas as follows:
 - Land use consent (Ref: L01146) was granted in 2001, authorising the tractor centre at 9 Heights Road (denoted as Existing Building 1 in Appendix 3 Indicative Masterplan and Perspectives¹). This consent included a requirement for a stormwater treatment system to capture and treat stormwater from all roofs and sealed or paved areas. There is no associated stormwater discharge consent.
 - The accessory buildings at 9 Heights Road (in the approximate area shown as New Building 1 in Appendix 3 Indicative Masterplan and Perspectives) that were consented in 2005 included a 29m³ soakhole. This was consented under a land use consent (Ref: L05102 / R-LUC-2005-500604) with no associated stormwater discharge consent.

¹ Appendix 3 of the notification documents for PPC110.

- Consent was obtained in 2017 to build a proposed shed at 33 Heights Road (denoted as Existing Building 2 in Appendix 3 Indicative Masterplan and Perspectives). Raingardens were proposed as part of this consent. This was consented under a land use consent (Ref: R/LUC/2017/818 or LUC60134266) and did not include a stormwater discharge consent.

11. The following issues pertaining to stormwater have been identified:

- **Performance and Integration of Existing Stormwater Devices:** While it is noted that there are existing lawfully established impervious surfaces with stormwater management requirements as noted in paragraph 9 above, details around the sizing or current performance of these devices have not been made available for the assessment of PPC 110. Additionally, the indicative masterplan (Appendix 3 Indicative Masterplan and Perspectives) shows that the existing stormwater management devices noted in the background consents above are to be removed. This could compromise stormwater management for these existing impervious areas or fragment the management of stormwater across the entire PPC area leading to a range of effects such as compromised water quality, increasing both onsite and downstream flood risk.
- **Stream Hydrology and Erosion:** The increase in impervious surfaces that PPC 110 enables will result in an increase in the peak flow rate and volume of stormwater discharging from the site. This has the potential to result in erosion in watercourses (particularly in the Whangapouri Catchment) if unmitigated.
- **Water Quality:** Runoff from new building and cladding materials as well as impervious surfaces can result in contaminants leaching into the receiving environment if unmitigated.
- **10% and 1% AEP Conveyance of Upstream Flows:** The current private stormwater infrastructure does not have sufficient capacity to convey either primary or secondary flows from the catchment directly upstream of the plan change area. Allowing for an increase of impervious surface without ensuring secondary flows can be conveyed safely through the PPC area could result in onsite flooding within the PPC area.
- **Onsite Flooding Risk:** The existing 600mm diameter culvert underneath State Highway 22 is confirmed to have insufficient conveyance capacity for both the 10% AEP and the 1% AEP event². Due to this limitation, flooding can occur within the plan change area during storm events, as State Highway 22 is topographically higher and prevents runoff from escaping efficiently. Without mitigation, flood depths within the PPC site are likely to be 580mm during the 10% AEP event and 890mm for the 1% AEP event³.
- **Recharging Aquifers:** There are three underlying high use aquifers (Te Hihi South Waitemata and Pukekohe Central Volcanic and Pukekohe Kaawa) within the PPC area⁴. Increasing impervious area will result in a change in the rate at which these aquifers recharge and will impact base flows of streams.

Applicant's Assessment

² Section 8.3.1.1 of the SMP.

³ Section 8.3.1.1 of the SMP.

⁴ Section 2.5.3 of the SMP.

Performance and Integration of Existing Stormwater Management Devices

12. In terms of the sizing and performance of existing stormwater management devices managing stormwater from existing lawfully established impervious surfaces, the Applicant notes that *“at the time of acceptance of resource consents, the applications would have included necessary stormwater mitigation measures suitable for the scale of development proposed in the resource consent”*⁵.
13. With respect to incorporating existing stormwater management devices to manage stormwater flows from existing impervious surfaces that have been lawfully established, the Applicant notes the following:
*“In accordance with AUP(OP) requirements, any future hydrology mitigation and water quality treatment devices will be constructed/installed prior to new/redeveloped impervious areas being established within the PPC. If existing treatment devices are removed as part of development, stormwater management for existing surfaces that are to remain will need to be provided for”*⁶.

Stream Hydrology and Erosion

14. The Applicant proposes to provide the equivalent of SMAF-1 hydrology mitigation (i.e., under chapter E10 of the AUP(OP)) by way of introducing the SMAF-1 control for the plan change area. This comprises retention (5mm runoff to be removed from the discharge through reuse and/or infiltration) and detention (discharge of the 95th percentile rainfall event over a 24-hour period).
15. The Applicant has undertaken geotechnical testing across the site identifying infiltration rates of more than 2mm/hr and up to 10mm/hr. This confirms that infiltration into ground is viable, however the Applicant notes that specific geotechnical testing should be undertaken at resource consent stage to identify if there are high ground water levels or any other geotechnical constraints that make retention to ground unfeasible. This is to enable aquifer recharge and maintain base flows of streams.
16. The retention hierarchy as stipulated under Table E10.6.3.1.1(2) will also be observed, which will prioritise infiltration to ground subject to geotechnical testing and investigation (as noted above) at resource consent stage. If infiltration is not feasible, then retention will be provided for roof runoff by rainwater tanks providing for non-potable reuse, otherwise the retention volume will be taken up as detention volume.
17. No direct discharge to the Whangapouri Stream is proposed. As demonstrated in the submitted SMP, stormwater from the plan change area can be treated and detained within two centralised wetlands before being slowly released over a 24-hour period for the 95th percentile rainfall event. This can prevent stream bank erosion.

Water Quality

18. With respect to water quality, the Applicant has identified the likely contaminants of concerns which include total suspended solids, heavy metals and temperature.
19. To demonstrate that water quality effects can be addressed, the SMP notes that new buildings are intended to be constructed using inert roofing and cladding materials to avoid contaminants leaching into runoff. Additionally, it has been demonstrated in the SMP that all stormwater flows can go to a centralised proprietary device(s) which will

⁵ The Applicant's CI23 RFI response dated 08/04/2024.

⁶ Section 6.4.1 of the SMP.

remove total suspended solids and heavy metals from stormwater runoff. The Applicant has outlined a mix of proprietary devices in Appendix C of the SMP. Stormwater flows can then receive further treatment in two centralised wetlands before being discharged to the NZTA culvert underneath SH22. It is stated in the SMP that any centralised proprietary devices and wetlands proposed will be designed and constructed in accordance with GD01 - Stormwater Management Devices in the Auckland Region December 2017 (GD01) to achieve the necessary level of contaminant or sediment removal. Design of any required treatment devices is proposed to be undertaken at the resource consent stage when redevelopment of the site occurs.

Onsite Flooding Risk

20. To address the issue of the private stormwater network being under capacity to facilitate the level of impervious surfaces this PPC will allow, the Applicant proposes to design a primary stormwater reticulation network on site (that will remain in private ownership) that will be designed to accommodate 10% AEP flows from the PPC area and the upstream catchments.
21. The Applicant has indicated a proposal of two centralised wetlands which can attenuate post-development peak flows to match pre-development levels. The wetlands have been sized to attenuate the 1% AEP flows with a climate change factor of 3.8 degrees. These two centralised wetlands will be designed to reduce the volume and rate of discharge to the SH22 culvert and ensure that flows from the PPC area do not exceed the capacity of this existing culvert.
22. Overland flow paths can be maintained and designed to accommodate 1% AEP flows with a climate change factor of 3.8 degrees. The SMP notes that entry and exit points of the overland flows can be maintained and will be unobstructed by buildings and structures. The Applicant has undertaken modelling and analysis of a representative cross-section at the most impacted location to demonstrate the safe conveyance of external flows through the PPC area (shown in Figure 15 of the SMP). The modelling and analysis undertaken by the Applicant in the SMP notes that with the flood attenuation measures provided by the two centralised wetlands, the maximum depth and average velocity of flow will be less than 0.3 m²/s at the location shown by yellow arrow in Figure 15 of the SMP. This complies with Auckland Transport requirements for pedestrian and vehicular safety. Additionally, the modelling undertaken by the Applicant shows that overland flows can be safely conveyed with acceptable flood depths of approximately 122 mm at the location shown by the yellow arrow in Figure 15 which does not pose any effects from a trafficability and pedestrian safety perspective.

Assessment of Effects

Incorporating Existing Stormwater Management Devices

23. It should be noted that effects of existing impervious areas are covered by the consent conditions of the background consents noted above and effects of new and additional impervious surfaces enabled by PPC 110 will be subject to Chapter E8 of the AUP(OP).
24. Following on from the above, it should be noted that the PPC area is 5.35ha. Under the AUP(OP), Applicants need to obtain resource consent for the diversion and discharge of stormwater runoff from impervious areas greater than 1,000m². It is

therefore likely that the development of the PPC area will require resource consent which will address the requirements to achieve hydrology mitigation, measures to avoid flood risk, the management of adverse effects on receiving environments including stream bank erosion and water quality treatment, flood risk to buildings and property, operation and maintenance requirements, and also to stipulate monitoring and reporting requirements. The existing AUP(OP) provisions are therefore considered sufficient to address stormwater effects in the PPC area. We therefore consider that no precinct provisions are considered necessary.

Stream Hydrology and Erosion

25. Mr Thompson supports the Applicant's approach for requiring further geotechnical testing and investigation at resource consent stage. He also supports the Applicant's approach to observe the retention hierarchy as stipulated under Table E10.6.3.1.1(2). Mr Thompson considers this a reasonable approach to ensuring aquifer recharge and that base flows of streams are maintained
26. Additionally, Mr Thompson also considers the application of SMAF-1 controls are appropriate to address the issue of exacerbating stream bank erosion.

Water Quality

27. The Applicant has demonstrated that adverse effects in relation to water quality can be mitigated.
28. Mr Vinnakota notes that there are no AUP(OP) standards explicitly requiring the use of inert roofing and cladding materials and that Chapter E9 of the AUP(OP) only imposes standards for water quality treatment for 'high contaminant generating carparks' (i.e., greater than 30 carpark spaces). The new development or redevelopment of this PPC area will likely be greater than 5,000m² due to the overall site size and will therefore trigger a discretionary activity resource consent. This means that Council is not limited in its discretion when assessing adverse effects related to stormwater and flooding. As Council will not be limited to matters of discretion, requiring water quality treatment of stormwater runoff from all impervious surfaces can be considered at resource consent stage without the need for specific precinct provisions.

Onsite Flooding Risk

29. Mr Thompson is satisfied with the measures the Applicant has undertaken to manage onsite flood risk.
30. Mr Vinnakota also notes that the PPC area is subject to the 1% AEP floodplain and overland flowpaths going through the PPC area as per Auckland Council GeoMaps. Chapter E36 of the AUP(OP) will therefore apply and impose restrictions on development activities affecting overland flowpaths and the 1% AEP floodplains. PPC 110 is not proposing to override these provisions. There will be an opportunity at resource consent stage to assess detailed design.

Submissions

31. The submissions received on PPC110 which raised stormwater related matters are summarised in Table 1 below. Discussion on the matters and our recommendations are also included in the table below.

Table 1. Summary of Submissions, Discussions and Recommendations on PPC 110.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
1.1	Peter Fa'afiu	<p>Approve the plan change without any amendments. Light Industrial use confirms site history and location, and stormwater concerns have been resolved.</p> <p><u>Discussion</u></p> <p>Mr Vinnakota and Mr Thompson agree that the stormwater management identified and demonstrated in the SMP is appropriate.</p>
4.2	NZ Transport Agency Waka Kotahi	<p>No stormwater discharge to the state highway culverts, although it is noted that runoff cannot be avoided in some instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts.</p> <p><u>Discussion</u></p> <p>The existing stormwater runoff currently discharges to the culvert underneath SH22.</p> <p>Additionally, it is noted that the Applicant has had discussions with NZTA early on at pre-lodgement stage⁷. The Applicant has given NZTA the opportunity to review the draft SMP and consideration has been given to NZTA's P46 Stormwater Specification to ensure the culvert obeys specifications stipulated in the document in particular the following:</p> <ul style="list-style-type: none"> • Convey the 10-year ARI storm event flow without surcharge of the pipe for the MPD scenario • Convey the 100-year ARI storm event flow without surcharge of the pipe more than 2m above the pipe soffit, whilst ensuring a minimum 500mm freeboard is provided from the peak water level to the outer edge line level for the MPD scenario. <p>The Applicant has addressed NZTA's concerns through the following measures:</p> <ul style="list-style-type: none"> • SMAF-1 controls to be implemented on site to address hydrological mitigation requirements. • The use of inert roofing and cladding materials to ensure contaminants do not leach into stormwater runoff. The use of centralised proprietary devices and two centralised wetlands to address water quality effects from runoff at the PPC area. • Ensuring the private stormwater network on site is sized to allow for the conveyance of 10% AEP flows including from the upstream catchment. • Ensuring that flows up to the 1% AEP flows are conveyed through the PPC area safely and to the two centralised wetlands for attenuation. This will allow stormwater flows to discharge into the NZTA culvert underneath SH22 and meet NZTA's technical specifications.

⁷ Section 5 of the SMP

Conclusion and Recommendations

32. We consider that PPC 110 has sufficiently demonstrated that stormwater can be appropriately managed to ensure that stormwater discharge effects of future developments can be avoided or mitigated. The SMP has sufficiently demonstrated that based off a conceptual design in the Business – Light Industry Zone, water quality treatment can be achieved. In addition to this, the SMP also demonstrates that hydrological mitigation comprising retention (5mm runoff to be removed from the discharge through reuse and/or infiltration) and detention (discharge of the 95th percentile rainfall event over a 24-hour period) can be provided. Based off the conceptual design, the SMP has demonstrated that the two centralised wetlands can be sized to attenuate the 1% AEP flows with a climate change factor of 3.8 degrees.
33. Future development of the PPC area will require a private stormwater discharge consent under Chapter E8 of the AUP(OP) to authorise their stormwater discharges and is likely to be a discretionary activity based on site size. The stormwater management measures can be finalised and reviewed at the resource consent stage and will be implemented when development and/or redevelopment occurs. As such, no precinct provisions are considered necessary.
34. Based on the above, we consider that PPC 110 can be supported from a stormwater and flooding perspective.

Sameer Vinnakota and Jack Thompson

11 July 2025

TRANSPORT TECHNICAL EXPERT S.42A REPORT FOR PROPOSED PLAN CHANGE 110 9, 33 AND 49 HEIGHTS ROAD PUKEKOHE

16 July 2025

1 INTRODUCTION

Background and Experience

- 1.1 My full name is Wesley John Edwards (Wes). I am a Transportation Advisor and Director at Arrive Limited, a transportation engineering practice I founded in 2002.
- 1.2 I hold a Bachelor of Engineering (Civil) from the University of Auckland, and a New Zealand Certificate of Engineering (Civil).
- 1.3 I am a Chartered Professional Engineer and an International Professional Engineer. I am an Engineering New Zealand Fellow, a Chartered Member of Engineering New Zealand, and a Member of the Institute of Transportation Engineers.
- 1.4 I am a member of Standards Australia Committee CE001 which is responsible for preparing and updating the AS/NZS 2890 Parking facility series of standards.
- 1.5 I am accredited by KiwiRail as a Level Crossing Safety Impact Assessor; have formerly been accredited by Waka Kotahi New Zealand Transport Agency as a Traffic Controller, Traffic Inspector, and Site Traffic Management Supervisor.
- 1.6 I was formerly accredited by the Ministry for the Environment as a Resource Management Act Hearings Commissioner.
- 1.7 I have 40 years of engineering experience, including over 33 years specialising in traffic engineering and transport planning in New Zealand which includes:
 - (a) the design of traffic infrastructure and facilities such as roads, intersections, bus facilities, and parking facilities;
 - (b) road safety auditing, road safety engineering, railway level crossing safety impact assessment, and forensic collision investigation;
 - (c) computer analysis and modelling of roads and intersections.

- (d) providing specialist opinions on traffic and transport matters as an expert witness in council hearings, and in District Court, Environment Court, Land Valuation Tribunal, Environmental Protection Agency Board of Inquiry, and High Court proceedings.

1.8 My recent relevant work experience includes:

- (a) advising Auckland Council reporting officers and hearing commissioners on several plan changes in southern Auckland including:
 - (i) PC55 Patumahoe South, 2019-22;
 - (ii) PC61 Waipupuke (Drury West), 2020-21;
 - (iii) PC91 McLarin Rd, Glenbrook Beach, 2021-23;
 - (iv) PC87 Buckland Road Precinct, Pukekohe, 2022-23; and
 - (v) PC88 Beachlands South, 2022-23;
- (b) advising Auckland Council, Waikato District Council, and Whangarei District Council reporting officers and hearing commissioners on Notices of Requirement for:
 - (i) KiwiRail Wiri to Middlemore rail corridor widening;
 - (ii) KiwiRail and Auckland Transport (AT) Ngaakora (Drury West) railway station;
 - (iii) New Zealand Transport Agency (NZTA) and AT – Pukekohe Arterials (in Drury, Runciman, Paerata, Pukekohe, and Bombay) including NOR 7 Pukekohe North-West Arterial;
 - (iv) AT South Frequent Transport Network (Manukau, Manurewa, Takanini, Papakura and Drury);
 - (v) Ministry of Education – several schools across Auckland; and
 - (vi) NZTA widening of State Highway 1 through Whangarei.
- (c) Advising many private clients on resource consents, plan changes and Notices of Requirement.

Involvement

- 1.9 I was engaged by Auckland Council to advise on transport aspects of this plan change in July 2023 following lodgement of the application. I visited the road network around the Plan Change area on 1 August 2023.

- 1.10 This report is my expert technical evidence on Proposed Plan Change 110 at 9, 33 and 49 Heights Road Pukekohe and submissions relevant to transport.

Code of Conduct

- 1.11 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.12 I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

Scope and Structure

- 1.13 The scope of this report includes assessing the likely transport-related effects of the proposal on the safe and efficient operation of the Plan Change area and the surrounding transport environment.
- 1.14 In forming my opinion and writing this report, I have reviewed the following documents:
- (a) Private Plan Change request and the Assessment of Environmental Effects (AEE);
 - (b) Transportation Assessment Report (TAR) prepared by Commute dated 2 August 2024;
 - (c) Further information requests and responses;
 - (d) Submissions; and
 - (e) Local Board comments.
- 1.15 I have also reviewed traffic data and planning material I obtained from Auckland Council, AT, and NZTA public and restricted-access information services.

Subject Matter

- 1.16 This report relates to Proposed Plan Change 110 at 9, 33 and 49 Heights Road Pukekohe, which is a private plan change request from GBar Properties Limited to:
- (a) rezone 5.35 hectares of land at Pukekohe from Future Urban Zone (FUZ) to Business - Light Industry Zone (BLIZ),
 - (b) and apply the Stormwater Management Area Flow 1 – “SMAF1” control to the Plan Change area.
- 1.17 The consideration of some matters is outside the scope of this report or my expertise. I do not consider:
- (a) Matters relating to noise, dust, or light spill generated by vehicle movements;
 - (b) Matters relating to stormwater runoff, including from roads or parking areas;
 - (c) the effect of traffic on amenity;
- 1.18 This report includes the following sections:
- (a) a summary of key transport issues (Section 2);
 - (b) comment on the assessment of transport effects by the applicant (Section 3);
 - (c) comment on the consistency of the Plan Change with documents relating to transport (Section 4)
 - (d) comment on matters raised in submissions and by the Local Board (Section 5);
 - (e) a conclusion and recommendations (Section 6).

2 SUMMARY OF KEY ISSUES

- 2.1 The key transport issues in contention are identified in Table 1.

Table 1: Key Transport Issues in Proposed Plan Change 110 - 9, 33 and 49 Heights Road Pukekohe

Key transport issues
<u>Effects on transport efficiency</u> <ul style="list-style-type: none">i. forecasting of future traffic volumesii. estimating of vehicle movements from developmentiii. effects on efficient operation of Paerata Road / Heights Road intersection
<u>Effects on transport safety</u> <ul style="list-style-type: none">i. sight distances at potential access locationsii. road widening at potential access locationsiii. effects on safety along Heights Roadiv. effects on road safety at Paerata Road / Heights Road intersection
<u>Ensuring upgrades</u> <ul style="list-style-type: none">i. means of ensuring that appropriate mitigation works are undertaken

3 COMMENT ON THE ASSESSMENT OF EFFECTS BY THE APPLICANT

Proposal

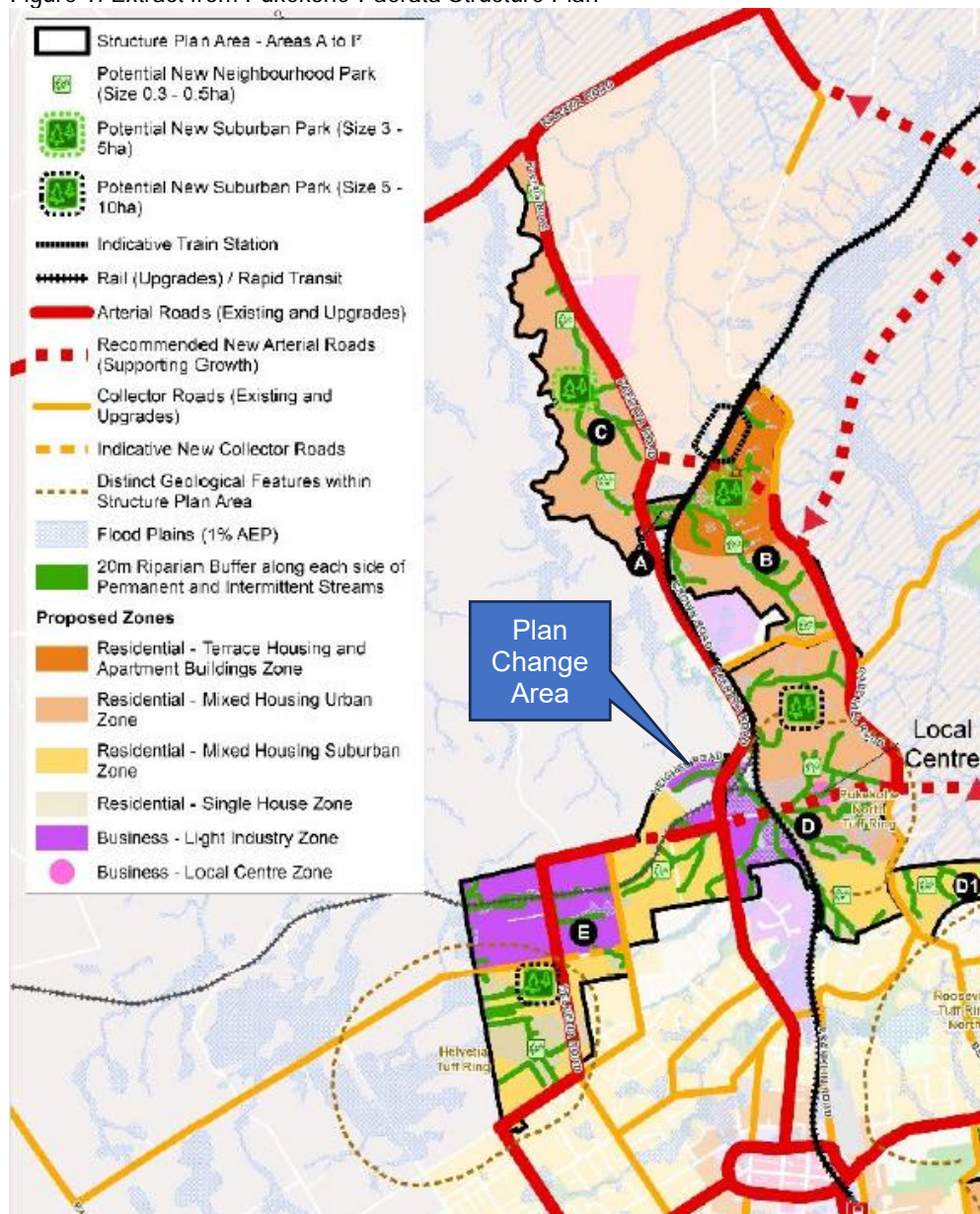
- 3.1 The proposed plan change involves rezoning the land from Future Urban Zone (FUZ) to Business - Light Industry Zone (BLIZ).
- 3.2 A masterplan is provided with the application material and the TAR analysis and assessment are based on it. The masterplan provides for:
- (a) Consolidation of the existing Tractor Centre into:
- | | |
|--------------------------|--------------------------|
| (i) Showroom and offices | 2,414 m ² GFA |
| (ii) Warehouse | 2,666 m ² GFA |
- (b) New industrial buildings 12,563 m² GFA
- 3.3 No mechanism is proposed to ensure that development of the Plan Change area is undertaken in accordance with the masterplan. While the masterplan may be a useful indicator of one possible development outcome, particularly for the shorter term, other outcomes are also enabled by the proposed zoning.

Expected Changes in the Area

Future Development Pattern

- 3.4 Auckland Council prepared the Pukekohe-Paerata Structure Plan (PPSP) in 2019 to inform and guide development and growth in the area. The Structure Plan was informed by transport analysis undertaken by Te Tupu Ngātahi Supporting Growth Alliance (SGA).
- 3.5 The PPSP includes proposed zoning patterns and transport links. The structure plan shows some of the Plan Change area as Business – Light Industry Zone (BLIZ) as shown in Figure 1.

Figure 1: Extract from Pukekohe-Paerata Structure Plan



- 3.6 In 2023 Auckland Council issued the Future Development Strategy 2023-2053 (FDS). Pukekohe is identified as an important area for accommodating growth in the long-term (years 11-30 i.e. 2034-2053) with areas such as the city centre and Westgate prioritised for growth in the first ten years.
- 3.7 The FDS provides a table with infrastructure prerequisites for various future urban areas with timing and staging. The plan change area is within the Pukekohe Northwest area which is scheduled for development “*Not before 2040+*” with the Pukekohe North West Arterial listed as a transport infrastructure prerequisite for development. (That project is now referred to by AT as the Pukekohe North-West Upgrade (PNWU)).

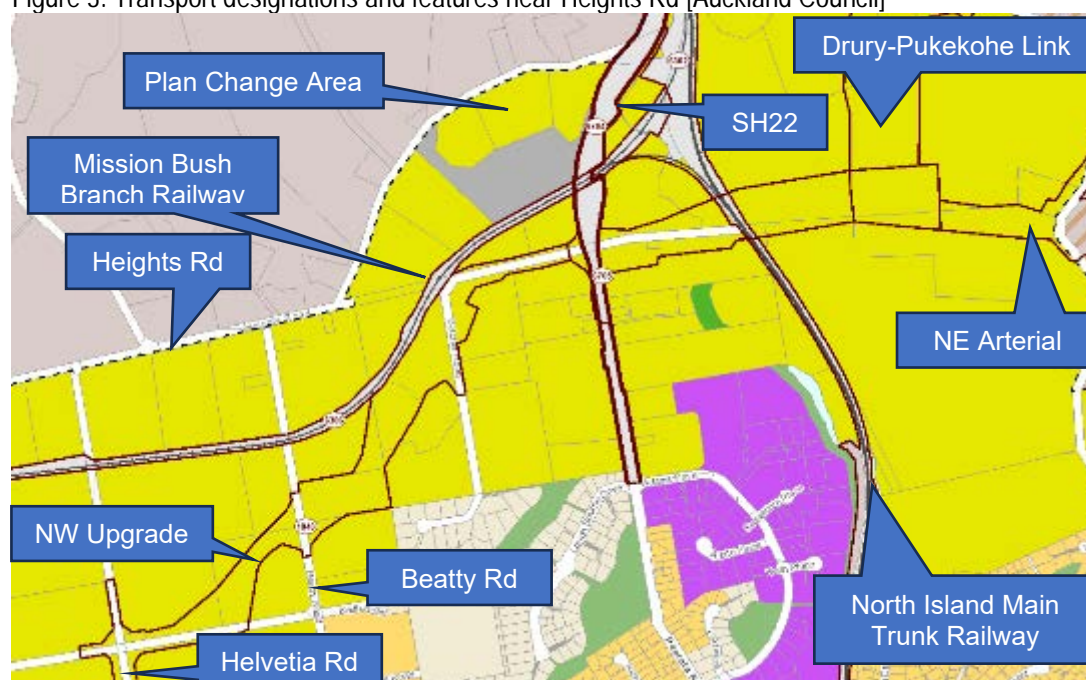
Future Road Network

Figure 2: Map of proposed arterials (AT) and associated infrastructure



- 3.8 NZTA is currently widening the Southern Motorway (SH1) between Pukekohe and Drury. A designation to provide for widening between Drury and Bombay has been secured but I understand funding is not currently committed.
- 3.9 AT and NZTA have recently secured designations for several arterial or strategic roading projects in the area to support the development pattern set out in the PPSP and the FDS. These include a new arterial road connecting Drury and Pukekohe (Drury-Pukekohe Link), a widened connection between Pukekohe and Bombay (Mill Rd), and new or upgraded roads around the periphery of Pukekohe as shown in Figures 2 and 3.
- 3.10 The Pukekohe North West Upgrade is a combination of upgrading Helvetia Road and constructing new sections of road connecting Helvetia Road, Beatty Road, Paerata Road (SH22), and points further east including the proposed Drury-Pukekohe Link. These designations were confirmed in October 2024. No funding is currently confirmed for these projects and based on the FDS this project may not be implemented before 2040.

Figure 3: Transport designations and features near Heights Rd [Auckland Council]



Effects on Pedestrians and Cyclists

- 3.11 Further development of the Plan Change area is expected to result in additional pedestrian movements to and from the area, but these are likely to be at low volumes until new road connections and better public transport links are established in the longer term.

- 3.12 The TAR notes that the closest bus stops are 1km from the Plan Change area and serviced by one bus route travelling between Wesley College and Pukekohe Station. The TAR concludes that public transport is currently not considered a viable option, and I agree.
- 3.13 The TAR then notes that the new Paerata Station is 2.5km from the Plan Change area which will make public transport a viable option in future.
- 3.14 The AT Future Connect webpage provides information on AT's plans for the transport network in Auckland. It shows that one new bus service is proposed to connect Paerata Station with the Paerata Rise neighbourhood in the first decade of the plan. No new services are planned near the Plan Change area in that period. No new services are shown beyond the first decade, although the Pukekohe-Paerata Structure Plan (PPSP) Integrated Transport Assessment (ITA) does show a new Connector bus service using the proposed North-West Upgrade (described below).
- 3.15 I therefore disagree that Paerata Station itself makes public transport access to the Plan Change area more viable as people can already use Pukekohe Station and the Wesley College bus to get to the nearest bus stop, and the nearest bus stop is expected to remain more than 1km away until new arterials and new bus services are provided.
- 3.16 Given the limited services and the distance from bus stops, the Plan Change area is poorly served by public transport. That is likely to be improved once the North West Upgrade is operational, but that may not occur until 2040 or beyond.
- 3.17 Development of the Plan Change area may result in some cycle travel between the Plan Change area and urban Pukekohe, or between the Plan Change area and Paerata Station. The existing network has relatively poor provision for cyclists, and that is not expected to be rectified until the new arterial projects are completed some time in the future.
- 3.18 Until those arterial road projects are completed walking and cycling are expected to be relatively unsafe and unattractive travel options for the Plan Change area. I would expect most travel to and from the plan change area to rely on private vehicles.

Vehicle Access

- 3.19 It is important to ensure that safe access opportunities exist as some activities can be established within the BLIZ without requiring consent or further assessment of transport aspects.

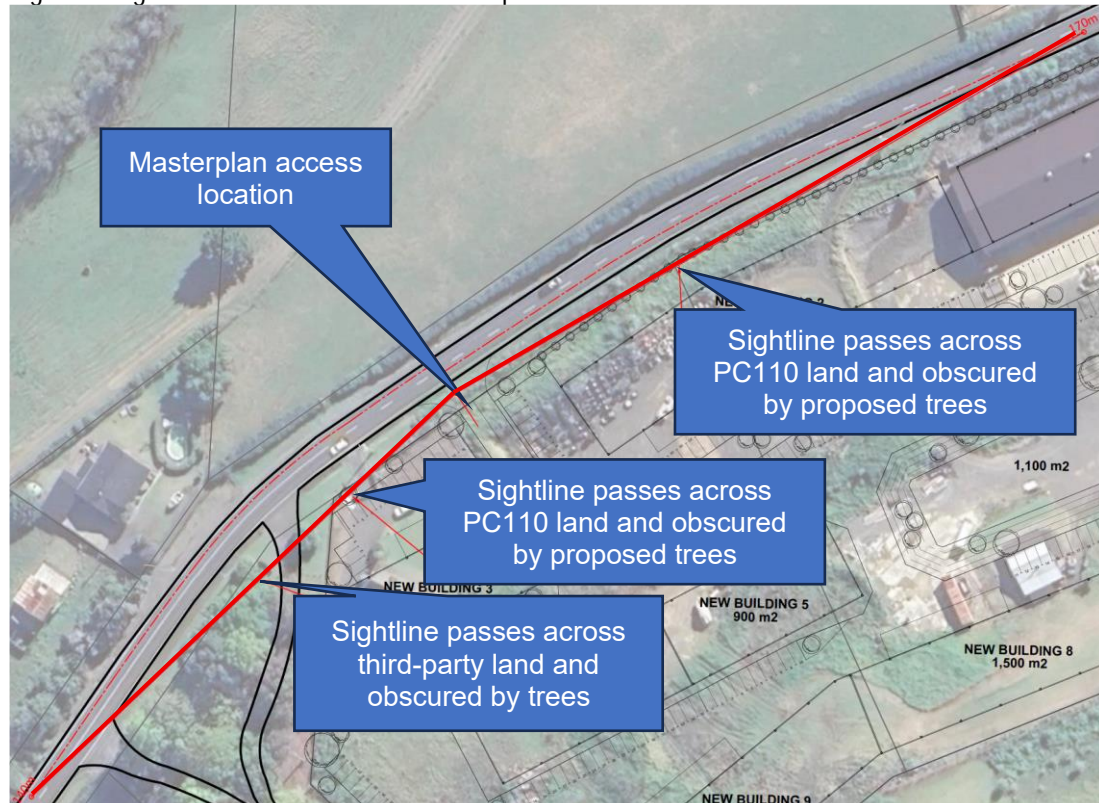
- 3.20 The TAR refers to the indicative masterplan noting it seeks to retain the eastern existing vehicle access, to remove all other existing access points, and to construct a new access towards the western end of the Plan Change area. The TAR notes that establishing an access at any other point may be difficult due to the existing level difference between the Plan Change area and Heights Road.
- 3.21 The primary consideration for safe access in this case is the availability of sufficient sight distances along Heights Road at any access points, and sight distance requirements increase with vehicle speed.
- 3.22 Secondary considerations include the proximity of any access point to intersections or other accesses, and the availability of sufficient road width to allow a vehicle waiting to turn into the Plan Change area to be safely passed by a following vehicle.

Sight Distance

- 3.23 The TAR has based the assessment of sight distance on the RTS 6¹ guideline and also refers to Austroads guidelines. RTS 6 adopts the Austroads Safe Intersection Sight Distance (SISD) standard for higher-volume driveways, high-speed roads, or roads with moderate to high traffic volumes.
- 3.24 I consider the appropriate standard for this context is the SISD standard, however, as the 1993 RTS 6 guideline was based on now-superseded distances I prefer the SISD distances given in the current Austroads guidelines.
- 3.25 The TAR notes the surveyed operating speed of eastbound traffic near the new access location but did not survey westbound traffic. It seems reasonable to assume that westbound traffic would be travelling at a similar speed.
- 3.26 For the measured eastbound speed of 71km/h the minimum Austroads SISD on a level grade using normal parameters is 154m.
- 3.27 The TAR states the achievable sight distance at the proposed new access location is 140m to the west and 170m to the east. A sight distance of 140m would meet the normal SISD requirements for speeds up to 66km/h, but not for the measured speed of 71km/h; however the stated sight distances may not be available at the masterplan access location.
- 3.28 I have plotted the TAR sight distances in a scaled drawing as shown in Figure 4 which demonstrates that both TAR sight lines cross private property and are, or are proposed to be, obscured by trees.

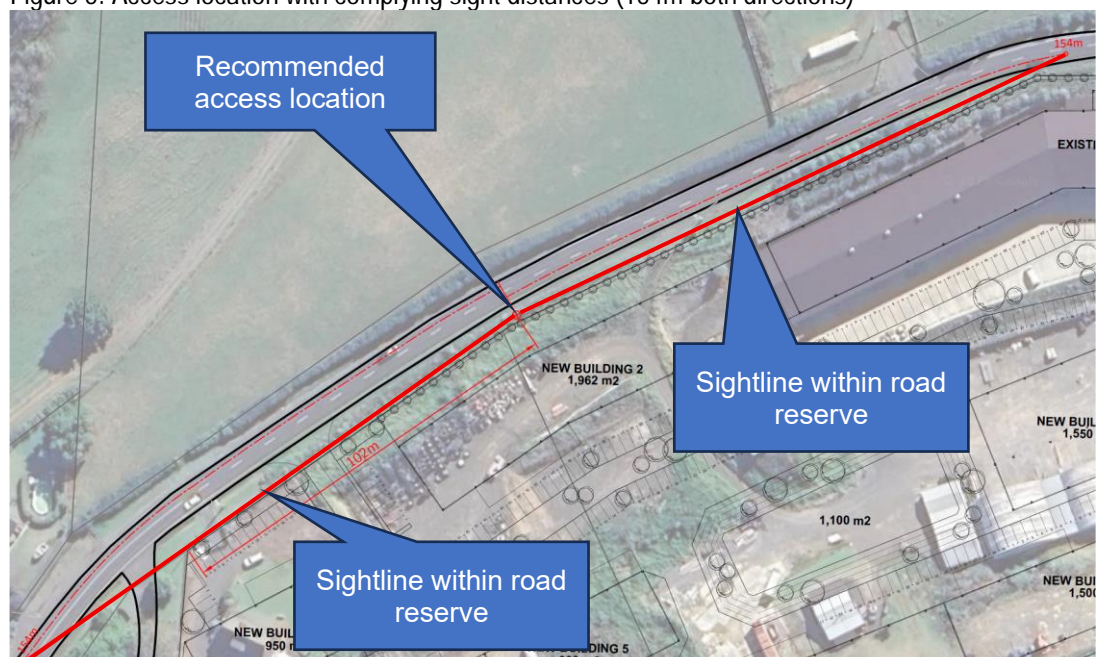
¹ Guidelines for visibility at driveways RTS6, May 1993, Land Transport Safety Authority, Wellington.

Figure 4: Sightlines drawn to match distances provided in TAR



- 3.29 I have identified a location along the site frontage that from my inspection of available imagery should have sight distances sufficient to meet the normal SISD standard. This location is shown in Figure 5 and is 102m east of the western boundary of the Plan Change area.

Figure 5: Access location with complying sight distances (154m both directions)



- 3.30 As the applicant currently controls land fronting the south side of Heights Road it may be possible to provide sufficient sight distances at other locations further east by vesting some land as road. I expect vesting of some plan change land as road would also be necessary to achieve the road upgrading proposed by the applicant in a manner acceptable to AT.
- 3.31 Alternatively, some other locations may have sufficient sight distance if the traffic speed on Heights Road were reduced. The TAR notes that with future development a change to a 60km/h speed limit would be likely and appropriate. Changes to speed limits are subject to separate processes and cannot be relied upon to provide sufficient sight distances for development.
- 3.32 As noted above, significant development could occur on the Plan Change area without resource consent if the Plan Change area is BLIZ. The Council and AT may therefore have no ability to assess or control matters such as access location or sight distance if the Plan Change is approved as notified.
- 3.33 For that reason I consider additional controls must be introduced as part of this plan change, including limitations on access locations. Potential controls are discussed later.

Proximity to intersections

- 3.34 The eastern existing access driveway, which is intended to be retained in the masterplan, is located relatively close to the Paerata Road/ Heights Road intersection.
- 3.35 The intersection has a relatively wide “bell-mouth”, as does the existing driveway, and the driveway is located on a bend in Heights Road.
- 3.36 If measured along the centreline of Heights Road the distance between the centreline of the driveway and the limit line at the intersection is 56m.
- 3.37 If measured along the edge of Heights Road, the distance between the nearest part of the driveway and the point where traffic turning left into Heights Road has straightened up is 19m.
- 3.38 If measured along the road boundary, the access is located within 7m of the Paerata Road boundary. It is therefore located within an Auckland Unitary Plan Vehicle Access Restriction (VAR) and any activity using the access would be a Restricted Discretionary Activity².

² AUP E27.4.1 (A5)

- 3.39 NZTA has a designation for road widening purposes that includes the land between the Plan Change area and the current Paerata Road carriageway. NZTA could utilise this land to move the carriageway and intersection closer to the Plan Change area.
- 3.40 The TAR does not provide a measured speed for this location but expects vehicles would be moving at lower speeds due to the proximity to the intersection which I accept in relation to westbound traffic coming from Paerata Road.
- 3.41 The TAR notes available sight distances are 60-70m to the east and 175-185m (depending on vegetation) to the west. Those distances would meet the Austroads SISD requirements for approach speeds up to 63km/h and 100km/h respectively. As a result I consider the sight distances available here to be sufficient.
- 3.42 The TAR notes there is potential to move this driveway a few metres to the west where 140m sight distance would be available to the west. As noted above, this would not meet Austroads SISD for the measured operating speed, so would only be appropriate if and when the speed environment is changed.
- 3.43 It appears the eastern existing access does not comply with three AUP E27 standards:
- (a) It is within a Vehicle Access Restriction (E27.6.4.1(3)(a));
 - (b) At 17m wide (measured at the boundary) it is almost twice as wide as the maximum width of 9m (E27.6.4.2(2));
 - (c) The gradient within the first 6m appears to be steeper than the maximum 5% (1:20) gradient (E27.6.4.4.2(3)).
- 3.44 For those reasons I recommend that the access be narrowed to the maximum width of 9m, and if the eastern side of the access were removed it could then be located at least 10m from the NZTA boundary. The land owner could make this change voluntarily, potentially when the road is upgraded to an urban form. Alternatively under E27.4.1(A2) and/or (A5) any use of this vehicle crossing would require consent as a Restricted Discretionary activity unless the crossing were modified to comply.

Road width

- 3.45 The TAR notes:
- Upgrades to Heights Road are required to provide a safe turning arrangement at any new vehicle access due to the rural nature of Heights Road, the operating speeds and the lack of formed shoulders between the lanes and the adjacent open channel drains.*

Based on the anticipated left and right turn volumes into the site and existing through flows, it is considered that sufficient shoulder widening to allow a through vehicle on Heights Road to pass a vehicle waiting to turn right into the site safely is required for both the accesses.

3.46 I agree that widening of the road at any access point is required, but I do not consider that the widening proposed would be sufficient to provide for safe operation of Heights Road.

3.47 Austroads road design guidelines provide calculations to determine when various forms of auxiliary turn lanes are required at intersections. Using my forecast turning volumes, the results of my Austroads calculations are summarised in Table 2.

Table 2: Austroads Auxiliary Lane Warrant Summary

Scenario		A.M. Peak Hour		P.M. Peak Hour	
		Right Turn	Left Turn	Right Turn	Left Turn
Two Driveways	East	Shoulder Widening	Auxiliary Lane	None	Auxiliary Lane
	West	Auxiliary Lane	None	Auxiliary Lane	Shoulder Widening
Single Driveway		Auxiliary Lane	Shoulder Widening	Auxiliary Lane	Auxiliary Lane

3.48 In my view the road should be widened to provide a central right turn bay (or flush median) at any access point to meet the Austroads warrants. In a higher-speed or rural environment an auxiliary lane should also be provided for left-turn entry movements at the northeastern-most (or only) access driveway.

3.49 The TAR also notes:

Given the proposal will urbanise the site it is also considered appropriate to upgrade the site frontage to include a kerb / channel and allow provision to provide a footpath (noting no footpath is initially considered necessary as there is no destination available).

This would likely require some retaining walls around the access points and potentially to support any future footpaths, however the exact location of these and the demand for these, including any land modification, would be determined during the detailed design of the site frontage and will be assessed at Engineering Plan Approval.

3.50 From my experience it is the standard practice of Auckland Council and AT to request that a developer upgrades the road frontage of a site to an urban form when urban development occurs in a formerly rural context.

3.51 In this case I note that the PPSP envisages land on the northern side of Heights Road would remain as rural for the foreseeable future, so I would not expect the northern side of the road to be upgraded by others. For that reason I consider it is important that the road is widened to an appropriate width to provide for further development of the Plan Change area.

- 3.52 I have not undertaken any design of a potential urban form for this road, but I do note that the northern side has steep banks and existing property accesses in some locations. I expect that most or all road widening would be undertaken on the southern side of the road. It appears likely that some land would need to be vested as road in order to complete this road widening. It may be possible to avoid changes to existing buildings, although vehicle movement between the building and the boundary might no longer be possible.
- 3.53 With respect to the need for a footpath in the short term, I would note that the cemetery to the southwest of the Plan Change area is a destination for pedestrians, albeit at low volumes.
- 3.54 I would also note that Council and AT tend to require footpaths and all other upgrades to be completed in conjunction with a resource consent application as they have less ability to require a developer to complete work after development works are completed.
- 3.55 In this case there may be no resource consent applications as many forms of development could occur as permitted activities in the BLIZ.
- 3.56 Potential mechanisms for realising these upgrades are discussed later in this report.
- 3.57 The TAR also notes:
Of note, if additional land is required for widening during the detailed design stage, where it is unable to be accommodated within the road reserve this is able to be accommodated on the subject property.
- 3.58 I would note that if development has already occurred on part of the Plan Change area, and potentially subdivided and sold, that vesting additional land to AT for road widening might be difficult to achieve for later development. Ideally the land needed would be identified now to prevent development on that land; however, at this time I cannot determine what land is required to produce a design that would meet all requirements and be acceptable to AT.

Effects on Transport Efficiency

- 3.59 The TAR considers the effects of the Plan Change on the efficiency of the road network following a typical methodology of:
- (a) reviewing historical traffic volume records;
 - (b) forecasting traffic volumes;
 - (c) estimating trip generation – i.e. the number of additional traffic movements likely to be generated by development enabled by the Plan Change;

- (d) estimating trip distribution – i.e. where those additional traffic movements will come from and go to;
- (e) computer modelling to analyse the change in performance of key parts of the transport infrastructure.

Historical Traffic Volumes and Growth Rates

Paerata Road within Pukekohe

- 3.60 The applicant's TAR describes the local transport environment including AT traffic data on Paerata Road within Pukekohe at a site between the two arms of Adams Drive.
- 3.61 The TAR calculates the rates of growth on Paerata Road within Pukekohe over the 2015-2020 period at 3% per annum on a daily basis, and 2% p.a. for the peak hours from the AT data.
- 3.62 The AT data for Paerata Road is reproduced in Tables 3 to 5 for ease of reference, along with growth rates I have calculated. Data beyond 2022 is unavailable at the time of writing.
- 3.63 Adams Drive forms a crescent which intersects Paerata Road twice. According to the AT database, the count site is located a short distance north of the southern intersection about 1.45km south of Heights Road.

Table 3: Traffic volume data at Paerata Road north of Adams Drive S (AT) - Daily

Date	2015	2016	2017	2018	2019	2020	2021	2022
5-Day Average Volume	13,179	13,970	13,972	15,055	15,055	15,345	15,039	13,653
Annual Change (5-Day)		6.0%	0.0%	7.8%	0.0%	1.9%	-2.0%	-9.2%
Average Change from 2015		6.0%	3.0%	4.7%	3.6%	3.3%	2.4%	0.5%

Table 4: Traffic volume data at Paerata Road north of Adams Drive S (AT) – A.M. Peak Hour

Year	2015	2016	2017	2018	2019	2020	2021	2022
Volume	1,085	1,136	1,122	1,066	1,179	1,206	1,247	1,148
Annual Change		4.7%	-1.2%	-5.0%	10.6%	2.3%	3.4%	-7.9%
Average Change from 2015		4.7%	1.7%	-0.6%	2.2%	2.2%	2.5%	0.8%

Table 5: Traffic volume data at Paerata Road north of Adams Drive S (AT) – P.M. Peak Hour

Year	2015	2016	2017	2018	2019	2020	2021	2022
Volume	1,171	1,270	1,229	1,243	1,241	1,277	1,303	1,188
Annual Change		8.5%	-3.2%	1.1%	-0.2%	2.9%	2.0%	-8.8%
Average Change from 2015		8.5%	2.5%	2.0%	1.5%	1.8%	1.9%	0.2%

- 3.64 This data shows:

- (a) daily traffic volumes on Paerata Road increased at an average rate of 4.7% per annum in the 2015-2018 period, then stayed relatively steady from 2018 to 2021, before falling significantly (9%) in 2022.
- (b) A.M. peak hour volumes increased 2.2% on average in the 2015-19 period and fell significantly (8%) in 2022.
- (c) P.M. peak hour volumes increased 1.5% on average in the 2015-19 period and fell significantly (9%) in 2022.
- (d) Growth in peak hours is around 40 to 60% of growth in daily volume;
- (e) Daily volumes from 2022 were 9% to 11% lower than volumes recorded in the previous three years.
- (f) Peak hour volumes from 2022 were 3 to 9% lower than volumes recorded in the previous three years.

Paerata Road SH22 at Paerata

- 3.65 Data from the NZTA SH22 continuous count station 1.2km north of Heights Road is available as a daily volumes and as an annual average daily volume which is summarised in Table 6 and graphed in Annexure A.

Table 6: Annual Average Daily Traffic (AADT) at NZTA Paerata count station

Year	2016	2017	2018	2019	2020	2021	2022	2023
AADT	15,808	16,634	16,836	18,636	16,112	14,125	15,658	17,420
Annual Change		+5.2%	+1.2%	+10.7%	-13.5%	-12.3%	+10.9%	+11.3%
Average Change from 2016		+5.2%	+3.3%	+6.0%	+0.5%	-2.1%	-0.2%	+1.5%

- 3.66 The NZTA data shows annual growth rates averaging around 6% before 2020 and lower volumes through the 2020-2023 period. I attribute the lower volumes in 2020-2023 to the effects of the Covid-19 Health Orders and the ensuing economic recession.
- 3.67 Inspection of the first chart in Annexure A shows that daily traffic volume on SH22 at Paerata Road can have significant weekly and seasonal fluctuations above and below the annual average.
- 3.68 There are some differences between the AT and NZTA data which can be seen in the second chart in Annexure A. There is more variation in the NZTA annual average daily volumes based on volumes recorded on many days of the year than in the AT daily volumes recorded over the course of one week each year.
- 3.69 The AT counts target a similar week each year and do not therefore capture seasonal or other variations throughout the year, and that was particularly relevant during the Covid-19 period.

- 3.70 In 2020 the AT count recorded similar volumes to the same week in other years, whereas the NZTA annual average picked up significant changes in daily flow.

Heights Road

- 3.71 The TAR provided no traffic count data for Heights Road. Information is now available for Heights Road and is summarised in the Table 7.

Table 7: Traffic volume data for Heights Road between the railway level crossing and Ostrich Farm Rd

Date	Weekday Average (v/d)	Peak Hours			% Heavy Vehicles
		A.M.	Midday	P.M.	
18/09/2024	5,433	456	367	536	12%

- 3.72 Helvetia Road and Heights Road provide an alternate north-south route to the primary Paerata Road and Edinburgh Street route. Heights Road appears to carry a significant proportion of peak-hour commuter travel between north-western Pukekohe and SH22. Residential and other growth continues to occur in western Pukekohe, Paerata, and further away. For those reasons I would expect traffic volumes on Heights Road to grow at a similar rate, if not a higher rate, than the historic growth rate on Paerata Road.

Paerata Road / Heights Road Intersection

- 3.73 The TAR provides the results of a traffic count at the Paerata Road / Heights Road intersection undertaken in November 2020 during the A.M. and P.M. peak hours.
- 3.74 As the traffic volume record shows, daily traffic volumes in 2020 were significantly lower than volumes recorded prior to 2020 and in 2023. It is possible that the November 2020 intersection count recorded lower than normal volumes.
- 3.75 The TAR discounts this possibility as the volumes recorded at the intersection in November 2020 were higher than the peak-hour volumes recorded by AT on Paerata Road in May 2022.
- 3.76 The TAR does not address the possibility that those characteristics are due to seasonal variations or to 2022 traffic volumes being affected by changes in travel patterns in the wake of the Covid-19 Health Orders.
- 3.77 For example, the AADT from the NZTA count station north of Heights Road recorded lower traffic volumes in 2022 than in 2020, and more recent volumes are higher than 2020 and 2022 volumes.

- 3.78 The TAR survey recorded volumes of 412 v/h in the A.M. peak and 507 v/h in the P.M. peak on Heights Road at the intersection in November 2020. AT recorded volumes on Heights Road west of Ostrich Farm Road of 456 v/h A.M and 536 v/h P.M. in September 2024.
- 3.79 The 2020 TAR volumes are between 6 and 11% lower than the 2024 AT volumes despite the AT count not recording traffic travelling between the intersection and Beatty Road or Ostrich Farm Road.
- 3.80 I conclude that the traffic volumes recorded at the intersection in 2020 are likely to be significantly lower than current volumes because of temporary Covid-19 related changes in travel patterns, and I therefore disagree with the statements made in the TAR.
- 3.81 In the absence of newer data, I consider it would be prudent to increase the traffic volumes recorded in November 2020 by around 9% to represent likely 2023 volumes.

Forecast Traffic Volumes

- 3.82 As the receiving environment includes the future environment it is important to consider likely future conditions, and for plan changes it is common to consider a ten-year period.
- 3.83 Prior to lodgement of the Plan Change I requested that the applicant consider three modelling scenarios - one for 2034 and two for 2048. I accept the reasons given for not providing modelling for the 2048 scenarios.
- 3.84 The TAR analysis has used a 2% annual growth rate to forecast future flows from the 2020 survey at the Paerata Road / Heights Road intersection.
- 3.85 Given the limited data available the 2% p.a. peak-hour growth rate adopted in the TAR appears to be a reasonable estimate for this purpose, but one that is subject to significant uncertainty.
- 3.86 In my view there are some issues with the TAR forecast:
- (a) The TAR forecast makes no adjustment for the 2020 count likely recording lower than normal traffic volumes;
 - (b) The TAR forecast applies ten years of 2% p.a. growth from 2020, producing a 2030 forecast and not a 2034 forecast as requested;
 - (c) the TAR forecast has applied growth to the through movements along Paerata Road, but not to the movements turning in and out of Heights Road.

- 3.87 I have prepared an alternate forecast for a 2034 scenario based on the volumes recorded at the Paerata Road / Heights Road intersection in 2020 with:
- (a) an increase of 9% to 2023 to account for Covid-19 effects (i.e. average of 3% p.a. 2020-2023);
 - (b) a further increase of 22% (2% p.a. for 11 years 2023-2034);
 - (c) increases applied to all movements at the intersection, not just SH22 through movements.

Trip Generation

Masterplan Scenario

- 3.88 An estimate of vehicle movements generated by development of the Plan Change area is provided in the TAR. The estimate is based solely on the masterplan, a survey of the existing Tractor Centre, and a trip generation rate sometimes recommended for factories:
- 3.89 The trip generation rates in the TAR are the number of vehicle movements per 100m² of gross floor area (G.F.A).
- (a) Tractor Centre 1.2 - 1.5 v/100 m² G.F.A.;
 - (b) all other activities 1.0 v/100 m² G.F.A.;
- 3.90 At those rates the TAR estimates development in accordance with the masterplan would generate around 152 vehicles per hour in addition to the existing Tractor Centre trips, resulting in a total of 185 v/h in the A.M. peak hour and 177 v/h in the P.M. peak hour.

Other Scenarios

- 3.91 The TAR acknowledges that the final activities are not yet known but considers adoption of the factory trip generation rate for all activities other than the Tractor Centre provides a conservative assessment as it is higher than the rate recommended for storage warehouses.
- 3.92 The TAR has undertaken a sensitivity test with the masterplan trip generation increased by 25%. The TAR states (bold emphasis added):

*In terms of Garden Centres and small scale retail / drive through it is also noted that the Light industrial zone is **subject to E27.6.1. Trip generation** which would require larger typical drive through restaurants to obtain Resource Consent and larger Garden Centres.*

- 3.93 AUP Standard E27.6.1 Trip Generation does result in some activities generating more than 100 v/h being Restricted Discretionary activities; however, that standard *“does not apply to development activities provided for as permitted in the applicable zone.”*
- 3.94 Several activities are permitted and could be established in the BLIZ without requiring consent for transport matters:
- (a) Warehousing and storage < 20,000 m² GFA
 - (b) Other industrial activities < 10,000 m² GFA
 - (c) Dairies < 100 m² GFA
 - (d) Accessory retail – drive-through < 333 m² GFA
 - (e) Accessory retail – not drive-through 1,667 m² GFA
 - (f) Food and beverage < 120 m² GFA
 - (g) Garden Centres³
 - (h) Motor Vehicle Sales³
 - (i) Marine Retail³
 - (j) Service Stations
 - (k) Show Homes
 - (l) Trade Suppliers
- 3.95 For that reason I consider the confidence placed in standard E27.6.1 by the TAR to prevent higher trip-generating activities from being developed without further transport assessment is misplaced. The only time that assessment can definitely be undertaken is now.
- 3.96 I agree the “all other activities” rate adopted in the TAR is reasonable for storage warehouses, many manufacturing activities, transport depots or equipment hire centres. I consider the rate is too low for some other activities that could be developed on the Plan Change area as permitted activities, including activities like the existing Tractor Centre.
- 3.97 I consider that the TAR +25% sensitivity test for the A.M. peak hour is appropriate for assessment purposes.

³ Permitted activity provided more than 100m from Business - Heavy Industry Zone. The nearest such zones are in Drury and Glenbrook.

- 3.98 In my view the +25% sensitivity test is not appropriate for the P.M. peak hour. I consider trip generation in the afternoon could be 50% higher than the TAR masterplan trip generation estimate if a sizeable proportion of the Plan Change area is occupied by activities such as service stations, drive-through restaurants, and some retail-like activities.

Trip Distribution

- 3.99 The TAR estimates three aspects of the trip distribution based on the survey of the existing Tractor Centre and the survey of the Paerata Road/ Heights Road intersection:

- (a) the ratio of entering vs exiting movements;
- (b) origin and destination pattern (north/ south/ east/ west);
- (c) the split between two driveways;

Entering vs exiting

- 3.100 The existing Tractor Centre had 59% entering in the A.M. peak hour and 24% entering in the P.M. peak hour.
- 3.101 Light-industrial activities typically have entering proportions of around 60% (55-75%) in the A.M. peak hour and around 40% (30-50%) in the P.M. peak hour⁴.
- 3.102 The TAR estimates the Plan Change area will have entering proportions of 80% in the A.M. peak hour and 20% in the P.M. peak hour. This estimate is likely to be conservatively pessimistic for assessing the driveway performance and some other situations, but it may be too optimistic for some other cases.

Origin / Destination

- 3.103 The existing Tractor Centre had directional proportions to and from the west (along Heights Road) of 18% in the A.M. peak hour and 28% in the P.M. peak hour.
- 3.104 The TAR estimates that 25% of all trips will travel to or from the west in each peak hour. That is likely to be a reasonable assumption if development on the Plan Change area serves a similar market to the Tractor Centre, but it may be significantly different if future development serves a different market area.

⁴ From NZ Trips Database Bureau industrial land uses, approximately 33%-ile to 85th-ile.

- 3.105 For traffic travelling to and from the east the TAR has used the survey of the Paerata Road / Heights Road intersection to determine which traffic would be travelling to or from the north and south.
- 3.106 The 2022 survey had the turning proportions shown in Table 8.

Table 8: Proportion of traffic using Heights Road turning to or from South

Movement	A.M. Peak	P.M. Peak
To south (right turn out of Heights Road as proportion of Heights Road exit flows)	8.2%	8.8%
From south (left turn into Heights Road as proportion of Heights Rd entry flows)	19.2%	8.6%

- 3.107 Traffic using Heights Road makes up 23% (A.M.) and 28% (P.M.) of the flow along Paerata Road north of the intersection, so Heights Road appears to function as a distributor of traffic between western Pukekohe and Auckland via Paerata Road (SH22). Tractor Centre traffic makes up around 7% and 4% of the traffic turning at the intersection.
- 3.108 It is not known how much of the Tractor Centre traffic turns right or left to or from Paerata Road. It is possible that much of this traffic could turn to and from the south and adopting the turning distribution surveyed at the intersection could result in an unreasonable estimate of turning movements from the Plan Change area.
- 3.109 In addition, future development on this plan change area could attract a greater proportion of traffic from urban Pukekohe, particularly if retail or retail-like activities located on the Plan Change area, and the area is likely to represent a larger proportion of intersection flows. These changes may result in a higher proportion of the Plan Change area traffic turning to and from the south than the existing intersection flow patterns.
- 3.110 In the longer term the implementation of the North-West Upgrade is likely to reduce the volume of traffic using Heights Road. The implementation of other arterials, and particularly the new arterial between Pukekohe and Drury, would likely increase the proportion of traffic turning right out of Heights Road. These arterials may be implemented some years apart and in either order. If the Drury-Pukekohe Link is implemented before the North-West Upgrade there may be a need to make changes to the Paerata Road/ Heights Road intersection, but that would be likely irrespective of development of the Plan Change land.

Split between Driveways

- 3.111 The TAR considers the performance of the two driveways assuming that all movements would be evenly distributed across the two driveways.
- 3.112 I consider an even distribution is unlikely to occur in practice. People tend to take the most direct route, for example, drivers from the western end of the Plan Change area are highly unlikely to use the eastern driveway for travel to or from the west.

- 3.113 The two driveways are located towards each end of the Plan Change frontage, so I would expect most travel to and from the west to use the western driveway, and most travel to and from the east to use the eastern driveway. As the TAR estimates 75% of traffic will travel to or from the east, I would expect the eastern driveway to have higher volumes than the western driveway. I consider it would be more reasonable for only 20% of eastbound movements to occur at the western driveway rather than 50%, and for 90% of westbound movements to occur at the western driveway.

TAR Traffic Modelling

- 3.114 The TAR has used *Sidra Intersection v9* software to model the Paerata Road / Heights Road intersection, which I consider is an appropriate tool for this assessment. The TAR does not model the performance of either driveway.

TAR Modelling Results

- 3.115 As reported in the TAR the intersection is modelled as having relatively good performance with the traffic volumes recorded in 2020. The right turn out of Heights Road is the most difficult movement, but due to the low number of vehicles making that movement the queue lengths and delays are moderate.
- 3.116 With TAR forecast 2030 flows and no further development of the Plan Change area, the intersection is modelled as having relatively poor performance for the right turn out of Heights Road, but at a level common to many intersections across the region for peak hours. The other movements have good performance.
- 3.117 When the additional traffic from development enabled by the proposed plan change is added to the TAR 2030 forecast the intersection is predicted in the TAR to have poor performance for the right-turn out movement but good to moderate performance for other movements.
- 3.118 As expected, the sensitivity test with 25% more Plan Change area traffic has poorer performance. The right-turn-out movement has an average delay of 130 seconds in the A.M. and 110 seconds in the P.M. peak hour.
- 3.119 The TAR notes (bold emphasis added):

*It is recognised that the right turn out movement is the critical movement at the intersection. From the SIDRA assessment **this movement is approaching unacceptable levels in relation to average delay** while the degree of saturation (volume to capacity) is well below critical levels. Overall predicted traffic levels (which are relatively low) would need to more than double that predicted above for the degree of saturation to reach unacceptable levels.*

*Critically, it is noted that with the high levels of delay experienced **it is more likely that vehicles would travel west via Heights Road towards Pukekohe rather than undertake the critical right turn.** With this alternative available and the reduced speed on Paerata Road to 60km/hr, the existing intersection form is considered appropriate.*

- 3.120 I agree the performance of this movement, as predicted by the TAR model, is reaching unacceptable levels of delay. I acknowledge that the degree of saturation is non-critical but I do not accept that has any real bearing on this assessment, as in my view it is the average delay that is likely to lead to unsafe turning behaviour and the degree of saturation is less important for intersections controlled by Give Way or Stop signs.
- 3.121 I accept that long delays may result in some drivers travelling west instead; however, the TAR does not consider the impact of the longer travel distances or the impact of that diverted traffic elsewhere in the network. While diversion may mitigate the adverse effects associated with the right turn movement to some degree, it would not avoid or substantially mitigate the wider-network effects.
- 3.122 For the reasons set out above, I consider the future-year modelling presented in the TAR should not be relied on.

Alternate Modelling

- 3.123 As noted above, the forecasts and estimates used in the TAR analysis are subject to uncertainty, which in some cases may be significant. This includes uncertainty in:
- (a) the impact of Covid-19 health orders on traffic surveys in 2020;
 - (b) traffic growth rates;
 - (c) trip generation rates; and
 - (d) travel distribution patterns.
- 3.124 The TAR analysis does include a sensitivity analysis for trip generation. As noted earlier, I consider that the 2034 volumes should have been forecast differently, and I consider it would be prudent to also consider:
- (a) trip generation in the P.M. peak increased by 50% (25% more than the TAR sensitivity test) to test performance in the event activities such as service stations, fast-food and other retail-like activities are present.
 - (b) a greater proportion (16% instead of 8-9%) of plan change area traffic turning right to the south at the Paerata Road intersection.

- (c) an uneven split between the two driveways.
 - (d) all development accessed from a single driveway as a sensitivity test.
- 3.125 I have undertaken this analysis. Outputs are provided in Annexure B and summarised below.

Paerata / Heights Intersection in 2034 With No Development

- 3.126 As a result of my 2034 forecast being calculated differently to the TAR 2030 forecast, the Paerata Road / Heights Road intersection is modelled as having poor performance with no further development of the Plan Change area.
- 3.127 The right turn out of Heights Rd has an average delay of 211 seconds (3.5 minutes) per vehicle (s/v) and is at Level of Service⁵ (LOS) F in the A.M. peak hour. It is at 143 seconds (2.4 minutes) per vehicle and LOS F in the P.M. peak hour. Queue lengths remain modest because of the relatively low number of vehicles currently turning right out of Heights Road.
- 3.128 Other movements at the intersection range from LOS A to D for Paerata Road movements, and LOS C for the left turn out of Heights Road.
- 3.129 The performance of the intersection under my 2034 no-development scenario is worse than under the TAR 2030 with-development scenario, performance the TAR describes as approaching unacceptable levels of delay.
- 3.130 Many priority-controlled intersections across Auckland have one movement at LOS F in peak periods and most such intersections are not prioritised for improvements by AT or NZTA; however, in many cases long delays can result in poor safety outcomes.
- 3.131 With delays at these levels I would expect some drivers turning right out of Heights Road to resort to unsafe behaviour to avoid these long delays, or to take an alternate route. In either case there would be adverse effects on the safe and efficient operation of the road network.

Paerata / Heights Intersection in 2034 With Development

- 3.132 As expected, when development traffic is added using the TAR volumes (+25% sensitivity test) the intersection performance is degraded.

⁵ Level of Service (LOS) is a measure of performance ranging from good conditions at LOS A to congested conditions at LOS F. For intersections LOS is determined by the average delay. LOS C or D is commonly adopted as a maximum for design although many priority-controlled intersections across the Auckland Region have one or more movements at LOS F for parts of the peak periods

- 3.133 The right turn out of Heights Road is modelled to have an average delay of over 9 minutes in the A.M. peak and over 13 minutes in the P.M. peak. In my view delays of that magnitude are unlikely to be realised in practice due to diversion and unsafe driver behaviour.
- 3.134 Queues on Heights Road are predicted to be up to 67m long in the A.M. hour and 101m long in the P.M. hour. That is likely to impact the ability of vehicles to move in or out of the eastern existing access and other driveways along this section of Heights Road.
- 3.135 The right turn from Paerata Road into Heights Road is forecast to be 20 s/v LOS C in the A.M. peak and 52 s/v LOS F in the P.M. peak. The queue is predicted to be up to 132m long in the P.M. peak hour. That is nearly three times longer than the available queue storage in the right turn bay and is likely to result SH22 southbound through traffic being impeded with a consequential risk of rear-end collisions.
- 3.136 In my view this represents an intersection that has failed to operate adequately. In light of that result I have not modelled the intersection with the +50% P.M. trip generation scenario.
- 3.137 As noted earlier, the daily traffic volumes on SH22 recorded by NZTA show considerable weekly and seasonal variation. I consider the models are likely to be a reasonable approximation of average conditions, so I would expect the performance of the intersection to be significantly worse on busier days.
- 3.138 From this modelling I conclude the existing transport infrastructure is insufficient to support development that would be enabled by the proposed plan change.
- 3.139 To accommodate the development of the Plan Change area it would be necessary to improve the capacity of the intersection by introducing a roundabout or traffic signals, or to wait until implementation of the Pukekohe North-West Upgrade and potentially other arterials have substantially reduced traffic flows along both Paerata Road and Heights Road.
- 3.140 I have evaluated the performance of the Paerata Road / Heights Road intersection based on concept designs of potential upgrades. My modelling shows:
- (a) a single-lane roundabout would have adequate performance⁶ in the A.M. peak hour, but not in the P.M. peak hour;

⁶ AM: LOS A-C, Deg Sat 75%. PM: LOS A-C, Deg Sat 92%.

- (b) a dual-lane roundabout would have adequate performance⁷ in both peak hours;
- (c) traffic signals could have adequate performance⁸ if Paerata Road was widened to provide an additional northbound lane and additional storage in the right turn bay.

Access Intersections

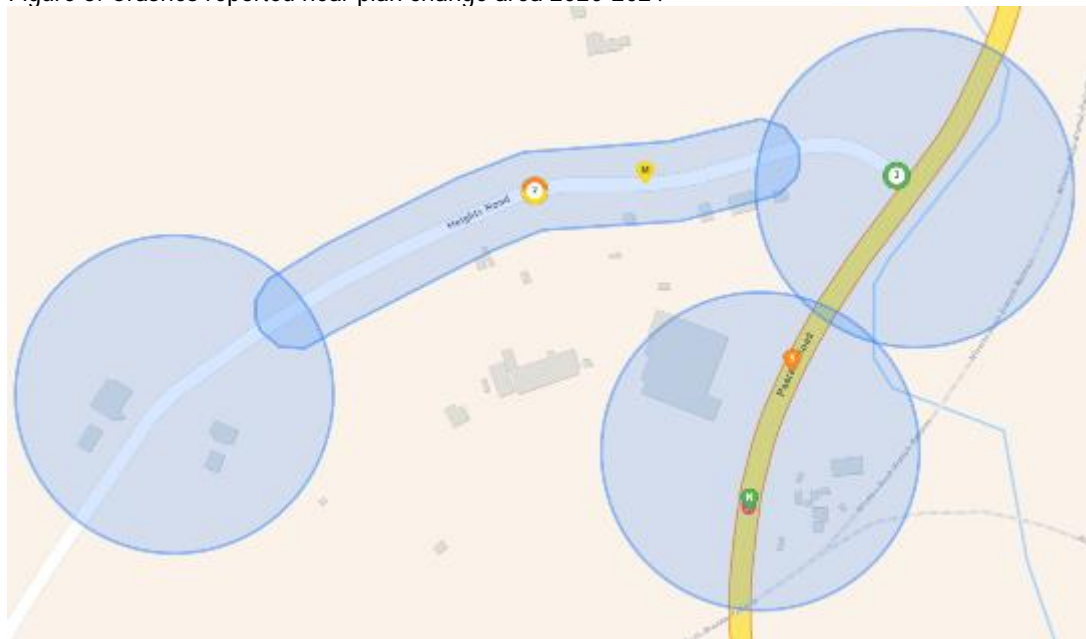
- 3.141 I have modelled the two proposed plan change area access driveway intersections on Heights Road and modelled a single driveway serving all development. I can confirm that the proposed intersections are predicted to operate with good levels of efficiency in either case.

Effects on Transport Safety

Crash History

- 3.142 Crash history is typically reviewed for a five-year period to identify hazards. The TAR provides crash data for 2017 to 2021 within 100m of the Plan Change area and for a wider area.
- 3.143 More recent data is now available. The map in Figure 6 shows crashes reported in the 2020-2024 period for the smaller area.

Figure 6: Crashes reported near plan change area 2020-2024



- 3.144 In mid-2020 the speed limit on Heights Road was reduced to 80km/h, and the speed limit on Paerata Road was reduced to 60km/h.

⁷ AM: LOS A-B, Deg Sat 62%. PM: LOS A-B, Deg Sat 71%,

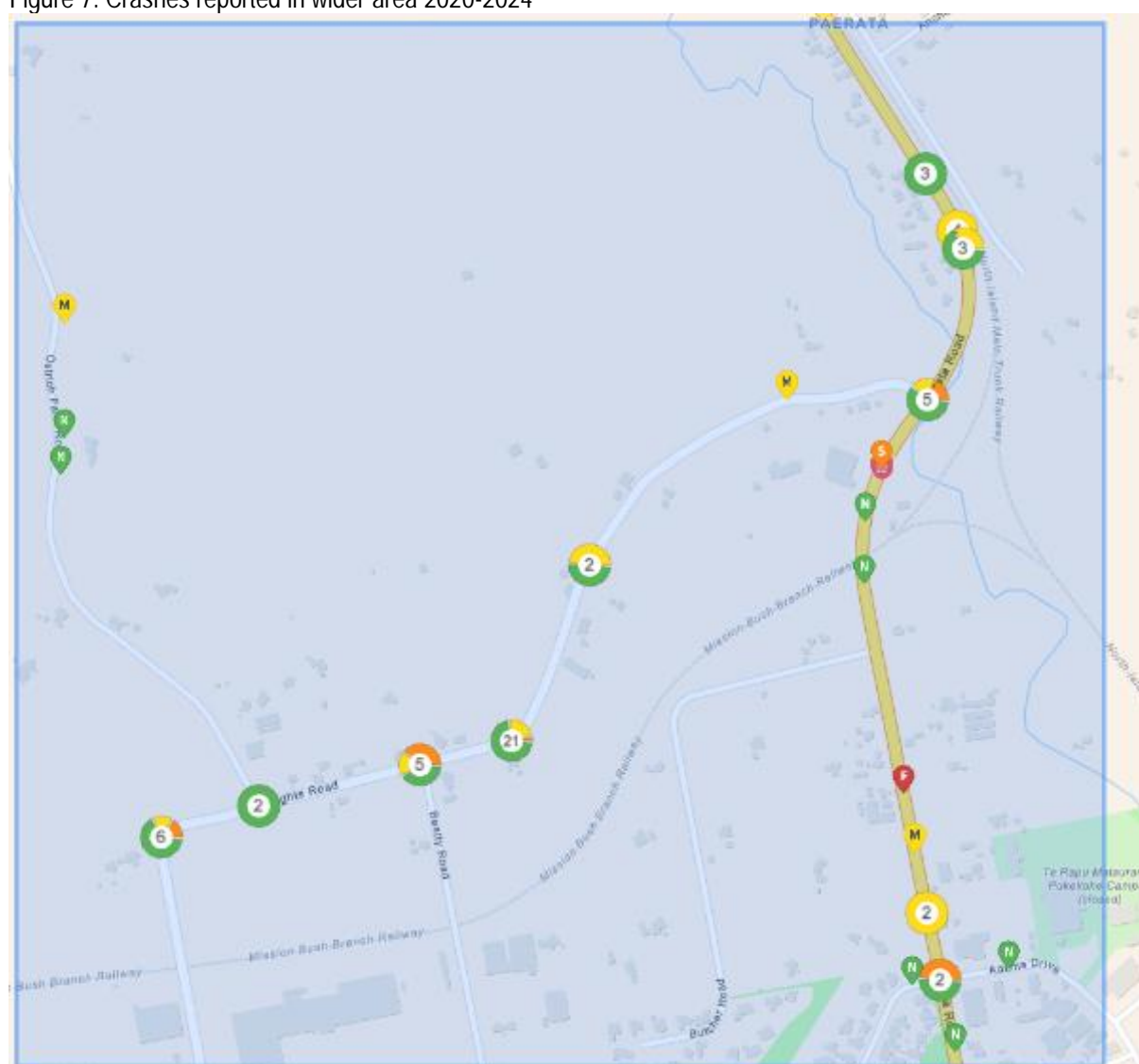
⁸ AM: LOS B-C, Deg Sat 79%, 50 s cycle time (no peds). PM: LOS A-C, Deg Sat 89%, 50 s cycle time (no peds).

3.145 For the 2020-2024 period there were 8 crashes in the smaller study area including:

- (a) three non-injury crashes at the intersection for a variety of reasons;
- (b) one serious-injury head-on crash on Heights Road along the Plan Change frontage;
- (c) two minor-injury loss-of-control crashes on Heights Road along the Plan Change frontage;

3.146 The 2020-2024 crash history for the wider study area is shown in Figure 7.

Figure 7: Crashes reported in wider area 2020-2024



3.147 There are several points to note from this wider crash history:

- (a) Twenty-three crashes were reported at the bend in Heights Road east of Beatty Road including:
 - (i) two serious-injury loss-of control crashes;
 - (ii) four minor-injury loss-of control crashes;
 - (iii) one minor-injury head-on crash;
 - (iv) thirteen non-injury loss-of-control crashes; and
 - (v) four non-injury head-on crashes.
- (b) There were three crashes at the Heights Road / Beatty Road intersection including one serious-injury cyclist crash and two non-injury crashes;
- (c) There were six loss-of-control crashes at the bend in Heights Road north of the railway level crossing including one serious-injury crash and one minor-injury crash.

3.148 Overall, the 2020-2024 period has fewer crashes than the 2017-2021 period and I expect this is partly due to lower traffic volumes in the 2021-2023 period and partly due to the lower speed limit. There is a significant crash history on Heights Road near Beatty Road.

Heights Road Level Crossing

- 3.149 There are two road crossings of the Mission Bush Branch railway west of the Plan Change area – an overbridge on Beatty Road and a level crossing on Heights Road. The TAR considers development traffic is more likely to use Beatty Road as it is closer to the Plan Change area, and a Level Crossing Safety Impact Assessment (LCSIA) is unlikely to be required.
- 3.150 Traffic counts are not available for Beatty Road, but AT estimates the volume and records the width of every road for road maintenance purposes. The most recent data is summarised in Table 9.

Table 9: AT data for roads south of Mission Bush Branch railway

Data	Heights Road	Beatty Road
Counted Volume, Feb 24 (v/d)	5218	
Estimated Volume, Jun 24 (v/d)	5218	560
Proportion of Heavy Vehicles	11%	5.5%
Road classification	Arterial	Access
Road width (m)	10	7.5

- 3.151 Heights Road provides better connections to southern and western Pukekohe via Helvetia Road. This is reflected in the AT traffic volumes, road classification, and road width. For that reason, I would expect 90% of development traffic using Heights Road to use the Heights Road level crossing and the remaining 10% to use Beatty Road.
- 3.152 KiwiRail often requests an LCSIA where development has the potential to impact a railway level crossing to ensure that the crossing is upgraded if necessary.
- 3.153 I cannot speak for KiwiRail requesting an LCSIA; however, I do note that the Heights Road level crossing already has flashing lights, bells, and half-arm boom barriers for vehicles.
- 3.154 There are currently no pedestrian facilities at the level crossing, but a proposed pedestrian crossing on the western side is present in the KiwiRail level crossing database, so would have been considered by some party in the past.
- 3.155 There have been no recorded road crashes on or near the crossing in the past five years. The KiwiRail level crossing database records known gradient and sightline issues, but no significant safety risk flags.
- 3.156 As a result, I expect the Plan Change is unlikely to require any changes to the level crossing.

Effects of Plan Change on Road Safety

- 3.157 Crashes are generally a product of the hazards that are present in the environment, and the exposure of people to those hazards. A route with many hazards may have few crashes if few vehicles use that route, but an increase in the number of vehicles using that route would result in a corresponding increase in crashes.
- 3.158 In the case of the Heights Road route it is evident that the bend near Beatty Road and the bend near the level crossing are hazardous.
- 3.159 In assessing the impact of crashes the TAR states:

In this regard additional traffic will always increase the exposure in relation to crashes in the local network. However, adding employment to this area will mean workers in Paerata and Pukekohe will need to travel less distance and thus reduce overall exposure. Essentially workers in these areas will need to travel somewhere for work (regardless of this proposed Plan Change).

In terms of Heights Road in particular, the crash analysis shows there is a potential existing safety concern on Heights Road on a corner some 150-180m east of Beatty Road with loss of control crashes being the dominant issue. While the proposal will add traffic to Heights Road (including this corner) this is

considered to be an existing wider network issue and the responsibility of Auckland Transport rather than directly linked to the proposed Plan Change.

- 3.160 I agree that additional traffic enabled by the Plan Change would likely result in a corresponding increase in the number of crashes.
- 3.161 To quantify that, using the TAR assumption that 25% of plan change area traffic will use Heights Road west of the Plan Change area, additional development of the Plan Change area would increase peak-hour traffic volumes on Heights Road by around 8% to 13%, and would likely increase daily traffic volumes by around 10% to 15%.
- 3.162 The TAR opines that providing employment at this plan change area will result in reduced travel distances for employment and therefore reduce the crash risk over a broader area.
- 3.163 That might be true if every route had similar hazards; however roads such as SH22 and SH1 are generally safer than minor local roads on a per-vehicle-kilometre basis.
- 3.164 While some people employed at this plan change area could live locally, it is also likely that some employees may travel a considerable distance to and from the area. While this might result in less travel overall, it is my view that any reduction in regional crash risk would not offset the increase in the crash risk on Heights Road.
- 3.165 The TAR suggests that the crash risk on Heights Road is an existing problem and it is the responsibility of AT to address rather than being linked to the Plan Change. That position ignores that development enabled by the Plan Change would increase traffic volumes on Heights Road resulting in a proportional increase in the number of crashes on Heights Road, exacerbating the problem.
- 3.166 To summarise, I would expect development enabled by the Plan Change to result in a 10-15% increase in the number of crashes occurring on Heights Road.
- 3.167 These effects could be mitigated by undertaking improvements along Heights Road to reduce the risks. Improvements could include crash reduction measures such as the installation of additional delineation (signs and markings), improving the road surfacing, and installing street lighting.

- 3.168 The NZTA *Crash Estimation Compendium* contains tables providing typical crash reduction rates achieved by various forms of intervention. For example, the installation of raised reflective pavement markers (cat's eyes) typically achieves a 5% reduction in crashes, and a vehicle-activated speed warning sign typically achieves a 35% reduction in crashes⁹.
- 3.169 In my view measures to reduce the risk of crashes along Heights Road by at least 10% should be a pre-requisite for further development of the Plan Change area. Auckland Transport approval would be required for such work.

Proposed Improvements to Road Network

- 3.170 As noted earlier, the TAR states that road widening at each access point is required, and that upgrading of the Plan Change road frontage to an urban form is expected. I consider that more comprehensive widening is required, in addition to the road safety improvement works described above.

Upgrading Mechanism

- 3.171 The application material proposes that a private agreement with AT be used to ensure that upgrading occurs. A common alternative to a private agreement with AT is to introduce plan change area specific rules into the AUP by way of a Precinct.
- 3.172 The relative benefits of each approach are primarily a matter for other experts, but I would note that I am not aware of the content of any prospective or actual agreement, so cannot comment on the effectiveness of that approach for addressing adverse effects arising from this plan change.

- 3.173 In any case I consider that works beyond those proposed by the applicant are required.

Staging of Upgrades

- 3.174 The TAR describes how the upgrading is proposed to be undertaken in two stages:
- (a) Stage 1 includes the following work, and is proposed to occur after the Plan Change area is developed with gross floor area beyond 9,000m² (50% of that in the masterplan):
- (i) construction of the new western accessway;

⁹ Table 33, Crash Estimation Compendium First Edition Amendment 1, NZ Transport Agency, June 2018.

- (ii) widening along the north side of Heights Road;
 - (iii) provision of a kerb and channel along the south (plan change frontage) side of Heights Road.
 - (b) Stage 2 includes providing a footpath and streetlighting along the south side of Heights Road, and is proposed to occur after the Plan Change area is fully developed with floor area beyond 17,500m² (100% of that in the masterplan):
- 3.175 Development of the Plan Change area could differ from the masterplan. For example, activities such as service stations, garden centres, motor vehicle sales, or the like typically use relatively small buildings and relatively large areas of land. If that occurred a gross floor area trigger may be reached later than necessary, if at all. For that reason, if there is to be a staged approach I would recommend a trigger based on land area rather than floor area.
- 3.176 It is also common practice to require upgrading of infrastructure prior to the relevant trigger point being reached, and I would recommend that approach here if a staged approach is used.

Third Party Interest

- 3.177 The TAR posits that no third parties are likely to have a significant interest in any agreement with AT. This is principally on the basis that any future works within the road reserve would require Engineering Plan Approval (from Council and/ or AT) and be constructed to AT standards.
- 3.178 While that may address concerns about the form of any works, this does not address any potential interest in ensuring that the work is required to be undertaken at an appropriate point in time.

4 CONSISTENCY WITH PLANNING PROVISIONS RELEVANT TO TRANSPORT

- 4.1 The TAR does not address planning instruments relevant to transport, other than the provisions of AUP Chapter E27 Transport that might be addressed for any resource consent applications. As noted earlier resource consents may not be necessary for development to occur.

Government Policy Statement on Land Transport 2024

- 4.2 The four strategic priorities of the Government Policy Statement on Land Transport 2024-34 (GPS-LT) are assessed below.

Economic Growth and Productivity

- 4.3 The overarching strategic priority for this GPS is to support economic growth and productivity through efficient investment in our land transport system to connect people and freight quickly and safely.
- 4.4 While the Plan Change is likely to support economic growth and productivity, in my view it would not assist in connecting people and freight quickly and safely because of the adverse effects on safety and efficiency, unless the Plan Change is modified to mitigate the safety and efficiency effects.

Increased Maintenance and Resilience

- 4.5 This priority relates to maintenance of the transport system and increasing resilience to natural events. I consider the Plan Change to be neutral with respect to this priority.

Safety

- 4.6 The safety priority states a safe transport system is critically important.
- 4.7 In my view PC110 would result in more crashes along Heights Road and at the Paerata Road / Heights Road intersection, so I consider the Plan Change is contrary to this priority, unless the Plan Change is modified to mitigate the safety and efficiency effects.

Value for Money

- 4.8 This priority relates to providing better value for money from government spending and I consider the Plan Change to be neutral in that regard.

National Policy Statement on Urban Development

- 4.9 The National Policy Statement on Urban Development 2020 (NPS-UD) sets out several objectives and policies and obliges Council to take several matters into account when deciding to zone land. Following direction from the Environment Court, I understand Council's current position is that Policies 3 and 4 should not be applied in the processing of private plan changes.

Infrastructure Readiness

- 4.10 NPS-UD Policy 2 requires Council to provide sufficient development capacity for housing and business land, and that development capacity must be "infrastructure ready".

- 4.11 Council must also be satisfied that additional infrastructure (not controlled by Council) to service the development capacity is likely to be available. With respect to transport this could include the provision of state highway infrastructure by NZTA and rail infrastructure by KiwiRail.
- 4.12 The NPS-UD has infrastructure requirements for short term (3 years), medium term (3 to 10 years), and long term (10 to 30 years). The short and medium terms are within the 10-year planning horizon of the AUP and are more relevant to the zoning of land for development, with the long-term period being of greater relevance to FUZ land.
- 4.13 With respect to the short term, development capacity is infrastructure-ready if there is adequate existing development infrastructure.
- 4.14 As noted above, the existing transport infrastructure is not adequate to support development enabled by the Plan Change. Widening and upgrading of Heights Road is required as acknowledged by the applicant. In my view upgrading of the Paerata Road/ Heights Road intersection is also required if development of the Plan Change area occurs before the Pukekohe North West Upgrade is fully operational.
- 4.15 I am not aware of any committed public funding for that infrastructure. The existing development infrastructure could potentially be made adequate if funded privately.
- 4.16 If the provision of the necessary infrastructure by private parties could be made certain, the Plan Change area could be considered infrastructure-ready in the short-term; however no mechanism for securing their delivery is included in the Plan Change.
- 4.17 For medium-term capacity, existing infrastructure must be adequate or funding for adequate infrastructure is to be identified in a long-term plan. There are expected to be significant deficiencies in the wider transport infrastructure in the district, which is why the PPSP has identified several changes to the arterial road network. The PPSP arterials are not identified in the RLTP so are not funded, and these are projects that are required for the full build-out of the wider PPSP, although some may only be required in the longer term.

Regional Policy Statement

- 4.18 Relevant objectives and policies are identified below.

B2.2 Urban Growth and Form

Objective B2.2.1 (1) A quality compact urban form that enables all of the following:

- ...
 - (c) *better use of existing infrastructure and efficient provision of new infrastructure;*

(d) improved and more effective public transport;

...

- 4.19 The plan change proposes the BLIZ be applied to the land that enables a range of activities.
- 4.20 In my view the Plan Change area is not within a walkable catchment of any public transport services, centres, or other higher-density environments; however, the proposal could be consistent with the objective in that it may allow other land closer to public transport to be developed in a more intensive and compact manner.

B2.3 A Quality Built Environment

B2.3.2. Policies

- (1) Manage the form and design of subdivision, use and development so that it does all of the following:*

...

- (b) contributes to the safety of the site, street and neighbourhood;*
- (c) develops street networks and block patterns that provide good access and enable a range of travel options;*
- (d) achieves a high level of amenity and safety for pedestrians and cyclists;*

...

- (2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:*

- (a) providing access for people of all ages and abilities;*
- (b) enabling walking, cycling and public transport and minimising vehicle movements; and*

...

- 4.21 PPC110 as notified does not propose a precinct and relies on a private agreement with AT to achieve the built environment policies relating to access, and street connections.

B2.5. Commercial and Industrial Growth

Policy B2.5.2

...

- (8) Enable the supply of industrial land which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports and airports, and can be efficiently served by infrastructure.*

- 4.22 In the longer term, once the Pukekohe Arterials are operational, the Plan Change area will have efficient access to freight routes and be efficiently served by infrastructure.
- 4.23 In the short to medium term the efficiency of the Paerata Road/ Heights Road intersection will become degraded unless the intersection is improved.

B3.3 Transport

Objective B3.3.1

(1) Effective, efficient and safe transport that:

- (a) supports the movement of people, goods and services;*
- (b) integrates with and supports a quality compact urban form;*
- (c) enables growth;*
- (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and*
- (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.*

- 4.24 The long-term transport infrastructure will achieve this objective, but unless the Paerata Road/ Heights Road intersection is upgraded the Plan Change would not contribute to effective, efficient and safe transport.

Policy B3.3.2

...

Integration of subdivision, use and development with transport

(5) Improve the integration of land use and transport by:

- (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
- (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;*
- (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes;*
- (d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network;*
- (e) enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and*
- (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.*

- 4.25 PPC110 has poor access other than by private vehicle, so would increase the demand for private vehicle trips.
- 4.26 The plan change area is adjacent to Paerata Road (SH22), and to the Mission Bush Branch railway, both of which are key pieces of transport infrastructure. In my view upgrading of the Paerata Road/ Heights Road intersection is required to provide for the safe and efficient operation of Paerata Road. I consider adverse effects on the railway would be minimal.

- 4.27 To summarise, the proposal is not entirely consistent with the RPS unless Heights Road and the Paerata Road/ Heights Road intersection are upgraded.

Future Development Strategy

- 4.28 Auckland Council has produced the Tamaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053 (FDS) as required by the NPS-UD.
- 4.29 The FDS aims to:
- (a) achieve well-functioning urban environments;
 - (b) ensure there is sufficient development capacity;
 - (c) integrate planning and infrastructure planning and funding.
- 4.30 Principle 5 of the FDS is to “*Enable sufficient capacity for growth in the right place and at the right time*”. To assist in achieving that principle the FDS prioritises different future urban areas and sets a timetable.
- 4.31 The plan change area is within the Pukekohe Northwest area which is scheduled for development “*Not before 2040+*” with the Pukekohe North West Arterial listed as a transport infrastructure prerequisite.
- 4.32 As noted above I consider that upgrading of Heights Road, and either the Pukekohe North West Upgrade or substantial upgrading of the Paerata Road / Heights Road is required to achieve a well-functioning urban environment.

Te Tāruke-ā-Tāwhiri Auckland Climate Plan

- 4.33 The climate plan has eight priorities including Transport.
- 4.34 The plan seeks to reduce emissions from transport. It states:
The highest priority is reducing emissions generated by light passenger vehicles and commercial vehicles, given these generate about 80 per cent of on-road emissions.
- 4.35 As noted above, PC110 enables a reduction in travel distance, but does not ensure it.

Transport Emissions Reduction Pathway

- 4.36 This document (TERP), endorsed by Auckland Transport and adopted by Auckland Council, is intended to give effect to the climate plan. It directs the activities of the Council and AT, describes eleven transformation areas, and provides an implementation pathway.

Reduce Travel

- 4.37 The TERP seeks to reduce travel where possible and appropriate. As noted above, the Plan Change partly enables, but does not ensure, that outcome.

Build Up Not Out

- 4.38 This includes planning for an increase in sustainable modes, a reduction in light vehicle kilometres travelled, reducing the scale of urban expansion, and locating more intensive development in areas with good access to opportunities. The pathway includes upzoning around areas of high access.
- 4.39 I consider the Plan Change is consistent with this as Council's PPSP has identified the land may be a suitable location for light industrial use.

5 SUBMISSIONS AND LOCAL BOARD COMMENTS

Submissions

- 5.1 I have been provided with six submissions and discuss the transport issues raised below which are summarised in Table 10.

Table 10: Transport Issues raised in Submissions

Transport Issues	Number of Submissions
Capacity of Heights Road	1
Urbanisation of Heights Road	1
Development on NZTA land	1
Safety at Paerata Road / Heights Road intersection	1

Capacity of Heights Road

- 5.2 Submission point #1.3 by Peter Fa'afiu raises concerns about the capacity of Heights Road and development of the Plan Change area being compatible with potential increases in traffic volume. The submitter suggests the Pukekohe North West Arterial may increase the traffic volume on Heights Road.
- 5.3 As noted earlier, I consider the completed Pukekohe North West Upgrade is likely to reduce traffic volumes on Heights Road by providing a more attractive alternative.

- 5.4 If some parts of the arterial are operational before others, it is possible that traffic volumes on Heights Road could increase for a period. I consider that is a factor that AT should consider when deciding on any staging of the arterial road, but it is a relevant matter to consider in relation to the planned timing of infrastructure delivery. This would not be an issue if development of the land is deferred until after the Pukekohe North West Upgrade is completed as described in the FDS.
- 5.5 As noted above, I am concerned that there could be adverse safety effects along Heights Road as a result of the Plan Change unless mitigation works are undertaken, and as a result Heights Road does not have sufficient capacity (using a wider meaning of the word) to accommodate development.
- 5.6 For those reasons, I consider this is a valid issue and support the submission point.

Urbanisation of Heights Road

- 5.7 Submission point #3.1 by Auckland Transport considers the urbanisation of the Plan Change frontage on Heights Road should occur as part of the initial development of the Plan Change area. Submission points #3.2 and #3.3 seek mechanisms such as a Precinct, or alternatives, to achieve these upgrades.
- 5.8 There appears to be no dispute that urbanisation (and widening) of the Heights Road frontage is warranted, although I consider the widening should be more comprehensive than proposed by the applicant. There also appear to be differing views on when this should occur and how delivery should be ensured.
- 5.9 For the reasons set out earlier in this report, I agree that a suitable mechanism is needed. Appropriate precinct provisions would provide a suitable mechanism, and for that reason I support these submission points.

Occupation of NZTA land

- 5.10 Submission point #4.1 by NZTA requests that all development is located within the Plan Change area so none is located within the NZTA designation, or alternatively that the consent of NZTA is obtained.
- 5.11 I consider this matter is separate from the Plan Change, and one that NZTA could resolve outside this process, so on that basis do not support the submission point.

Safety at Paerata Road / Heights Road Intersection

- 5.12 Submission point # 4.4 by NZTA recommends that the applicant investigate road signage options at the Paerata Road / Heights Road intersection to address loss of control crashes at or near the intersection.
- 5.13 In the 2020-2024 period the crashes on Paerata Road at or near the intersection are summarised in the Table 11.

Table 11: Crashes reported 2020-2024 on Paerata Road at or near intersection with Heights Road

Location	Description	Factors	Conditions	Casualties
Intersection	Car southbound on Paerata Road lost control turning right.	Lost control under acceleration	Dry, Twilight, Fine	None
	Car westbound on Heights Road swung wide and hit a car head-on		Wet, Dark, Fine	None
	Car westbound on Heights Road hit car reversing along road	Did not notice another vehicle	Dry, Sunny, Fine	None
Paerata Rd, south of intersection	SUV southbound on Paerata Road swinging wide hit Car head-on	Swung wide on bend	Dry, Dark, Fine	None
	SUV southbound on Paerata Road swinging wide hit Car head-on	Swung wide on bend	Wet, Overcast, Light Rain	3 Serious

- 5.14 In that five-year period there was one non-injury loss-of-control crash involving a vehicle turning at the intersection.
- 5.15 There were two head-on crashes on the bend south of the intersection with one producing serious injuries. In my view the head-on crashes are unlikely to be associated with the intersection or unduly exacerbated by the Plan Change.
- 5.16 In my view the three crashes at the intersection are unlikely to have been prevented by additional signage at the intersection.
- 5.17 As noted earlier, I do have concerns about road safety at this intersection as traffic volumes increase and efficiency deteriorates, but that is not related to loss-of-control crashes, nor one that could be adequately addressed by additional signage. For those reasons, I do not support this submission point.
- 5.18 Submission point #4.3 requests “*Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.*”
- 5.19 I have identified that the Plan Change would result in adverse effects on the safety and efficiency of Paerata Road (SH22) and the Heights Road intersection, so I agree that some “other relief” is necessary and support that submission point.

Summary

- 5.20 A summary of submission points relevant to transport is contained in Table 12.

Table 12: Assessment of Transport Issues Raised in Submissions

Submitter Name	Point	Issue	Relief Sought	Technical Assessment
1 Peter Fa'afiu	1.3	Capacity of Heights Road	Confirm capacity is sufficient for additional traffic	Capacity of the Paerata Road / Heights Road intersection would be inadequate, with a consequential increase in crashes, unless the Pukekohe North West Upgrade is fully operational, or the intersection is controlled by traffic signals or a roundabout. Heights Road west of the Plan Change land does not have the capacity to safely accommodate additional traffic unless crash reduction mitigation measures are implemented.
3 Auckland Transport	3.1, 3.2, 3.3	Heights Road frontage upgrades	A mechanism, such as a Precinct, to ensure upgrades are achieved as part of the initial development of the site	Upgrades to Heights Road along the site frontage are required. In the absence of another mechanism suitable Precinct provisions would ensure the appropriate upgrades are provided.
4 New Zealand Transport Agency	4.1	Development within NZTA designation	Locate development outside designation or obtain consent of NZTA	This is an existing matter unrelated to the Plan Change.
	4.3	Operation of state highway and safety of users	Any other relief	Capacity of the Paerata Road / Heights Road intersection would be inadequate, with a consequential increase in crashes, unless the Pukekohe North West Upgrade is fully operational, or the intersection is controlled by traffic signals or a roundabout.
	4.4	Safety at Paerata / Heights intersection	Investigate road signage options to address loss-of-control crashes	The crash history of this intersection could not be addressed by additional or improved signage.

Local Board Comments

- 5.21 The Franklin Local Board provided comments on the Plan Change in the Board Minutes of 24 June 2025. I provide comments on the transport-related matters below.

i) *tautoko / support rezoning 5.35 hectares of land at Pukekohe from FutureUrban Zone to Business - Light Industry Zone on the basis that light industry is needed to support local jobs and economic development opportunity in the wider Pukekohe area i.e. so local people do not need to travel for employment .*

- 5.22 I agree the Plan Change would provide additional employment, and that it is likely that some people working in the Plan Change area may live locally.

- v) *suggest that in considering the plan change, that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer, noting that in the future, for those working at this site, accessing the Heights Road Cemetery or moving through the area should be enabled to walk, cycle and access public transport.*

5.23 I agree it is important that the delivery of appropriate transport infrastructure can be ensured.

6 CONCLUSION / RECOMMENDATIONS

Transport Issues in Contention

Effects on efficiency of transport network

- 6.1 Any adverse effects of the proposal on transport efficiency are largely confined to the Paerata Road (SH22) / Heights Road intersection.
- 6.2 In my view the applicant's analysis of effects on the efficiency of the intersection should not be relied on as they have incorrectly forecast future volumes and have not considered some forms of development that are permitted in the BLIZ and could generate higher volumes of traffic.
- 6.3 My analysis shows the intersection is expected to operate poorly in future without further development of the Plan Change area, and I consider the intersection does not have sufficient capacity to accommodate development of the Plan Change area as proposed.
- 6.4 In my view rezoning and further development of the Plan Change area should be delayed until the Pukekohe North West Upgrade is operational (as per the FDS), or the Paerata Road / Heights Road intersection should be upgraded to either a dual-lane roundabout or traffic signals with widening of Paerata Road.

Effects on road safety

Paerata Road (SH22) / Heights Road intersection

- 6.5 The road safety record at the Paerata Road/ Heights Road intersection is currently not of significant concern; however, as traffic volumes increase delays at the intersection will eventually become significant. Those delays and the resulting queues are likely to result in unsafe behaviour turning right out of Heights Road.

- 6.6 The queue for the right turn into Heights Road is forecast to extend well beyond the available storage, which increases the risk of rear-end crashes.
- 6.7 Those adverse effects would be accelerated and exacerbated by further development of this plan change area.
- 6.8 As a result I am of the view that the existing intersection is inadequate, and that rezoning and further development of the Plan Change area should be delayed until the Pukekohe North West Upgrade is fully operational (as per the FDS), or the intersection is upgraded as described above.

Heights Road at access points

- 6.9 The sightlines at the new access location identified by the applicant are insufficient. A new access in that location would result in an increase in crash risk, particularly as long heavy vehicles are likely to use the access.
- 6.10 There appears to be another location along the Plan Change frontage where sight distances would be sufficient, and I recommend that any new access be confined to that location unless an assessment associated with a resource consent application can demonstrate that sight distances are appropriate.
- 6.11 The eastern existing site access is close to Paerata Road which is undesirable for safe operation. Relocating the access to the west appears to provide inadequate sight distance for the existing operating speed. The existing access is also inconsistent with three AUP standards, although it appears those inconsistencies could be reduced or avoided by removing the eastern half of the access.
- 6.12 The applicant has proposed that the northern shoulder of Heights Road be widened at access points; however, in my view more expansive road widening to provide right turn bays is warranted, in conjunction with widening to provide a left-turn lane at the eastern-most access.
- 6.13 In my view development of the Plan Change area as proposed would result in adverse effects on road safety at the access points unless appropriate locations are chosen, appropriate widening works are completed, and the speed environment is reduced.
- 6.14 AT has recently reduced the speed limit, and I would not expect AT to reduce the speed limit further in the short to medium term, particularly as land on the northern side of Heights Road is planned to remain rural.

- 6.15 Under the Plan Change some development is possible without resource consent, and in that case Council and Auckland Transport would have no control over the location or form of any access. In my view a Precinct that includes controls on access is necessary to avoid potential adverse safety effects.

Heights Road west of the site

- 6.16 I consider the crash history of Heights Road west of the Plan Change area to be poor, and the crash record would be exacerbated by further development of the Plan Change area.
- 6.17 I consider that any further development of the Plan Change area should require the prior implementation of road safety improvement measures at the bend east of Beatty Road, the intersection with Beatty Road, and the bend north of the railway level crossing.

Ensuring upgrades

- 6.18 The applicant has proposed that an agreement between the applicant and AT be used to ensure that appropriate upgrading works are undertaken in a staged manner.
- 6.19 At the time of writing I understand agreement with AT has not been reached. As noted above, I consider additional and more significant upgrading is required, and in the event agreement with AT has been reached prior to the hearing, I expect it may not include such measures.
- 6.20 I note that AT has requested that a Precinct or similar provision be imposed if the Plan Change is approved. I support that request and have appended draft Precinct provisions for consideration and further development.

Recommendation

- 6.21 I do not support Plan Change 110 as notified.
- 6.22 In my view the Plan Change area could be rezoned as requested provided:
- (a) The Pukekohe North West Upgrade is fully operational, or the Paerata Road (SH22) / Heights Road intersection is upgraded with a dual-lane roundabout or traffic signals with additional lanes¹⁰;
 - (b) The speed limit on Heights Road is reduced, or access points are located to provide sight distances sufficient to meet the Austroads Safe Intersection Sight Distance standard for measured operating speeds;
 - (c) Heights Road is upgraded to provide a right turn bay (or flush median) at any access point, and to provide an auxiliary left-turn lane at the northeastern-most access point;
 - (d) Road safety improvements to achieve a minimum of 10% reduction in crashes (potentially including improved road surfacing, road markings, or road signage) are carried out at and near the bend in Heights Road east of Beatty Road, the intersection with Beatty Road, and at the bend in Heights Road north of the railway level crossing¹¹.
 - (e) Heights Road is upgraded to an urban form including a footpath along the Plan Change frontage¹².
 - (f) Precinct provisions are added to ensure that the above upgrades are completed prior to any further development of the site¹³.
- 6.23 I note that item (a) requires the approval of NZTA, and items (b) to (e) require the approval of AT.
- 6.24 I provide a possible set of Precinct provisions in Annexure C. These provisions are modelled on provisions in recent Precincts elsewhere in Pukekohe. I provide references to similar provisions in other AUP southern Precincts in Annexure D.
- 6.25 In considering activities that might be implemented as interim activities ahead of industrial development, I note that residential activities are Non-Complying in the BLIZ, and some other activities would be permitted.

¹⁰ Relevant submission points: 1.3, 4.3

¹¹ Relevant submission points: 1.3

¹² Relevant submission points: 3.1

¹³ Relevant submission points: 3.2

ANNEXURE A: PAERATA ROAD TRAFFIC COUNTS

Figure A.1. Sourced from NZTA Open Data for Paerata Road (SH22) North of Heights Road

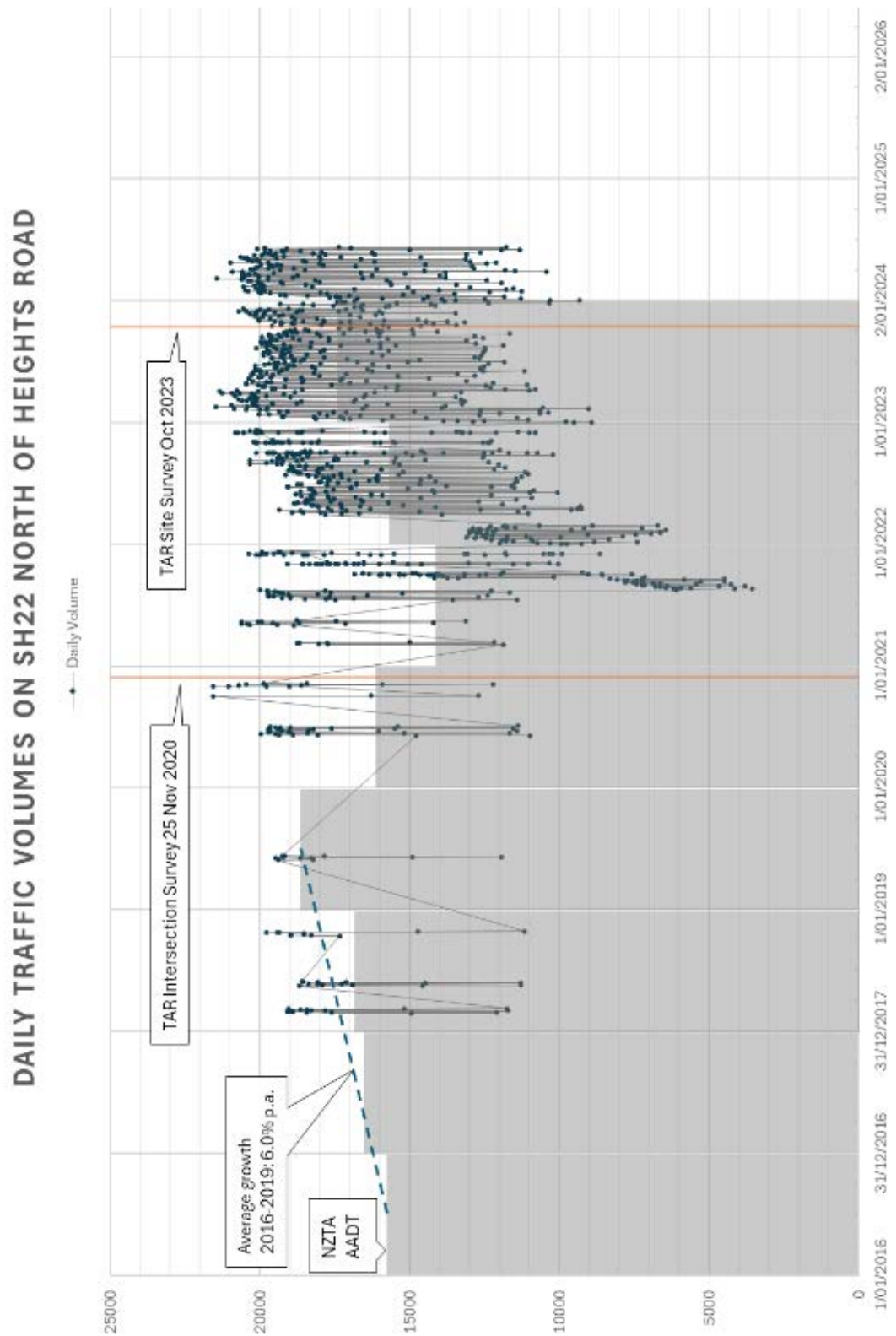
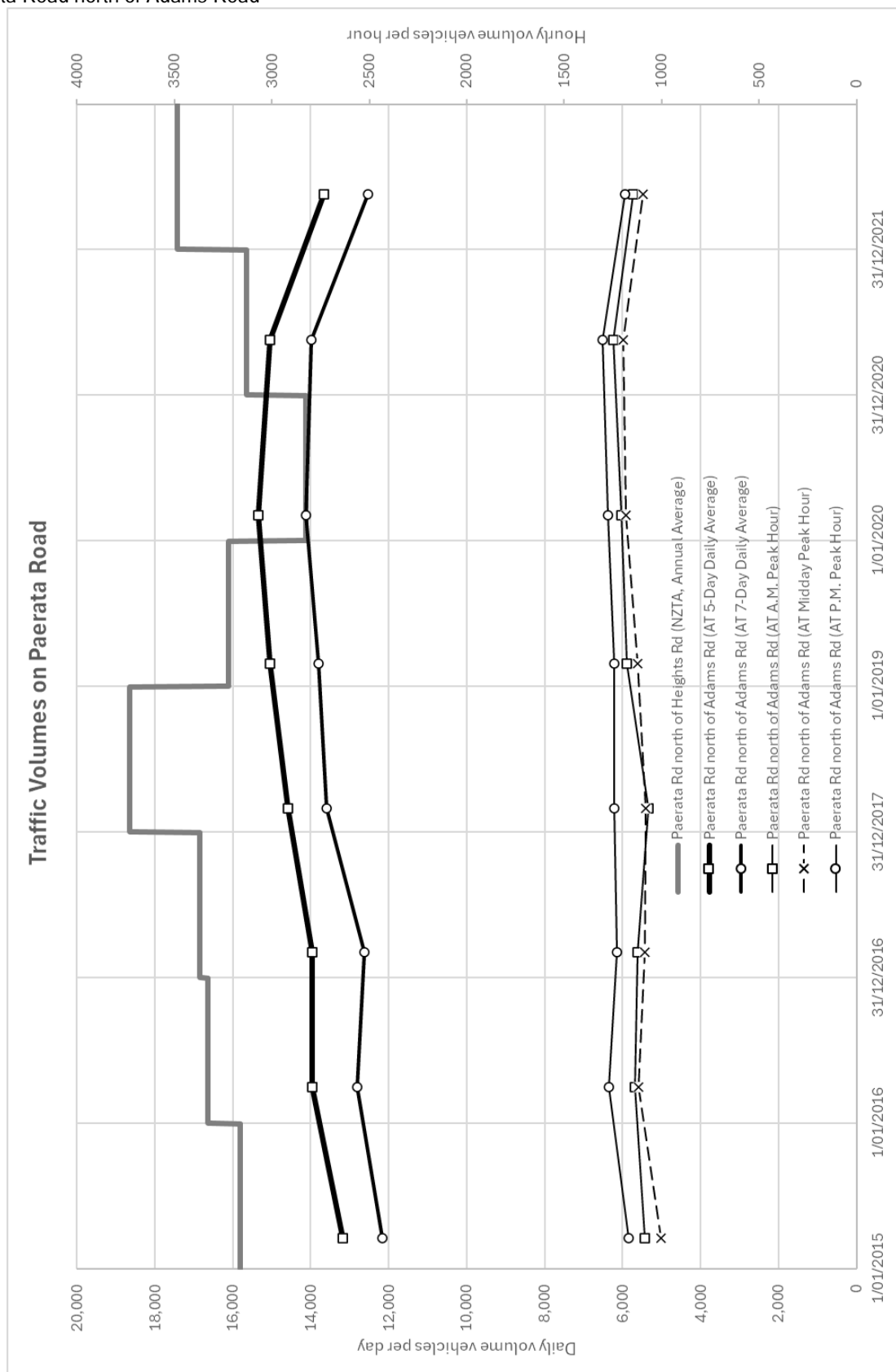


Figure A-2. Sourced from NZTA Open Data for Paerata Road (SH22) North of Heights Road and AT traffic counts for Paerata Road north of Adams Road



ANNEXURE B: ALTERNATE ANALYSIS

B.1 Trip Distribution

Figure B. 1: 2034 Traffic Volumes With No Further Development – A.M. Peak Hour

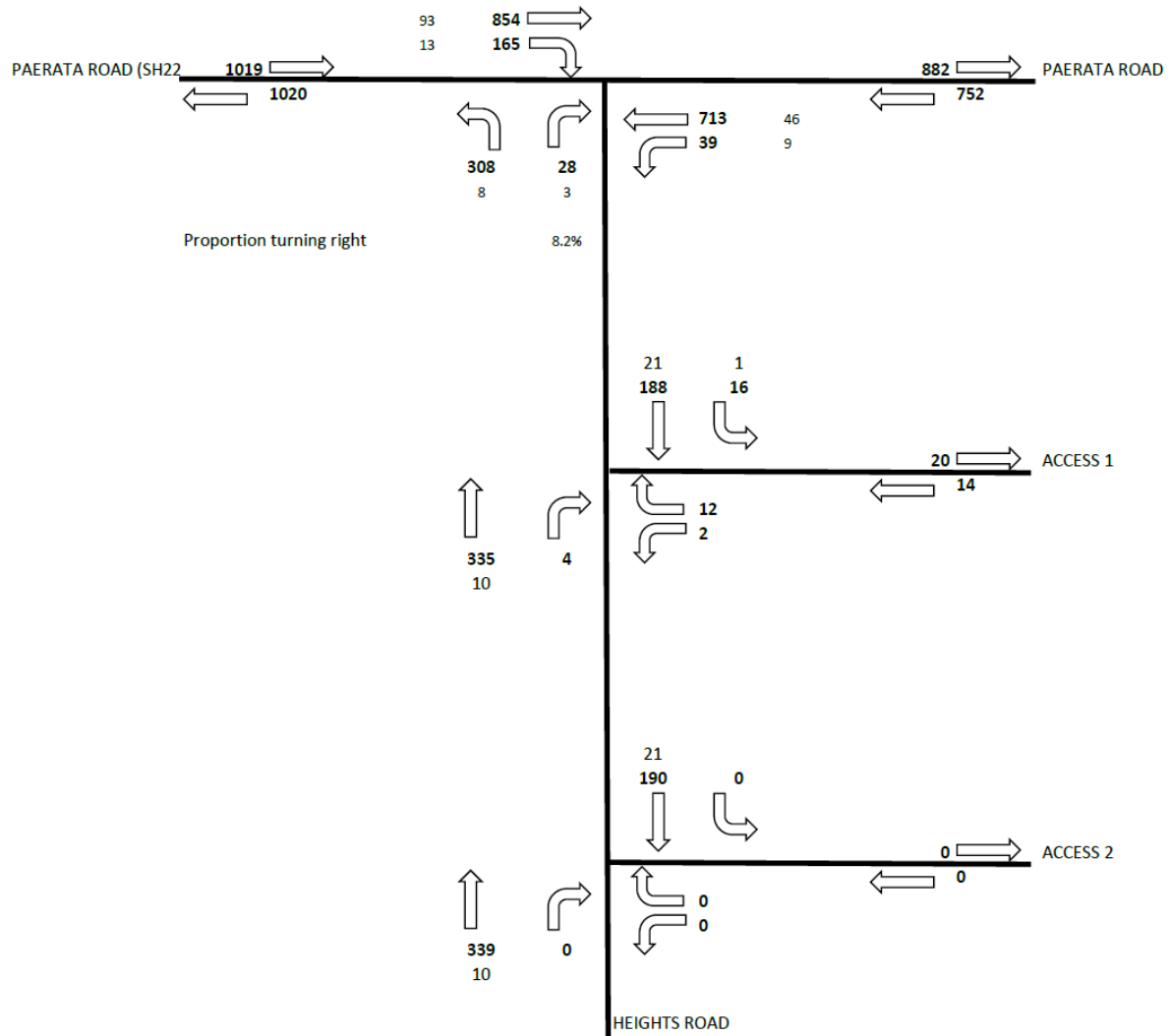


Figure B. 2: 2034 Traffic Volumes With No Further Development – P.M. Peak Hour

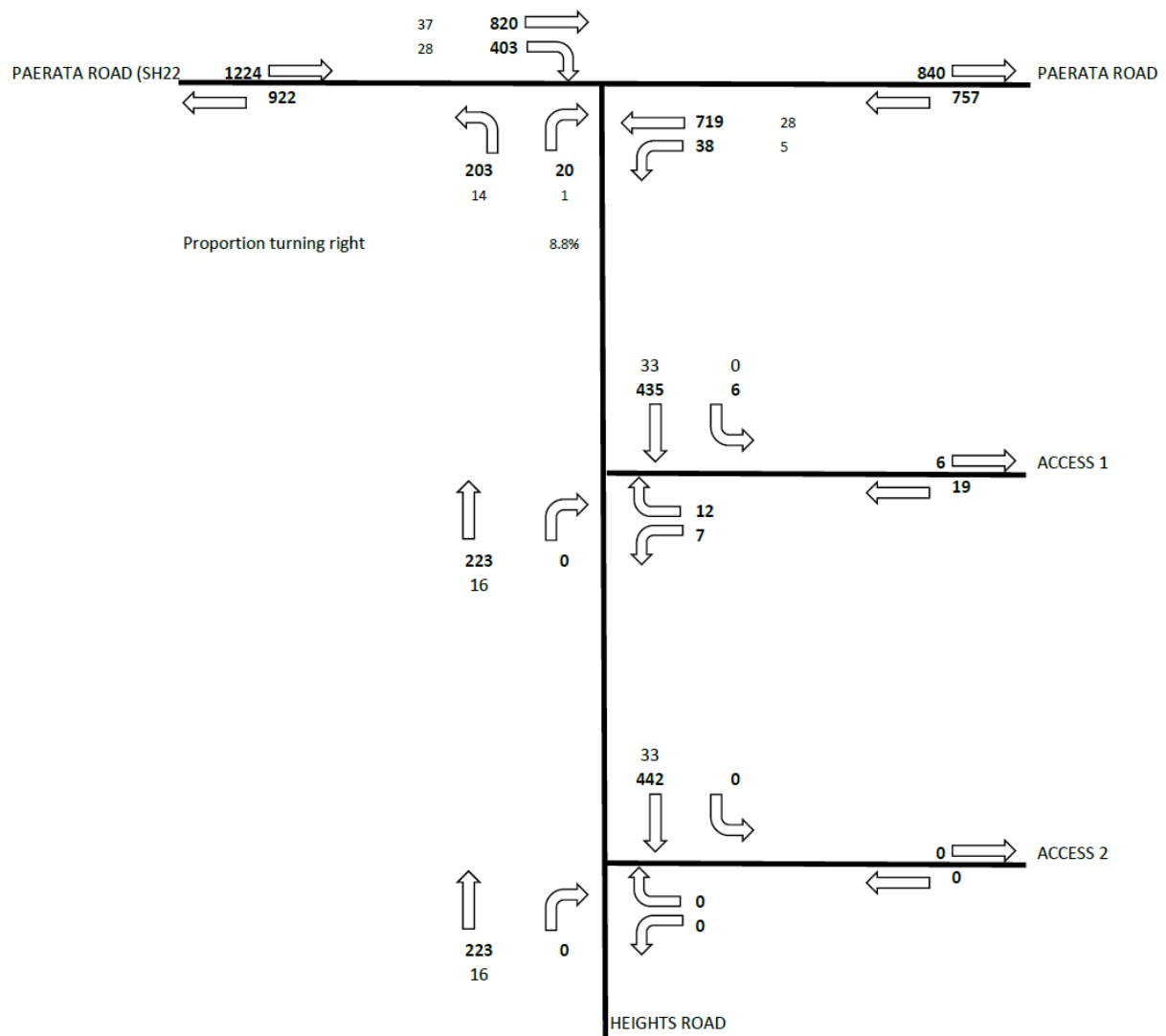


Figure B. 3: Trip Generation for Business – Light Industrial Zoning – A.M. Peak

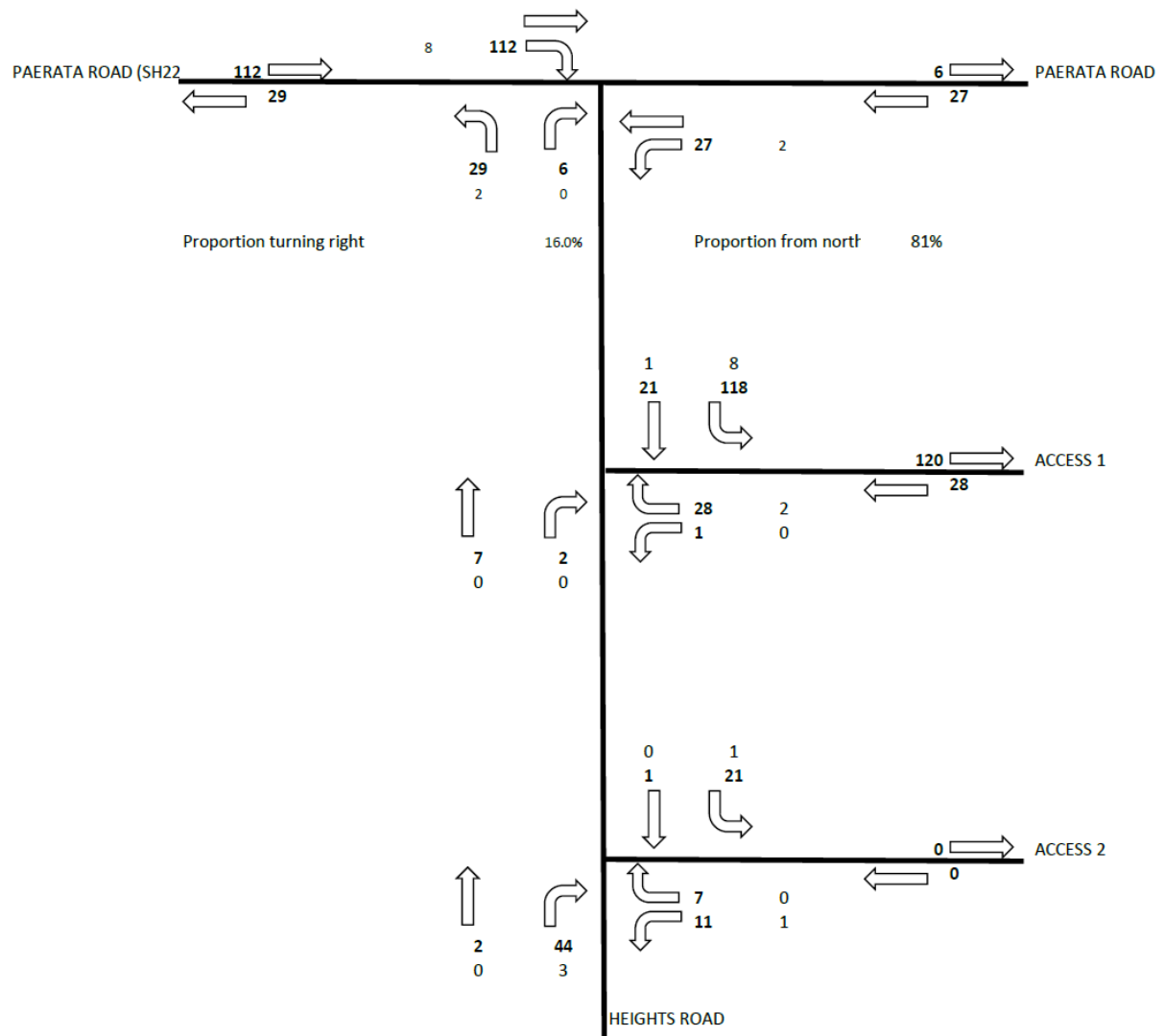


Figure B. 4: Trip Generation for Business – Light Industrial Zoning – P.M. Peak

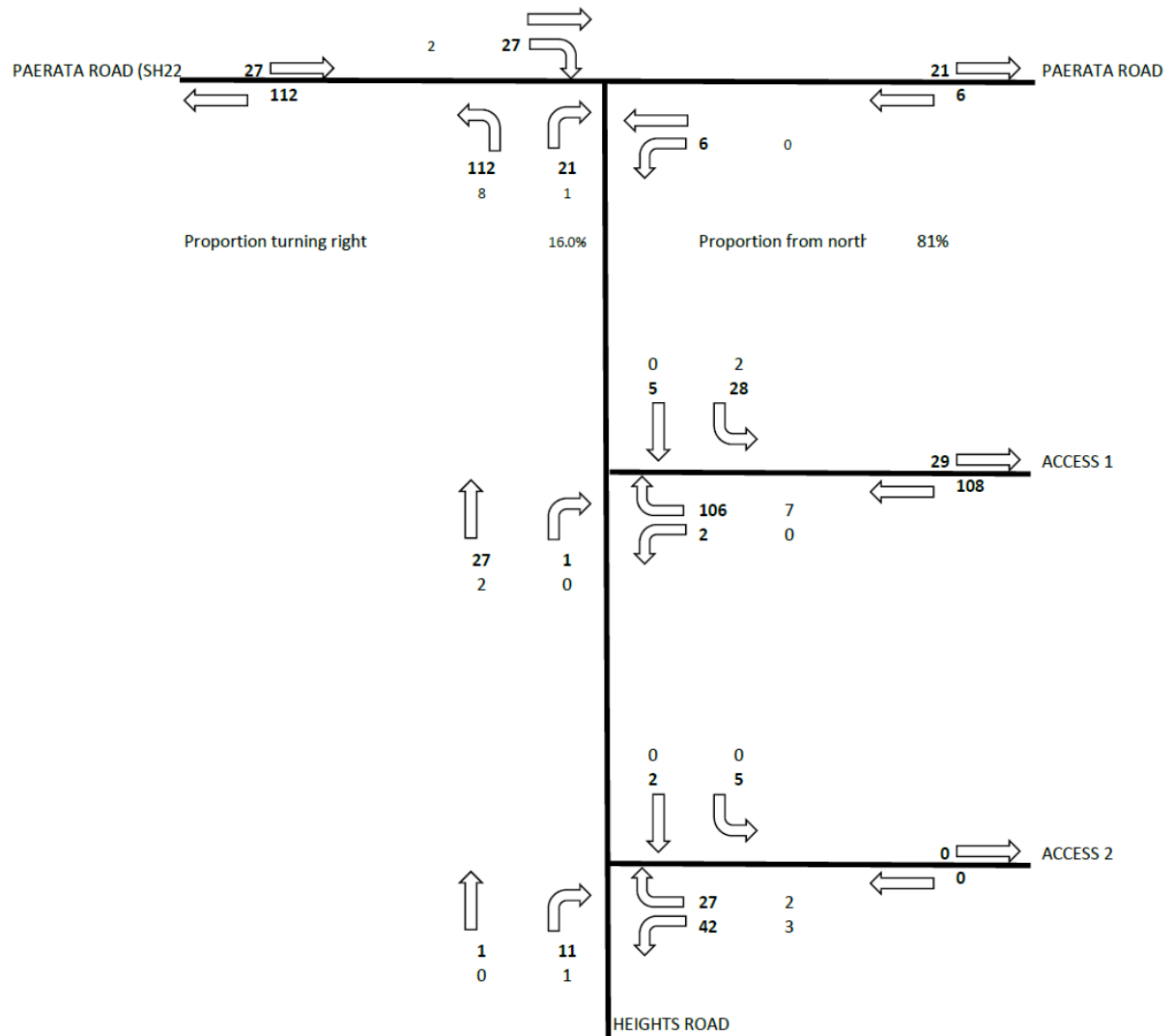


Figure B. 5: 2034 With Development of Business – Light Industrial Zoning – A.M. Peak

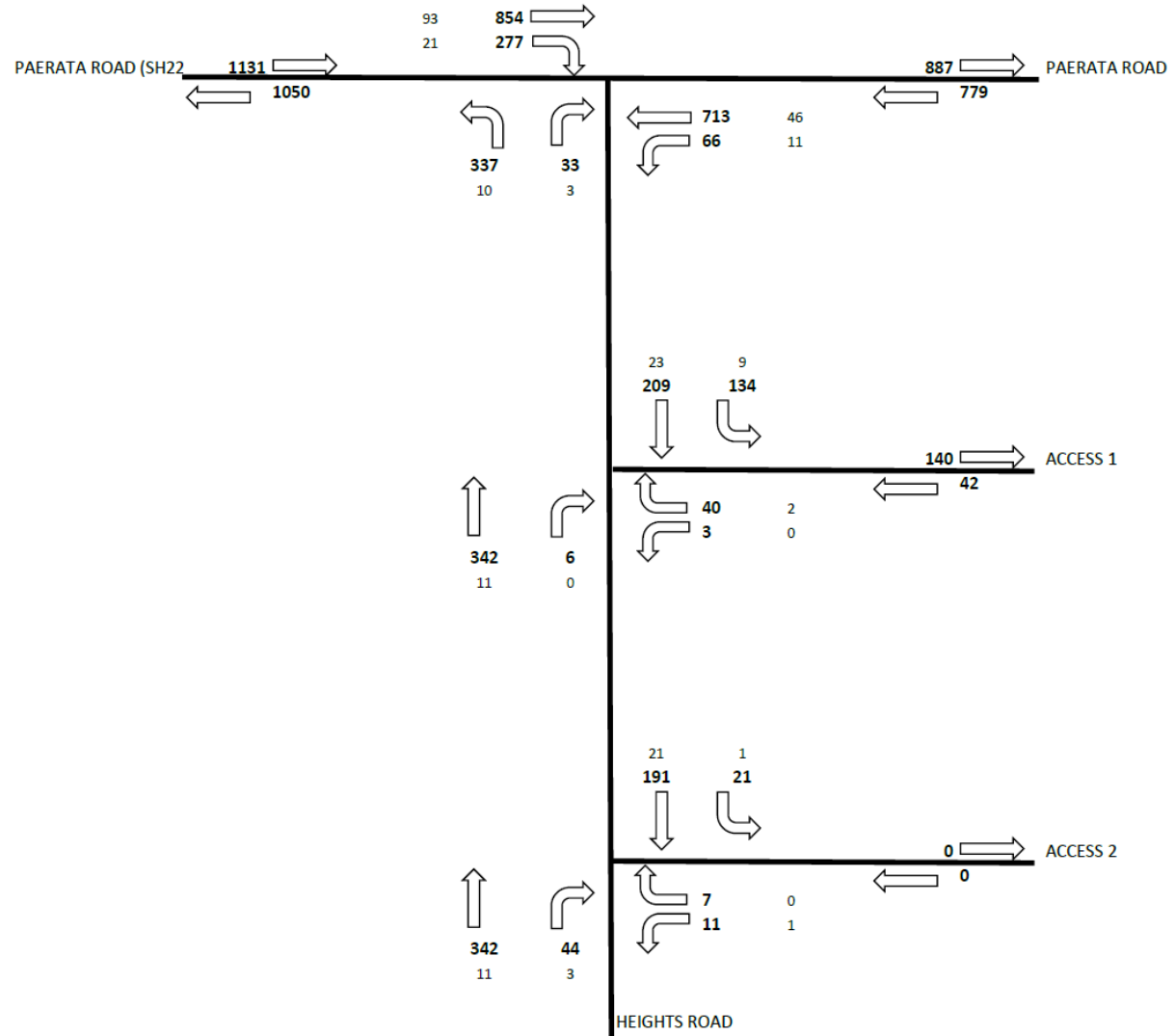
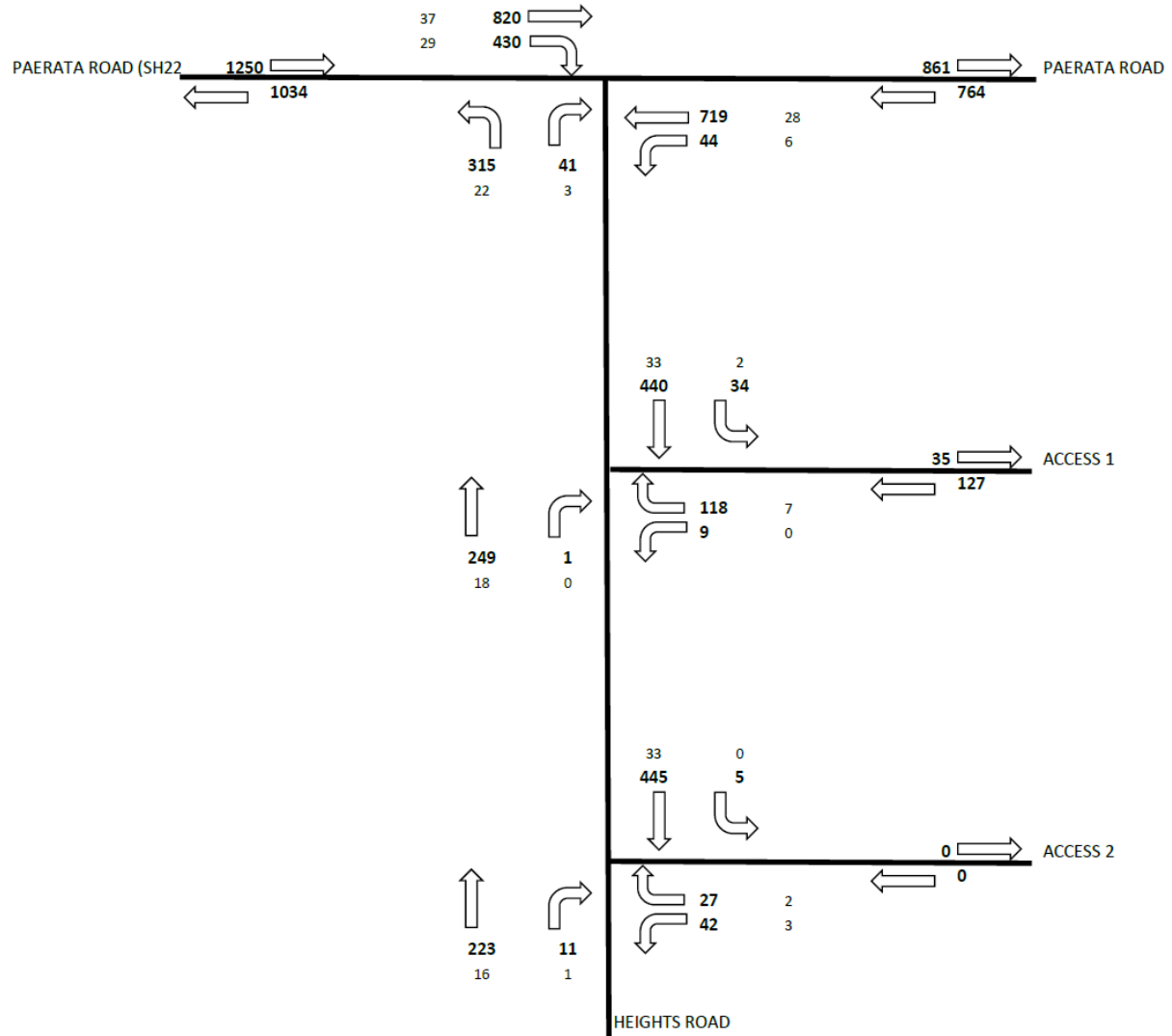


Figure B. 6: 2034 With Development of Business – Light Industrial Zoning – P.M. Peak



B.2 Model Output – Paerata Road / Heights Road Intersection 2034 With No Further Development

Figure B. 7: Model Diagram

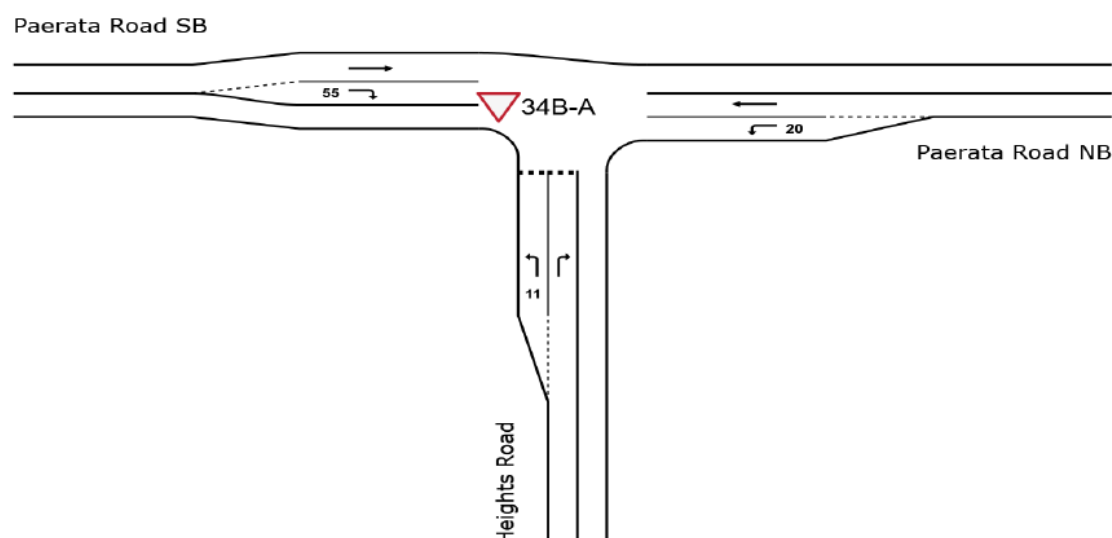


Figure B. 8: Movement Summary – 2034 No Development - A.M. Peak Hour

Vehicle Movement Performance														
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles Rate to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh.	Dist]			
			veh/h	%	veh/h	%	v/c	sec		veh	m			km/h
South: Heights Road														
1	L2	All MCs	324	2.6	324	2.6	0.676	19.2	LOS C	4.1	29.4	0.84	1.12	48.7
3	R2	All MCs	29	10.7	29	10.7	0.972	211.1	LOS F	2.7	21.0	1.00	1.17	13.6
Approach			354	3.3	354	3.3	0.972	35.2	LOS E	4.1	29.4	0.85	1.13	40.1
East: Paerata Road NB														
4	L2	All MCs	41	23.1	41	23.1	0.026	5.8	LOS A	0.0	0.0	0.00	0.57	51.9
5	T1	All MCs	751	6.5	751	6.5	0.401	0.1	LOS A	0.0	0.0	0.00	0.00	59.7
Approach			792	7.3	792	7.3	0.401	0.4	NA	0.0	0.0	0.00	0.03	59.3
West: Paerata Road SB														
11	T1	All MCs	899	10.9	899	10.9	0.476	0.2	LOS A	0.0	0.0	0.00	0.00	59.6
12	R2	All MCs	174	7.9	174	7.9	0.382	14.9	LOS B	1.7	12.5	0.76	0.97	49.0
Approach			1073	10.4	1073	10.4	0.476	2.6	NA	1.7	12.5	0.12	0.16	57.6
All Vehicles			2218	8.2	2218	8.2	0.972	7.0	NA	4.1	29.4	0.20	0.27	54.4

Figure B. 9: Movement Summary – 2034 No Development - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles to Depart	Aver. Speed
			[Total HV]	%	[Total HV]	%	v/c	sec		[Veh. veh	Dist] m				km/h
South: Heights Road															
1	L2	All MCs	214	6.9	214	6.9	0.472	16.7	LOS C	2.1	15.8	0.77	1.00	1.13	50.2
3	R2	All MCs	21	5.0	21	5.0	0.706	143.2	LOS F	1.6	11.7	0.99	1.04	1.24	18.3
Approach			235	6.7	235	6.7	0.706	28.0	LOS D	2.1	15.8	0.79	1.00	1.14	43.5
East: Paerata Road NB															
4	L2	All MCs	40	13.2	40	13.2	0.024	5.7	LOS A	0.0	0.0	0.00	0.57	0.00	52.3
5	T1	All MCs	757	3.9	757	3.9	0.398	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	59.7
Approach			797	4.4	797	4.4	0.398	0.4	NA	0.0	0.0	0.00	0.03	0.00	59.3
West: Paerata Road SB															
11	T1	All MCs	863	4.5	863	4.5	0.743	3.7	LOS A	9.0	65.1	0.84	0.73	1.20	54.9
12	R2	All MCs	424	6.9	424	6.9	0.912	34.5	LOS D	11.4	84.3	0.96	1.78	3.66	38.9
Approach			1287	5.3	1287	5.3	0.912	13.8	NA	11.4	84.3	0.88	1.08	2.01	48.3
All Vehicles			2319	5.1	2319	5.1	0.912	10.7	NA	11.4	84.3	0.57	0.71	1.23	51.0

2034 With Development of Business – Light Industrial Zone

Figure B. 10: Movement Summary – 2034 With Development - A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh. veh	Dist]				km/h
			veh/h	%	veh/h	%	v/c	sec			m				
South: Heights Road															
1	L2	All MCs	355	3.0	355	3.0	0.744	21.2	LOS C	5.1	36.8	0.87	1.19	1.93	47.4
3	R2	All MCs	35	9.1	35	9.1	1.475	562.1	LOS F	8.9	66.9	1.00	1.58	4.27	7.9
Approach			389	3.5	389	3.5	1.475	69.4	LOS F	8.9	66.9	0.88	1.23	2.14	32.9
East: Paerata Road NB															
4	L2	All MCs	69	16.7	69	16.7	0.042	5.7	LOS A	0.0	0.0	0.00	0.57	0.00	52.2
5	T1	All MCs	751	6.6	751	6.6	0.401	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	59.7
Approach			820	7.4	820	7.4	0.401	0.6	NA	0.0	0.0	0.00	0.05	0.00	59.0
West: Paerata Road SB															
11	T1	All MCs	899	10.9	899	10.9	0.476	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	59.6
12	R2	All MCs	292	7.6	292	7.6	0.667	20.1	LOS C	4.1	30.5	0.86	1.18	1.66	45.8
Approach			1191	10.1	1191	10.1	0.667	5.1	NA	4.1	30.5	0.21	0.29	0.41	55.5
All Vehicles			2400	8.1	2400	8.1	1.475	14.0	NA	8.9	66.9	0.25	0.36	0.55	50.9

Figure B. 11: Movement Summary – 2034 With Development - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV] veh/h	%	[Total HV] veh/h	%	v/c	sec		[Veh. veh	Dist] m				km/h
South: Heights Road															
1	L2	All MCs	332	7.0	332	7.0	0.734	21.7	LOS C	4.8	35.8	0.87	1.19	1.89	47.0
3	R2	All MCs	43	7.3	43	7.3	1.756	803.4	LOS F	13.5	100.7	1.00	1.74	5.24	6.7
Approach			375	7.0	375	7.0	1.756	111.7	LOS F	13.5	100.7	0.88	1.25	2.27	27.8
East: Paerata Road NB															
4	L2	All MCs	46	13.6	46	13.6	0.027	5.7	LOS A	0.0	0.0	0.00	0.57	0.00	52.3
5	T1	All MCs	757	3.9	757	3.9	0.398	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	59.7
Approach			803	4.5	803	4.5	0.398	0.5	NA	0.0	0.0	0.00	0.03	0.00	59.2
West: Paerata Road SB															
11	T1	All MCs	863	4.5	863	4.5	0.761	8.3	LOS A	13.5	98.1	0.86	0.76	1.76	52.6
12	R2	All MCs	453	6.7	453	6.7	0.979	51.6	LOS F	17.8	131.6	0.99	2.25	5.21	32.9
Approach			1316	5.3	1316	5.3	0.979	23.2	NA	17.8	131.6	0.91	1.27	2.95	43.6
All Vehicles			2494	5.3	2494	5.3	1.756	29.2	NA	17.8	131.6	0.61	0.87	1.90	43.6

2034 With Development and Intersection Upgrades Single-Lane Roundabout

Figure B. 12: Model Diagram – Single-Lane Roundabout

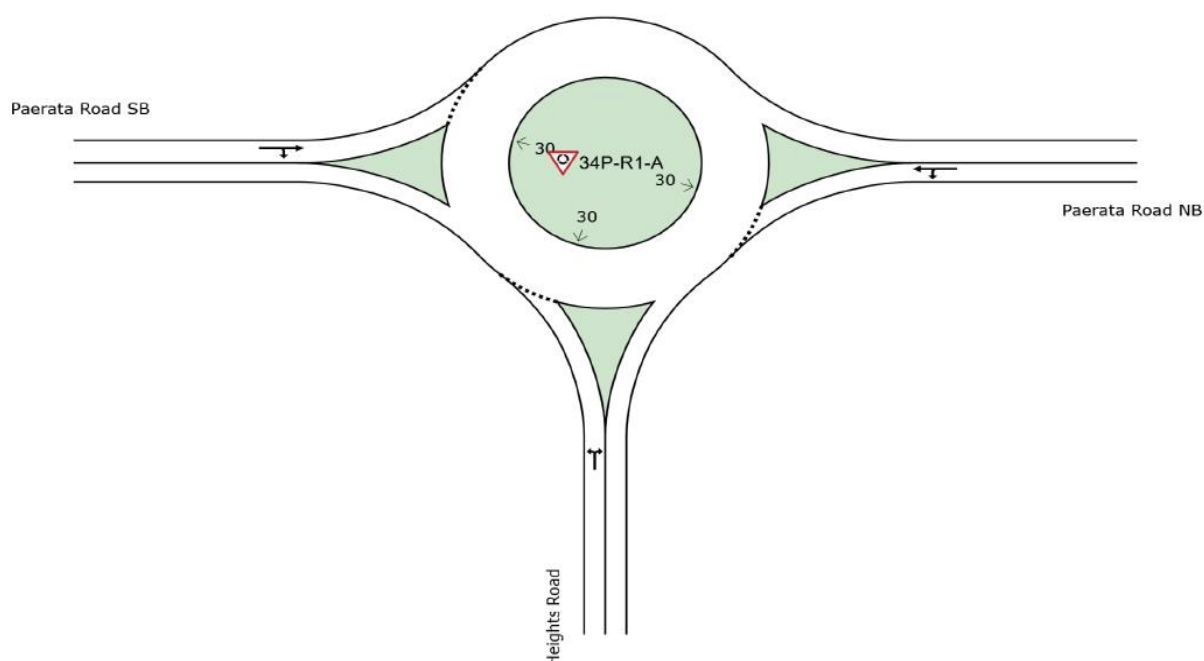


Figure B. 13: Movement Summary – 2034 With Development – Single-Lane Roundabout - A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles to Depart	Aver. Speed
			[Total HV]	%	[Total HV]	%	v/c	sec		[Veh.]	Dist]				km/h
			veh/h		veh/h					veh	m				
South: Heights Road															
1	L2	All MCs	355	3.0	355	3.0	0.621	16.6	LOS B	7.0	50.3	1.00	0.92	1.31	51.2
3	R2	All MCs	35	9.1	35	9.1	0.621	23.5	LOS C	7.0	50.3	1.00	0.92	1.31	50.4
Approach			389	3.5	389	3.5	0.621	17.2	LOS B	7.0	50.3	1.00	0.92	1.31	51.1
East: Paerata Road NB															
4	L2	All MCs	69	16.7	69	16.7	0.731	9.2	LOS A	10.2	75.7	0.88	0.72	1.03	51.4
5	T1	All MCs	751	6.5	751	6.5	0.731	8.9	LOS A	10.2	75.7	0.88	0.72	1.03	50.2
Approach			820	7.3	820	7.3	0.731	9.0	LOS A	10.2	75.7	0.88	0.72	1.03	50.3
West: Paerata Road SB															
11	T1	All MCs	899	10.9	899	10.9	0.754	4.0	LOS A	13.7	104.4	0.44	0.41	0.44	52.9
12	R2	All MCs	292	7.6	292	7.6	0.754	9.7	LOS A	13.7	104.4	0.44	0.41	0.44	55.2
Approach			1191	10.1	1191	10.1	0.754	5.4	LOS A	13.7	104.4	0.44	0.41	0.44	53.4
All Vehicles			2400	8.1	2400	8.1	0.754	8.5	LOS A	13.7	104.4	0.68	0.60	0.78	52.0

Figure B. 14: Movement Summary – 2034 With Development – Single-Lane Roundabout - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh.]	[Dist]				
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Heights Road															
1	L2	All MCs	332	7.0	332	7.0	0.708	21.4	LOS C	8.5	63.4	1.00	1.02	1.47	47.7
3	R2	All MCs	43	7.3	43	7.3	0.708	27.7	LOS C	8.5	63.4	1.00	1.02	1.47	47.2
Approach			375	7.0	375	7.0	0.708	22.1	LOS C	8.5	63.4	1.00	1.02	1.47	47.7
East: Paerata Road NB															
4	L2	All MCs	46	13.6	46	13.6	0.916	26.9	LOS C	23.9	174.0	1.00	1.40	2.10	42.9
5	T1	All MCs	757	3.9	757	3.9	0.916	26.0	LOS C	23.9	174.0	1.00	1.40	2.10	41.9
Approach			803	4.5	803	4.5	0.916	26.0	LOS C	23.9	174.0	1.00	1.40	2.10	41.9
West: Paerata Road SB															
11	T1	All MCs	863	4.5	863	4.5	0.850	3.9	LOS A	22.0	160.7	0.66	0.42	0.66	52.3
12	R2	All MCs	453	6.7	453	6.7	0.850	9.9	LOS A	22.0	160.7	0.66	0.42	0.66	54.4
Approach			1316	5.3	1316	5.3	0.850	6.0	LOS A	22.0	160.7	0.66	0.42	0.66	53.0
All Vehicles			2494	5.3	2494	5.3	0.916	14.9	LOS B	23.9	174.0	0.82	0.83	1.25	48.1

Dual-Lane Roundabout

Figure B. 15: Model Diagram – Dual-Lane Roundabout

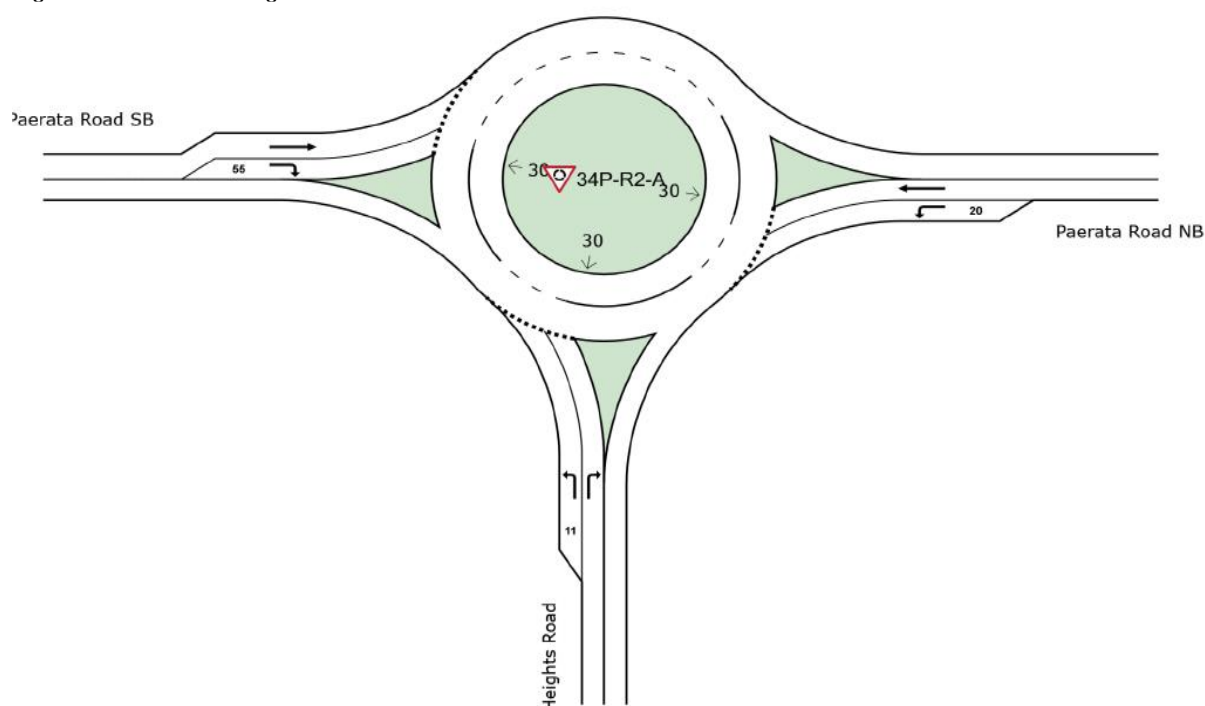


Figure B. 16: Movement Summary – 2034 With Development – Dual-Lane Roundabout - A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]	%	[Total HV]	%	v/c	sec		[Veh. veh]	Dist m				km/h
South: Heights Road															
1	L2	All MCs	355	3.0	355	3.0	0.481	11.7	LOS B	4.2	29.8	0.92	0.79	1.02	55.2
3	R2	All MCs	35	9.1	35	9.1	0.082	18.8	LOS B	0.4	3.3	0.77	0.82	0.77	50.3
Approach			389	3.5	389	3.5	0.481	12.3	LOS B	4.2	29.8	0.90	0.80	0.99	54.7
East: Paerata Road NB															
4	L2	All MCs	69	16.7	69	16.7	0.101	6.3	LOS A	0.5	3.8	0.49	0.57	0.49	55.0
5	T1	All MCs	751	6.5	751	6.5	0.622	6.3	LOS A	5.6	41.5	0.68	0.58	0.71	52.2
Approach			820	7.3	820	7.3	0.622	6.3	LOS A	5.6	41.5	0.66	0.58	0.69	52.4
West: Paerata Road SB															
11	T1	All MCs	899	10.9	899	10.9	0.570	3.8	LOS A	5.8	44.8	0.26	0.34	0.26	54.5
12	R2	All MCs	292	7.6	292	7.6	0.256	9.5	LOS A	1.6	11.9	0.19	0.58	0.19	53.2
Approach			1191	10.1	1191	10.1	0.570	5.2	LOS A	5.8	44.8	0.24	0.40	0.24	54.2
All Vehicles			2400	8.1	2400	8.1	0.622	6.7	LOS A	5.8	44.8	0.49	0.53	0.52	53.7

Figure B. 17: Movement Summary – 2034 With Development – Dual-Lane Roundabout - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]	%	[Total HV]	%	v/c	sec		[Veh. veh	Dist] m				km/h
South: Heights Road															
1	L2	All MCs	332	7.0	332	7.0	0.487	12.0	LOS B	4.3	31.8	0.94	0.80	1.05	54.9
3	R2	All MCs	43	7.3	43	7.3	0.105	18.7	LOS B	0.6	4.4	0.80	0.82	0.80	50.4
Approach			375	7.0	375	7.0	0.487	12.8	LOS B	4.3	31.8	0.93	0.81	1.02	54.3
East: Paerata Road NB															
4	L2	All MCs	46	13.6	46	13.6	0.077	7.6	LOS A	0.4	2.8	0.58	0.63	0.58	54.5
5	T1	All MCs	757	3.9	757	3.9	0.707	9.8	LOS A	8.5	61.5	0.85	0.80	1.08	50.1
Approach			803	4.5	803	4.5	0.707	9.7	LOS A	8.5	61.5	0.83	0.79	1.05	50.3
West: Paerata Road SB															
11	T1	All MCs	863	4.5	863	4.5	0.540	3.8	LOS A	5.3	38.3	0.27	0.35	0.27	54.6
12	R2	All MCs	453	6.7	453	6.7	0.356	9.5	LOS A	2.6	18.9	0.23	0.57	0.23	53.2
Approach			1316	5.3	1316	5.3	0.540	5.8	LOS A	5.3	38.3	0.26	0.42	0.26	54.1
All Vehicles			2494	5.3	2494	5.3	0.707	8.1	LOS A	8.5	61.5	0.54	0.60	0.63	52.8

Traffic Signals

Figure B. 18: Model Diagram – Traffic Signals

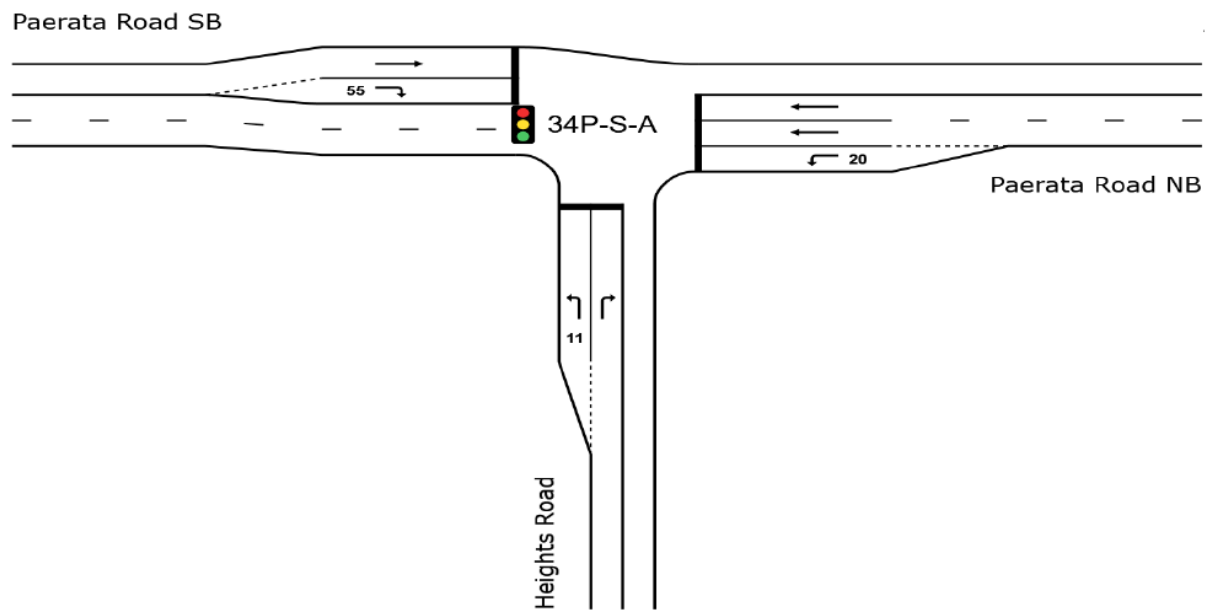


Figure B. 19: Traffic Signal Phasing

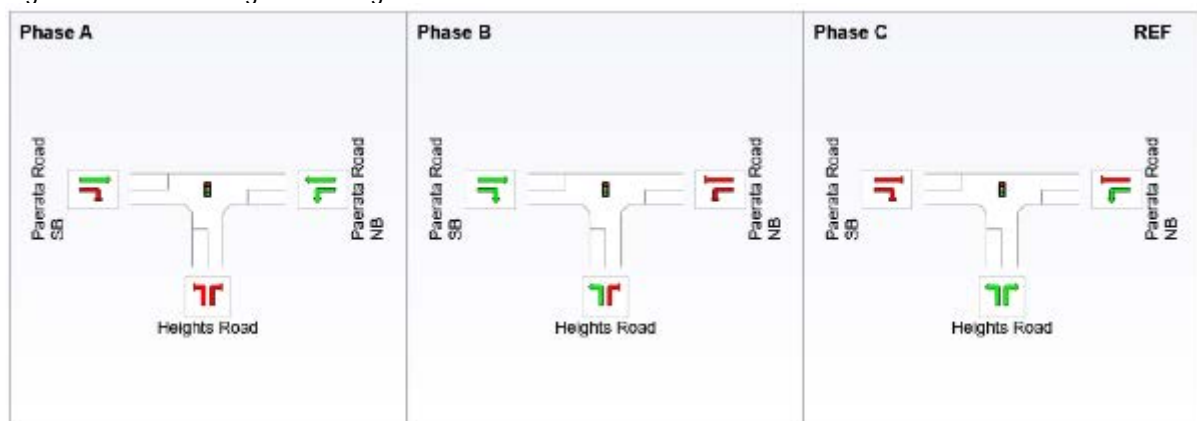


Figure B. 20: Movement Summary – 2034 With Development – Traffic Signals- A.M. Peak Hour – 50s cycle time

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh. veh	Dist] m				km/h
			veh/h	%	veh/h	%	v/c	sec							
South: Heights Road															
1	L2	All MCs	355	3.0	355	3.0	0.438	21.4	LOS C	5.9	42.5	0.71	0.79	0.71	50.3
3	R2	All MCs	35	9.1	35	9.1	* 0.166	34.7	LOS C	0.8	6.2	0.93	0.72	0.93	42.5
Approach			389	3.5	389	3.5	0.438	22.6	LOS C	5.9	42.5	0.73	0.79	0.73	46.5
East: Paerata Road NB															
4	L2	All MCs	69	16.7	69	16.7	0.079	18.1	LOS B	0.8	6.7	0.51	0.68	0.51	49.3
5	T1	All MCs	751	6.5	751	6.5	0.720	22.4	LOS C	9.4	69.7	0.95	0.88	1.07	45.4
Approach			820	7.3	820	7.3	0.720	22.0	LOS C	9.4	69.7	0.92	0.86	1.02	44.0
West: Paerata Road SB															
11	T1	All MCs	899	10.9	899	10.9	* 0.785	10.9	LOS B	18.2	139.4	0.78	0.78	0.87	51.6
12	R2	All MCs	292	7.6	292	7.6	0.720	28.6	LOS C	7.3	54.7	0.98	0.89	1.13	42.0
Approach			1191	10.1	1191	10.1	0.785	15.2	LOS B	18.2	139.4	0.83	0.81	0.93	48.2
All Vehicles			2400	8.1	2400	8.1	0.785	18.8	LOS B	18.2	139.4	0.84	0.82	0.93	46.4

Figure B. 21: Movement Summary – 2034 With Development – Traffic Signals- P.M. Peak Hour – 50s cycle time

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh. veh	Dist] m				km/h
			veh/h	%	veh/h	%	v/c	sec							
South: Heights Road															
1	L2	All MCs	332	7.0	332	7.0	0.376	17.8	LOS B	4.9	36.0	0.63	0.77	0.63	51.7
3	R2	All MCs	43	7.3	43	7.3	* 0.204	33.3	LOS C	1.0	7.6	0.94	0.73	0.94	42.4
Approach			375	7.0	375	7.0	0.376	19.6	LOS B	4.9	36.0	0.66	0.77	0.66	48.3
East: Paerata Road NB															
4	L2	All MCs	46	13.6	46	13.6	0.058	21.5	LOS C	0.6	4.8	0.57	0.68	0.57	48.9
5	T1	All MCs	757	3.9	757	3.9	* 0.886	33.9	LOS C	11.9	86.4	1.00	1.12	1.50	40.2
Approach			803	4.5	803	4.5	0.886	33.2	LOS C	11.9	86.4	0.98	1.09	1.45	38.8
West: Paerata Road SB															
11	T1	All MCs	863	4.5	863	4.5	0.694	6.5	LOS A	13.8	100.3	0.70	0.63	0.70	54.3
12	R2	All MCs	453	6.7	453	6.7	* 0.886	34.7	LOS C	14.0	103.7	1.00	1.07	1.46	38.9
Approach			1316	5.3	1316	5.3	0.886	16.2	LOS B	14.0	103.7	0.80	0.78	0.96	47.7
All Vehicles			2494	5.3	2494	5.3	0.886	22.2	LOS C	14.0	103.7	0.84	0.88	1.07	44.5

B.3 Model Output –Heights Road Accesses

Figure B. 22: Model Diagram – Site Access Driveways



Two Accesses – Eastern Access

Figure B. 23: Movement Summary – 2034 With Development – Eastern Access – A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Rate	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh. veh]	[Dist] m				km/h
			veh/h	%	veh/h	%	v/c	sec							
South: Heights Rd S															
2	T1	All MCs	360	3.2	360	3.2	0.194	0.0	LOS A	0.1	0.4	0.02	0.02	0.02	49.8
3	R2	All MCs	6	0.0	6	0.0	0.194	5.6	LOS A	0.1	0.4	0.02	0.02	0.02	47.8
Approach			366	3.2	366	3.2	0.194	0.1	NA	0.1	0.4	0.02	0.02	0.02	49.7
East: Access 1															
4	L2	All MCs	3	0.0	3	0.0	0.070	5.3	LOS A	0.2	1.6	0.50	0.73	0.50	41.9
6	R2	All MCs	42	5.0	42	5.0	0.070	8.2	LOS A	0.2	1.6	0.50	0.73	0.50	15.5
Approach			45	4.7	45	4.7	0.070	8.0	LOS A	0.2	1.6	0.50	0.73	0.50	17.3
North: Heights Rd N															
7	L2	All MCs	141	6.7	141	6.7	0.200	3.9	LOS A	0.0	0.0	0.00	0.21	0.00	42.0
8	T1	All MCs	220	11.0	220	11.0	0.200	0.0	LOS A	0.0	0.0	0.00	0.21	0.00	48.1
Approach			361	9.3	361	9.3	0.200	1.5	NA	0.0	0.0	0.00	0.21	0.00	46.5
All Vehicles			773	6.1	773	6.1	0.200	1.2	NA	0.2	1.6	0.04	0.15	0.04	45.5

Figure B. 24: Movement Summary – 2034 With Development – Eastern Access – P.M. Peak Hour

Vehicle Movement Performance														
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles Rate to Depart	Aver. Speed
			[Total HV]	%	[Total HV]	%				[Veh. veh]	[Dist] m			km/h
South: Heights Rd S														
2	T1	All MCs	262	7.2	262	7.2	0.146	0.1	LOS A	0.1	0.4	0.03	0.03	49.7
3	R2	All MCs	5	0.0	5	0.0	0.146	6.8	LOS A	0.1	0.4	0.03	0.03	47.7
Approach			267	7.1	267	7.1	0.146	0.2	NA	0.1	0.4	0.03	0.03	49.7
East: Access 1														
4	L2	All MCs	4	0.0	4	0.0	0.235	6.7	LOS A	0.8	6.0	0.62	0.85	40.7
6	R2	All MCs	124	5.9	124	5.9	0.235	10.0	LOS A	0.8	6.0	0.62	0.85	15.0
Approach			128	5.7	128	5.7	0.235	9.9	LOS A	0.8	6.0	0.62	0.85	15.9
North: Heights Rd N														
7	L2	All MCs	46	6.8	46	6.8	0.269	3.9	LOS A	0.0	0.0	0.00	0.05	44.3
8	T1	All MCs	453	7.4	453	7.4	0.269	0.0	LOS A	0.0	0.0	0.00	0.05	49.4
Approach			499	7.4	499	7.4	0.269	0.4	NA	0.0	0.0	0.00	0.05	49.2
All Vehicles			895	7.1	895	7.1	0.269	1.7	NA	0.8	6.0	0.10	0.16	42.4

Two Accesses – Western Access

Figure B. 25: Movement Summary – 2034 With Development – Western Access - A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh.	Dist]				
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Heights Rd S															
2	T1	All MCs	360	3.2	360	3.2	0.224	0.2	LOS A	0.4	2.8	0.11	0.12	0.11	48.9
3	R2	All MCs	46	6.8	46	6.8	0.224	5.6	LOS A	0.4	2.8	0.11	0.12	0.11	46.9
Approach			406	3.6	406	3.6	0.224	0.8	NA	0.4	2.8	0.11	0.12	0.11	48.6
East: Access 1															
4	L2	All MCs	12	9.1	12	9.1	0.020	5.3	LOS A	0.1	0.5	0.37	0.56	0.37	43.1
6	R2	All MCs	7	0.0	7	0.0	0.020	7.5	LOS A	0.1	0.5	0.37	0.56	0.37	17.9
Approach			19	5.6	19	5.6	0.020	6.2	LOS A	0.1	0.5	0.37	0.56	0.37	34.0
North: Heights Rd N															
7	L2	All MCs	22	4.8	22	4.8	0.123	3.9	LOS A	0.0	0.0	0.00	0.05	0.00	44.3
8	T1	All MCs	201	12.0	201	12.0	0.123	0.0	LOS A	0.0	0.0	0.00	0.05	0.00	49.4
Approach			223	11.3	223	11.3	0.123	0.4	NA	0.0	0.0	0.00	0.05	0.00	49.2
All Vehicles			648	6.3	648	6.3	0.224	0.8	NA	0.4	2.8	0.08	0.11	0.08	48.2

Figure B. 26: Movement Summary – 2034 With Development – Western Access - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles to Depart	Aver. Speed
			[Total HV]		[Total HV]					[Veh.]	[Dist]				
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Heights Rd S															
2	T1	All MCs	239	6.6	239	6.6	0.139	0.2	LOS A	0.1	0.9	0.07	0.08	0.07	49.4
3	R2	All MCs	12	9.1	12	9.1	0.139	6.9	LOS A	0.1	0.9	0.07	0.08	0.07	47.3
Approach			251	6.7	251	6.7	0.139	0.5	NA	0.1	0.9	0.07	0.08	0.07	49.3
East: Access 1															
4	L2	All MCs	44	7.1	44	7.1	0.096	6.7	LOS A	0.3	2.5	0.51	0.72	0.51	42.1
6	R2	All MCs	28	7.4	28	7.4	0.096	9.1	LOS A	0.3	2.5	0.51	0.72	0.51	17.4
Approach			73	7.2	73	7.2	0.096	7.6	LOS A	0.3	2.5	0.51	0.72	0.51	33.1
North: Heights Rd N															
7	L2	All MCs	5	0.0	5	0.0	0.246	3.9	LOS A	0.0	0.0	0.00	0.01	0.00	45.3
8	T1	All MCs	453	7.4	453	7.4	0.246	0.0	LOS A	0.0	0.0	0.00	0.01	0.00	49.8
Approach			458	7.4	458	7.4	0.246	0.1	NA	0.0	0.0	0.00	0.01	0.00	49.8
All Vehicles			781	7.1	781	7.1	0.246	0.9	NA	0.3	2.5	0.07	0.09	0.07	47.5

Single Access

Figure B. 27: Movement Summary – 2034 With Development – Single Access Scenario - A.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles	Aver. Speed
			[Total HV]		[Total HV]					[Veh.]	[Dist]		Rate to Depart		km/h
			veh/h	%	veh/h	%	v/c	sec		veh	m				
South: Heights Rd S															
2	T1	All MCs	353	3.0	353	3.0	0.226	0.3	LOS A	0.5	3.3	0.14	0.16	0.14	48.6
3	R2	All MCs	48	6.5	48	6.5	0.226	6.3	LOS A	0.5	3.3	0.14	0.16	0.14	46.8
Approach			401	3.4	401	3.4	0.226	1.0	NA	0.5	3.3	0.14	0.16	0.14	48.4
East: Access 1															
4	L2	All MCs	13	8.3	13	8.3	0.071	5.4	LOS A	0.2	1.7	0.48	0.67	0.48	42.1
6	R2	All MCs	37	5.7	37	5.7	0.071	8.5	LOS A	0.2	1.7	0.48	0.67	0.48	17.3
Approach			49	6.4	49	6.4	0.071	7.7	LOS A	0.2	1.7	0.48	0.67	0.48	24.1
North: Heights Rd N															
7	L2	All MCs	146	6.5	146	6.5	0.191	3.9	LOS A	0.0	0.0	0.00	0.23	0.00	41.8
8	T1	All MCs	198	11.2	198	11.2	0.191	0.0	LOS A	0.0	0.0	0.00	0.23	0.00	47.9
Approach			344	9.2	344	9.2	0.191	1.6	NA	0.0	0.0	0.00	0.23	0.00	46.2
All Vehicles			795	6.1	795	6.1	0.226	1.7	NA	0.5	3.3	0.10	0.22	0.10	45.4

Figure B. 28: Movement Summary – 2034 With Development – Single Access Scenario - P.M. Peak Hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Qued	Eff. Stop of Cycles	Number of Cycles	Aver. Speed
			[Total HV]		[Total HV]					[Veh.	Dist]		Rate to Depart		km/h
			veh/h	%	veh/h	%	v/c	sec		veh	m				
South: Heights Rd S															
2	T1	All MCs	235	7.2	235	7.2	0.139	0.2	LOS A	0.1	1.1	0.07	0.09	0.07	49.3
3	R2	All MCs	13	8.3	13	8.3	0.139	7.1	LOS A	0.1	1.1	0.07	0.09	0.07	47.2
Approach			247	7.2	247	7.2	0.139	0.6	NA	0.1	1.1	0.07	0.09	0.07	49.2
East: Access 1															
4	L2	All MCs	48	6.5	48	6.5	0.306	7.4	LOS A	1.2	9.1	0.60	0.86	0.71	40.8
6	R2	All MCs	140	6.8	140	6.8	0.306	10.4	LOS B	1.2	9.1	0.60	0.86	0.71	16.7
Approach			188	6.7	188	6.7	0.306	9.7	LOS A	1.2	9.1	0.60	0.86	0.71	23.4
North: Heights Rd N															
7	L2	All MCs	35	6.1	35	6.1	0.266	3.9	LOS A	0.0	0.0	0.00	0.04	0.00	44.5
8	T1	All MCs	458	7.6	458	7.6	0.266	0.0	LOS A	0.0	0.0	0.00	0.04	0.00	49.5
Approach			493	7.5	493	7.5	0.266	0.3	NA	0.0	0.0	0.00	0.04	0.00	49.3
All Vehicles			928	7.3	928	7.3	0.306	2.3	NA	1.2	9.1	0.14	0.22	0.16	42.3

ANNEXURE C: DRAFT PRECINCT PROVISIONS (TRANSPORT)

I4XX. Heights Road Precinct

I4XX.1. Precinct Description

...

I4XX.2. Objectives [rp/dp]

- (1) Provide a well-connected and safe transport network that supports a range of travel modes.
- (2) Transport infrastructure is integrated and coordinated with subdivision and development and provides safe and efficient connections to the wider transport network and upgrades to the transport network.
- (3) ...

I4XX.3. Policies [rp/dp]

Subdivision and development

- (1) Require that the design of any subdivision and development within the precinct is undertaken in general accordance with the Heights Road precinct plans.

Transport and Infrastructure

- (2) Require subdivision and development to provide for a transport network that:
 - (a) Integrates with, and avoids, remedies or mitigates adverse effects on the safety and efficiency of the transport network of the surrounding area by:
 - (i) Implementing dual-lane roundabout or traffic signal control of the the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.
 - (ii) Providing Austroads Safe Intersection Sight Distance for the measured operating speed on Heights Road at any site access point.
 - (iii) Providing a right turn bay or flush median on Heights Road at any site access point.
 - (iv) Providing an auxiliary left turn lane on Heights Road at the northeastern-most access point.

- (v) Implementing road safety improvement works on Heights Road at the bend east of Beatty Road, the intersection with Beatty Road, and the bend north of the railway level crossing.
- (vi) Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.
- (vii) Avoiding vehicle access directly off Paerata Road.
- (b) Is designed and constructed in a manner that is appropriate having regard to the requirements of Auckland Transport's relevant code of practice or engineering standards.
- ...

I4XX.4. Activity table

The activity tables in any relevant overlays, Auckland-wide and zones apply unless the activity is listed in Table I4XX.4.1 below.

Table I4XX 4.1 specifies the activity status of land use and subdivision activities in the precinct pursuant to sections 9(2), 9(3) and section 11 of the Resource Management Act 1991.

Note 1: A blank cell in the activity status means the activity status of the activity in the relevant overlays, Auckland-wide or zones applies for that activity unless that activity is specifically listed in Table I4XX.4.1.

Table I4XX.4.1 Activity table

Activity	Activity status
Use and Development	
(A1) Activities listed as permitted, restricted discretionary, discretionary, or non-complying activities in Table H14.4.1 in the Business –Light Industrial Zone	
(A2) Any activity not complying with the standards under I45XX.6.1.2.1	RD
(A3) Any vehicle access to Heights Road in a location shown on Precinct Plan 1	RD
(A4) Any vehicle access to Heights Road in a location other than shown on Precinct Plan 1	D
(A5) Any vehicle access to Paerata Road	NC
Subdivision	
(A6) Subdivision not complying with the standards under I4XX.6.1	RD

I4XX.5. Notification

- (1) Any application for resource consent for an activity listed in Table I4XX.4.1 Activity table will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

I4XX.6. Standards

All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table I4XX.4.1.

All activities listed in Table I4XX.4.1 Activity Table must comply with the following standards.

I4XX.6.1 Precinct Plan and infrastructure requirements

All development and subdivision must comply with the following standards:

I4XX.6.1.1 Precinct Plan requirements

- (1) ...

I4XX.6.1.2 Transport

I4XX6.1.2.1 Infrastructure Requirements

Purpose:

- Mitigate the adverse effects of traffic generation on the surrounding local and wider transport network.
 - Achieve the integration of land use and transport.
- (1) Subdivision and development must comply with the standards in Table I4XX.6.1.2.1

Table I4XX.6.1.2.1 Transport Infrastructure Requirements

Transport Infrastructure Upgrade		Trigger
(T1)	Implementing dual-lane roundabout or traffic signal control of the the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.	Any subdivision or development
(T2)	Implementing road safety improvement works on Heights Road in the locations shown on Precinct Plan 2 using	

	measures that typically achieve a minimum 10% reduction in crashes.	
(T3)	Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.	

I4XX.6.1.2.2 Upgrade of Heights Road

Purpose:

- To ensure that the upgrade of Heights Road to an urban standard complies with Appendix 1: Minimum Road Width, Function and Required Design Elements.
- (1) Any development and/or subdivision must comply with Appendix 1 Minimum Road Width, Function and Required Design Elements as applicable.

I4XX.6.1.2.3 Vehicle Access to Heights Road

Purpose:

- To ensure the safe operation of the local transport network.
- (1) Any vehicle access along Heights Road must:
- (a) Provide Austroads Safe Intersection Sight Distance for the measured 85th percentile speed on Heights Road.
 - (b) Provide a right turn bay or flush median on Heights Road to Auckland Transport standards.
- (2) The northeastern-most access along Heights Road must also provide an auxiliary left turn lane on Heights Road to Auckland Transport standards.

I4XX.7. Assessment – restricted discretionary activities

I4XX.7.1 Matters of discretion

The Council will restrict its discretion to all the following matters when assessing a restricted discretionary activity resource consent application for activities listed in Table I4XX.4.1 Activity Table, in addition to the matters specified for the relevant restricted discretionary activities in the overlay, Auckland wide or zone provisions:

- (1) Non-compliance with the standards I4XX.6.1
- (a) Consistency with the Heights Road Precinct Plans I4XX.9.
 - (b) Safe and efficient operation of the current and future transport network.

- (c) Consistency with the objectives and policies of the Precinct.

I4XX.7.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

(1) Subdivision and development:

- (a) The extent to which the intersection of Paerata Road and Heights Road is designed and constructed to provide a dual-lane roundabout or traffic signals with sufficient capacity; or the Pukekohe North West Upgrade is fully operational.
- (b) The extent to which road safety improvement works are implemented along Heights Road at the locations shown in Precinct Plan 2 to achieve a minimum 10% typical crash reduction.
- (c) The extent to which safe site access is provided that:
 - (i) has sight distances meeting or exceeding the Austroads Safe Intersection Sight Distance standard for the measured operating (85th percentile) speed on Heights Road.
 - (ii) has widening of the Heights Road carriageway and provision of a right turn bay or flush median meeting Auckland Transport standards.
 - (iii) has widening of the Heights Road carriageway and provision of an auxiliary left turn lane at the northeastern-most access to any site in the Precinct in accordance with Auckland Transport standards.
 - (iv) avoids direct vehicle access from Paerata Road.

I4XX.8. Special information requirements

I4XX.8.1 Traffic Design Report

(1) A Traffic Design Report must be provided:

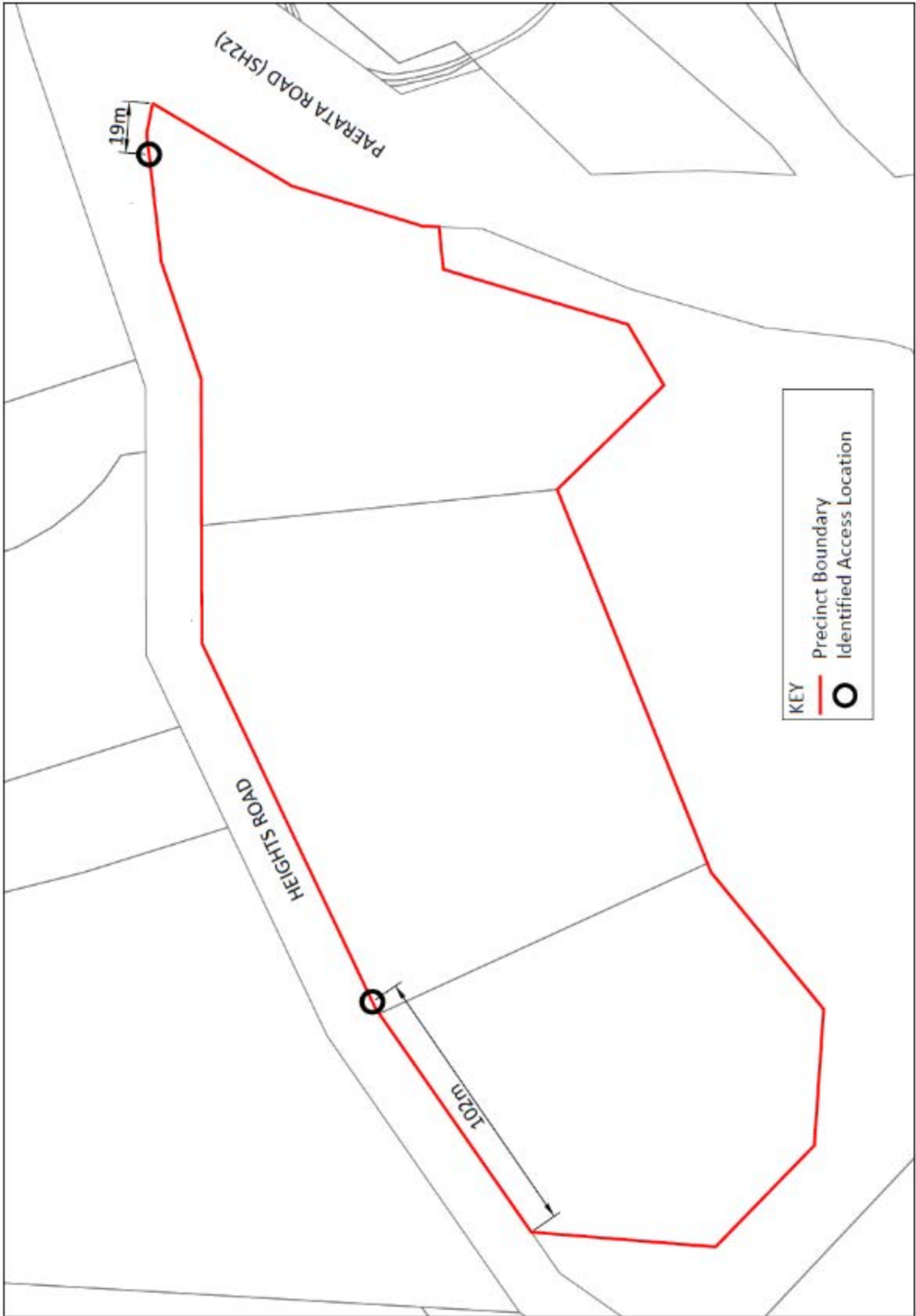
- (a) At the first stage of subdivision or development of any site existing at (date of plan change approval); and
- (b) For any subdivision or development which involves a new or modified site access.

(2) The Traffic Design Report must:

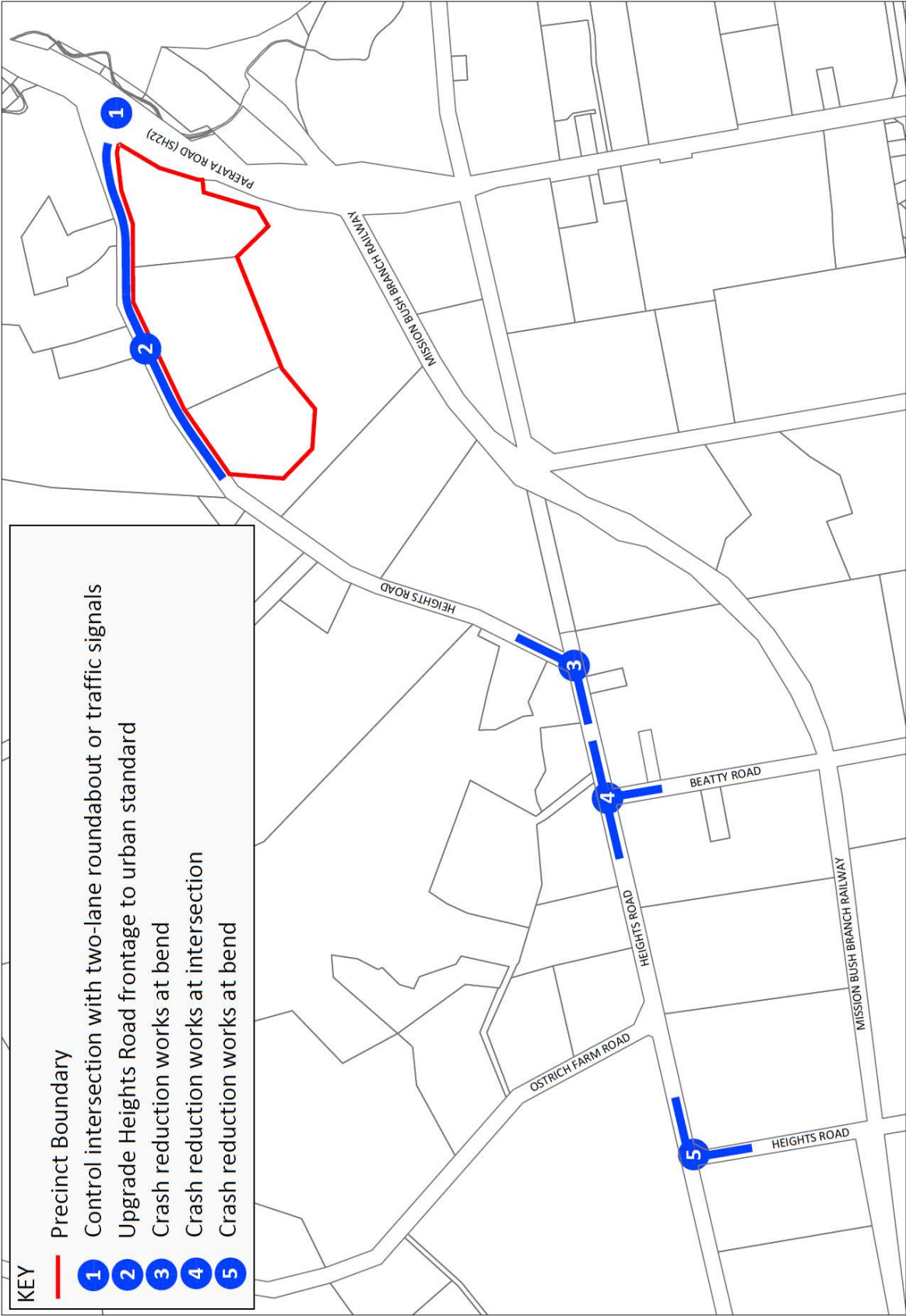
- (a) provide measured 85th percentile vehicle operating speeds along Heights Road in each direction near the site access.
- (b) provide measured available sight distances at the site access in accordance with Austroads Guidelines for Safe Intersection Sight Distance.
- (c) provide a design for an auxillary right turn lane or flush median to Auckland Transport standards (unless already present).
- (d) provide a design for an auxillary left turn lane to Auckland Transport standards at the eastern-most site access (unless already present).

I4XX.9. Heights Road Precinct Plans

Precinct Plan 1



Precinct Plan 2



I4XX.10 Appendices

Appendix 1 - Minimum Road Width, Function and Required Design Elements for Heights Road

Minimum road reserve	20m (Note 1)
Minimum sealed carriageway width	7m (Notes 2 and 3)
Number of through lanes	2
Design Speed	60 km/h
Median	No (Note 3)
Cycle Provision	No
Pedestrian Provision	1.8m wide footpath on southern side
Bus Provision	No
Street Lighting	Yes

Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, access design, intersection design, significant constraints or other localised design requirements.

Note 2: Typical minimum width which may need to be varied in specific locations where required to accommodate vehicle tracking on bends, intersection design, significant constraints or other localised design requirements.

Note 3: Whilst not a general part of the road cross section, flush medians or right turn bays are required at access points.

ANNEXURE D: PROVISIONS IN SOUTHERN PRECINCTS

D.1 Controls on Location of Vehicle Access

Precinct	Standard	Elements
I336 Sylvia Park	I336.6.4 Vehicle access	Limited to points identified on Plan
I403 Beachlands 1	I403.6.7. Road network	Limited locations
I430 Patumahoe	I430.6.4 Vehicle parking and access	None from Kingseat Road
I447 Waipupuke	I447.6.4 Arterial Road and State Highway Access	None from Karaka Rd (SH22), limited access from Jesmond Rd
I453 Pukekohe East-Central	I453.6.4.6 Site Access	Restrictions on new crossings or additional use of crossings on East St
I454 Pukekohe Golding	I454.6.3 Site Access	Limitations on locations
I455 Buckland Road	I455.6.1.2 Transport	Limitations on locations

D.2 Infrastructure Prerequisites

Precinct	Standard	Elements
I447 Waipupuke	I447.6.6 Development Staging & Transport Network Infrastructure Requirements	Road and intersection upgrades
I452 Waihoehoe	I452.6.2. Staging of Subdivision and Development with Transport Upgrades	Upgrade of rural roads, including walking and cycling facilities, upgrading of intersections, infrastructure upgrades beyond precinct by others
I453 Glenbrook 3 (SHA)	I453.5.1 Infrastructure Staging and I453.6.1.6 Infrastructure upgrades and timing of development – Transport	Requires upgrading of defined sections of roads to an urban standard, lowering of speed limits (including beyond precinct), upgrading several intersections (including beyond precinct), road safety improvements (beyond precinct)
I453 Pukekohe East-Central	I453.6.4.2 Transport, I453.6.4.2A Road design and upgrade of exiting rural roads	Upgrade of roads to collector or local standards, provision of pedestrian path, pedestrian/ cycle path beyond precinct
I454 Pukekohe Golding	I454.6.1 Transport Infrastructure Requirements	Pedestrian and cycle connections, upgrade of rural roads to urban standard
I455 Buckland Road	I455.6.1.2 Transport	Upgrading of rural road to urban standard, provision of pedestrian and cycle facilities (beyond precinct), new roads, new intersection
I456 Glenbrook 4	I456.6.7. Road design and upgrade of existing rural roads	Upgrade of rural roads to urban form (along frontage)
I457 Highbrook	I457.6.2. Transport infrastructure development upgrade standards	Provision of bus stops, shuttle bus, path upgrades
I458 Beachlands South	I 458.6.3. Staging of Subdivision and Development with Transport Upgrades	Upgrade of rural roads to urban standard with pedestrian and cycle facilities, upgrade of intersections (including beyond precinct)

D.3 Provision of Special Information

Precinct	Standard
I334 Wairaka	I334.9 Integrated transport assessment
I447 Waipupuke	I447.8 (1) Transport Assessment Report
I452 Waihoehoe	I452.9 (4) ITA and (6) Transport Design Report
I453 Pukekohe East-Central	I453.8.2 Traffic Assessment I453.8.3 Transport Design Report
I455 Buckland Road	I455.8.1 Traffic Assessment and I455.8.2 Transport Design Report
I457 Highbrook	I457.10 Transport Assessment

ATTACHMENT 4

FRANKLIN LOCAL BOARD VIEWS

Franklin Local Board

OPEN MINUTES

Minutes of a meeting of the Franklin Local Board held in the Leslie Comrie Board Room, Level One Franklin: The Centre, 12 Massey Ave, Pukekohe on Tuesday, 24 June 2025 at 9.30am.

TE HUNGA KUA TAE MAI | PRESENT

Chairperson	Angela Fulljames
Deputy Chairperson	Alan Cole
Members	Malcolm Bell JP
	Gary Holmes
	Amanda Hopkins
	Andrew Kay

TE HUNGA KĀORE I TAE MAI | ABSENT

Member	Sharlene Druyven
Member	Amanda Kinzett

16 Local Board views on Private Plan Change 110 - Heights Road (9, 33 and 49 Heights Road) Pukekohe

Joy LaNauze, Senior Policy Planner, was present to speak to this report.

Resolution number FR/2025/105

MOVED by Chairperson A Fulljames, seconded by Member A Kay:

That the Franklin Local Board:

- a) **provide the following local board views on Private Plan Change 110 by GBar Properties Limited to rezone 5.35 hectares of land at Pukekohe from Future Urban Zone to Business - Light Industry Zone, at 9, 33, and 49 Heights Road, Pukekohe:**
 - i) **tautoko / support rezoning 5.35 hectares of land at Pukekohe from Future Urban Zone to Business - Light Industry Zone on the basis that light industry is needed to support local jobs and economic development opportunity in the wider Pukekohe area i.e. so local people do not need to travel for employment .**
 - ii) **tuhi tīpoka / note that Watercare seeks that the plan change be declined, but if approved, seeks amendments. Would encourage the applicant to work with Watercare to address Watercare concerns.**
 - iii) **tuhi tīpoka / note the opposition from Ngāti Te Ata and recommend that the applicants works with lwi to address any cultural impact concerns.**
 - iv) **whakahē / do not share the concerns expressed by an adjacent property owner and consider the land appropriate for light industrial use. noting it was zoned in the Pukekohe Structure Plan.**
 - v) **suggest that in considering the plan change, that pedestrian, cycling and public transport infrastructure considerations are addressed by the developer, noting that in the future, for those working at this site, accessing the Heights Road Cemetery or moving through the area should be enabled to walk, cycle and access public transport.**
- b) **whakahē / decline the opportunity to appoint a local board member to speak to the local board views at a hearing on the private plan change request.**

CARRIED

ATTACHMENT 5

STATUTORY FRAMEWORK

Attachment 5 – Statutory Framework

STATUTORY MATTERS

Private plan change requests can be made to the council under Clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as council-initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 and clause 22(1) in Schedule 1 of the RMA⁴.

Any person may request a change to a district plan, a regional plan or a regional coastal plan. The procedure for private plan change requests is set out in Part 2 of Schedule 1, of the RMA. The process council follows as a plan maker is adapted, and procedural steps added including the opportunity to request information.

Additional information has been received from the applicant following formal requests for information under clause 23 of Schedule 1.

Resource Management Act 1991

Sections of the RMA relevant to private plan change decision making are recorded in the following table.

RMA Section	Matters
Part 2	Purpose and intent of the Act
Section 31	Outlines the functions of territorial authorities in giving effect to the RMA
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal.
Section 67	Contents of regional plans- sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.
Section 73	Sets out schedule 1 of the RMA as the process to prepare or change a district plan
Section 74	Matters to be considered by a territorial authority when preparing a change to its district plan. This includes its functions under section 1, Part 2 of the RMA, national policy statement, other regulations and other matters.

⁴ Clause 29(1) Schedule 1 of the RMA provides 'except as provided in subclauses (1A) to (9), Part 1 with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)'

Section 75	Contents of district plans- sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with
Section 76	Provides that a territorial authority may include rules in a district plan for the purpose of (a) carrying out its functions under the RMA; and (b) achieving objectives and policies set out in the district plan
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications.

The mandatory requirements for plan preparation are comprehensively summarised by the Environment Court in *Long Bay-Okura Great Park Society Incorporated and Others v North Shore City Council (Decision A078/2008)*, 16 July 2018 at [34] and updated in subsequent cases including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55 at [17]. When considering changes to district plans, the RMA sets out a wide range of issues to be addressed. The relevant sections of the RMA are set out above and the statutory tests that must be considered for PC74 are set out in 1 below.

A. General requirements

1. *A district plan (change) should be designed to accord with and assist the territorial authority to carry out its functions so as to achieve, the purpose of the Act.*
2. *When preparing its district plan (change) the territorial authority must give effect to any national policy statement or New Zealand Coastal Policy Statement.*
3. *When preparing its district plan (change) the territorial authority shall:*
 - (a) *Have regard to any proposed regional policy statement;*
 - (b) *Not be consistent with any operative regional policy statement.*
4. *In relation to regional plans:*
 - (a) *The district plan (change) must not be inconsistent with an operative regional plan for any matter specified in section 30(1) [or a water conservation order]; and*
 - (b) *Must have regard to any proposed regional plan on any matter of regional significance etc.*
5. *When preparing its district plan (change) the territorial authority must also:*
 - *Have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations, and to consistency with plans and proposed plans of adjacent territorial authorities.*
 - *Take into account any relevant planning document recognised by an iwi authority; and*
 - *Not have regard to trade competition.*
6. *The district plan (change) must be prepared in accordance with any regulation (there are none at present);*
7. *The formal requirement that a district plan (change) must also state its objectives, policies and the rules*

<i>B. Objectives [the section 32 test for objectives]</i>
<i>8. Each proposed objective in a district plan (change) is to be evaluated by the extent to which it is the most appropriate way to achieve the purpose of the Act.</i>
<i>C. Policies and methods (including rules) [the section 32 test for policies and rules]</i>
<i>9. The policies are to be implement the objectives, and the rules (if any) are to implement the policies;</i>
<i>10. Each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:</i>
<i>(a) The benefits and costs of the proposed policies and methods (including rules); and</i>
<i>(b) The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.</i>
<i>D. Rules</i>
<i>11. In making a rule the territorial authority must have regard to the actual and potential effect of activities on the environment.</i>
<i>E. Other statutes</i>
<i>12. Finally territorial authorities may be required to comply with other statutes. This includes, within the Auckland Region, the Local Government (Auckland) Amendment Act 2004.</i>

ATTACHMENT 6

SUBMISSIONS

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 110 (Private)

9, 33 and 49 Heights Road, Pukekohe

SUMMARY OF DECISIONS REQUESTED

Enclosed:

- **Explanation**
- **Summary of Decisions Requested**
- **Submissions**

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by **6 June 2025**.
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 110 Private): 9, 33 and 49 Heights Road, Pukekohe

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
1	1.1	Peter Fa'afiu	pfaafiu@hotmail.com	Approve the plan change without any amendments. Light Industrial use confirms site history and location, and stormwater concerns have been resolved.
1	1.2	Peter Fa'afiu	pfaafiu@hotmail.com	Provide sufficient buffer to cemetery
1	1.3	Peter Fa'afiu	pfaafiu@hotmail.com	Confirm Heights Road traffic capacity
2	2.1	Ngāti Te Ata	karl_flavell@hotmail.com	Opposes the plan change. Ngāti Te Ata have not been consulted regarding the application, and little engagement attempt made by applicant. Cultural values and environmental preferences of Ngāti Te Ata are unknown. Plan Change does not meet Resource Management Act Section 6(e), Section 7(1), Section 8 or Fourth Schedule Section 33(d).
2	2.2	Ngāti Te Ata	karl_flavell@hotmail.com	Ngāti Te Ata seek to be better informed during the course of the hearing
2	2.3	Ngāti Te Ata	karl_flavell@hotmail.com	Comprehensive cultural impact assessment report (CIA) to be undertaken by Ngāti Te Ata
2	2.4	Ngāti Te Ata	karl_flavell@hotmail.com	Ngāti Te Ata want further discussions so matters raised in their submission and cultural impact assessment report (CIA) are fully understood
3	3.1	Auckland Transport	spatialplanning@at.govt.nz	Amendments requested. In absence of completion of private agreement and covenant with applicant and Auckland Transport, Heights Road frontage upgrades are sought as part of initial development of site to support safe and efficient connections for active modes
3	3.2	Auckland Transport	spatialplanning@at.govt.nz	Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time
3	3.3	Auckland Transport	spatialplanning@at.govt.nz	Where amendments are proposed, would consider alternative wording or amendments to like effect, which addresses the reasons for the submission. Also seeks any consequential amendments required to give effect to the amendments and decision requested.
4	4.1	NZ Transport Agency Waka Kotahi	EnvironmentalPlanning@nzta.govt.nz	Locate all development where it does not encroach into the NZTA designation, or obtain consent from NZTA under s176 of the Resource Management Act 1991, and a License to Occupy.
4	4.2	NZ Transport Agency Waka Kotahi	EnvironmentalPlanning@nzta.govt.nz	No stormwater discharge to the state highway culverts, although it is noted that runoff cannot be avoided in some instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts.
4	4.3	NZ Transport Agency Waka Kotahi	EnvironmentalPlanning@nzta.govt.nz	Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.
4	4.4	NZ Transport Agency Waka Kotahi	EnvironmentalPlanning@nzta.govt.nz	Applicant should investigate further road signage options Heights Road / Paerata Road intersection
5	5.1	Watercare Services Limited	planchanges@water.co.nz	Plan change should be declined unless a new precinct is required [wording supplied] to manage development sequencing in the plan change area. Plan change is out of sequence with the timing for development set out in council's Future Development Strategy, and therefore out of sequence with Watercare's planned bulk wastewater infrastructure for the Pukekohe Northwest Future Urban Area.
5	5.2	Watercare Services Limited	planchanges@water.co.nz	Decline the plan change, but if approved, make amendments requested. Subdivision and development should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development. Any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion of the Pukekohe North Wastewater Project
5	5.3	Watercare Services Limited	planchanges@water.co.nz	Decline the plan change, but if approved, make amendments requested. Generally not opposed to interim private onsite treatment and discharge for this area, provided the plan change area connects to Watercare's wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project.
5	5.4	Watercare Services Limited	planchanges@water.co.nz	Decline the plan change, but if approved, connect the current private water supply and servicing for this area to Watercare's water supply network.
6	6.1	Gerald Baptist	busmajic@gmail.com	Decline the plan change, and resolve noise problems with existing development and activities on site, including dog training and gym events
6	6.2	Gerald Baptist	busmajic@gmail.com	Decline the plan change, and resolve environmental pollution caused by open fires on site.
6	6.3	Gerald Baptist	busmajic@gmail.com	Decline the plan change, and resolve safety concerns about security of existing activities. Includes safety concerns about potential chemical spills. Is sufficient water available for fire fighting?
6	6.4	Gerald Baptist	busmajic@gmail.com	Decline the plan change, but if approved, make amendments requested. Rezoning from Future Urban to Light Industry is questioned. Wants urban environmental standards to apply to 1173 Paerata Road and other properties on eastern side of State Highway 22. Wants buffer between plan change site and housing.

Submissions

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 110 - Peter Fa'afiu
Date: Tuesday, 8 April 2025 2:46:25 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Peter Fa'afiu

Organisation name:

Agent's full name:

Email address: pfaafiu@hotmail.com

Contact phone number:

Postal address:

7 Cape Vista Crescent

Pukekohe

Auckland 2120

Submission details

This is a submission to:

Plan change number: Plan Change 110

Plan change name: PC 110 (Private): 9, 33 and 49 Heights Road, Pukekohe

My submission relates to

Rule or rules:

Private Plan Change to amend designation from future urban to Light Industrial.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

1. Long history of the site when it comes to light industrial so plan change confirms the reality.
2. Appropriate for the area on the edge of Pukekohe especially with Power Farming next to it and Counties Storage about 200 metres down the road.
3. The stormwater concerns have been resolved via the proposed responses from the technical experts.

I do have minor concerns however no doubt thought of by the applicant or been dealt with via the technical reports and so assessed accordingly by Council officers:

1. Proximity to Heights Cemetery however the landscaping report and engineering report confirm significant buffer between the site and cemetery which is well known to the Pukekohe community.
2. Traffic reports notes the SH22 expansion and also Heights Road likely to remain a rural road, but does it consider the new Roundabout off Butcher Road which will be fed by an arterial road - Pukekohe Northwest Arterial Road - NOR 7, I think. So traffic off the back of SH22 likely to be

1.2

1.3

heavy load so presume the new designated site will be attuned to that so is Heights Road able to take that extra load?

I or we seek the following decision by council: Approve the plan change without any amendments

1.1

Details of amendments:

Submission date: 8 April 2025

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.





NGATI TE ATA

"Ka whiti te ra ki tua o rehua ka ara a Kaiwhare i te rua"

23rd April 2025

SUBMISSION REGARDING

AUCKLAND COUNCIL
Unitary Plan Department
Submissions

Jo Sunde
Senior Associate Planner j
jo.sunde@woods.co.nz

Application details

PC 110 (Private): 9, 33 and 49 Heights Road, Pukekohe Application number
BUN60368908

This private plan change aims to rezone 5.35 hectares of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone and apply the Stormwater Management Area Flow 1 (SMAF-1) control to the plan change land.

Issues

1. Ngāti Te Ata is a manawhenua iwi of Pukekohe.
2. We have not been consulted regarding this application.
3. No to little attempt has been made to contact us and be engaged on this plan change by the applicant.
4. The cultural values of Ngaati Te Ata are unknown. Our environmental preferences are unknown.
5. This plan change application does not meet the following:
 - RMA Section 6(e)
 - RMA Section 7(a)
 - RMA Section 8
 - RMA 4th Schedule Section 33(d)

2.1

THEREFOE, WE OPPOSE THIS PLAN CHANGE APPLICATION.

Relief Sought

1. That Ngāti Te Ata are better informed during the course of the hearing and what information from all parties becomes apparent.

2.2

- | | | |
|----|---|-----|
| 2. | That a comprehensive cultural impact assessment (cia) report is undertaken by Ngāti Te Ata. | 2.3 |
| 3. | That further discussions be undertaken with Ngāti Te Ata to fully understand how the matters raised in this submission and recommendations in our (aforementioned) cia report have been provided for. | 2.4 |
| 4. | The Submitter wishes to be heard in support of their submission. | |



Karl Flavell
Te Taiao (Manager Environment)
Ngāti Te Ata
Pukekohe

Ph: 027 9328998
karl_flavell@hotmail.com

29 April 2025

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Proposed Private Plan Change 110 – 9, 33 and 49 Heights Road, Pukekohe

Please find attached Auckland Transport's submission on **Proposed Private Plan Change 110 – 9, 33 and 49 Heights Road, Pukekohe**. The applicant is GBar Properties Limited.

If you have any queries in relation to this submission, please contact me at spatialplanning@at.govt.nz or on 09 930 5001 ext. 2418.

Yours sincerely



Emeline Fonua
Planner, Spatial Planning and Policy Advice

cc:
Jo Sunde
by email: jo.sunde@woods.co.nz

Submission by Auckland Transport on Private Plan Change 110: 9, 33 and 49 Heights Road, Pukekohe

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 110 from GBar Properties Limited for land located at 9, 33 and 49 Heights Road, Pukekohe

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 GBar Properties Limited (**the applicant**) is applying for a private plan change (**PC 110 or the plan change**) to the Auckland Unitary Plan – Operative in Part (**AUP(OP)**) to rezone 5.35 ha of land (**the site**) at 9, 33 and 49 Heights Road, Pukekohe from Future Urban Zone to Business – Light Industry Zone and to apply a Stormwater Management Area – Flow 1 Control to the entirety of the site.
- 1.2 Auckland Transport (**AT**) is a Council-Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. AT has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.¹ In fulfilling this role, AT is responsible for the following:
 - a. The planning and funding of most public transport, including bus, train and ferry services.
 - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle).
 - c. Operating the roading network.
 - d. Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Urban development on greenfield land not previously developed for urban purposes generates transport effects and needs transport infrastructure and services to support construction, land use activities and the communities that will live and work in these areas. AT's submission seeks to ensure that the transport-related matters raised by PC 110 are appropriately considered and addressed.
- 1.4 AT continues to be available and willing to work through the matters raised in this submission with the applicant and appreciates the recent engagement prior to the submission being lodged.
- 1.5 AT is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

2. Submission

- 2.1 AT **supports in part** PC 110 to rezone 5.35 ha of land to Business – Light Industry Zone. This submission is made to ensure that AT's interest is appropriately addressed, particularly in relation to the site's frontage upgrade on Heights Road.

¹ Local Government (Auckland Council) Act 2009, section 39.

- 2.2 The Pukekohe-Paerata Structure Plan 2019 sets out the land use pattern and supporting infrastructure network for Future Urban zoned land around Pukekohe and Paerata. The Pukekohe-Paerata Structure Plan identifies the site for future light industrial use, with adjacent land to the west and south planned for residential use. AT notes that although the site is the first property along Heights Road to be urbanised, it is necessary that appropriate transport infrastructure is implemented to support safe and efficient connections for active modes as adjacent land becomes urbanised in the future.
- 2.3 AT considers the urbanisation of the site's frontage on Heights Road should occur as part of the initial development of the site for the reasons set out above. This should at a minimum include the construction of a new kerb and channel, footpath, berms and street lighting. These upgrades should extend along the entire frontage of the site, from the eastern boundary with Paerata Road Reserve (State Highway 22) to the western boundary with Heights Park Cemetery (Lot 1 DP 66575). The delivery of these frontage upgrades would be undertaken in alignment with the partial build-out and full build-out of the site.
- 2.4 Since 2023, AT has engaged with the applicant during the preparation of PC 110. AT and the applicant have agreed to address any transport concerns related to the development of the site by registering a covenant on the title of land at 9, 33 and 49 Heights Road that requires the applicant to undertake frontage upgrades. AT and the applicant are currently negotiating a private agreement and land covenant to secure the delivery of the frontage upgrade. 3.1
- 2.5 While discussions with the applicant continue to progress, the agreement and covenant has not been finalised by the submission close date. AT recognises there is a possibility that this agreement may not be finalised and enforced via a covenant. Therefore, in the absence of a finalised private agreement and covenant, AT requests that the plan change includes appropriate mechanisms such as a precinct plan and precinct specific provisions to ensure the frontage upgrades are delivered at an appropriate time. 3.2
- 3. Decision Sought**
- 3.1 The decision which AT seeks from the Council is set out above.
- 3.2 In cases where amendments to the plan change are proposed, AT would consider alternative wording or amendments to like effect, which addresses the reason for AT's submission. AT also seeks any consequential amendments required to give effect to the amendments and decision requested. 3.3
- 4. Appearance at the hearing**
- 4.1 AT wishes to be heard in support of this submission, subject to the outcome of any discussions with the applicant prior to the hearing.
- 4.2 If others make a similar submission, AT will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:



Patrick Buckley
Manager - Spatial Planning Policy Advice

Date: 29 April 2025

Contact person: Emeline Fonua
Planner, Spatial Planning and Policy Advice

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 09 930 5001 ext. 2418

Email: spatialplanning@at.govt.nz

NZ Transport Agency Waka Kotahi Reference: 2023-0242

29 April 2025

Auckland Council
C/- Joy LaNauze (Senior Policy Planner)
Private Bag 92300
Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

Dear Joy,

Submission on Proposed Plan Change 110 (Private) – 9, 33 and 49 Heights Road, Pukekohe

Attached is the NZ Transport Agency Waka Kotahi (**NZTA**) submission on the proposed rezoning of 5.35 hectares of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone and apply the Stormwater Management Area Flow 1 (**SMAF-1**) control to the land.

In addition to the below submission, NZTA recommends the applicant investigates further road signage options Heights Road/ Paerata Road intersection, as noted in the Integrated Traffic Assessment, the majority of crash information at or near these sites are due to drivers losing control of the vehicle. There is potential for increased risk with the proposal increasing heavy vehicle volumes.

4.4

We welcome the opportunity to discuss the contents of our submission with Auckland Council and GBar Properties Limited as required.

If you have any questions, please contact me.

Yours sincerely



Vonnie Veen-Grimes
Principal Planner / Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: +64 9 9288751

Email: Vonnie.veen-grimes@nzta.govt.nz

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**Submission on Proposed Plan Change 110 (Private) – Future Urban Zone to Business - Light Industry Zone – 9, 33
and 49 Heights Road, Pukekohe**

To: Auckland Council
C/- Joy LaNauze (Senior Policy Planner)
Private Bag 92300
Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

From: NZ Transport Agency Waka Kotahi
AON House, 29 Customs Street West
Auckland CBD 1010

1. This is a submission on the following:

Proposed Plan Change 110 (Private) – 9, 33 and 49 Heights Road, Pukekohe to the Auckland Unitary Plan (Operative in Part).

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.**3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context

SH22 forms part of the Auckland Motorway network connecting Pukekohe and State Highway 1 north of Drury and south of Rosehill. SH22 has an annual average daily traffic (AADT) volume of 16,000 vehicles and a posted speed limit of 60 km/h.

The subject section of State Highway 22 (SH22) is north of Pukekohe town centre and defined as Regional in NZTA One Network Road Classification. The site and its users are expected to utilise the intersection of Heights Road (local) and Paerata Road (SH22). The subject intersection accesses Limited Access Road 'Paerata to Pukekohe'.

The zoning surrounding the subject section of SH22 is mostly Future Urban Zone, Residential - Single House Zone, and Business - Light Industry Zone. There is no dedicated walking, cycling or public transport facilities within proximity to the subject intersection. It is noted the site is has historically been used for light industrial.

In the last 10 years there have been 7 minor crashes and 1 serious crash in the vicinity of the subject intersection. There have been no fatal crashes in the last 10 years.

The subject site comprising of 9, 33 and 49 Heights Road is located approximately 4.5km southeast of the NZTA SH22 Drury Upgrade project which is currently in the consenting phase with no confirmed construction date. The project is intending to meet the projected growth of the South Auckland region.

The subject site sits partially within and adjacent to NZTA Designation 6704 and, as currently proposed, within NZTA Designation 6705. Designation purposes as stated in the Auckland Unitary Plan are:

- Designation 6704: 'State Highway – declared limited access road'.
- Designation 6705: 'Land for road widening - 5m where indicated on Map 100, to a minimum width of 30m of road reserve.'

5. The specific provisions of the proposal that this submission relates to are:

Provisions relating to the transport network to the extent that they impact NZTA's obligations in terms of ensuring an integrated, safe, and sustainable transport system. It seeks to ensure that appropriate transport infrastructure is provided at the right time to support the plan change and anticipated future growth.

The Pukekohe-Paerata Structure Plan, dated August 2019, in which the subject site (Area C – North-west Paerata) is proposed as Residential – Mixed Housing Urban (medium to high density). The Auckland Future Development Strategy 2023-2053 indicates a development period of 2040+ for Pukekohe Northwest.

6. The submission of NZTA is:

- (i) NZTA is neutral the Proposed Plan Change 110 to the extent outlined in this submission.

7. NZTA seeks the following decision from the local authority:

- (i) NZTA seeks that all proposed development be located within the private property and not encroach within NZTA land. '9-49 Heights Road Proposed Plan Change Indicative Masterplan', dwg no. P18-188-UD101 (attachment 1), indicates the design of the internal layout follows this existing boundary which encroaches into NZTA designation and road corridor. NZTA does not have any record of agreement to use this land and therefore requests the indicative layout and manoeuvring of the Plan Change area be contained within the site boundaries. Section 176 (1b) of the Resource Management Act 1991 states that "no person may, without the prior written consent of that requiring authority", in this instance NZTA, "do anything in relation to the land that is subject to the designation that would prevent or hinder a public work or project or work to which the designation relates". If the applicant wishes to proceed with use of NZTA road parcel and Designations 6704 and 6705, NZTA notes the applicant shall be required to apply for section 176 written approval with the agency and gain a License to Occupy.

4.1

- (ii) NZTA seeks for no stormwater discharge to the state highway culverts due to exacerbated capacity of the network. It is however noted that runoff cannot be avoided in some instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts. | 4.2
- (iii) Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users. | 4.3
- 8. NZTA does not wish to be heard in support of this submission.**
- 9. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**
- 10. NZTA is willing to work with GBar Properties Limited in advance of a hearing.**

Signature:



Perri Unthank
Principal Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 29 April 2025

Address for service: NZ Transport Agency Waka Kotahi
AON House, 29 Customs Street West
Auckland CBD 1010

Contact Person: Vonnie Veen-Grimes
Telephone Number: +64 9 928 8751
Alternate Email: EnvironmentalPlanning@nzta.govt.nz

Attachments:
Attachment 1: Indicative Masterplan

ATTACHMENT 1: Indicative Masterplan



Auckland Council
Unitary Plan Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 110 (Private): 9, 33 and 49 Heights Road,
Pukekohe, Auckland 2676

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: planchanges@water.co.nz

DATE: 29 April 2025

Watercare could not gain an advantage in trade competition through this submission.

1. WATERCARE'S PURPOSE

- 1.1. Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").
- 1.2. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the Auckland region.
- 1.3. Watercare's purpose, embodied in the Maori whakatauki (proverb) below, reflects the connection between our services and the wellbeing of our community and the local environment:

Ki te ora te wai, ka ora te whenua, ka ora te tangata.

When the water is healthy, the land and the people are healthy.

- 1.4. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets.
- 1.5. Watercare is subject to economic regulation under the Watercare Charter ("**Charter**"). The Charter imposes minimum service quality standards, financial performance objectives and an interim price-quality path. Regulatory oversight is held by the Commerce Commission as the appointed Crown

Monitor. Subject to the Charter, Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) ("**AUP(OP)**"), the Auckland Plan 2050 and the Auckland Future Development Strategy 2023-2053 ("**FDS**").¹

2. SUBMISSION

- 2.1. This is a submission on a private plan change requested by GBar Properties Limited ("**Applicant**") to the AUP(OP) that was publicly notified on 27 March 2025 ("**Plan Change 110**").
- 2.2. Plan Change 110 aims to rezone approximately 5.35 ha of land from Future Urban Zone to Business – Light Industry Zone and apply the Stormwater Management Area Flow 1 (SMAG-1) control to the land subject to Plan Change 110 ("**Plan Change Area**"). The Plan Change Area is made up of three land parcels owned by the Applicant (9, 33 and 49 Heights Road, Pukekohe).
- 2.3. The objective of Plan Change 110 is to enable the operation and expansion of light industrial activities in the Plan Change Area to meet current and future demand for industrial growth, while avoiding, remedying and mitigating adverse effects on the environment.²
- 2.4. Plan Change 110 does not propose a new site-specific precinct and therefore the existing AUP(OP) provisions, including the objectives, policies and rules in the Business – Light Industry Zone chapter of the AUP(OP) would apply to the Plan Change Area.
- 2.5. The Plan Change Area is currently serviced by a private Wastewater Pump Station ("**WWPS**") and rising main that discharges into the public gravity system adjacent to Possum Borne Reserve. The Plan Change Area is not currently serviced by the public water supply network.
- 2.6. The purpose of this submission is to ensure that the technical feasibility of the proposed water and wastewater servicing is addressed and that the potential adverse effects of the future development enabled under Plan Change 110 on Watercare's existing and planned water and wastewater networks, and the services they provide, are appropriately considered and managed in accordance with the Resource Management Act 1991 ("**RMA**").
- 2.7. In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, the Long-term Plan 2024-2034 (10-year Budget), Watercare's Statement of Intent 2024-2027, the FDS, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision ("**Code of Practice**"), the Watercare Business Plan 2025-2034 (10-Year Business Plan) and the Watercare Asset Management Plan FY25-FY34. Watercare has also considered the relevant RMA documents including the AUP(OP) and the National Policy Statement on Urban Development 2020 (updated in May 2022).
- 2.8. For the reasons set out below, Watercare opposes Plan Change 110 as proposed by the Applicant.
- 2.9. In making this submission, it is noted that any infrastructure delivery dates provided in this submission are forecast dates only and therefore subject to change.

¹ Local Government (Auckland Council) Act 2009, s58.

² Heights Road Plan Change Planning Report, Section 32 Assessment at [11.1].

Specific parts of Plan Change 110 this submission relates to

- 2.10. Watercare's submission relates to Plan Change 110 in its entirety.
- 2.11. Without limiting the generality of 2.10 above, the specific parts of Plan Change 110 that Watercare has a particular interest in are the actual and potential effects of Plan Change 110 on Watercare's existing and planned water and wastewater networks and the services they provide.

Sequencing of development

- 2.12. Watercare's bulk infrastructure programme is planned, funded and sequenced in line with the Auckland Plan 2050, the Auckland Council Development Strategy (this is currently the FDS, which replaced the Future Urban Land Supply Strategy 2017 in December 2023), the Auckland Council Growth Scenario (AGS), and the AUP(OP).
- 2.13. Plan Change 110 is located within the Pukekohe Northwest Future Urban Area ("**FUA**") which the FDS identifies as not ready for development before 2040+.³
- 2.14. Appendix 6 of the FDS identifies the infrastructure prerequisites that enable the development of the FUAs.⁴ This Appendix states:⁵

"The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS."

- 2.15. The Isabella Drive WWPS and the New Reservoir Adams Road South are identified in the FDS as infrastructure prerequisites necessary to support the development of Pukekohe Northwest FUA.⁶ Based on the current assessment, the Isabella WWPS needs to be in place to enable bulk wastewater servicing of the Plan Change Area. However, the New Reservoir at Adams Road South is required only to provide additional resilience for the bulk water supply network and is not a prerequisite for development of the Plan Change Area.
- 2.16. Watercare's key concern is that Plan Change 110 is "out of sequence" with the timing for development set out in the FDS and is therefore out of sequence with upgrades to the bulk wastewater infrastructure planned for this FUA. The Isabella WWPS is currently anticipated to be delivered by 2028.
- 2.17. Watercare is also concerned that the Applicant is not proposing a new precinct to apply over the Plan Change Area and is instead relying on the existing provisions and rules within the Business-Light Industry Zone chapter of the AUP(OP). Watercare does not consider the provisions in the Business-Light Industry Zone chapter will sufficiently manage the sequencing of development of the Plan Change Area to ensure that subdivision and development do not occur in advance of bulk wastewater

³ FDS, Appendix 6 at p. 41.

⁴ As defined and introduced in the FDS 2023 Appendix 6 at p. 32.

⁵ FDS, Appendix 6 at p. 41.

⁶ FDS, Appendix 6 at p. 36-37.

infrastructure with sufficient capacity to service the development being constructed and commissioned.

- 2.18. Watercare therefore considers it is appropriate for a new precinct to be part of Plan Change 110 and requests that the Applicant address this. If a new precinct with appropriate provisions, as outlined in this submission, is not included in Plan Change 110 then Watercare seeks that Plan Change 110 is declined.

Wastewater servicing

Treatment

- 2.19. The Pukekohe Wastewater Treatment Plant ("**WWTP**") provides wastewater treatment to the communities of Pukekohe, Paerata and parts of the Waikato District Council (Tuakau & Pokeno).
- 2.20. The Pukekohe WWTP currently has capacity to service a population of 60,000. The Stage 3 Upgrade, which is currently anticipated to be commissioned in the early to mid-2030's, will increase the capacity of the WWTP to service a population of 90,000.
- 2.21. Based on the existing inflows and loads to the WWTP and using the AGSv1 and Statistics NZ High Growth forecasts, it is unlikely that growth will result in the Pukekohe WWTP being at capacity before the planned Stage 3 Upgrade is completed the early to mid-2030s.
- 2.22. Whilst the Stage 3 WWTP Upgrade is not considered to be a prerequisite for development of the Plan Change Area, if growth exceeds the rates forecast by the AGSv1 and the Statistics NZ High scenarios, then Watercare will need to carefully manage permissions to connect development from all live zoned land including the Plan Change Area, to ensure compliance with our consents.

Networks

- 2.23. The Plan Change Area is currently serviced by a private WWPS and rising main that discharges into the public gravity system adjacent to Possum Borne Reserve.
- 2.24. The current public wastewater network servicing the Plan Change Area is at capacity. No additional wastewater flows from the Plan Change Area can be accepted into the public network until the Pukekohe North Wastewater Project (which is the project comprising the construction of the Isabella WWPS and the Pukekohe Transmission Trunk Sewer) is completed and commissioned.
- 2.25. Under the FDS the construction and commissioning of the Isabella Drive WWPS is an infrastructure pre-requisite for development of the Pukekohe Northwest FUA, as stated above. The Pukekohe North Wastewater Project is funded in the Watercare Asset Management Plan (FY25-FY34) and is currently forecast for completion around mid-2028. Construction of the Pukekohe North Wastewater Project has not yet commenced but is currently expected to get underway in late 2025.
- 2.26. The Civil Infrastructure Report prepared to support Plan Change 110 states: "The site is serviced by a private WWPS and rising main **with sufficient capacity to service the full development** until a public connection needs to be considered" (emphasis added).⁷ Watercare does not agree with this assessment. The private WWPS and rising main currently discharge to the public wastewater network and is therefore not independent of the capacity of the public wastewater network which, as

⁷

Appendix 5 - Civil Infrastructure Report, Wood & Partners Consultants Ltd (dated 31 July 2024), at p 15.

stated earlier, currently does not have capacity to service the full development enabled by Plan Change 110. Therefore, any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion and commissioning of the Pukekohe North Wastewater Project.

5.2

2.27. Several permanent and interim solutions for wastewater servicing, which could support the development of the Plan Change Area prior to the commissioning of the Pukekohe North Wastewater Project, are considered in the Civil Infrastructure Report.⁸ Watercare does not support any solutions that would:

- a) increase wastewater discharge into the public network above the existing levels generated by the Plan Change Area, prior to the completion of the Pukekohe North Wastewater Project;
- b) involve tanking / trucking of wastewater; or
- c) include permanent private onsite treatment.

2.28. Watercare does not support further trucking of wastewater for the following reasons:

- a) further discharges to the Rosedale WWTP will not be accepted by Watercare as the plant's ability to accept more trucking discharge is limited and needs to be preserved for emergency situations; for example where tankers may be required to mitigate WWPS breakdowns;
- b) the inefficiency of trucking is not aligned with Watercare's carbon emissions reduction commitments; and
- c) Watercare's experience with tankering solutions is that they are high risk for untreated wastewater overflow to the environment, inefficient and costly, create concern for the community, result in odour complaints, and are not aligned with Watercare's obligations to be a minimum cost provider.

2.29. Watercare does not support permanent private servicing for future urban land included in the FDS, in particular because this will result in the inefficient delivery of infrastructure given that Watercare is planning to service the future urban areas identified in the FDS, and in particular this Plan Change Area, through the Pukekohe North Wastewater Project and the Pukekohe WWTP Stage 3 Upgrade referred to above. Aspects of this investment would be superfluous if the Plan Change Area did not ultimately connect to the bulk infrastructure as it has already been factored into the Infrastructure Growth Charges (IGC).

2.30. Watercare is generally not opposed to interim private onsite treatment and discharge for this area, provided the Plan Change Area connects to Watercare's wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project. For the avoidance of doubt, Watercare's opposition or otherwise to any other alternative interim servicing regime will depend on the details of the specific interim servicing solution proposed.

5.3

2.31. Watercare seeks that a site-specific Precinct is required over the Plan Change Area and that this Precinct include provisions that require the Plan Change Area to be connected to the public

⁸ Appendix 5 - Civil Infrastructure Report, Wood & Partners Consultants Ltd (dated 31 July 2024), at p 24.

wastewater network once capacity is available, and for the interim onsite solution to be decommissioned once permanent connection to the public wastewater network occurs.

Water supply servicing

- 2.32. The Plan Change Area is not currently serviced by the public water supply network.
- 2.33. The current bulk water supply network has sufficient capacity to service development of the Plan Change Area. Despite this, there are planned upgrades in the vicinity that will enhance the network's resilience. These upgrades include the construction of the Wellesley-Paerata Watermain, currently anticipated to begin construction in 2030+, and a new reservoir at Adams Road South, currently anticipated to be required by 2040+. As noted in 2.15 above, the reservoir is listed in the FDS as a prerequisite for development in the Pukekohe Northwest FUA. However, as stated, the existing bulk network already has sufficient capacity to enable development of the Plan Change Area, and the new reservoir will provide additional resilience to the network. The reservoir is not a prerequisite for development of the Plan Change Area.
- 2.34. The Plan Change Area is currently serviced by a private water supply in the form of a consented borehole. Watercare strongly prefers that any private water supply servicing used onsite be decommissioned and that development be connected to the bulk water supply network. As the water supply provider of last resort, Watercare prefers to provide the public water supply where possible to avoid the consequences of a private scheme failing to provide safe drinking water and Watercare being required to take on the servicing at short notice.

5.4

3. DECISION SOUGHT

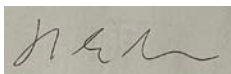
- 3.1. Watercare opposes Plan Change 110 as currently proposed by the Applicant, on the basis that it is out of sequence with the expected timing for development of the Pukekohe Northwest FUA, in advance of the required bulk wastewater infrastructure and does not propose a precinct with provisions to manage effects on the bulk wastewater infrastructure.
- 3.2. If Plan Change 110 is approved, Watercare seeks that a new precinct is included which the Plan Change Area is to be subject to, and that this precinct includes provisions as set out in Attachment 1, or similar provisions that will achieve the same outcomes.
- 3.3. In addition, Watercare notes that if Plan Change 110 is approved, the Applicant will be required to deliver and fund the local water supply and wastewater network capacity and servicing requirements of the development enabled by Plan Change 110 in accordance with Watercare standards.

5.1

4. HEARING

4.1. Watercare wishes to be heard in support of its submission.

29 April 2025



Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Address for Service:
Amber Taylor
Development Planning Team Lead
Watercare Services Limited
Private Bag 92521
Victoria Street West
Auckland 1142
Phone: 021 242 8153
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Attachment 1

Precinct description

The Precinct applies to 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe.

The primary purpose of the Precinct is to enable ongoing operation, intensification and expansion of light industrial activity. Light industrial land use and subdivision activities are largely enabled through the underlying zoning, however the delivery of these within the precinct needs to be closely aligned with the delivery of water supply, wastewater and other infrastructure to support the development of the precinct.

Implementation

Subdivision and development is restricted until the Precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

Objectives

(x) Subdivision and development are coordinated with the supply of sufficient transport, water supply, stormwater, wastewater, energy and communications infrastructure.

(x) Subdivision and development does not occur in advance of the availability and capacity of bulk water supply and bulk wastewater infrastructure, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

Policies

(X) Ensure that subdivision and development in the precinct is coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.

(X) Avoid subdivision and development that is in advance of the provision of functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development within the Precinct area, except where an interim solution and associated decommissioning for water and/or wastewater self-servicing is proposed.

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

Activity table

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table XX below.

Activity		Activity Status
Subdivision and Development		
(x)	Use and development that does not comply with Standard IX6.11 Bulk Water Supply and Wastewater Infrastructure	NC
(x)	Subdivision that does not comply with Standard IX6.11 Bulk Water Supply and Wastewater Infrastructure	NC

IX.5. Notification

(x) Any application for resource consent for an activity listed in Table IX.4.1 Activity will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(x) In addition and notwithstanding the requirements of [x], any application for resource consent that infringes the following standard shall be notified to Watercare:

- (a) Standard [x] Bulk Water Supply and Wastewater Infrastructure

Standards

All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table XX unless otherwise specified below. All activities listed in Activity Table X must also comply with Standards XX and with XX Special Information Requirements.

Where there is any conflict or difference between standards in this Precinct and the Auckland-wide and zone standards, the standards in this Precinct will apply.

XX Bulk Water Supply and Wastewater Infrastructure

Purpose:

- To ensure subdivision and development within the Precinct is adequately serviced with bulk water supply and wastewater infrastructure.
- (1) Bulk water supply and wastewater infrastructure with sufficient capacity for servicing the proposed development must be completed, commissioned and functioning:
 - a. in the case of subdivision, prior to issuing of a certificate pursuant to 224(c) of the Resource Management Act 1991;
 - b. in the case of land use only, prior to construction of any buildings for activities that would require water and/or wastewater servicing.

Special information requirement**(x) Water and Wastewater Servicing Plan**

- (a) Within the application for the first stage of subdivision or development of any site existing at [date of plan change approval] within the Precinct the applicant must provide a Water and Wastewater Servicing Plan for the Precinct Area. The Water and Wastewater Servicing Plan must:
- i. Identify the location, size and capacity of the proposed water supply and wastewater network within the Precinct.
 - ii. Identify the timing, location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.
 - iii. Where interim water or wastewater servicing is proposed prior to the bulk water and wastewater network being available, details of:
 - a. The interim measures proposed including timing, location and capacity.
 - b. In the case of wastewater, demonstrate how the system will operate so that no more than XXX is discharged to the existing public network, including monitoring and reporting.
 - c. How the interim measures will be decommissioned once the bulk water and wastewater system is available.
 - d. How the Precinct area will be connected to the bulk water and wastewater system following decommissioning of the interim solutions, including any consultation and agreements with Watercare.

(x) Water Supply and Wastewater Infrastructure Capacity Assessment

- (a) All applications for subdivision or development must be accompanied by a Water Supply and Wastewater Infrastructure Capacity Assessment. The applicant is required to produce a water supply and wastewater infrastructure capacity assessment for the precinct to demonstrate there is sufficient capacity in the wider water and wastewater reticulated network, to service the proposed development or lots.

29/4/2025-

TO AUCKLAND COUNCIL
UNITARY PLAN PC110

FROM

GERARDUS ADRIANUS M. BAPTIST

PROFESSIONAL TRUSTEE SERVICES LTD.

1173 PAERATA ROAD

PAERATA,

PUKEKOHE 2676

Postal ADDRESS 26 ELLIOT CRESCENT
OWHATA.

ROTORUA 3010

EMAIL: busmajic@gmail.com

phone 021-0260 1412

SUBMISSION IN REGARD TO
UNITARY PLAN PC110

DEAR SIR/MADAM

My 1st attempt by Auckland Council
Website failed, and now my word document
is not working on my laptop.

THE FOLLOWING CONCERNS

- | | |
|-----------------------------|-----|
| 1/ ENVIRONMENTAL NOISE | 6.1 |
| 2/ ENVIRONMENTAL POLLUTION | 6.2 |
| 3/ SAFETY ISSUES - SECURITY | |
| - FIRE | 6.3 |
| - CHEMICAL SPILLS | |

4/ ALLOWING ENTERPRISE WITHOUT

Examples of Noise Problems

1) Commercial generator with No silent mode operating during the day. This generator was run 24/7 on a long weekend. When I contacted the CEO ABOUT THE NOISE, HE SAID IT HAD TO BE KEPT GOING DUE TO POWER CUT. I PHONED THE COUNTRIES POWER WHO CONTACTED ALL THEIR MAINTENANCE CREWS WHO INFORMED ME THERE HAS BEEN NO POWER CUT THROUGHOUT THE AREA THE LONG WEEKEND. THE CEO HAD THE OPPORTUNITY TO SWITCH OFF HE CHOSE AGAIN NOT TOO.

2) ON SUNDAYS AT ~~7~~ 7.30 AM THE CEO ALLOWED A KENNEL CLUB DOG GROUP TRAIN ONSITE. WE HAD 20 DOGS BARKING FROM 7.30 AM - TILL AFTER LUNCH. ~~AT~~ AFTER MY PHONE CALL, HE SAID THEY HAVE TO TRAIN SOME WHERE. WHERE IS THE RESOURCE CONSENT TO ALLOW THIS TO HAPPEN? AFTER MY PHONE CALL THE SUNDAY DOG TRAINING CARRIED ON.

3) THE COMPANY IMPORTED ~~BASED~~ TRACTORS. STARTED TO DISMANTLE THEM WITH SILENT HAMMER, WELDING ~~FOR~~ TORCH, WITH FULL LPE CYLINDERS IN CLOSE PROXIMITY. THIS WAS DONE BY THE FENCE ~~PAGE 266~~ NEAR OUR BOUNDARY AS STAFF

WORKING ON SITE DIDN'T WANT TO HEAR THE NOISE.

WHERE IS THE RESOURCE CONSENT TO OPERATE A WRECKERS YARD,

WHERE IS THE CONSIDERATION FOR NEIGHBOURS, WHERE THEIR OWN STAFF DIDN'T WANT TO PUT UP WITH THE NOISE.

PLEASE NOTE THAT AFTER MY PHONE CALLS TO THE CEO, WHICH WERE ALL CIVIL, THE CEO ALLOWED THE PROBLEM TO CONTINUE, ~~AND~~

ENVIRONMENTAL POLLUTION

AT THE TRACTOR CENTRE THEY REGULARLY HAVE OPEN FIRES, WITH A TOXIC ^{FUMES} SMOKE, BLACK SMOKE WHICH CROSSES THE SH 22 AND OCCASIONALLY THERE IS SOOT ON THE WASHINE WHICH NEEDS TO BE WASHED AGAIN.

SAFETY

SECURITY

THERE IS A ELECTRIC FENCE SURROUNDING THE PROPERTY, AFTER HOURS WHILE SITTING ON MY DECK, I SEE ADULTS AND CHILDREN IN THE TRACTOR CENTRE PLAYING WITH THE EQUIPMENT,

I HAVE CONCERNS IF PEOPLE WITH

RAD INTENTIONS THEY COULD START FIRES, CHEMICAL SPILLS.

I WOULD LIKE TO KNOW WHAT ~~THE~~ THERE FIRE AND CHEMICAL HAZARD PROCEDURE IS.

HOW MANY ^{FIRE} HAZARDS ARE THERE. ITS A RURAL AREA. WHERE IS THE FIRE BRIGADE SOURCE OF WATER?

ON SOCIAL MEDIA THERE ARE LOTS OF MEDIA STORIES ABOUT LIGHT INDUSTRY, AGRICULTURE & URBAN BOUNDARIES. NOISE, FUMES, ALLERGY, SPRAY. IN THIS PLAN REQUEST THERE IS NO BUFFER BETWEEN URBAN AND AGRICULTURE WAREHOUSE.

MY SIDE OF THE ROAD IS ALL HOUSING, NEILS ROAD OPPOSITE IS THAT HOUSING, BEHIND THE TRACTOR CENTRE IS THAT FUTURE HOUSING. INSTEAD OF THE TRACTOR CENTRE EXPANDING, ITS A R17 LIKE WESTERN SPRINGS STADIUM AND URBAN NEIGHBOUR. PERHAPS THEY SHOULD LOCATE ELSEWHERE.

PERHAPS THE ZONING PLANNERS NEED TO REZONE SOME OF THE FUTURE URBAN. MY PROPERTY WAS ^{ZONED} LIGHT INDUSTRY AND CHANGED BACK TO FUTURE URBAN. CONSIDERING BUTCHER ROAD IS THE NEW HIGHWAY, LIGHT INDUSTRY ~~WAS~~ SHOULD HAVE STAYED AT

quite a few times for my property. Every time there was an open day the zoning changed!

I am against the plan change but if it goes ahead then I would like to see amendments so the urban dwellers are not disadvantaged, can live a urban life style without fear of noise, pollution, fire and chemical spills. I'm sure there are areas to consider for urban living.

Council have one opportunity to get it right.

Front yard activities outside the boundary, wrecking yard with propane cylinders near by in the work area, dog training classes are not part of the resource consent. How will this be controlled.

My phone calls to CEO explaining the problems are ignored. I have grave concerns with a urban build up. Urban dwellers will not get urban zone life style.

AMENDMENTS TO PC 110

Reading my notes will give you the information required to make the necessary amendments so

URBAN ZONING HAS URBAN ENVIRONMENT
ENVIRONMENT NOISE

1) NOT A 24/7 operation
NOISE TO A URBAN LEVEL.

NO commercial generators.

NO WRECKING YARD RESOURCE CONSENT

NO NOISE URBAN RESOURCE CONSENT.

NO GYM TRAIN CLASSES.

There WAS A VERY POPULAR AND
GOOD GYM TRAINER ~~CLUB~~ VERY HELPFUL
PEOPLE, THEN A ~~MANAGER~~ NEW INSTRUCTOR
PLAYED LOUD HEAVY ROCK AT 5AM. I SPOKE
TO HIM, HE WAS VERY LIPPY, NEXT
MORNING NOISE CONTROL CAME AND
TOOK AWAY HIS MUSIC. HIS STUDENTS TOLD
ME ALL ABOUT IT.

2) ENVIRONMENT POLLUTION

YOU CAN'T STOP OPEN FIRES,
UNLESS FIRE SEASON.

BUT NO TOXIC BURNING.

3) COUNCIL ARE HAPPY WITH
FIRE AND CHEMICAL HAZARD
CONTROLS AND PROCEDURES.

I WOULD LIKE TO SPEAK TO
THE PL LO SUBMISSION.

MY APOLOGIES FOR THE HAND WRITING.

YOURS FAITHFULLY

G. Baptis

GERALD BAPTIST

ATTACHMENT 6A

**LETTER DATED 21 JULY 2025 FROM NGĀTI TE
ATA (SUBMITTER 2)**



NGAATI TE ATA WAIOHUA

*“Ka whiti te raa ki tua o rehua ka ara a
Kaiwhare i te rua”*

AUCKLAND COUNCIL
Unitary Plan Department
Attention: Joy La Nauze

21/07/2025

By email: Joy.LaNauze@aucklandcouncil.govt.nz

PRIVATE PLAN CHANGE 110 - 9, 33 AND 49 HEIGHTS ROAD, PUKEKOHE

Ngāti Te Ata is a mana whenua iwi of Pukekohe and a submitter (Submission No. 2) on Private Plan Change 110 (PC110), which seeks to rezone 5.35 hectares of land at 9, 33 and 49 Heights Road Pukekohe from Future Urban Zone to Business - Light Industry Zone and apply the Stormwater Management Area Flow 1 (SMAF-1) control to the plan change land.

Ngāti Te Ata's submission raised concerns with PC 110, including the lack of consultation and expressed a wish to be better informed. The Submission also sought that a comprehensive cultural impact assessment (CIA) be undertaken by Ngāti Te Ata and that further discussions be undertaken with Ngāti Te Ata to fully understand how the matters raised in Ngāti Te Ata's submission and recommendations and CIA report have been provided for.

Since lodging its submission Ngāti Te Ata has engaged constructively with the applicant for PC 110 including, undertaking a site visit, providing a CIA and having further discussions and correspondence regarding the matters raised in the CIA and reached agreement on how these can be addressed as the site is developed in the future (i.e. at resource consent stage).

As a result, Ngāti Te Ata considers that the concerns raised in its submission have been addressed and no longer requests to be heard at the hearing.

Please contact me if you have any questions.

Karl Flavell

Te Taiao (Manager Environment)
Ngāti Te Ata
Pukekohe

Ph: 027 932 8998
karl_flavell@hotmail.com

cc: Gbar Properties Limited
c/- Woods
Attention: Joanne Sunde
By email: jo.sunde@woods.co.nz

ATTACHMENT 7

TABLE OF RECOMMENDATIONS ON SUBMISSIONS

Attachment 7 – Table of Recommendations on PC110 Submissions

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
1.1	Peter Fa'afiu	Light industrial use Stormwater	Approve the plan change without any amendments. Light Industrial use confirms site history and location, and stormwater concerns have been resolved.	9.1 Light Industrial Zoning and Use 9.9 Stormwater and Flooding Effects 9.10 Water and Wastewater Infrastructure, Development Engineering Effects	Accept in part
1.2	Peter Fa'afiu	Cemetery buffer	Provide sufficient buffer to cemetery	9.7 Landscape and Visual Amenity Effects 9.6 Parks and Open Space Effects	Accept in part
1.3	Peter Fa'afiu	Traffic - Heights Road capacity	Confirm Heights Road traffic capacity	9.11 Transport Infrastructure and Traffic Effects	Accept
2.1	Ngāti Te Ata	Manawhenua iwi consultation RMA	Opposes the plan change. Ngāti Te Ata have not been consulted regarding the application, and little engagement attempt made by applicant. Cultural values and environmental preferences of Ngāti Te Ata are unknown. Plan Change does not meet Resource Management Act Section 6(e), Section 7(1), Section 8 or	9.2 Mana Whenua values	Accept in part

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			Fourth Schedule Section 33(d).		
2.2	Ngāti Te Ata	Manawhenua iwi consultation	Ngāti Te Ata seek to be better informed during the course of the hearing	9.2 Mana Whenua values	Accept in part
2.3	Ngāti Te Ata	Manawhenua iwi consultation	Comprehensive cultural impact assessment report (CIA) to be undertaken by Ngāti Te Ata	9.2 Mana Whenua values	Accept in part
2.4	Ngāti Te Ata	Manawhenua iwi consultation	Ngāti Te Ata want further discussions so matters raised in their submission and cultural impact assessment report (CIA) are fully understood	9.2 Mana Whenua values	Accept in part
3.1	Auckland Transport	Traffic - Heights Road frontage	Amendments requested. In absence of completion of private agreement and covenant with applicant and Auckland Transport, Heights Road frontage upgrades are sought as part of initial development of site to support safe and efficient connections for active modes	9.11 Transport Infrastructure and Traffic Effects 9.12 Infrastructure Timing and Funding	Accept in part
3.2	Auckland Transport	Traffic - Heights Road frontage	Amendments requested. Inclusion sought in plan change of appropriate mechanisms such as a	9.11 Transport Infrastructure and Traffic Effects 9.12 Infrastructure	Accept in part

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			precinct plan and precinct specific provisions to ensure Heights Road frontage upgrades are delivered at an appropriate time	Timing and Funding	
3.3	Auckland Transport	Traffic - Heights Road frontage	Where amendments are proposed, would consider alternative wording or amendments to like effect, which addresses the reasons for the submission. Also seeks any consequential amendments required to give effect to the amendments and decision requested.	9.11 Transport Infrastructure and Traffic Effects 9.12 Infrastructure Timing and Funding	Accept in part
4.1	NZ Transport Agency Waka Kotahi	Traffic - Paerata Road (State Highway 22) frontage	Locate all development where it does not encroach into the NZTA designation, or obtain consent from NZTA under s176 of the Resource Management Act 1991, and a License to Occupy.	9.11 Transport Infrastructure and Traffic Effects	Accept
4.2	NZ Transport Agency Waka Kotahi	Stormwater - culverts beneath State Highway 22	No stormwater discharge to the state highway culverts, although it is noted that runoff cannot be avoided in some	9.9 Stormwater and Flooding Effects 9.10 Water and Wastewater Infrastructure,	Reject in part

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			instances and that the applicant has done sufficient due diligence in mitigating stormwater runoff impacts.	Development Engineering Effects	
4.3	NZ Transport Agency Waka Kotahi	Traffic - safety	Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.	9.11 Transport Infrastructure and Traffic Effects	Accept in part
4.4	NZ Transport Agency Waka Kotahi	Traffic - Height Roads/Paerata Road intersection	Applicant should investigate further road signage options Heights Road / Paerata Road intersection	9.11 Transport Infrastructure and Traffic Effects	Accept in part
5.1	Watercare Services Limited	Wastewater servicing	Plan change should be declined unless a new precinct is required [wording supplied] to manage development sequencing in the plan change area. Plan change is out of sequence with the timing for development set out in council's Future Development Strategy, and therefore out of sequence with Watercare's planned	9.10 Water and Wastewater Infrastructure, Development Engineering Effects 9.12 Infrastructure Timing and Funding	Accept in part

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			bulk wastewater infrastructure for the Pukekohe Northwest Future Urban Area.		
5.2	Watercare Services Limited	Wastewater servicing	Decline the plan change, but if approved, make amendments requested. Subdivision and development should not occur in advance of bulk wastewater infrastructure with sufficient capacity to service the development. Any discharges into the public wastewater network over and above the current discharges that occur from the Plan Change Area cannot be accepted prior to the completion of the Pukekohe North Wastewater Project	9.10 Water and Wastewater Infrastructure, Development Engineering Effects 9.12 Infrastructure Timing and Funding	Accept in part
5.3	Watercare Services Limited	Wastewater servicing	Decline the plan change, but if approved, make amendments requested. Generally not opposed to interim private onsite treatment and discharge for this area, provided the plan change area	9.10 Water and Wastewater Infrastructure, Development Engineering Effects 9.12 Infrastructure Timing and Funding	Accept in part

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			connects to Watercare's wastewater network once capacity is available following the completion and commissioning of the Pukekohe North Wastewater Project.		
5.4	Watercare Services Limited Watercare Services Limited	Water supply servicing	Decline the plan change, but if approved, connect the current private water supply and servicing for this area to Watercare's water supply network.	9.10 Water and Wastewater Infrastructure, Development Engineering Effects	Accept in part
6.1	Gerald Baptist	Environmental noise	Decline the plan change, and resolve noise problems with existing development and activities on site, including dog training and gym events	9.13 Other Matters	Reject
6.2	Gerald Baptist	Environmental pollution	Decline the plan change, and resolve environmental pollution caused by open fires on site.	9.13 Other Matters	Reject
6.3	Gerald Baptist	Safety	Decline the plan change, and resolve safety concerns about security of existing activities. Includes safety concerns about potential chemical spills. Is sufficient water available for fire	9.13 Other Matters	Reject

Submission Number	Submitter	Subject	Summary of Decisions Requested	Report Section	Recommendation
			fighting?		
6.4	Gerald Baptist	Zoning	Decline the plan change, but if approved, make amendments requested. Rezoning from Future Urban to Light Industry is questioned. Wants urban environmental standards to apply to 1173 Paerata Road and other properties on eastern side of State Highway 22. Wants buffer between plan change site and housing.	9.1 Light Industrial Zoning and Use 9.7 Landscape and Visual Amenity Effects 9.13 Other Matters	Reject in part

ATTACHMENT 8

S42A RECOMMENDED PC110 HEIGHTS ROAD PRECINCT PROVISIONS

Attachment 8 – s42A Recommended PC110 Heights Road Precinct Provisions

Amendments are shown with text to be added as underlined.

Heights Road Precinct

IXXX.1. Precinct Description

The Heights Road Precinct applies to 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe, on the northern edge of Pukekohe. The zoning of land within the Heights Road Precinct is Business – Light Industry zone. To the north, the land is bordered by Heights Road, which forms the Rural Urban Boundary (RUB). Land zoned Rural - General Rural is on the northern side of Heights Road. To the east, the land is bordered by the Paerata Road section of State Highway 22. The council's Heights Park Cemetery borders the land to its west and south. The cemetery is zoned Special Purpose - Cemetery Zone.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct.

The primary purpose of the Heights Road Precinct is to enable ongoing operation, intensification and expansion of light industrial activity. Light industrial land use and subdivision activities are largely enabled through the underlying zoning, however the delivery of these within the Heights Road Precinct needs to be closely aligned with the delivery of water supply, wastewater, transport upgrades, and other infrastructure to support the development of the precinct.

There are known water supply and wastewater constraints in the bulk infrastructure network serving the Heights Road Precinct. There are planned upgrades to the bulk network to address these constraints. At the time a land use or subdivision consent application is made, an applicant must demonstrate that there is sufficient capacity in the bulk network to cater for the development.

Subdivision and development is restricted until the Precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.

The transport network in the wider area will be progressively upgraded over time to support planned urban growth in this part of Pukekohe. The Heights Road Precinct includes provisions to ensure that subdivision and development of land for housing and related activities is coordinated with the construction of transport infrastructure upgrades necessary to mitigate adverse effects on the local and wider transport network.

Transport infrastructure is required to be integrated and coordinated with subdivision and development and provide safe and efficient connections to the wider transport network and upgrades to the transport network.

Buffer controls are proposed to protect the amenity of the Heights Park Cemetery.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

IXXX.2. Objectives [rp/dp]

- (1) Subdivision and development are coordinated with the supply of sufficient transport, water supply, stormwater, wastewater, energy and communications infrastructure.

- (2) Subdivision and development does not occur in advance of the availability and capacity of bulk water supply and bulk wastewater infrastructure, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.
- (3) Provide a well-connected and safe transport network that supports a range of travel modes.
- (4) Transport infrastructure is integrated and coordinated with subdivision and development and provides safe and efficient connections to the wider transport network and upgrades to the transport network.
- (5) Adverse effects on amenity values and the natural environment of the adjacent Heights Park Cemetery zoned Special Purpose – Cemetery are managed.

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

IXXX.3. Policies [rp/dp]

Subdivision and development

- (1) Require that the design of any subdivision and development within the precinct is undertaken in general accordance with the Heights Road precinct plan.

Infrastructure

- (2) Ensure that subdivision and development in the precinct is coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.
- (3) Avoid subdivision and development that is in advance of the provision of functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development within the Precinct area, except where an interim solution and associated decommissioning for water and/or wastewater self-servicing is proposed.

Transport and Infrastructure

- (4) Require subdivision and development to provide for a transport network that:
 - (a) Integrates with, and avoids, remedies or mitigates adverse effects on the safety and efficiency of the transport network of the surrounding area by:
 - (i) Implementing dual-lane roundabout or traffic signal control of the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.
 - (ii) Providing Austroads Safe Intersection Sight Distance for the measured operating speed on Heights Road at any site access point.
 - (iii) Providing a right turn bay or flush median on Heights Road at any site access point.
 - (iv) Providing an auxiliary left turn lane on Heights Road at the eastern-most access point.

- (v) Implementing road safety improvement works on Heights Road at the bend east of Beatty Road, the intersection with Beatty Road, and the bend north of the railway level crossing.
 - (vi) Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.
 - (vii) Avoiding vehicle access directly off Paerata Road.
- (b) Is designed and constructed in a manner that is appropriate having regard to the requirements of Auckland Transport's relevant code of practice or engineering standards.

Amenity

- (5) Require development adjacent to the Special Purpose – Cemetery Zone to manage adverse amenity effects on that zone.

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

IXXX.4. Activity table [rp/dp]

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IXXX.4.1 below.

Activity Table IXXX.4.1 specifies the activity status of land use and subdivision activities in the Heights Road Precinct pursuant to sections 9(2), 9(3), and 11 of the Resource Management Act 1991.

A blank in the activity status column means that the activity status in the relevant overlay, Auckland-wide or zone provision applies.

Table IXXX.4.1 Activity table

<u>Activity</u>		<u>Activity status</u>
<u>Use and Development</u>		
(A1)	<u>Activities listed as permitted, restricted discretionary, discretionary, or non-complying activities in Table H14.4.1 in the Business – Light Industrial Zone</u>	
(A2)	<u>Use and development that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure</u>	<u>NC</u>
(A3)	<u>Use and development that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure</u>	<u>NC</u>
(A4)	<u>Any activity not complying with Standard IXXX.6.1.2 Transport</u>	<u>RD</u>
<u>[rp/dp]</u>		

(A5)	<u>Any vehicle access to Heights Road in a location shown on IXXX.10.1 Precinct Plan 1</u>	<u>RD</u>
(A6)	<u>Any vehicle access to Heights Road in a location other than shown on IXXX.10.1 Precinct Plan 1</u>	<u>D</u>
(A7)	<u>Any vehicle access to Paerata Road</u>	<u>NC</u>
<u>Subdivision</u>		
(A8)	<u>Subdivision that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure</u>	<u>NC</u>
(A9)	<u>Subdivision not complying with the standards under IXXX.6.1.2 Transport</u>	<u>RD</u>

IXXX.5. Notification

- (1) Any application for resource consent for an activity listed in Activity Table IXXX.4.1 above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) In addition and notwithstanding the requirements of IXXX.5.(1), any application for resource consent that infringes the following standard shall be notified to Watercare:
 - (a) Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure

IXXX.6. Standards

- (1) All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IXXX.4.1
- (2) All activities listed in Activity Table IXXX.4.1 must also comply with Standards IXXX.6.1.1 – IXXX.6.1.5 and with IXXX.8. Special Information Requirements.

Where there is any conflict or difference between standards in this Precinct and the Auckland-wide and zone standards, the standards in this Precinct will apply.

IXXX.6.1. Precinct Plan and infrastructure Requirements

All development and subdivision must comply with the following standards:

IXXX.6.1.1. Bulk Water Supply and Wastewater Infrastructure Requirements

Purpose:

- To ensure subdivision and development within the Precinct is adequately serviced with bulk water supply and wastewater infrastructure.
- (1) Bulk water supply and wastewater infrastructure with sufficient capacity for servicing the proposed development must be completed, commissioned and functioning:

- (a) in the case of subdivision, prior to issuing of a certificate pursuant to 224(c) of the Resource Management Act 1991;
- (b) in the case of land use only, prior to construction of any buildings for activities that would require water and/or wastewater servicing.

6.1.2 Transport

6.1.2.1 Transport Infrastructure Requirements

Purpose:

- Mitigate the adverse effects of traffic generation on the surrounding local and wider transport network.
- Achieve the integration of land use and transport.

(1) Subdivision and development must comply with the standards in Table IXXX.6.1.2.1.1

Table IXXX.6.1.2.1.1 Transport Infrastructure Requirements

<u>Transport Infrastructure Upgrade</u>		<u>Trigger</u>
<u>(T1)</u>	<u>Implementing dual-lane roundabout or traffic signal control of the the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.</u>	<u>Any subdivision or development</u>
<u>(T2)</u>	<u>Implementing road safety improvement works on Heights Road in the locations shown on Precinct Plan 2 using measures that typically achieve a minimum 10% reduction in crashes.</u>	
<u>(T3)</u>	<u>Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.</u>	

6.1.2.2 Upgrade of Heights Road

Purpose:

- ensure that the upgrade of Heights Road to an urban standard complies with IXXX.9.1.Appendix 1: Minimum Road Width, Function and Required Design Elements.
- (1) Any development and/or subdivision must comply with Heights Road Precinct IXXX.9.1.Appendix 1 Minimum Road Width, Function and Required Design Elements as applicable.

6.1.2.3 Vehicle Access to Heights Road

Purpose:

- ensure the safe operation of the local transport network.

(1) Any vehicle access along Heights Road must:

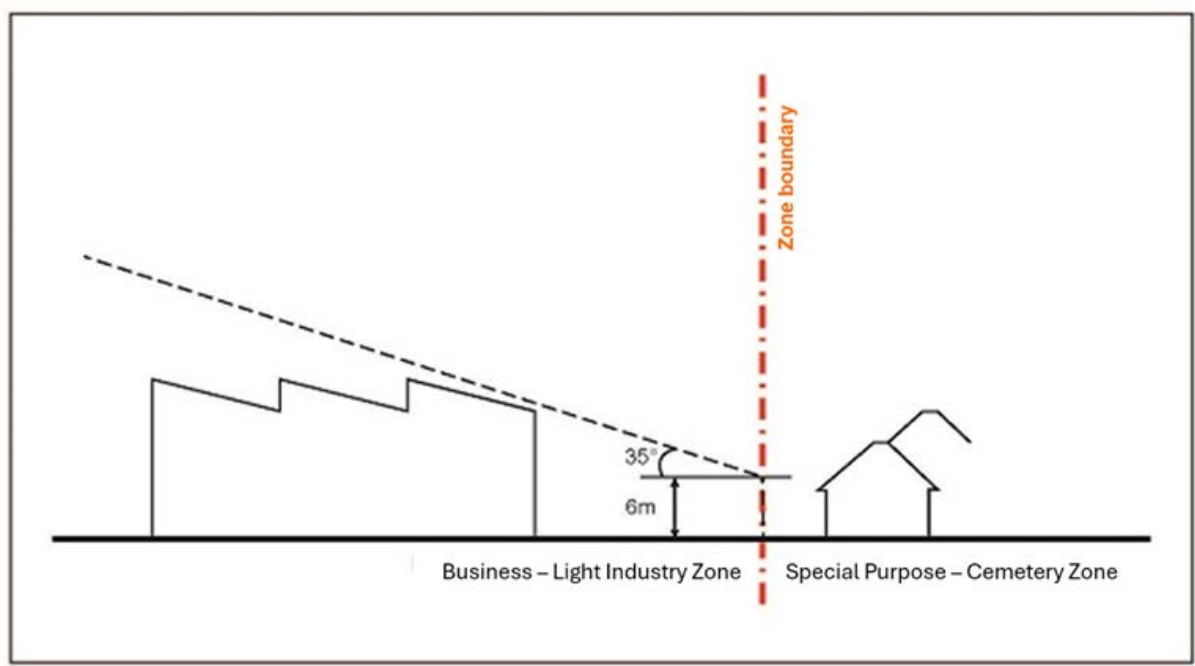
- (a) Provide Austroads Safe Intersection Sight Distance for the measured 85th percentile speed on Heights Road.
- (b) Provide a right turn bay or flush median on Heights Road to Auckland Transport standards.
- (2) The eastern-most access along Heights Road must also provide an auxiliary left turn lane on Heights Road to Auckland Transport standards.

6.1.3 Height in Relation to Boundary to Heights Park Cemetery

Purpose:

- manage the effects of building height;
 - allow reasonable sunlight and daylight access to Heights Park Cemetery; and
 - manage visual dominance effects on Heights Park Cemetery
- (1) Buildings must not project beyond a 35 degree recession plane measured from a point 6m vertically above ground level along the boundary of the Special Purpose – Cemetery Zone:

Figure IXXX.6.1.3.1 Height in relation to boundary



IXXX.6.1.4 Yards to Heights Park Cemetery

Purpose:

- provide a buffer and screening between industrial activities and the neighbouring Special Purpose - Cemetery Zone, to mitigate adverse visual and nuisance effects;
- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IXXX.6.1.4.1

Table IXXX.6.1.4.1 Yards

<u>Yard</u>	<u>Minimum depth</u>
<u>Rear</u>	<u>5m where the rear boundary adjoins the Special Purpose – Cemetery Zone</u>
<u>Side</u>	<u>5m where the side boundary adjoins the Special Purpose – Cemetery Zone</u>

Note

(1) A side or rear yard, and/or landscaping within that yard, is required along that part of the side or rear boundary adjoining the Special Purpose – Cemetery Zone.

(2) Side and rear yards must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard to provide a densely planted visual buffer for a depth of at least 3m and must be appropriately maintained thereafter.

IXXX.6.1.5. Storage and screening to Heights Park Cemetery

Purpose:

- require rubbish and/or storage areas to be screened from the neighbouring Special Purpose – Cemetery Zone

(1) Any outdoor storage or rubbish collection areas that directly face and are visible from the Special Purpose – Cemetery Zone adjoining a boundary with an industrial zone, must be screened from those areas by landscaping, a solid wall or fence at least 1.8m high.

IXXX.7. Assessment – restricted discretionary activities

IXXX.7.1. Matters of discretion

The Council will restrict its discretion to all the following matters when assessing a restricted discretionary activity resource consent application for activities listed in Table IXXX.4.1 Activity Table, in addition to the matters specified for the relevant restricted discretionary activities in the overlay, Auckland wide or zone provisions:

(1) Non-compliance with the standards in IXXX.6

- (a) Consistency with the Heights Road Precinct Plans in IXXX.10
- (b) Safe and efficient operation of the current and future transport network.
- (c) Consistency with the objectives and policies of the Precinct.

IXXX.7.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

(1) Subdivision and development:

- (a) The extent to which the intersection of Paerata Road and Heights Road is designed and constructed to provide a dual-lane roundabout or traffic signals with sufficient capacity; or the Pukekohe North West Upgrade is fully operational.
- (b) The extent to which road safety improvement works are implemented along Heights Road at the locations shown in Precinct Plan 2 to achieve a minimum 10% typical crash reduction.
- (c) The extent to which safe site access is provided that:
 - (i) has sight distances meeting or exceeding the Austroads Safe Intersection Sight Distance standard for the measured operating (85th percentile) speed on Heights Road.
 - (ii) has widening of the Heights Road carriageway and provision of a right turn bay or flush median meeting Auckland Transport standards.
 - (iii) has widening of the Heights Road carriageway and provision of an auxiliary left turn lane at the eastern-most access to any site in the Precinct in accordance with Auckland Transport standards.
 - (iv) avoids direct vehicle access from Paerata Road.

IXXX.8. Special information requirements

IXXX.8.1. Water and Wastewater Servicing Plan

- (1) Within the application for the first stage of subdivision or development of any site existing at [date of plan change approval] within the Precinct the applicant must provide a Water and Wastewater Servicing Plan for the Precinct Area. The Water and Wastewater Servicing Plan must:
 - (a) Identify the location, size and capacity of the proposed water supply and wastewater network within the Precinct.
 - (b) Identify the timing, location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.
 - (c) Where interim water or wastewater servicing is proposed prior to the bulk water and wastewater network being available, details of:
 - i. The interim measures proposed including timing, location and capacity.
 - ii. In the case of wastewater, demonstrate how the system will operate so that no more than XXX is discharged to the existing public network, including monitoring and reporting.
 - iii. How the interim measures will be decommissioned once the bulk water and wastewater system is available.
 - iv. How the Precinct area will be connected to the bulk water and wastewater system following decommissioning of the interim solutions, including any consultation and agreements with Watercare.

IXXX.8.2. Water Supply and Wastewater Infrastructure Capacity Assessment

- (1) All applications for subdivision or development must be accompanied by a Water Supply and Wastewater Infrastructure Capacity Assessment. The applicant is required to produce a water supply and wastewater infrastructure capacity assessment for the precinct to demonstrate there is sufficient capacity in the wider water and wastewater reticulated network, to service the proposed development or lots.

IXXX.8.3. Traffic Design Report

- (1) A Traffic Design Report must be provided:
- (a) At the first stage of subdivision or development of any site existing at (date of plan change approval); and
 - (b) For any subdivision or development which involves a new or modified site access.
- (2) The Traffic Design Report must:
- (a) provide measured 85th percentile vehicle operating speeds along Heights Road in each direction near the site access.
 - (b) provide measured available sight distances at the site access in accordance with Austroads Guidelines for Safe Intersection Sight Distance.
 - (c) provide a design for an auxillary right turn lane or flush median to Auckland Transport standards (unless already present).
 - (d) provide a design for an auxillary left turn lane to Auckland Transport standards at the eastern-most site access (unless already present).

IXXX.9. Appendices

IXXX.9.1. Appendix 1 - Minimum Road Width, Function and Required Design Elements for Heights Road

<u>Minimum road reserve</u>	<u>20m (Note 1)</u>
<u>Minimum sealed carriageway width</u>	<u>7m (Notes 2 and 3)</u>
<u>Number of through lanes</u>	<u>2</u>
<u>Design Speed</u>	<u>60 km/h</u>
<u>Median</u>	<u>No (Note 3)</u>
<u>Cycle Provision</u>	<u>No</u>
<u>Pedestrian Provision</u>	<u>1.8m wide footpath on southern side</u>
<u>Bus Provision</u>	<u>No</u>
<u>Street Lighting</u>	<u>Yes</u>

Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment,

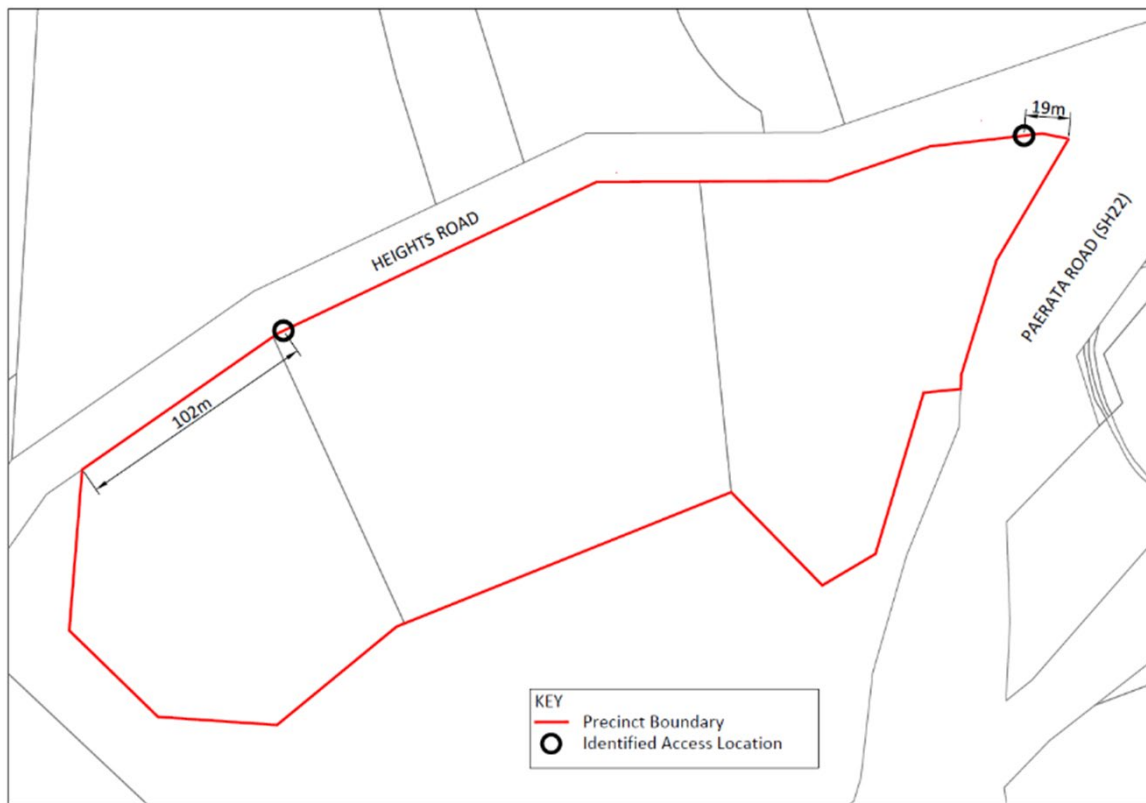
access design, intersection design, significant constraints or other localised design requirements.

Note 2: Typical minimum width which may need to be varied in specific locations where required to accommodate vehicle tracking on bends, intersection design, significant constraints or other localised design requirements.

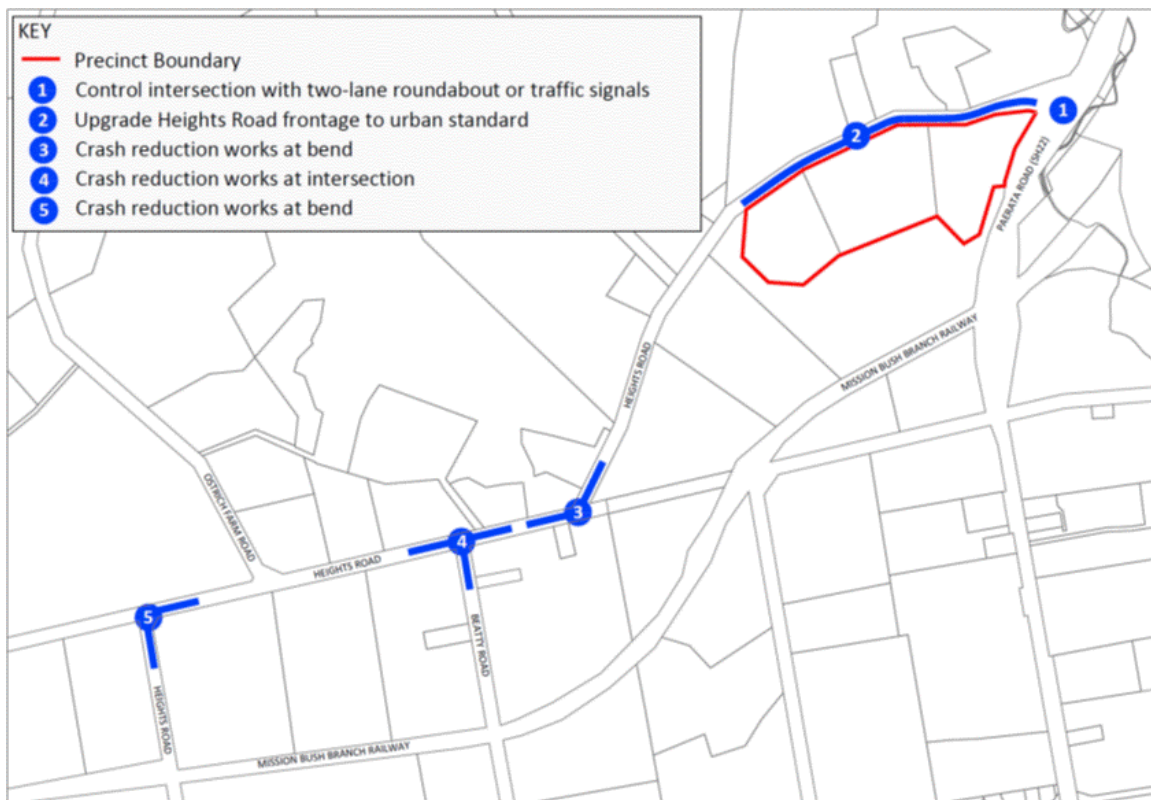
Note 3: Whilst not a general part of the road cross section, flush medians or right turn bays are required at access points

IXXX.10. Precinct plans

IXXX.10.1. Heights Road Precinct Plan 1



IXXX.10.2. Heights Road Precinct Plan 2



Heights Road Precinct

IXXX.11. Precinct Description

The Heights Road Precinct applies to 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe, on the northern edge of Pukekohe. The zoning of land within the Heights Road Precinct is Business – Light Industry zone. To the north, the land is bordered by Heights Road, which forms the Rural Urban Boundary (RUB). Land zoned Rural - General Rural is on the northern side of Heights Road. To the east, the land is bordered by the Paerata Road section of State Highway 22. The council's Heights Park Cemetery borders the land to its west and south. The cemetery is zoned Special Purpose - Cemetery Zone.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct.

The primary purpose of the Heights Road Precinct is to enable ongoing operation, intensification and expansion of light industrial activity. Light industrial land use and subdivision activities are largely enabled through the underlying zoning, however the delivery of these within the Heights Road Precinct needs to be closely aligned with the delivery of water supply, wastewater, transport upgrades, and other infrastructure to support the development of the precinct.

There are known water supply and wastewater constraints in the bulk infrastructure network serving the Heights Road Precinct. There are planned upgrades to the bulk network to address these constraints. At the time a land use or subdivision consent application is made, an applicant must demonstrate that there is sufficient capacity in the bulk network to cater for the development.

Subdivision and development is restricted until the Precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.

The transport network in the wider area will be progressively upgraded over time to support planned urban growth in this part of Pukekohe. The Heights Road Precinct includes provisions to ensure that subdivision and development of land for housing and related activities is coordinated with the construction of transport infrastructure upgrades necessary to mitigate adverse effects on the local and wider transport network.

Transport infrastructure is required to be integrated and coordinated with subdivision and development and provide safe and efficient connections to the wider transport network and upgrades to the transport network.

Buffer controls are proposed to protect the amenity of the Heights Park Cemetery.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

IXXX.12. Objectives [rp/dp]

- (3) Subdivision and development are coordinated with the supply of sufficient transport, water supply, stormwater, wastewater, energy and communications infrastructure.

- (4) Subdivision and development does not occur in advance of the availability and capacity of bulk water supply and bulk wastewater infrastructure, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.
- (3) Provide a well-connected and safe transport network that supports a range of travel modes.
- (4) Transport infrastructure is integrated and coordinated with subdivision and development and provides safe and efficient connections to the wider transport network and upgrades to the transport network.
- (5) Adverse effects on amenity values and the natural environment of the adjacent Heights Park Cemetery zoned Special Purpose – Cemetery are managed.

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

IXXX.13. Policies [rp/dp]

Subdivision and development

- (5) Require that the design of any subdivision and development within the precinct is undertaken in general accordance with the Heights Road precinct plan.

Infrastructure

- (6) Ensure that subdivision and development in the precinct is coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.
- (7) Avoid subdivision and development that is in advance of the provision of functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development within the Precinct area, except where an interim solution and associated decommissioning for water and/or wastewater self-servicing is proposed.

Transport and Infrastructure

- (8) Require subdivision and development to provide for a transport network that:
 - (a) Integrates with, and avoids, remedies or mitigates adverse effects on the safety and efficiency of the transport network of the surrounding area by:
 - (i) Implementing dual-lane roundabout or traffic signal control of the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.
 - (ii) Providing Austroads Safe Intersection Sight Distance for the measured operating speed on Heights Road at any site access point.
 - (iii) Providing a right turn bay or flush median on Heights Road at any site access point.
 - (iv) Providing an auxiliary left turn lane on Heights Road at the eastern-most access point.

- (v) Implementing road safety improvement works on Heights Road at the bend east of Beatty Road, the intersection with Beatty Road, and the bend north of the railway level crossing.
 - (vi) Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.
 - (vii) Avoiding vehicle access directly off Paerata Road.
- (b) Is designed and constructed in a manner that is appropriate having regard to the requirements of Auckland Transport's relevant code of practice or engineering standards.

Amenity

- (9) Require development adjacent to the Special Purpose – Cemetery Zone to manage adverse amenity effects on that zone.

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

IXXX.14. Activity table [rp/dp]

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IXXX.4.1 below.

Activity Table IXXX.4.1 specifies the activity status of land use and subdivision activities in the Heights Road Precinct pursuant to sections 9(2), 9(3), and 11 of the Resource Management Act 1991.

A blank in the activity status column means that the activity status in the relevant overlay, Auckland-wide or zone provision applies.

Table IXXX.4.1 Activity table

Activity		Activity status
Use and Development		
(A1)	Activities listed as permitted, restricted discretionary, discretionary, or non-complying activities in Table H14.4.1 in the Business – Light Industrial Zone	
(A2)	Use and development that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure	NC
(A3)	Use and development that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure	NC
(A4) [rp/dp]	Any activity not complying with Standard IXXX.6.1.2 Transport	RD

(A5)	Any vehicle access to Heights Road in a location shown on IXXX.10.1 Precinct Plan 1	RD
(A6)	Any vehicle access to Heights Road in a location other than shown on IXXX.10.1 Precinct Plan 1	D
(A7)	Any vehicle access to Paerata Road	NC
Subdivision		
(A8)	Subdivision that does not comply with Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure	NC
(A9)	Subdivision not complying with the standards under IXXX.6.1.2 Transport	RD

IXXX.15. Notification

(10) Any application for resource consent for an activity listed in Activity Table IXXX.4.1 above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(11) In addition and notwithstanding the requirements of IXXX.5.(1), any application for resource consent that infringes the following standard shall be notified to Watercare:

(b) Standard IXXX.6.1.1 Bulk Water Supply and Wastewater Infrastructure

IXXX.16. Standards

(12) All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IXXX.4.1

(13) All activities listed in Activity Table IXXX.4.1 must also comply with Standards IXXX.6.1.1 – IXXX.6.1.5 and with IXXX.8. Special Information Requirements.

Where there is any conflict or difference between standards in this Precinct and the Auckland-wide and zone standards, the standards in this Precinct will apply.

IXXX.16.1. Precinct Plan and infrastructure Requirements

All development and subdivision must comply with the following standards:

IXXX.16.1.1. Bulk Water Supply and Wastewater Infrastructure Requirements

Purpose:

- To ensure subdivision and development within the Precinct is adequately serviced with bulk water supply and wastewater infrastructure.
- (2) Bulk water supply and wastewater infrastructure with sufficient capacity for servicing the proposed development must be completed, commissioned and functioning:

- (a) in the case of subdivision, prior to issuing of a certificate pursuant to 224(c) of the Resource Management Act 1991;
- (b) in the case of land use only, prior to construction of any buildings for activities that would require water and/or wastewater servicing.

6.1.2 Transport

6.1.2.1 Transport Infrastructure Requirements

Purpose:

- Mitigate the adverse effects of traffic generation on the surrounding local and wider transport network.
- Achieve the integration of land use and transport.

(2) Subdivision and development must comply with the standards in Table IXXX.6.1.2.1.1

Table IXXX.6.1.2.1.1 Transport Infrastructure Requirements

Transport Infrastructure Upgrade		Trigger
(T1)	Implementing dual-lane roundabout or traffic signal control of the the Paerata Road and Heights Road intersection if the Pukekohe North West Upgrade is not fully operational.	Any subdivision or development
(T2)	Implementing road safety improvement works on Heights Road in the locations shown on Precinct Plan 2 using measures that typically achieve a minimum 10% reduction in crashes.	
(T3)	Delivering an urban standard of frontage to Heights Road along the site frontage including at a minimum, footpaths and cycling connectivity.	

6.1.2.2 Upgrade of Heights Road

Purpose:

- ensure that the upgrade of Heights Road to an urban standard complies with IXXX.9.1.Appendix 1: Minimum Road Width, Function and Required Design Elements.
- (2) Any development and/or subdivision must comply with Heights Road Precinct IXXX.9.1.Appendix 1 Minimum Road Width, Function and Required Design Elements as applicable.

6.1.2.3 Vehicle Access to Heights Road

Purpose:

- ensure the safe operation of the local transport network.

(1) Any vehicle access along Heights Road must:

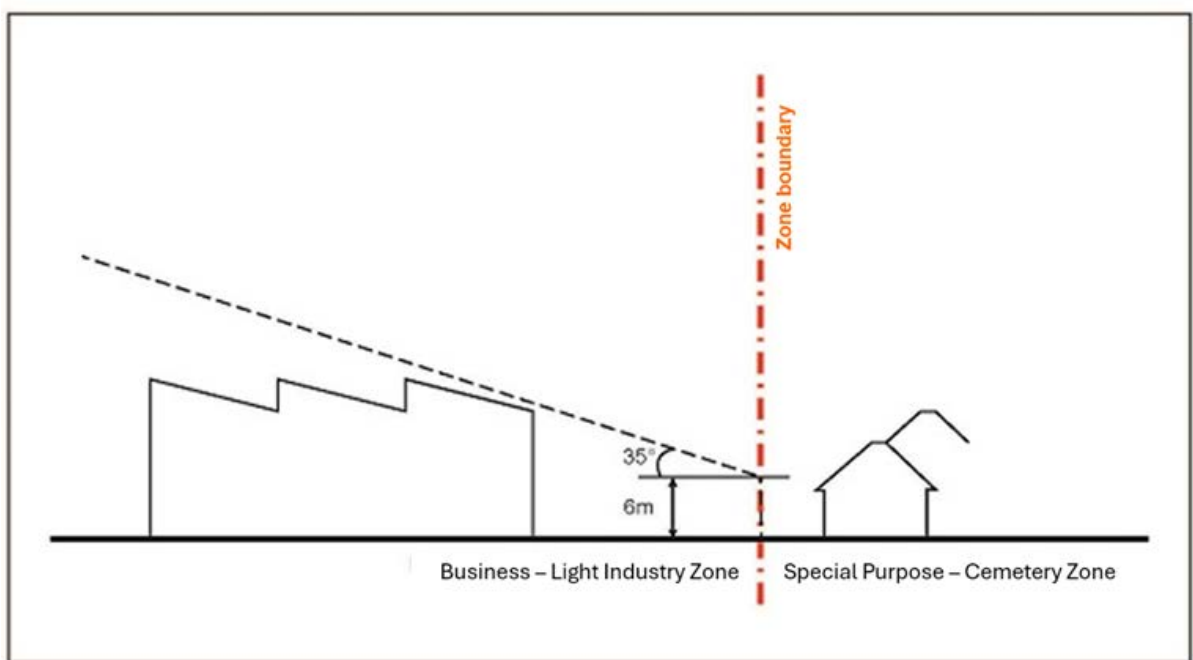
- (c) Provide Austroads Safe Intersection Sight Distance for the measured 85th percentile speed on Heights Road.
- (d) Provide a right turn bay or flush median on Heights Road to Auckland Transport standards.
- (2) The eastern-most access along Heights Road must also provide an auxiliary left turn lane on Heights Road to Auckland Transport standards.

6.1.3 Height in Relation to Boundary to Heights Park Cemetery

Purpose:

- manage the effects of building height;
- allow reasonable sunlight and daylight access to Heights Park Cemetery; and
- manage visual dominance effects on Heights Park Cemetery
- (2) Buildings must not project beyond a 35 degree recession plane measured from a point 6m vertically above ground level along the boundary of the Special Purpose – Cemetery Zone:

Figure IXXX.6.1.3.1 Height in relation to boundary



IXXX.6.1.4 Yards to Heights Park Cemetery

Purpose:

- provide a buffer and screening between industrial activities and the neighbouring Special Purpose - Cemetery Zone, to mitigate adverse visual and nuisance effects;
- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IXXX.6.1.4.1

Table IXXX.6.1.4.1 Yards

Yard	Minimum depth
Rear	5m where the rear boundary adjoins the Special Purpose – Cemetery Zone
Side	5m where the side boundary adjoins the Special Purpose – Cemetery Zone

Note

(1) A side or rear yard, and/or landscaping within that yard, is required along that part of the side or rear boundary adjoining the Special Purpose – Cemetery Zone.

(2) Side and rear yards must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard to provide a densely planted visual buffer for a depth of at least 3m and must be appropriately maintained thereafter.

IXXX.6.1.5. Storage and screening to Heights Park Cemetery

Purpose:

- require rubbish and/or storage areas to be screened from the neighbouring Special Purpose – Cemetery Zone

(1) Any outdoor storage or rubbish collection areas that directly face and are visible from the Special Purpose – Cemetery Zone adjoining a boundary with an industrial zone, must be screened from those areas by landscaping, a solid wall or fence at least 1.8m high.

IXXX.17. Assessment – restricted discretionary activities**IXXX.17.1. Matters of discretion**

The Council will restrict its discretion to all the following matters when assessing a restricted discretionary activity resource consent application for activities listed in Table IXXX.4.1 Activity Table, in addition to the matters specified for the relevant restricted discretionary activities in the overlay, Auckland wide or zone provisions:

- (1) Non-compliance with the standards in IXXX.6
 - (a) Consistency with the Heights Road Precinct Plans in IXXX.10
 - (b) Safe and efficient operation of the current and future transport network.
 - (c) Consistency with the objectives and policies of the Precinct.

IXXX.17.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

(1) Subdivision and development:

- (a) The extent to which the intersection of Paerata Road and Heights Road is designed and constructed to provide a dual-lane roundabout or traffic signals with sufficient capacity; or the Pukekohe North West Upgrade is fully operational.
- (b) The extent to which road safety improvement works are implemented along Heights Road at the locations shown in Precinct Plan 2 to achieve a minimum 10% typical crash reduction.
- (c) The extent to which safe site access is provided that:
 - (i) has sight distances meeting or exceeding the Austroads Safe Intersection Sight Distance standard for the measured operating (85th percentile) speed on Heights Road.
 - (ii) has widening of the Heights Road carriageway and provision of a right turn bay or flush median meeting Auckland Transport standards.
 - (iii) has widening of the Heights Road carriageway and provision of an auxiliary left turn lane at the eastern-most access to any site in the Precinct in accordance with Auckland Transport standards.
 - (iv) avoids direct vehicle access from Paerata Road.

IXXX.18. Special information requirements

IXXX.18.1. Water and Wastewater Servicing Plan

- (2) Within the application for the first stage of subdivision or development of any site existing at [date of plan change approval] within the Precinct the applicant must provide a Water and Wastewater Servicing Plan for the Precinct Area. The Water and Wastewater Servicing Plan must:
 - (d) Identify the location, size and capacity of the proposed water supply and wastewater network within the Precinct.
 - (e) Identify the timing, location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.
 - (f) Where interim water or wastewater servicing is proposed prior to the bulk water and wastewater network being available, details of:
 - v. The interim measures proposed including timing, location and capacity.
 - vi. In the case of wastewater, demonstrate how the system will operate so that no more than **XXX** is discharged to the existing public network, including monitoring and reporting.
 - vii. How the interim measures will be decommissioned once the bulk water and wastewater system is available.
 - viii. How the Precinct area will be connected to the bulk water and wastewater system following decommissioning of the interim solutions, including any consultation and agreements with Watercare.

IXXX.18.2. Water Supply and Wastewater Infrastructure Capacity Assessment

- (2) All applications for subdivision or development must be accompanied by a Water Supply and Wastewater Infrastructure Capacity Assessment. The applicant is required to produce a water supply and wastewater infrastructure capacity assessment for the precinct to demonstrate there is sufficient capacity in the wider water and wastewater reticulated network, to service the proposed development or lots.

IXXX.18.3. Traffic Design Report

- (1) A Traffic Design Report must be provided:
- (a) At the first stage of subdivision or development of any site existing at (date of plan change approval); and
 - (b) For any subdivision or development which involves a new or modified site access.
- (2) The Traffic Design Report must:
- (a) provide measured 85th percentile vehicle operating speeds along Heights Road in each direction near the site access.
 - (b) provide measured available sight distances at the site access in accordance with Austroads Guidelines for Safe Intersection Sight Distance.
 - (c) provide a design for an auxillary right turn lane or flush median to Auckland Transport standards (unless already present).
 - (d) provide a design for an auxillary left turn lane to Auckland Transport standards at the eastern-most site access (unless already present).

IXXX.19. Appendices

IXXX.19.1. Appendix 1 - Minimum Road Width, Function and Required Design Elements for Heights Road

Minimum road reserve	20m (Note 1)
Minimum sealed carriageway width	7m (Notes 2 and 3)
Number of through lanes	2
Design Speed	60 km/h
Median	No (Note 3)
Cycle Provision	No
Pedestrian Provision	1.8m wide footpath on southern side
Bus Provision	No
Street Lighting	Yes

Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment,

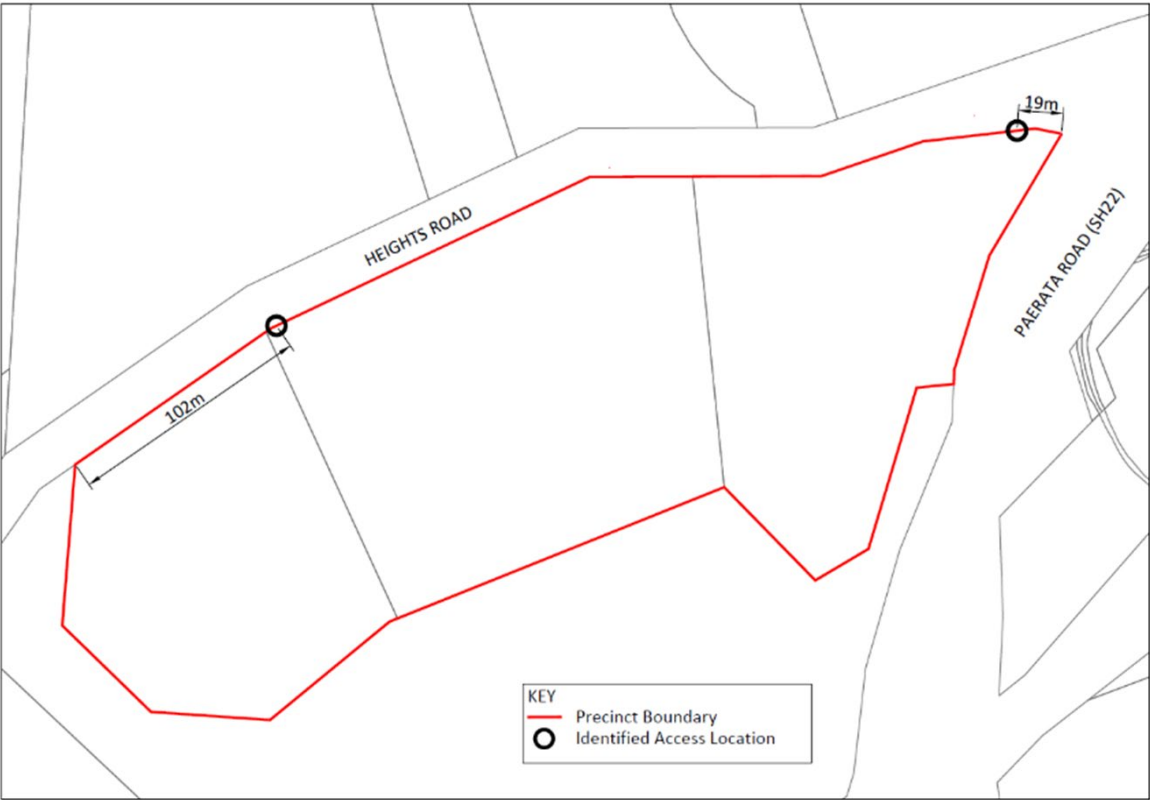
access design, intersection design, significant constraints or other localised design requirements.

Note 2: Typical minimum width which may need to be varied in specific locations where required to accommodate vehicle tracking on bends, intersection design, significant constraints or other localised design requirements.

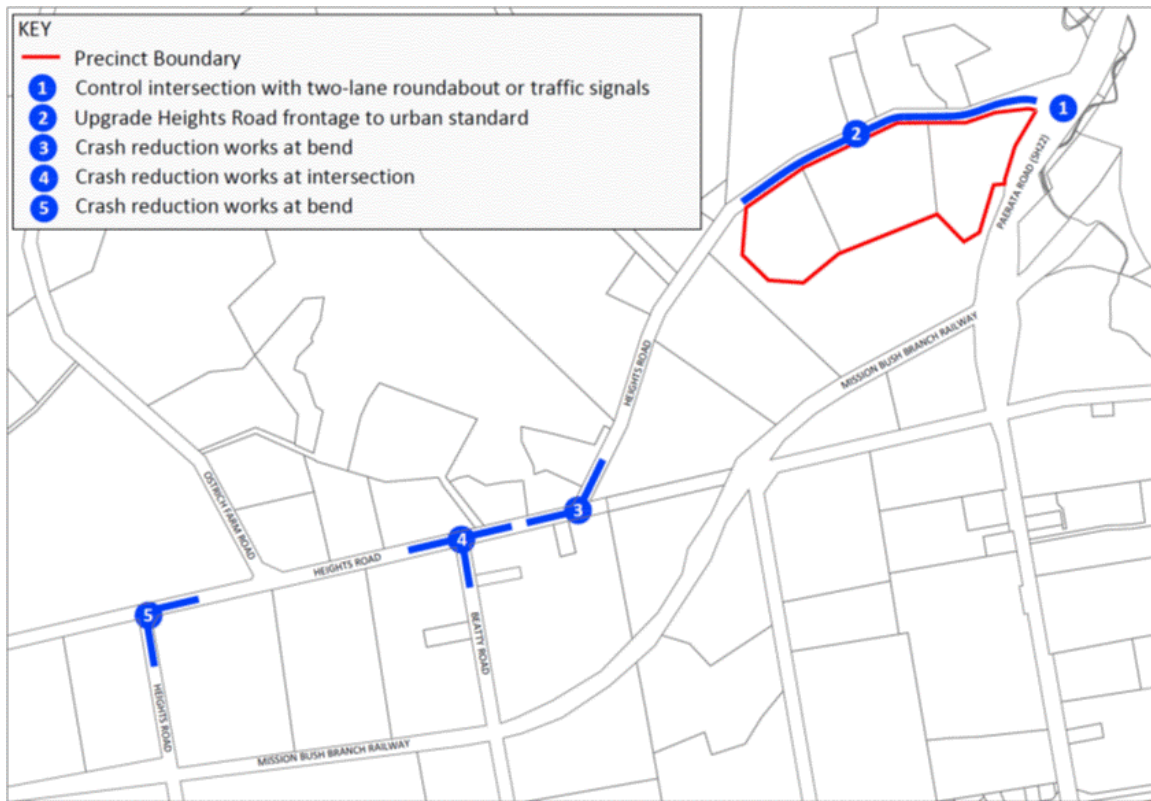
Note 3: Whilst not a general part of the road cross section, flush medians or right turn bays are required at access points

IXXX.20. Precinct plans

IXXX.20.1. Heights Road Precinct Plan 1



IXXX.20.2. Heights Road Precinct Plan 2



ATTACHMENT 9

SECTION 32AA ANALYSIS FOR PC110 HEIGHTS ROAD PRECINCT PROVISIONS

Attachment 9 – Section 32AA Analysis for PC110 Heights Road Precinct Provisions

Overview

Section 32AA of the RMA requires further evaluation of changes made to PC110 to support the changes recommended to commissioners through the s42A report. This further evaluation corresponds to the scale and significance of the changes.

The key substantive change proposed is the imposition of precinct provisions for a new Heights Road Precinct as set out in the amendments in Attachment 8 to the s42A report.

The provisions in the precinct relate to three topics:

1/Bulk Water Supply and Wastewater Infrastructure

2/Transport

3/ Amenity controls adjacent to Heights Park Cemetery

	Option 1 – PC110 as notified (with no precinct provisions)	Option 2 – New Heights Road Precinct relating to PC110 land at 9, 33 and 49 Heights Road
Topic 1		Bulk Water Supply and Wastewater Infrastructure
Description 1		Subdivision and development is restricted until the Precinct is able to connect to functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service subdivision and development, except where an interim solution and associated decommissioning for water and/or wastewater servicing is proposed.
Efficiency and effectiveness	PC110 as notified is efficient and effective in relation to the unmodified AUP. However some effects relating to water and wastewater infrastructure are not effectively addressed.	
Costs	Unanticipated public expenditure on	Requirement for plan change land to connect to bulk water and wastewater

	required infrastructure servicing or upgrades which may be recommended to enable PC110 to proceed could create adverse economic effects.	supply even if on site solutions have been approved.
Benefits	Bulk water supply connection is available now. A new pump station at Isabella Drive will be completed by 2028, which will be available to service the plan change land.	Site-specific provisions in the form of precinct provisions are required to address the costs and timing of future infrastructure servicing in order to avoid, remedy, or mitigate any potential adverse economic effects.
Extent to which this is the most appropriate way to achieve the purpose of the RMA	Less appropriate in achieving the purpose of the RMA	More appropriate in achieving the purpose of the RMA
Topic 2		Transport
Description 2		<p>Precinct provisions are proposed with:</p> <ul style="list-style-type: none"> - an appropriate set of ‘transport triggers’ to provide certainty that the transport infrastructure required to support development of the plan change area will be delivered. -a precinct plan showing the locations of transport infrastructure (such as the new collector road) to ensure consistency with long term planning documents, and -precinct provisions (objectives, policies, standards, assessment criteria, matters of discretion and special information requirements) which provide the necessary integration between land use and infrastructure.

Efficiency and effectiveness	PC110 as notified is efficient and effective in relation to the unmodified AUP. However some effects relating to transport infrastructure are not effectively addressed.	
Costs	<p>Unanticipated public expenditure on required infrastructure servicing or upgrades which may be recommended to enable PC110 to proceed could create adverse economic effects.</p> <p>Transport efficiency</p> <p>Transport Safety</p>	<p>Additional and more significant upgrading than requested by AT is required</p> <p>Funding for transport upgrades could be at developer's cost. No funding is currently confirmed for the Pukekohe North West Upgrade, and based on the FDS this project may not be implemented before 2040.</p>
Benefits	Existing AUP provisions are considered appropriate and the applicant intends to work with Auckland Transport to develop a private agreement and land use covenant requiring an urban frontage to be constructed.	<p>Transport efficiency</p> <p>Transport Safety</p> <p>Significant development could occur on the plan change land without resource consent if the plan change land is rezoned to Business – Light Industry Zone. The Council and AT may therefore have no ability to assess or control matters such as access location or sight distance if the plan change is approved as notified.</p> <p>Site-specific provisions in the form of precinct provisions are required to address the costs and timing of future infrastructure servicing in order to avoid, remedy, or mitigate any potential adverse economic effects</p>
Extent to which this is the most appropriate way to achieve the purpose of the RMA	Less appropriate in achieving the purpose of the RMA	More appropriate in achieving the purpose of the RMA

Topic 3		Amenity controls adjacent to Heights Park Cemetery
Description 3		Introduction of Standards that apply in the Business-Light Industry zone when it adjoins a more sensitive zone (including residential, open space, Special Purpose – Māori Purpose and Special Purpose School zones). These controls relate to height in relation to boundary and yard controls, including landscape requirements for side and rear yards.
Efficiency and effectiveness	PC110 as notified is efficient and effective in relation to the unmodified AUP. However some effects relating to interface controls relating to the Heights Road Cemetery are not effectively addressed.	
Costs	Potential adverse visual effects on Heights Park Cemetery	Economic and social costs - reduction in the extent of land available for light industrial development
Benefits	Any future buildings that establish on or near the boundary with Heights Park Cemetery are likely to face away from the cemetery	Social benefits - Reduction of adverse visual effects to a low-moderate level for those using the neighbouring Heights Park Cemetery, i
Extent to which this is the most appropriate way to achieve the purpose of the RMA	Less appropriate in achieving the purpose of the RMA	More appropriate in achieving the purpose of the RMA

Overall I conclude that Option 2 (the imposition of a new Heights Road precinct relating to the plan change land at 9, 33 and 49 Heights Road Pukekohe) is the most efficient and effective way to manage the effects of PC110 and the amount of social and economic wellbeing that can be derived from it.