

PUKEKOHE LIMITED

PROPOSED PRIVATE PLAN CHANGE FROM FUTURE URBAN ZONE
TO BUSINESS – GENERAL BUSINESS ZONE

301 and 303 Buckland Road, Pukekohe

Assessment of Environmental Effects



Project No. 4314.00

Date January 2022



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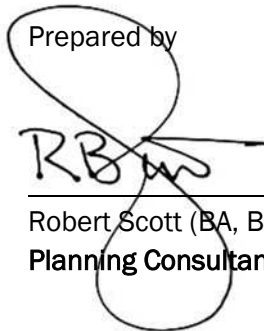
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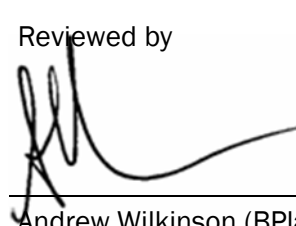


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LIMITATIONS

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This report is for use by Pukekohe Limited and Auckland Council and should not be used or relied upon by any other person or for any other project.

1 INTRODUCTION

This is a request for a private plan change (PPC) to the Auckland Unitary Plan – Operative in Part (Unitary Plan) under Part 2 of the First Schedule to the Resource Management Act 1991 (RMA). The PPC seeks to rezone two parcels of land at 301 and 303 Buckland Road, Pukekohe from Future Urban Zone (FUZ) to Business – General Business Zone (BGBZ). No other changes to the provisions of the Unitary Plan are proposed. For the purposes of this report the land subject to the PPC is referred to as the Plan Change Area (PCA).

1.1 THE REQUESTER

The properties subject to this plan change request are owned by two separate entities (301 Buckland Road – Peterex Properties Limited and 303 Buckland Road – Pukekohe Limited). However, for administrative simplicity, a single entity (Pukekohe Limited) is the requester for this plan change. Some of the expert reports supporting this request refer to Peterex Properties and Pukekohe Limited but should be viewed as being for the single entity requesting the plan change.

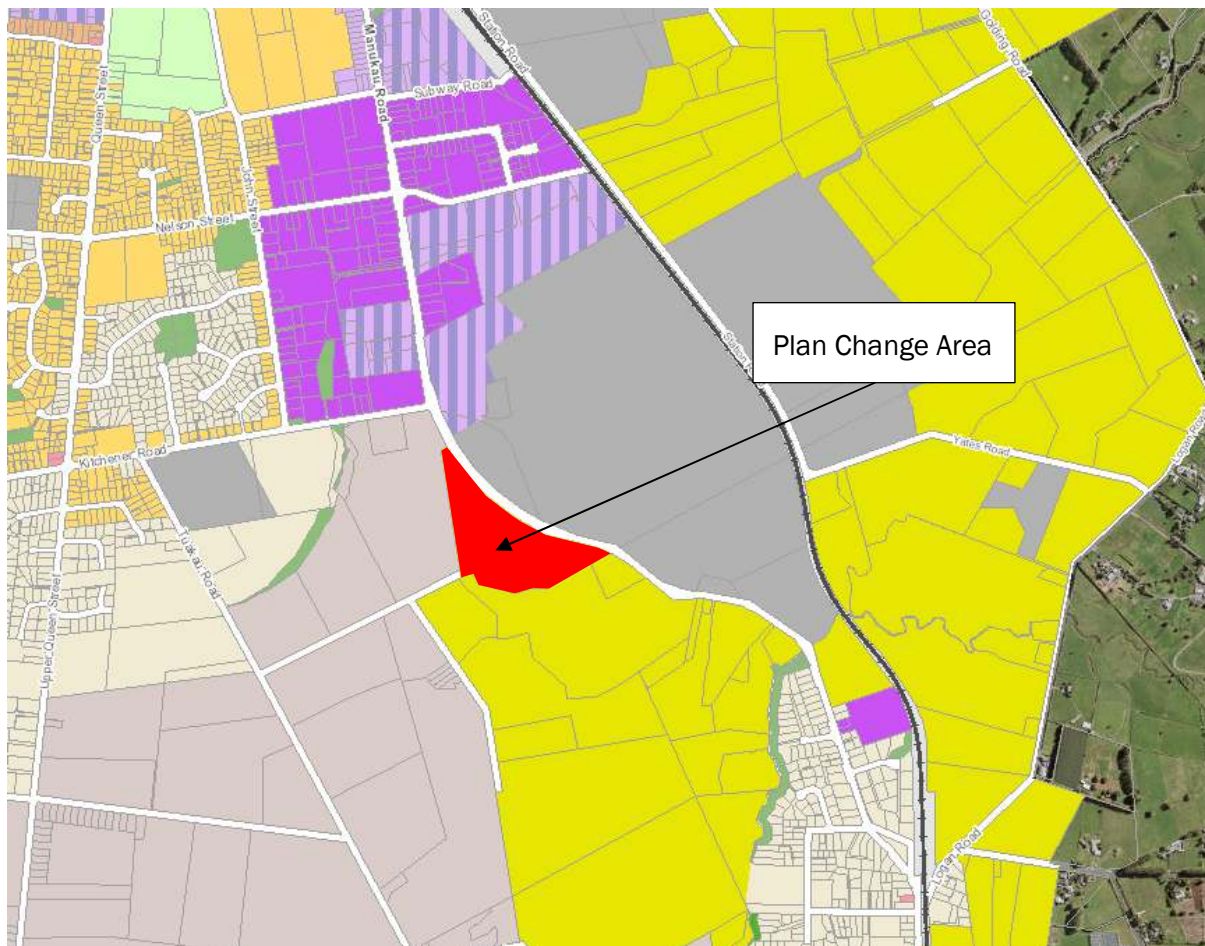


Figure 2 - Land subject to the Private Plan Change Request (Source: Auckland Council Geo Maps)

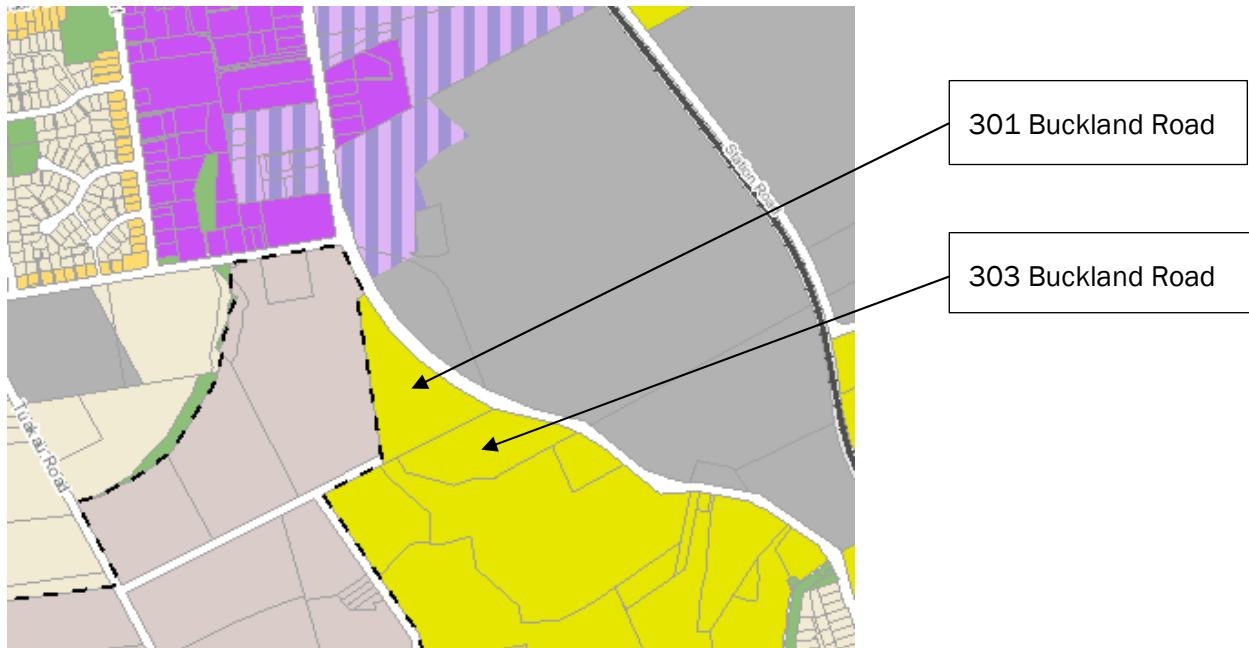


Figure 3 - 301 and 303 Buckland Road (Source: Auckland Council Geo Maps)

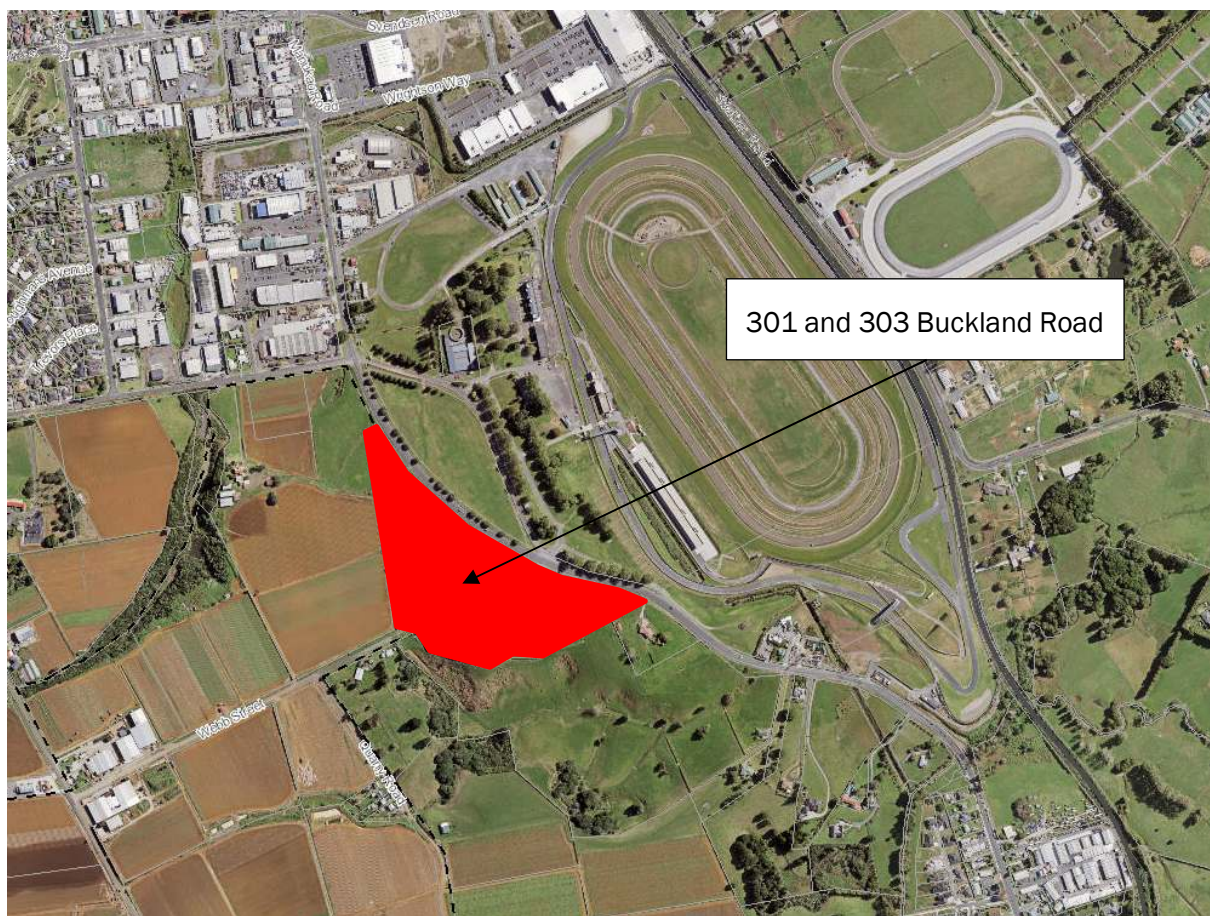


Figure 4 - Locality Plan - Aerial (Source: Auckland Council Geo Maps)

2 PLAN CHANGE LOCALITY

| | |
|-------------------|---|
| Site Address | 301 and 303 Buckland Road, Pukekohe |
| Name of Requester | Pukekohe Limited |
| Legal Description | 301 Buckland Road - Pt Lot 1 DP 3363 303 Buckland Road - Lot 1 DP 64805 refer (Attachment 1) |
| Site Area | 301 Buckland Road – 4.3602 ha 303 Buckland Road - 3.5038 ha |

PLANNING INSTRUMENTS

Auckland Unitary Plan- Operative in Part:

| | |
|----------------|---|
| Zoning | Future Urban Zone (FUZ) |
| Precinct | NA |
| Overlays | <u>Natural Heritage</u> NA <u>Natural Resources</u> Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Kaawa Aquifer Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Central Volcanic Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay [rp] - Franklin Volcanic Aquifer <u>Height Sensitive Areas</u> NA |
| Controls | Controls: Macroinvertebrate Community Index - Rural |
| Designations | NA |
| Other features | NA |

3 EXISTING ENVIRONMENT

3.1 LOCATION

The PPC comprises two parcels of land:

301 Buckland Road

The site is triangular shaped and located on Buckland Road approximately 120m south of Kitchener Road on the southern outskirts of Pukekohe. It is comprised almost completely of grazed pasture with only a few exotic trees scattered near the rear boundary of the site. The site contains a single level timber farmhouse near the southern boundary and farm sheds near the southern end of the western boundary. Otherwise the site is devoid of structures.

The topography of the site slopes steadily up from Buckland Road to the west from RL 61m at the northern corner, to RL 85.5m at the southern western corner.

The site has frontage to Buckland Road which has an Arterial Road classification under the Unitary Plan. The frontage is some 372m long. An existing vehicle crossing to Buckland Road serving the dwelling on site is located at the southern boundary. At the south western edge of the site is the eastern extent of Webb Street, which is a local rural road running from Tuakau Road.

303 Buckland Road

This site adjoins 301 Buckland Road to the south and has an irregular polygonal shape. It has no stream, wetland or other fresh water features and is primarily in grass pasture. Limited hedging exists along internal and external fence lines. Otherwise the site is devoid of vegetation.

The site contains a single dwelling with nearby garaging and a swimming pool. A formed driveway located at the northern corner of the site provides access to the dwelling.

The site slopes steadily up from Buckland Road in an east to west direction ranging from RL 65m at the south eastern Buckland Road frontage to RL 85m at the western boundary.

Adjoining to the west is productive rural land used primarily for horticulture with some highly modified wetland and stream area adjoining near the south western boundary.

Locality

Adjoining to the south of both properties are several rural land holdings formed in pasture and with single dwellings. These sites are zoned Future Urban Zone (**FUZ**). Adjoining to west is rural land used for commercial horticulture and there are two large horticultural processing facilities associated with these activities on the intersection of Webb Street and Tuakau Road.

Opposite the site is Pukekohe Park which is a multi-purpose recreation facility incorporating the Pukekohe Racing Club (horse racing), the Pukekohe Raceway (motor racing) and a conference and function centre.

To the north of Kitchener Road is the urban extent of the Pukekohe township with Manukau Road being dominated by a range of industrial, warehousing and distribution activities. Land to the north east of Pukekohe Park has recently been rezoned BGBZ while the remainder of the Park has a Special Purpose – Major Recreation Facility zoning.

Further to the north along Manukau Road is land zoned predominantly Business – Light Industry Zone (**BLIZ**) with some land also zoned BGBZ. This constitutes the largest area of business zoned land in Pukekohe with a smaller area of BLIZ land located east of Paerata Road to the north.

There is no residential zoned land in the immediate locality with the nearest land located to the west some 500m away containing a mix of Residential – Single House Zone and Residential – Mixed Housing Suburban Zone land fully developed.

On the corner of Tuakau Road and Kitchener Road (some 530m from the western boundary of 301 Buckland Road) is Pukekohe Hospital.

Pukekohe

Pukekohe is an established community located approximately 50 kilometres south of Auckland's city centre. It is located on the rail line and is connected to State Highway 1 and the rest of Auckland via State Highway 22.

The wider catchment includes Paerata, located on State Highway 22, and immediately to the north of Pukekohe. The nearby towns of Tūākau and Pokeno, located in the Waikato District, are also well connected to Pukekohe.

Pukekohe serves a wide rural catchment, centred on rural production with some of New Zealand's most elite soils and prime agricultural land. Dairy farms and horticultural production activities have long been established on the surrounding fertile soils.

Pukekohe's economy is based on farming-related activities which is centred on its highly productive soils for a range of horticultural products. It also continues to attract those seeking a rural lifestyle.

3.2 SITE ECOLOGY AND VEGETATION

The site has very low ecological values. There is no indigenous vegetation on the site or stands of established trees. Both sites do not have any watercourses or wetlands and no associated habitat values of indigenous flora or fauna.

As set out in the description of each site, both properties are formed in pasture and have been used for productive livestock farming.

3.3 TOPOGRAPHY

The PCA slopes up from Buckland Road with the lowest point being at the northern edge of the PCA adjoining Buckland Road (RL 62m) rising to the highest point near the western most part of the PCA at RL 85m. The PCA has an even slope to the north east to the south west and offers elevated views across Pukekohe Park to the east as well as views north to Pukekohe township.

The site is also very legible and visible from a number of vantage points within the urban limits of Pukekohe along Manukau Road.

3.4 CULTURAL AND HERITAGE

There are no known cultural or heritage sites identified or associated with the PCA. The Pukekohe locality is recognised as being within the rohe of Ngati Tamaoho and Ngati Te Ata who are recognised mana whenua in this area.

Cultural Values Assessments (**CVA**) have been undertaken by both mana whenua groups and this is discussed in the cultural effects section of this report.

3.5 CONTAMINATION

Both properties that comprise the PCA have been subject to preliminary site investigations (**PSI**)

and it has been confirmed that the PCA has been used for pastoral farming (cattle, sheep and horses) and it is unlikely that any activity on the Hazardous Activities and Industries List (**HAIL**) has been undertaken.

3.6 INFRASTRUCTURE

The PCA is serviced by existing water supply infrastructure in the Buckland Road reserve and Watercare has indicated that it is upgrading its wastewater infrastructure and has established a new wastewater pump station at 1749 Buckland Road (to the south west). There is no reticulated stormwater services on the site or within the road reserve.

3.7 PREVIOUS CONSENTS

3.7.1 301 BUCKLAND ROAD

An integrated consent comprising: land use, subdivision, stormwater discharge and consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, was granted on the site on 9 September 2019.

The Council reference is BUN60333645 (LUC60325312, SUB60333646, and DIS60340705).

This consent was granted to Franklin Plumbing and was to be the headquarters for this large Pukekohe based firm. The consent involved a large warehouse and trade supply depot with associated earthworks and on site stormwater collection, treatment and discharge. The subdivision component provided for the extension of Webb Street through to Buckland Road.

A copy of this decision is annexed as **Attachment 3**, and the approved layout is shown in **Figure 5** below.

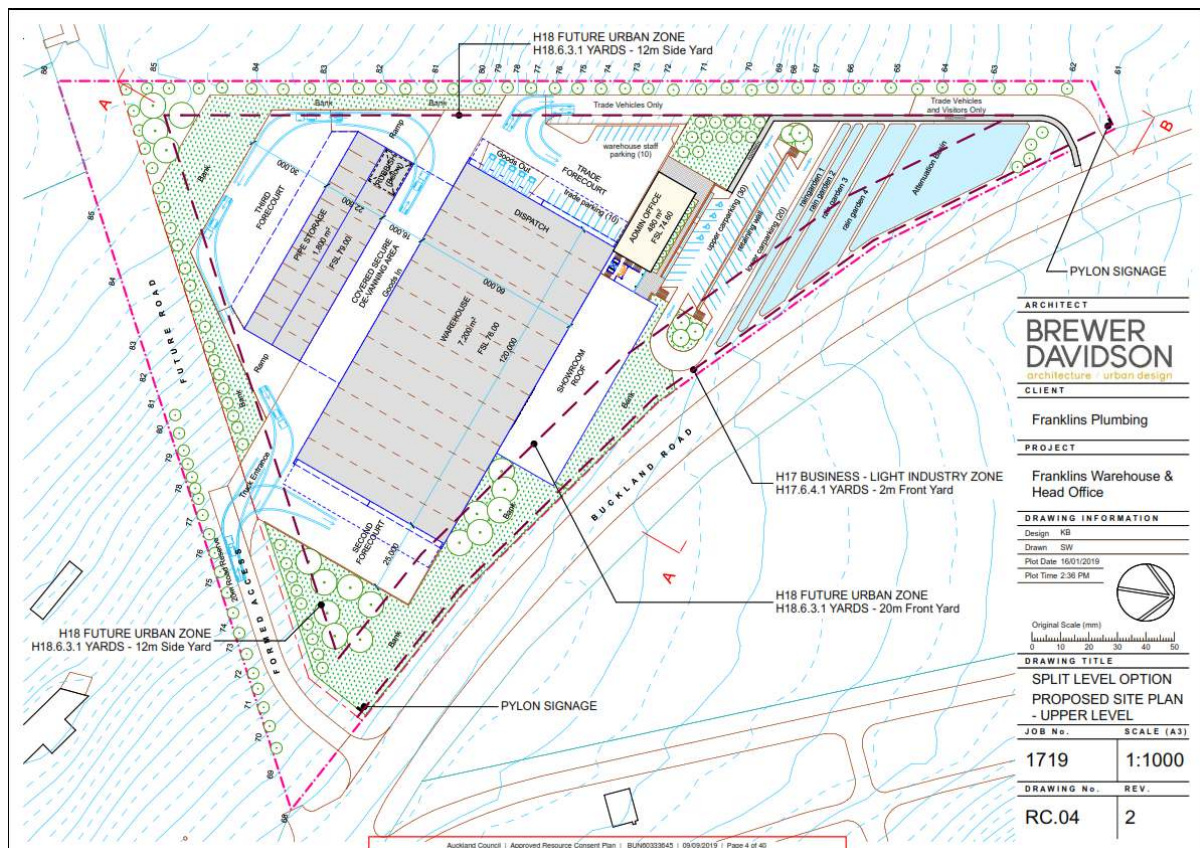


Figure 5: BUN60333645 (LUC60325312, SUB60333646, and DIS60340705) consent for 301 Buckland Road

3.7.2 303 BUCKLAND ROAD

A land use consent to authorise the use of up to 4,320m² of the land at 303 Buckland Road, Pukekohe (including construction and upgrade of access) as an industrial service storage yard for a period of 10 years was approved on 21 April 2021.

The Council reference is BUN60368560 (LUC60368561 (s9 land use consent)).

A copy of this decision is annexed as **Attachment 3**, with the layout shown in **Figure 6** below.

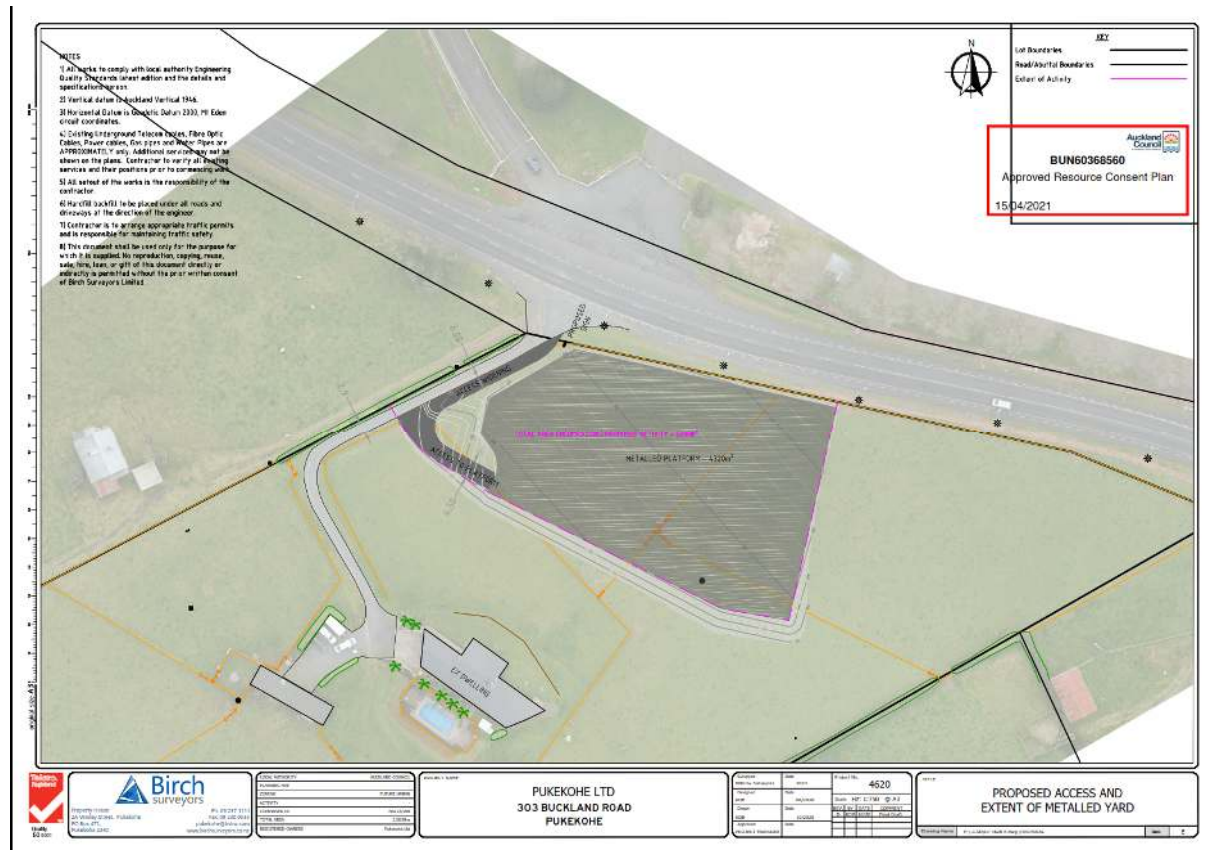


Figure 6: BUN60368560 (LUC60368561(s9 land use consent)) consent for 303 Buckland Road.

4 EMERGING AND PLANNED ENVIRONMENT

4.1 AUCKLAND PLAN 2020

The Auckland Plan 2050 (**Auckland Plan**) is a 30-year spatial plan for Auckland adopted in June 2018. It provides broad direction for Auckland's growth and development through the six outcomes and the Development Strategy contained within the Plan.

The Auckland Plan signals that Auckland's population could grow by another 720,000 people to reach 2.4 million people over the next 30 years. While it promotes this growth as an opportunity for Auckland as a catalyst for cultural and economic success it also acknowledges that growth puts pressure on its communities, environment, housing and infrastructure.

The Auckland Plan signals that around 32 per cent of growth will be accommodated in future urban areas. This means that approximately 99,000 dwellings and around 1400ha of business land is needed in future urban areas.

With regard to business activity, the Auckland Plan strategy envisages a multi-nodal model within

the urban footprint with the city centre continuing to be the focus of Auckland's business, tourism, educational, cultural and civic activities. Significant growth is also planned in Albany, Westgate and Manukau, including their catchments. In addition, the satellite towns of Warkworth and Pukekohe act as rural nodes. They are intended to service their surrounding rural communities while also being connected to urban Auckland through state highways and, in the case of Pukekohe, by rail and will support significant business and residential growth.

4.1.1 FUTURE DEVELOPMENT OF PUKEKOHE

The Auckland Plan identifies Pukekohe as a “rural node” and a “satellite town” with the potential to accommodate up to 14,000 additional dwellings. As a satellite town the Auckland Plan expects that Pukekohe will:

function semi independently from the main urban area of Auckland. This can reduce the need for travel out of Pukekohe to access services, facilities and employment. An increase in business land will help achieve this aim.¹

To achieve this the Auckland Plan provides for significant growth in this area over the next 30 years. Approximately 1,700 hectares of land for future urban development has been identified around Pukekohe, including around 790 hectares in Paerata. This has the potential to accommodate the estimated 14,000 dwellings.

To support this growth the Auckland Plan anticipates upgrades to water, wastewater, stormwater and transport will be required.

This includes:

- an extension of electric passenger trains from Papakura to Pukekohe;
- a new train station at Paerata, and
- improvements to the road network to increase safety, capacity and resilience.

Development has been staged over the next 10 years, reflecting demand and the provision of the necessary infrastructure upgrades.

The Auckland Plan vision for Pukekohe will be implemented through the structure plan for Pukekohe and Paerata which will refine the staging and timing of development and will identify the mix and location of housing, employment, retail, commercial and community facilities required.

¹ Auckland Plan 2050 – Page 205

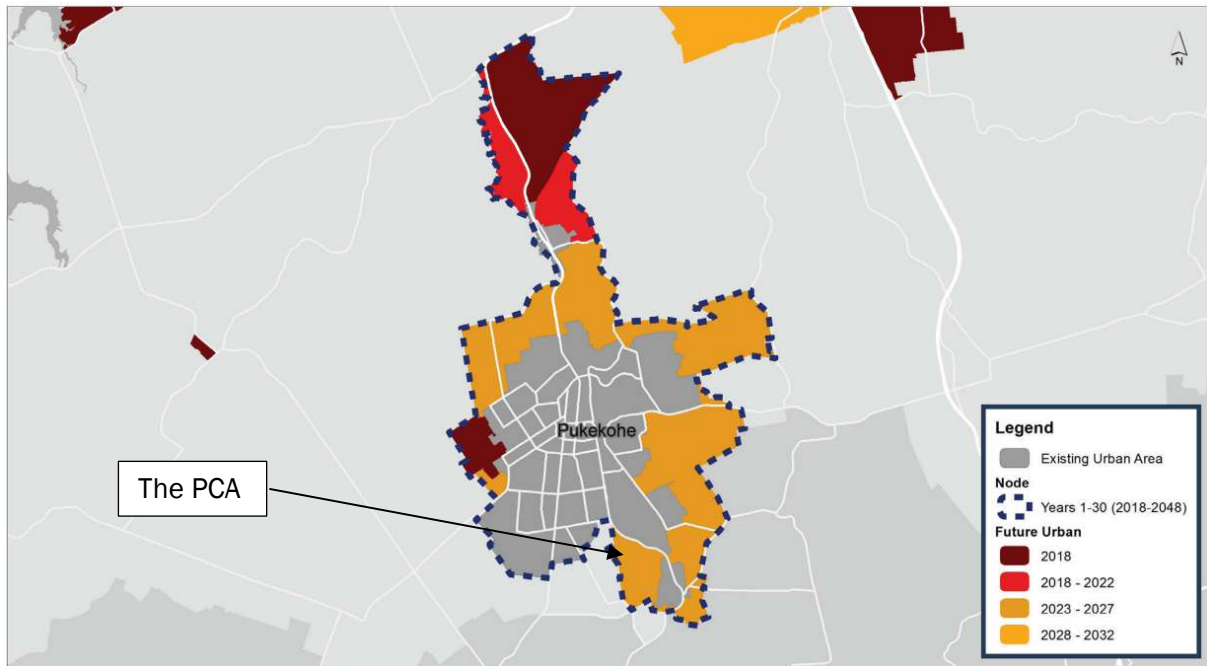


Figure 7 - Development Strategy: Pukekohe (Source: Auckland Plan 2050)

As can be seen from the Development Strategy for Pukekohe in the Auckland Plan, the PCA is identified for urban zoning from 2023 onwards.

With regard to business activity, the Auckland Plan strategy envisages a multi-nodal model within the urban footprint with the city centre continuing to be the focus of Auckland's business, tourism, educational, cultural and civic activities. Significant growth is also planned in Albany, Westgate and Manukau, including their catchments. In addition, the satellite towns of Warkworth and Pukekohe act as rural nodes. They are intended to service their surrounding rural communities while also being connected to urban Auckland through state highways and, in the case of Pukekohe, by rail and will support significant business and residential growth.

4.2 AUCKLAND UNITARY PLAN

The site is zoned FUZ in the Unitary Plan and is within the Rural Urban Boundary (**RUB**). This zoning is applied to greenfield land that has been identified as being suitable for urbanisation. To rezone land from Future Urban, structure planning is required as well as a plan change to the Unitary Plan.

The FUZ is applied to land that has been identified as being suitable for urbanisation through a range of methods including structure planning, spatial plan growth assessments and future infrastructure planning assessments. In the AUP the FUZ is a form of hybrid zoning containing elements of urban and rural techniques and methods. The zone statement for the FUZ is as follows:

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.

In that regard the FUZ is an urban zone in that it relates to land that has been included in the RUB for urban development but is also like a rural zone because its provisions are intentionally restrictive so that urbanisation can be planned for and progressed in a cohesive and co-ordinated manner. Objective H18.2(1) for the FUZ is focussed on land being used to:

achieve the objectives of the Rural – Rural Production Zone until it is rezoned

and Objective H18.2(3) directs that:

future urban development is not compromised by premature subdivision, use or development.

Auckland Council has prepared a structure plan for the Pukekohe and Paerata area which is discussed in sections below, and in summary the PPC proposes zoning consistent with the structure plan.

4.3 PUKEKOHE-PAERATA STRUCTURE PLAN 2019

The Pukekohe-Paerata Structure Plan 2019 (**Structure Plan**) is intended to implement the strategic vision for the Pukekohe and Paerata area in the Auckland Plan 2050. It is prepared under the provisions of the Local Government Act 2002 and has been prepared in accordance with the structure plan guidelines as set out in Appendix 1 of the Unitary Plan.

While this is a non-statutory document under the RMA, it will form the basis of future Auckland Council or privately initiated plan changes under it.

The Structure Plan has the broad goal of:

New growth areas will enhance Pukekohe as a focal point and place to further support the surrounding rural economy. These areas will offer a range of housing choice and employment opportunities for people at all stages of life. It will be well connected to the wider Auckland and Waikato regions, while protecting and enhancing the natural, physical and cultural values that contribute to Pukekohe's unique character and identity.

The proposed Structure Plan Map shows the location of new zoning areas with the site shown in purple (indicating proposed business land) as Area H.

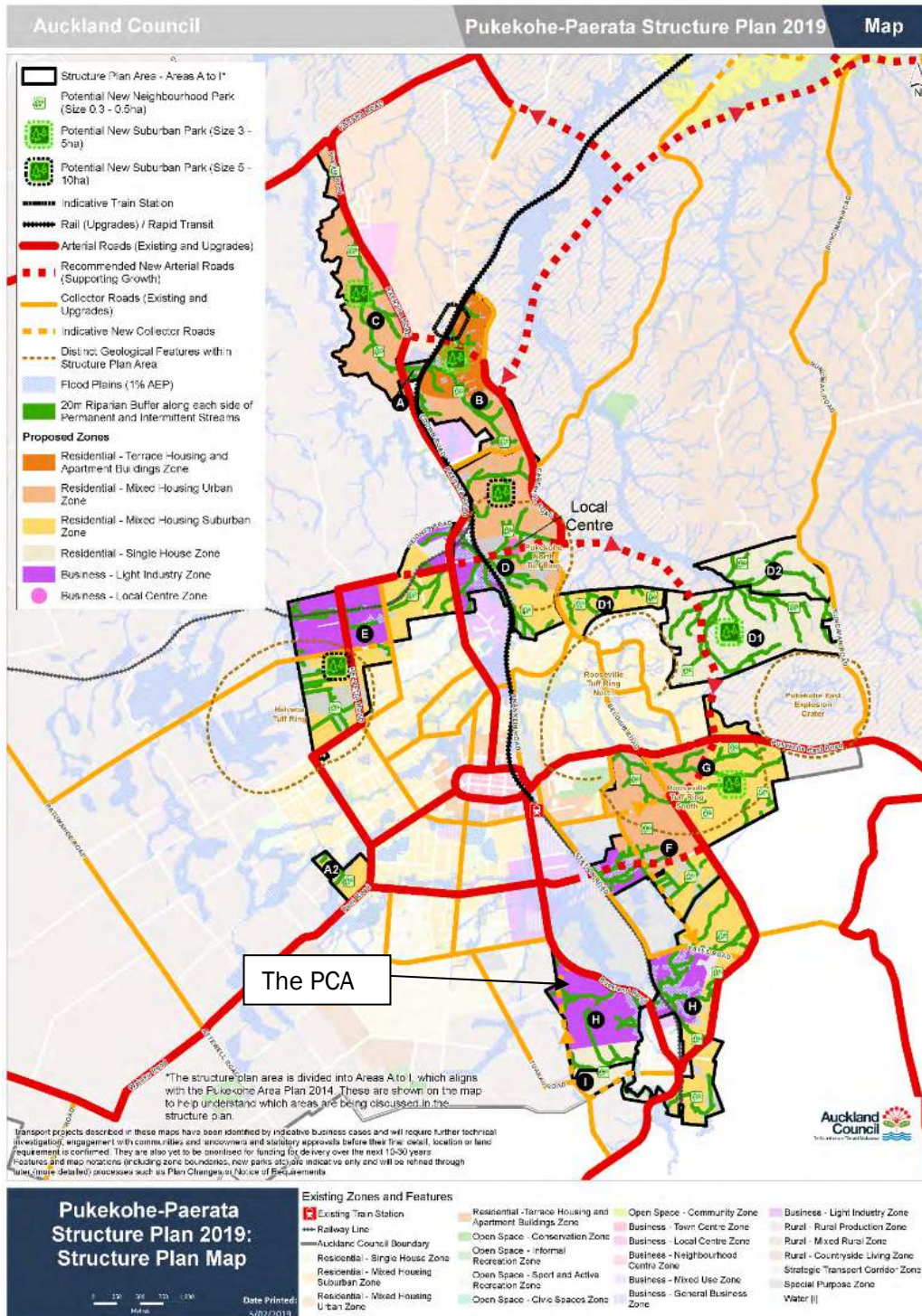


Figure 8 - Pukekohe-Paerata Structure Plan 2019: Structure Plan Map

With regard to the provision of business land section 3.3.2 of the Structure Plan provides for more land to be rezoned for business activity to support the planned urban growth. This is seen as vital to the functioning of Pukekohe as a satellite town which is intended to be self – sustaining in terms of providing employment for its new residents and reducing the need to commute to work outside the area was very important.

The Structure Plan broadly provides for employment to be provided for through the implementation of the BLIZ to provide for 80-100ha of new industrial land. The strategy in the Structure Plan is that the provision of new business land could enable around 2,370 new jobs within the new industrial

areas within the Structure Plan area which in turn is expected to reduce the need for community and freight movement northwards, which affects congestion across Auckland as a whole.

The Structure Plan has indicated that Area H (which includes the PCA) be rezoned BLIZ on the grounds that it has a favourable location including:

- good access to the existing and proposed road network, especially freight routes and routes that will limit the need for traffic to travel through the Pukekohe town centre;
- relatively flat land to reduce the need for future earthworks and to enable larger floor areas and outdoor storage areas often needed by industrial activities;
- proximity to existing areas zoned Light Industry, e.g. Manukau Road. Adjoining new industrial areas to established industrial areas limits potential reverse sensitivity issues and allows the opportunity for the co-location of similar activities and businesses;
- proximity to existing “less sensitive” activities to limit potential reverse sensitivity issues, such as the Rural Production Zone and Special Purpose – Major Recreation Facility Zone (e.g. the Pukekohe Park Raceway), and
- reflection of existing land uses that are more suited to the Light Industry Zone, e.g. vegetable processing and packing sheds in Heights Road, and rural machinery sales and maintenance in Heights Road.

With regard to Area H specifically, this is set out in section 4.4.11 of the Structure Plan. The PCA is located in Area H West and states:

Area H west is shown as Light Industry in the Pukekohe Area Plan, and as business land in the 2017 consultation material. In the 2018 consultation material the extent of business land in this area was reduced in the very south to reflect the location of the stream and the three Significant Ecological Areas west of Buckland. The extent of this business land is the same as 2018 and it is now proposed to be zoned Light Industry. This zoning reflects access to transport routes and the proximity to the Pukekohe Park Raceway.

4.4 FUTURE URBAN LAND SUPPLY STUDY

The Future Urban Land Supply Strategy (**FULSS**) identifies a programme to sequence future urban land over 30 years. The study was updated in 2017 to reflect changes to the Unitary Plan, new demand for development, and further technical work to understand requirements for development (e.g. the Supporting Growth Programme and the Whenuapai Structure Plan).

The Site is identified in the FULSS to be ‘development ready’ between 2023-2027. Land is considered development ready once the following four steps are complete:

- Future urban zoned land in the Unitary Plan Planning phase;
- Structure planning completed;
- Land rezoned for urban uses; and
- Bulk infrastructure provided.

The FULSS anticipates upgrades to water, wastewater and stormwater are required to enable large scale development to proceed. Construction of additional water reservoir capacity is planned as well as upgrades to the Pukekohe wastewater treatment plant and expanded wastewater networks to service growth in the area. Pukekohe and Paerata require less stormwater investment compared to Takanini, Opaheke and Drury. The FULSS states:

Pukekohe is sequenced in the second half of decade one (2023 – 2027), excluding most of Belmont (Pukekohe) which is already live zoned. The early sequencing of Pukekohe will allow for the development of a comprehensive structure plan for the entire future urban area. A structure plan for the whole of Pukekohe will enable efficient and integrated land use and infrastructure solutions to be found.

4.5 TE TUPU NGĀTAHI | SUPPORTING GROWTH PROGRAMME

Te Tupu Ngātahi | Supporting Growth (**Supporting Growth Alliance**) is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency. Its role is the investigation and planning for more than 70 transport projects to support urban growth in Auckland over the next 30 years.

With regard to planned growth in Pukekohe the Supporting Growth Alliance is planning for the following transportation projects:

- rail upgrades and new train stations at Drury Central, Drury West and Paerata;
- a new connection to improve safety and support the future movement of people and goods between the proposed Mill Road Corridor, State Highway 1 and Pukekohe town centre by providing an alternative route to State Highway 22; and
- new urban arterials around Pukekohe, including the north-east section, to unlock development within the planned new growth areas and existing urban land around Pukekohe. The project will upgrade the roads around the town centre, allow for improved freight access to the surrounding area and provide increased access and travel choices in and around Pukekohe.

5 DETAILS OF THE PROPOSED PLAN CHANGE

5.1 BUSINESS – GENERAL BUSINESS ZONE

It is proposed to rezone the PCA from FUZ to BGBZ. The BGBZ zone is set out in Chapter H14 of the Unitary Plan and a full copy of these provisions is annexed as **Attachment 4**.

The BGBZ is a business zone that provides almost exclusively for business and employment activities. The range of business activities is from light industry through to retail and office and food and beverage activities. A feature of the zone is that it also provides for Large Format Retail where they cannot be established in centres. The zone description states:

The Business – General Business Zone provides for business activities from light industrial to limited office, large format retail and trade suppliers. Large format retail is preferred in centres but it is recognised that this is not always possible, or practical. These activities are appropriate in the Business – General Business Zone only when they do not adversely affect the function, role and amenity of the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.

Although the application of the zone within Auckland is limited, it is an important part of this Plan’s strategy to provide for growth in commercial activity and manage the effects of large format retail.

The establishment of small retail activities in the zone should be limited as the presence of these activities, in combination with large format retail, can effectively create an unplanned centre. Residential activity is also not envisaged due to the potential presence of light industrial activities and the need to preserve land for appropriate commercial activities.

The zone is located primarily in areas close to the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone or within identified growth corridors, where there is good transport access and exposure to customers.

New development within the zone requires assessment in order to ensure that it is designed to a good standard.

In terms of locational criteria Objective H14.3(7) states:

(7) The zone is located primarily in areas close to the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone, or in other areas where appropriate.

In addition, Policy H14.3(15) states:

(15) Locate the zone adjacent or close to the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone and within the Identified Growth Corridor Overlay and in other areas where appropriate.

Other objectives for the BGBZ focus on the amenity values of surrounding areas and the management of the zones interface with other zones. The Policies recognise that the BGBZ should enable business activities that either have difficulty accommodating within established business or town centres (due to scale or functional requirements) or are more appropriately accommodated outside on business centre zones.

The Policies also guard against the establishment of small scale retail activities within the zone as that could undermine that function as part of the town centre activities. The BGBZ specifically enables light industrial activity but also includes a range of other employment activities including office activity, large format retail, trade suppliers and commercial services. The zone however, does not provide for any residential or visitor accommodation activity as that is considered inconsistent with the expected amenity effects associated with the range of business activities enabled, especially light industry. In that regard, the BGBZ is considered to be a broad based employment zone.

The range of activities provided for in the BGBZ is set out in H14.4 Activity Table which reinforces the wide range of business activities as a permitted activity including:

- Commercial services
- Drive through restaurants
- Entertainment facilities
- Food and beverage
- Garden centres
- Marine retail
- Motor vehicle sales
- Offices up to 500m² gross floor area per site
- Retail greater than 450m² gross floor area per tenancy (i.e. Large Format Retail)
- Trade suppliers
- Industrial activities
- Marae complex
- Recreational facilities

Activities that require resource consent for a restricted discretionary activity are as follows:

- Department stores
- Service stations
- Supermarkets greater than 450m² gross floor area per tenancy
- Emergency services
- All New Buildings

Activities that require resource consent for a discretionary activity are as follows:

- Commercial sexual services
- Conference facilities
- Funeral directors' premises
- Offices greater than 500m² gross floor area per site
- Retail exceeding 200m² per tenancy and up to 450m² gross floor area per tenancy
- Care centres, Community facilities, Education facilities and Tertiary education facilities
- Healthcare facilities and Hospitals
- Justice facilities

The zone Standards are set out in H14.6 with the following standards noted:

- The following activities within 30m of a residential zone require resource consent for a restricted discretionary activity:
 - (a) bars and taverns;
 - (b) drive-through restaurants;
 - (c) outdoor eating areas accessory to restaurants;
 - (d) entertainment facilities;
 - (e) child care centres; and
 - (f) animal breeding and boarding.
- Maximum Height: 16.5m
- Height in relation to boundary – adjoining a Residential zone, Special Purpose zone, Open Space zone
- Yards: Where the zone adjoins a Residential, Special Purpose – Māori Purpose zone, a stream, lake or the coastal marine area
- Landscaping: 2m in depth must be provided along the street frontage
- Wind: Specific assessment for buildings exceeding 25m in height

H14.8.1 sets out the matters for discretion for restricted discretionary activities and they encompass matters relating to design, appearance and amenity, landscaping, transportation (roads, parking, traffic generation, access and manoeuvring), intensity, effects on retail in other centres.

The assessment criteria for restricted discretionary activities are set out in H14.8.1 and these direct the assessment back to specific policies in H14.3.

6 ASSESSMENT OF ENVIRONMENTAL EFFECTS

Sections 68(3) and 76(3) of the RMA state that in making a regional or district rule, the council must have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. Furthermore, Schedule 1 of the RMA states that where environmental effects are anticipated, the request shall describe those effects, taking into account

clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan.

This section sets out the potential effects on the environment associated with the PPC and covers both positive and adverse effects. This section is based on expert technical reports which are submitted as part of the Request.

6.1 POSITIVE EFFECTS

The PPC will enable a broad range of business and employment activities to support planned residential growth ranging from light industrial activities to office, large format retail and a range of food and beverage and commercial services. The Structure Plan envisages up to 14,000 new dwellings in Pukekohe to be provided through new greenfield development on FUZ land. The proposed zoning of the site to BGBZ will enable a wide range of employment based activities to be established to provide local-based employment as new growth occurs. This in turn reinforces the role of Pukekohe as a satellite town and reduces the need for residents to travel to other urban areas for work and employment.

It enables the early development of employment land with the ability for infrastructure to be established that will provide local employment as Pukekohe grows. The plan change provides for an effective and efficient approach that enables a streamlined consideration of the effects associated with essential infrastructure.

The PPC provides efficient use of the land resource, positive socio-economic benefits and avoids any adverse effects on streams and wetlands.

6.2 ECOLOGY EFFECTS

The site is almost entirely formed in pasture associated with previous use for grazing activities. There is no indigenous vegetation on the land and there are no freshwater streams or wetlands present.

A stormwater management plan has been prepared by Birch Surveying Limited (refer **Attachment 8**) and that plan assessed the land for its ability to provide on-site collection, treatment and discharge of stormwater to local waterways under the proposed BGBZ development scenario. That assessment has determined that stormwater treatment and hydrological neutrality can be achieved on site subject to a number of ecological enhancements that can be imposed at the development stage. These include:

- Identify Best Practice Options for Stormwater treatment for the development area;
- Promote Water Sensitive Design to mitigate adverse effects of development on the receiving environment;
- Minimise discharge of contaminants into the receiving environment; and
- Not worsen downstream flooding.

A number of stormwater options has been investigated and these are all available for use at the development stage under a BGBZ on the site. These options are described in greater detail in the stormwater plan assessment.

Any adverse effects on ecological values can be avoided, remedied or mitigated under the proposed BGBZ.

6.3 GEOTECHNICAL EFFECTS

A Geotechnical assessment of the site has been undertaken by Initia Geotechnical Specialists. A copy of their full assessment is annexed as **Attachment 5**.

The principal findings of the geotechnical assessment are set out below.

- A review of the published geological maps for the area and historical geotechnical investigation data available for the PCA and is underlain by fine grained and course grained basalt and rock associated with the KeriKeri Volcanic Group of the South Auckland Volcanic Field (**AVF**). The rock is overlain by a thick mantle of weathered ash/tuff and gravelly soils also from the AVF. The weathered ash/tuff layer at the site is a competent material with only minor geotechnical constraints required to enable typical retail and commercial development.
- Standing groundwater levels of between 2.5m and 4.2m were recorded in the hand auger boreholes during the investigations carried out by previous investigations at 301 Buckland Road and no groundwater observed/recorded above 5.0m below existing ground level at 303 Buckland Road during the Initia ground investigations. Shallow cuts and/or foundations at the site are unlikely to interfere with standing ground water levels.
- The site seismic subsoil class should be taken as “Class D”. Due to the cohesive nature of the soils at the site, the risk of liquefaction at the site is considered negligible for business development.
- A terracing of the land will provide global slope stability factors of safety to fall within the Unitary Plan requirements for any future development at the PCA, provided the slopes are subject to specific engineering design and review.
- The natural soils at the PCA are generally suitable for earthworks and will support a range of building foundation types i.e. shallow strip or pad foundations, subject to specific engineering design.

Based on the above assessment Initia conclude that:

Based on our understanding of the local ground conditions and our experience with typical retail and commercial developments, i.e. lightly to moderately loaded buildings, we do not expect any significant geotechnical constraints to BGBZ zoning at the site. We expect the competent nature of the ground at the site to support a variety of development types and options.

The site is therefore suitable to be zoned BGBZ from a geotechnical perspective and any adverse effects from development can be avoided, remedied or mitigated through a consent process.

6.4 CONTAMINATION EFFECTS

Both the properties that make up the PCA have been subject to landuse consent applications under their current FUZ zoning and contamination assessments were undertaken in association with each of those consent processes. Environmental Management Solutions (**EMS**) has been engaged to provide a review and update of those assessments and apply them to the proposed plan change request. A copy of this assessment is annexed as **Attachment 6**.

The assessment has considered the future development of this land in the context of the Unitary Plan and under Regulations 5(4) and 5(6) of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**NES**), being soil disturbance and change in land use, respectively. These are activities to

which the NES applies where an activity that can be found on the Ministry for the Environment Hazardous Activities and Industries List (**HAIL**) has occurred, is occurring, or is likely to have occurred. These activities relate to land uses that store, use or dispose of contaminants and because of this, can, but do not necessarily, lead to site contamination.

6.4.1 301 BUCKLAND ROAD

The land at 301 Buckland Road, Pukekohe was subject to a Preliminary Site Investigation (**PSI**) prepared by Geosciences Ltd in November 2018. This PSI identified that the site was predominantly pastoral historically but also identified the potential for several activities that can be found on the Ministry for the Environment Hazardous Activities and Industries List to have occurred. HAIL activities identified included HAIL A10 due to the potential for horticultural activities to have occurred on the south eastern portion of the property between 1942 and 1960, although historical aerial photography was inconclusive; HAIL H in relation to the potential migration of contaminants from neighbouring market gardens and HAIL I in relation to uncertified fill stockpiled on the site and in the vicinity of a former building footprint, and due to the potential for lead based paint to have leached into the soil immediately surrounding an existing villa on the site. Subsequently, Geosciences undertook a Detailed Site Investigation (**DSI**) in January 2019 to determine if these activities had adversely affected soils on the site.

Of the sixteen soil samples collected on the site in relation to these identified land uses, only one sample breached the NES Soil Contaminant Standards for a commercial land use scenario and this sample was collected from imported soil (~10m³) stockpiled on the site. This soil would be removed to landfill in accordance with an approved Remedial Action Plan (**RAP**) associated with any development approved. In addition, a composite sample collected from the area directly adjoining the dwelling on site exceeded permitted activity soil acceptance criteria for Lead as set out in Table E30.6.1.4.1 of the Unitary Plan but did not exceed NES Soil Contaminant Standards for a commercial land use. Levels detected were not significantly above the permitted standards in the Unitary Plan. Contamination of this nature is generally shallow, being limited to surface soils, and localized to within a 3m halo surrounding the building footprint. On this basis, the contamination assessment has concluded that dilution through mixing of surface soils in this location to reduce levels below Unitary Plan thresholds is a viable option for contaminant reduction, noting that soils already meet NES Soil Contaminant Standards for the intended land use. Alternatively, a low volume of surface soils surrounding the villa could also be removed off-site to landfill. Validation will occur post-remediation on the site.

6.4.2 303 BUCKLAND ROAD

EMS was engaged to undertake a PSI of the land at 303 Buckland Road, Pukekohe in September 2020 to determine whether the land has been, is likely to have been, or is being, adversely affected by land use HAIL activities and accordingly, whether undertaking any proposed future development is likely to pose a risk to human health. A review of historic aerial photography and property records, coupled with a site history interview confirmed that the site has historically always been used for low intensity pastoral grazing for sheep, cattle and horses.

The property remains in pastoral grazing with a concrete block and iron constructed stable building and a brick and concrete residential dwelling located in the centre of the site. An accessway connects these to Buckland Road in the north. No superphosphate fertiliser has been applied to the land in conjunction with this land use, no chemicals have been used or stored on the property, nor were any burn piles, farm dumps or fuel storage areas located on the site. The PSI did not verify any HAIL activities on the land at 303 Buckland Road, Pukekohe and concluded that soils on

the site are highly unlikely to have been adversely affected by past land use activities. In the absence of a HAIL activity, it was considered that the NES does not apply to any future proposal on this site.

6.4.3 CONTAMINATION CONCLUSION

Having considered both contamination assessments recently undertaken on both the properties that make up the site the EMS assessment has concluded that both properties are suitable for the intended plan change and change of use. There are no contamination issues identified within any report prepared, that would pose any major constraints on, or inhibit, this proposal.

6.5 INFRASTRUCTURE EFFECTS

The provision of water supply, wastewater and stormwater infrastructure to support a BGBZ has been assessed by Birch Surveyors and a copy of these assessment annexed as **Attachment 7** (wastewater and water supply) and **Attachment 8** (stormwater).

6.5.1 WASTEWATER

The assessment describes the existing wastewater reticulation network servicing the Pukekohe area as predominantly a series of gravity flow piped systems which carry wastewater to three pump stations within the area. Sewage collected via the Wesley Pump Station and Franklin stations are transferred to the Pukekohe Transmission Pump station, which is then conveyed via a 7km trunk main to the Pukekohe Wastewater Treatment Plant located on Parker Lane where it is treated and ultimately discharges into the Waikato River.

As part of the Structure Plan, Watercare has undertaken a network capacity assessment of Pukekohe's existing infrastructure and state that the recently constructed Pukekohe Pump Station can accommodate the ultimate future wet weather flows from Structure Plan area, which includes the area associated with this PPC, with the site being just west of the Pukekohe Pump Station and within the FUZ.

The wastewater assessment proposes a new gravity network to service the PCA. This can be accomplished by designing and constructing a traditional underground piped network from an appropriate point on the existing infrastructure. This option would be the most preferable as it provides a network connection and will not incur additional maintenance costs associated with Pump Stations etc. The assessment states that development can connect to Pukekohe's existing wastewater infrastructure via a gravity line to the existing 525mm Wastewater Line approaching the Pukekohe Pump Station.

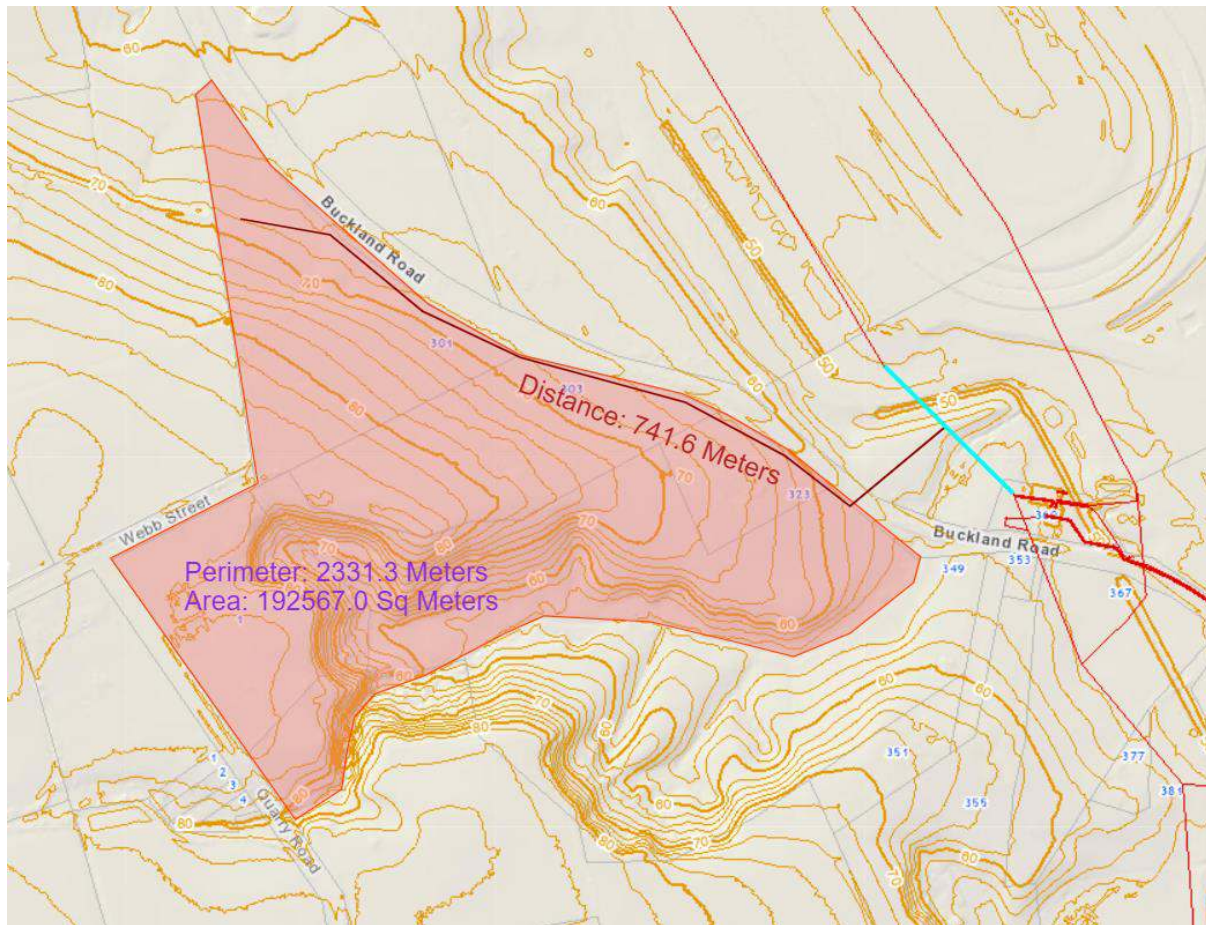


Figure 9: Possible Connection to wastewater reticulation (Source: Infrastructure Assessment)

The Pukekohe Transmission Pump station is located at 360 Buckland Road, which is located approximately 400m to the east of the PCA. This has been designed and built to accommodate the ultimate future wet weather flows from the FUZ, including the Structure Plan area within which the PPC is located.

Overall, the wastewater assessment concludes that the PCA can be serviced by a gravity wastewater system that can be designed to meet the standards required by Watercare's Code of Practice for Land Development. Furthermore, the assessment concludes that the existing Pukekohe Transmission Pump Station can accommodate the additional flows created by development that would be enabled under this PPC.

6.5.2 WATER SUPPLY

The current Water Supply system involves pumping Treated Water from the Waikato 1 Watermain to a number of Water Reservoirs in Pukekohe, these include Kitchener Road, Anzac Ave and Roosevelt Park, the former being the closest reservoir or bulk supply. Kitchener Road has a supply elevation of RL 106m (Watercare), and with the other reservoirs, delivers water to Pukekohe Area.

The PCA contains two existing dwellings and both are connected to the public water supply via water meters. The existing Water Supply along Buckland Road is a 150mm fire main on one side of the road linking Pukekohe with Buckland, and a 100mm/80mm main on the other side, extending from Buckland to the southern boundary of the proposed plan change area.

There is also a low-pressure trickle feed along Webb Street west servicing the existing rural zoned land.

To support development in a BGBZ the proposed water supply networks must be able to service both peak demand and firefighting scenarios. According to Watercare Water Code of Practice and SNZ PAS 4509, the minimum flow is 25L/s for residential area and the minimum residual pressures during fire flow is 100kPa. Watercare guidelines require a minimum level of service to every property, supply at least 25l/s flow at a minimum pressure of 250 kPa or 25m head.

The water supply assessment states that the PPC has direct road frontage onto Buckland Road, and can connect to the existing Public Water Supply along the frontage of the site. There is an existing 150mm Water Main along Buckland Road between Buckland and Pukekohe, with a secondary main of 80mm/100mm installed on the other side from Buckland to the southern end of the site.

6.5.3 STORMWATER

As noted in section 6.2 above, Birch Surveyors have prepared a separate stormwater management plan to support proposed plan change to BGBZ as there is no reticulated stormwater system to service the land, as yet.

The assessment identifies that the PCA straddles two catchments:

- 301 Buckland is at the top end of a small catchment of 16.1ha that drains north to Manukau Road, through a culvert under Manukau Road to a short length of open drain, and then is piped some 200m to discharge into the Tutaenui Stream.
- 303 Buckland is at the upper end of a 7.0ha catchment draining south via open road drains/channels to join the adjacent 132ha catchment at a common drainage point, being the head of a culvert under Buckland Road, which drains to the Tutaenui Stream via a modified natural Channel.

The stormwater assessment observes that there are no upstream catchments, nor does the area contain any public stormwater infrastructure. The site and the surrounding area are serviced by open drains, natural channels (mostly highly modified) culverts and some historic private pipes that directs surface water to the Stream.

The catchments downstream from the PCA have been identified as having existing flood and drainage issues and any development must take this into account.

The proposal and its immediate catchment area fall within the Auckland wide Stormwater Network Discharge Consent (NDC) and within the area formerly contained in the Pukekohe South Stormwater Network Discharge Consent. The NDC regulates Stormwater Treatment and Disposal for the areas it covers.

Stormwater Disposal

In determining the appropriate Stormwater Treatment and Disposal for the proposed Activity, the stormwater assessment recommends a design that achieves consistency with the objectives and policies of the Unitary Plan as well as Auckland Council's Guideline Documents, the current Stormwater Network Discharge Consent and industry best practice options.

As noted in section 6.2, this approach would establish a cohesive methodology to the management of stormwater runoff by specifying controls on the quality and quantity of the runoff and requiring ecological enhancements including:

- Identify Best Practice Options for Stormwater treatment for the development area;
- Promote Water Sensitive Design to mitigate adverse effects of development on the receiving

environment;

- Minimise discharge of contaminants into the receiving environment; and
- Not worsen downstream flooding.

Proposed methodologies to achieve the above outcomes include:

- Provide for SMAF-1 equivalent hydrology treatment for all impervious areas;
 - Retention will be achieved using the following methods in order of preference;
 - Ground Soakage if conditions permit;
 - Reuse if practical and feasible;
 - Added to Detention Volume;
 - For Roads and other access ways, should the ground soakage prove unsuitable, the detention volume will be increased by the retention component within the on-site or communal Raingarden or Wetland;
 - Attenuated and treated stormwater discharge points shall be stabilised and/or green outlets as best suits the discharge point and immediate receiving environment;
- Provide stormwater treatment at source or within centralised Raingardens or Wetlands;
- Inert Roofing Materials to be installed to all covered structures;
- Additional treatment may be required by future businesses to treat specific contaminants (e.g. Gross Pollutant Traps, Oil Grit Separators etc - depending upon actual site use); and
- Provide attenuation to ensure peak runoff is not increased up to and including the 100yr ARI Rainfall event.

The stormwater assessment recommends the treatment of carparking areas in bioretention swales to suitably treat the runoff, designed with sufficient retention and detention capacity to provide both SMAF-1 treatment and attenuate runoff up to the 100yr ARI Storm event. If the latter is not possible in the same device, a separate device can be utilised to provide attenuation up to the 100yr ARI Storm event.

Further, it is recommended that the roofs of all buildings will be constructed from inert materials; consequently, the roof runoff can be considered clean. The runoff can be attenuated via sub-surface stormwater devices, either under the buildings or adjacent access to provide SMAF-1 treatment and to attenuate runoff up to the 100yr ARI Storm event. As all buildings in the BGBZ require resource consent for a restricted discretionary activity, this can be imposed as a condition of consent at the time of development.

Detention of stormwater is recommended in the form of sub-surface Stormwater Cells for future buildings either under the floor Slab or under adjacent hardstand areas (parking/access), with strategically located outlets to achieve the desired stormwater controls. The Cells will be designed for the contributing catchment and it is expected that they will have a treatment area of 70m² for every 1,000m² roof area. The future building sizes are unknown, and the size of the Stormwater Management Device can be determined at the time of Building Consent on a pro-rata basis. The example proposed allows for the SMAF-1 retention and detention as well as the 10yr ARI storm attenuation released via orifice at flowrates not exceeding the pre-development flowrates.

A similar type of system can be utilised to manage the stormwater runoff from sealed or unsealed carpark and access, except the surface water will be directed to vegetated swales to treat the water

before flowing into the stormwater cells. Raingardens or wetlands can be used as an alternative treatment for both treatment and attenuation.

The assessment also recommends that any new stormwater infrastructure will need to convey the anticipated flows from the contributing catchment. There is no upstream catchment, so any proposed infrastructure need only provide for the full developed site works. The NDC identifies that developments must maintain flows to pre-development rates. Therefore, the design criteria for any new Public Stormwater Network will be to convey the existing 10% AEP runoff from all directly contributing catchments.

Overland Flow

In terms of overland flow, the assessment has concluded that the surface runoff will predominantly be sheet flows, not being concentrated into overland flowpaths. The Auckland Council GIS identified overland flowpaths are minor and do not follow natural depressions, indicating these are minor to insignificant in nature. It is anticipated that the future development of the site will be undertaken holistically and will manage the surface flows in compliance with the NDC in regard to the surface water discharge flow and location and to actual site development.

Low Impact Design

The stormwater assessment recommends that adoption of Low Impact Design (**LID**) with the primary objectives being:

- to limit impervious surfaces; and
- to both treat the surface runoff before entering the stormwater network; and
- to reduce the impact of impervious surfaces by retaining and/or detaining runoff from the increased impervious surfaces that development invariably creates.

The Soil Maps indicate that soakage is possible, and further investigation will be required. Based on the Hydrological Soil Class, the site soakage will achieve the minimum soakage rates for SMAF-1 retention within raingardens and thus contributing to ground water recharge. The presence of soakage also makes raingardens (bioretention) a more viable and successful stormwater treatment option. However, the stormwater assessment also recognises that on-site reuse of rainwater is an option that is available.

Other LID options including living walls and roofs have been investigated but deemed impractical as the environmental benefits required can be achieved using raingardens, which are more cost effective and simpler and more economic to construct and maintain for future owners. Porous pavements were also investigated. Future carparking will be classified as high-contaminant yielding, and it is likely that a porous pavement would require more frequent maintenance using specialised equipment to ensure the environmental benefit is maintained. The maintenance regime for swales and raingardens are considered to be easier to understand and simpler for future owners and developers and this would ensure better functioning of the device and therefore greater environmental efficiency. Limiting impervious areas in a business zone will depend on the future use and development design. Increasing the proposed impervious areas will also increase raingarden sizing, and by extension, the pervious area.

The proposed stormwater treatment will include retention and detention devices, soakage and bioretention (raingardens or bioswales). These devices are sized to soak away the SMAF 1 retention volume of 5mm, to provide detention of the 95% storm and release ensure over 24hours, and to provide detention of the 10yr ARI Storm event to pre-development flows or less and to attenuate the 100yr ARI Storm Event.

Conclusion

The conclusion of the stormwater assessment is that the future development of the site under a BGBZ will can be managed effectively (principally through the resource consent process under the BGBZ) to the extent that any adverse effects of stormwater discharge can be avoided, remedied or mitigated.

6.6 TRANSPORTATION EFFECTS

An Integrated Transportation Assessment (ITA) has been undertaken by Commute Transportation Consultants (**Commute**) and a copy of this assessment is annexed as **Attachment 9**.

Commute has stated that the key transportation considerations of the PPC are:

- The ability of Manukau Road and Buckland Road to accommodate additional traffic generated by the activities enabled in the proposed re-zoned land; and
- Integration of any proposed development on the re-zoned land with wider transport network plans, and land use plans (Structure Plans), in Pukekohe.

The key findings of the ITA can be summarised as follows:

6.6.1 ROAD NETWORK

Buckland Road typically runs in a north-south alignment connecting to Manukau Road to the north and George Street to the south.

The posted speed limit along Buckland Road is 80 km/hr. With reference to the Unitary Plan, Buckland Road is classified as an 'Arterial Road'. Based on these volumes, the major access locations to the PPC area will likely require higher level intersection treatments such as roundabouts which the roading environment would be able accommodate in the future.

The subject properties have road frontage onto Buckland Road which is already a wide and well-formed corridor. This is beneficial for business/industry operations as it allows for high exposure and visibility whilst also being easily accessible.

6.6.2 TRAFFIC GENERATION

Rule E.27.6.1 "Trip Generation" of the Unitary Plan sets out the trip generation limits as to when resource consent for a restricted discretionary activity is required. For retail (non-drive through), this limit is 1,667m² GFA therefore the likely development that would follow rezoning is likely to meet the threshold and trigger assessment under this rule.

A detailed analysis of the expected traffic generation is currently being undertaken. However, based on the analysis and size of the Pukekohe Racecourse Plan Change to General Business Zone (recently approved) opposite the site, the PPC is likely to generate up to 700 vehicles per hour. However, this assumes a high proportion of large format retail and the final make-up of the site may be significantly less should other permitted activities such as light industry and office activity be established.

6.6.3 ACCESS

The bulk of the retail, warehouse or commercial activities within the PCA are recommended to be served either directly off Buckland Road or by new roundabout at the extension of PU-NS-2 Road extension to Buckland Road. The establishment of a roundabout will enable safer access to and

from the site as well as Pukekohe Park opposite.

Roundabouts are considered to integrate well with the existing road network and in this case provide a threshold into the south of Pukekohe. In general, it is considered that there is sufficient land area within the road reserve, or within the PCA, to accommodate a single lane roundabout.

6.6.4 SPEED LIMIT

As a result of the PPC, it is suggested in the ITA that the posted speed limit of 50 km/hr would be extended south along the entire frontage of the PPC.

6.6.5 INTERNAL ROAD NETWORK

Internal public roads within the site (if required) are recommended to be 16-21m wide in accordance with the Auckland Transport Roads and Streets Framework standard for greenfield sites.

PU-NS-2 Road extension should be extended through the site to Buckland Road with a future roundabout constructed at Buckland Road. This is in accordance with the Structure Plan and allows roading access to both sites (it essentially splits the overall site in two). Figure 10 shows this road as per the Structure Plan ITA. As this road is anticipated to be a collector road it should be 21m in width as per Structure Plan ITA.

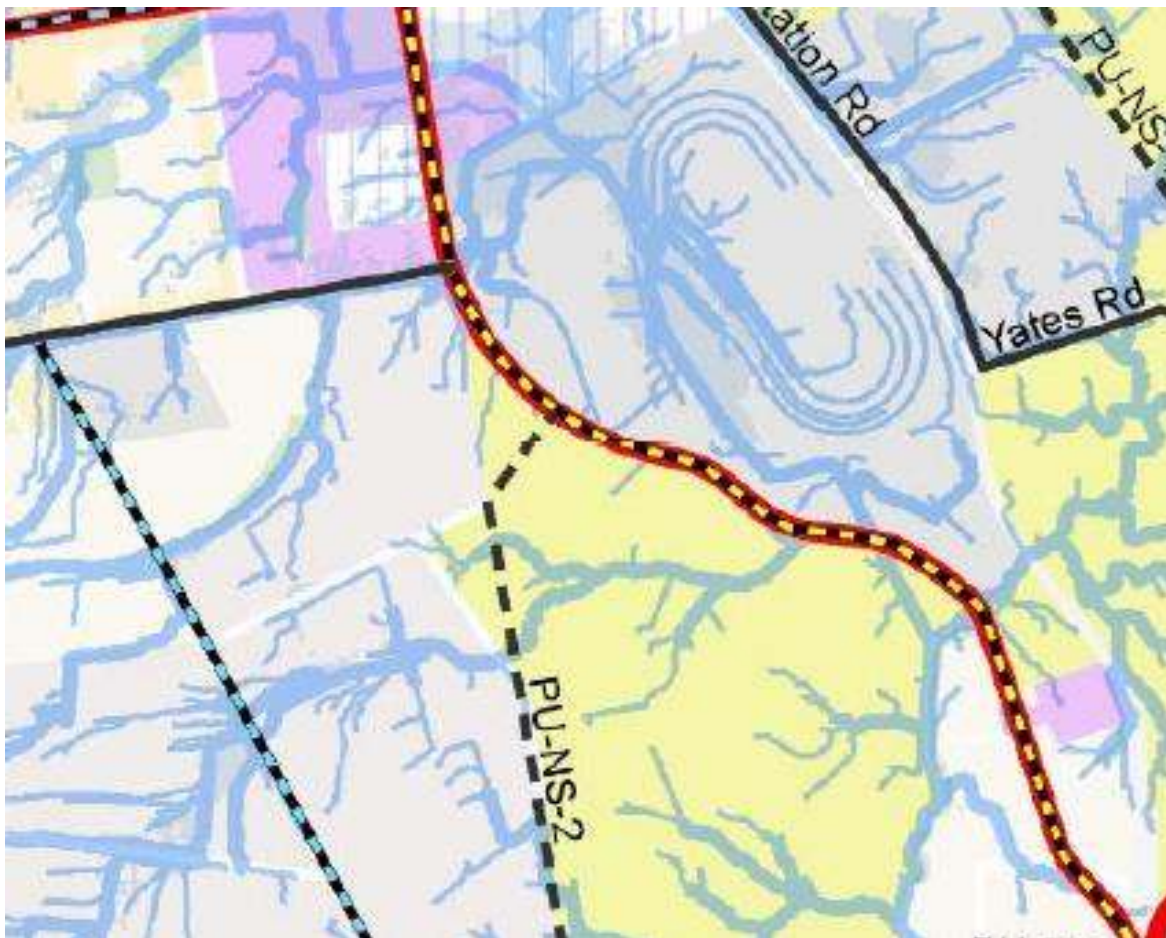


Figure 10: Pukekohe Structure Plan - Proposed Collector Road

6.6.6 PEDESTRIAN ACCESS

Due to the site being immediately outside the current Rural Urban Boundary there is currently no pedestrian access along Buckland Road (adjacent to the site). It is therefore recommended to extend the existing footpath along the western side of Buckland Road along the entire site frontage and linking to Kitchener Road (where an existing footpath exists on Manukau Road). The extended footpath should be 1.8 m wide (similar to that existing on Manukau Road).

From a pedestrian perspective (provided the above is incorporated), the site is well-connected and provides for a safe environment. It is expected that this would be required/implemented when the land is first developed or subdivided.

6.6.7 PUBLIC TRANSPORT

There are two existing bus routes that pass by the site with the nearest bus stop located some 1km north of the most northern portion of the site on Manukau Road. With further development likely to occur near the proposed site (at Pukekohe Park), it is recommended that consideration be given to providing bus stops fronting the site to encourage the use of public transport when travelling to and from the site. It is therefore recommended that, as the road frontage is upgraded to include a flush median (subject to any new access being established at the on Buckland Road) a bus stop should be incorporated into the design to encourage the use of public transport to and from the site. This could be implemented when the land is developed.

6.6.8 WIDER EFFECTS

In terms of the wider impacts (including the northern section of Manukau Road) the Drury- Opāheke and Pukekohe-Paerata Structure Plan including the “Draft Integrated Transport Assessment and Addendum” dated 2nd April 2019 contains information on the site. Of particular note are a number of projects in the wider area including:

- Electrification of the rail line to Pukekohe (already funded)
- Pukekohe Expressway linking Pukekohe with a new interchange on SH1 (medium to long term)
- Pukekohe ring road (providing a new alternative to travel around the Pukekohe Town Centre)*;
- General safety improvements on Buckland Road and
- Upgrade of Mill road (linking to Bombay)*

* At the time of writing it is uncertain if these two projects will proceed.

These upgrades are considered appropriate to cater for the growth in Pukekohe in the long term.

The proposal also is an employment zone and thus will create jobs in the Pukekohe area and thus keep residents in the Pukekohe area (and thus not need to travel on the wider network).

6.6.9 IMPLEMENTATION PLAN

Commute have developed an implementation plan of the works that will need to be undertaken as part of the development of the land under the proposed zoning.

| Trigger | Upgrade | Comments | Funder |
|--|--|--|---|
| Any new access on Buckland Road | Buckland Road upgraded to accommodate a painted flush median / right turn bay. | Will be required as part of initial development. | Developer |
| Commencement of development | Footpaths to link site(s) to existing footpath on Manukau Road (1.8m wide) | Will be required as part of initial development and as required | Developer |
| Initial development | Reduce speeds past the site to 50km/hr | Speed reduction can only be instigated by Road Controlling Authority (Auckland Transport) | Auckland Transport |
| To be assessed at Resource Consent (likely needed early in development) | Provide roundabout on Buckland Road | Highly dependent on exact land-use. Also provides an appropriate threshold to 50km/hr area. | Developer |
| To be assessed at Resource Consent (unlikely to be directly needed by development but needs to be accounted for) | Provide PU-NS-2 Collector Road to Buckland Road | Highly dependent on exact land-use. | Developer |
| To be assessed at Resource Consent | Upgrade Webb Street | Upgraded to local road standard, site frontage. | Developer / Other Developers on Webb Street |
| Considered as part of subsequent developments near the development site | Provision of bus stops (fronting the site) | To encourage the use of public transport when travelling to and from the area surrounding the site | Auckland Transport |

Overall, Commute conclude that:

- The existing road network will partly provide for accessibility of the site by various transport modes: walking, cycling, bus and private vehicle;
- The extent of development proposed can be accommodated by the surrounding road network while maintaining acceptable levels of safety and performance (with mitigation); and
- The proposed development is consistent with and encourages key regional and district transport policies.

It is therefore concluded that any adverse transportation effects resulting from the BGBZ zoning and resulting development can be managed such that any adverse effects are avoided, remedied or mitigated

6.7 ECONOMIC EFFECTS

An economics assessment has been undertaken by Urban Economics and a copy of this assessment is annexed as **Attachment 10**.

The economic effect of the proposed plan change can be measured in terms of economic costs

(adverse economic effects) and economic benefits (positive economic effects). While the proposed rezoning would enable a wide range of employment related economic opportunities on the PCA this needs to be weighed against its potential adverse impact on the viability of existing and established commercial centres that are engaged in similar activities.

6.7.1 LAND SUPPLY

The Urban Economics assessment has considered land supply in Pukekohe and as noted that there is no BGBZ land available in Pukekohe (other than the area recently rezoned adjoining Pukekohe Park) and only one site zoned BLIZ. Since the writing of the Urban Economics assessment it is understood that this land has sold and is no longer available. Accordingly, there is currently no BLIZ land for sale in Pukekohe.

The assessment has analysed the redevelopment value of the land in Pukekohe zoned either BGBZ or BLIZ and found there is high demand for land that can be used and redeveloped for the range of activities provided for in the BGBZ. The assessment has also considered land prices in existing commercial and industrial areas in Pukekohe and have increased significantly since 2000 from \$100-\$200/m² to \$500-\$1,000/m². The Urban Economics assessment has concluded that this represents a short supply for both BGBZ and BLIZ in Pukekohe.

6.7.2 REDEVELOPMENT CAPACITY IN THE CITY CENTRE

The Urban Economics assessment has considered the opportunity for the establishment of the commercial activities provided for in the BGBZ (including large format retail – i.e. retail over 450m² in area). The conclusion is that there is little opportunity to establish large format retail activity in the existing town centre due to the historic land tenure pattern of small sites or the use of larger sites for established activities that are unlikely to change (i.e. public car parking area or existing supermarket).

6.7.3 BUSINESS DEVELOPMENT AT THE PCA

The PCA is located at the southern edge of the Pukekohe township. Immediately north along Manukau Road and adjoining side streets is the largest area of industrial zoned land in Pukekohe. Existing activities in this area provide a wide range of business employment activities ranging from industrial processing and manufacturing to large format retail, trade based retail, car yards, office activity, yard based activities and other commercial services and supporting food and beverage activity. In that regard, this established industrial and business area supports a wide range of business activities that are enabled in both the BLIZ and the BGBZ.

The Urban Economics assessment acknowledges the wide range of activities enabled in the BGBZ (from light industry to large format retail and commercial services) and concludes that:

The General Business zone therefore provides a greater flexibility to respond to market demand (i.e. it can respond to demand for light industry and large format retail). This additional flexibility would support the optimal development of the site and elevates General Business over the Light Industry as the optimal zone for the site.²

The Urban Economics assessment also concludes that there is presently an acute shortage of both

² Urban Economics Assessment Pg 19

Light Industry and General Business zone land in Pukekohe, and the provision of additional land, albeit a relatively small quantity, would help meet this demand in the interim period before the Pukekohe-Paerata Structure Plan (and subsequent Plan Change) enables additional land to be released to the market. In that regard, the Urban Economics assessment supports the rezoning of the land to BGBZ now.

The BGBZ is seen as the best business zoning for the site based on the wide range of business and employment activities enabled in it. For example both zones provide for the following:

- Industrial Activity;
- Trade suppliers, and
- Motor vehicle sales.

The BGBZ also enables several other employment based activities including:

- Commercial services;
- Drive through restaurants and food beverage;
- Offices (permitted to 500m² and there after a discretionary activity);
- Retail greater the 450m² (with retail between 200m² and 450m² a discretionary activity);
- A wide range of education and community facilities; and
- Healthcare activities.

In that regard, the practical implication is that if the BGBZ is applied to the site, it could provide for a range of employment activities, including a large proportion of those activities otherwise enabled by the Light Industry zone.

6.7.4 ECONOMIC COSTS AND BENEFITS

The Urban Economics assessment has assessed the key costs (adverse effects) and benefits (positive effects) of the proposed zoning change and these are assessed as follows:

Economic Benefits

- The proposal would increase the supply of general business land by approximately 22% of existing supply, and 50% of future general business zone demand. This contributes significantly to the capacity for the town to accommodate the expected population growth.
- The proposal would utilise existing bulk infrastructure with a value of \$10.3 million, which is a substantial economic benefit.
- The proposal will provide access to services and employment and allow people to 'live and work' within Pukekohe (a key strategic outcome for Pukekohe as a 'satellite town' in the Auckland Plan and Structure Plan), contributing towards the self-sufficiency identified by the Council for rural towns.
- The site is optimally located for the town's planned southern commercial expansion, which will encourage the establishment of new local businesses while reducing the pressure on existing business land in Pukekohe. Both BLIZ and BGBZ zoned land are suitably located as a southward expansion of the existing Buckland Road business cluster.

Economic Costs

- The potential trade competition and related economic effects on the town centre are addressed when the rapid rate of demand growth is considered. There is approximately 80,000m² -85,000m² of large format retail in Pukekohe, and in this sector, there would be

demand for approximately 64,000m² of additional floorspace over the next 2 decades. This rate of growth; however, offsets any competitive effect on the town centre.

6.7.5 IMPACT ON THE EXISTING COMMERCIAL CENTRE IN PUKEKOHE

The zone description for the BGBZ refers to the provision of large format retail and its relationship to the viability of existing centres. The zone statement includes the following statement:

Large format retail is preferred in centres but it is recognised that this is not always possible, or practical. These activities are appropriate in the Business – General Business Zone only when they do not adversely affect the function, role and amenity of the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.

This is a key economic outcome for the placement of the BGBZ within an existing urban area. This same outcome is mirrored in Objective H14.2(6):

- (6) *A range of business activities outside centres are provided for, while ensuring activities within the zone do not compromise the function, role and amenity of centres.*

And Policy H14.3(17)

- (17) *Avoid commercial and retail activities of a scale and type locating within the zone that will compromise the function, role and amenity of the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone beyond those effects ordinarily associated with trade effects on trade competitors.*

An important function of the BGBZ is to enable activities that are unable to locate in centres, most notably large format retail and trade suppliers. However there is an important qualification that these activities are primarily intended to locate in centres, to support their role. While BGBZ is consistent with a “centres first” principle it enables the provision of large format retail and other commercial activities that could not otherwise locate within an established centre.

As outlined in the Urban Economics assessment the Pukekohe population is forecast to have rapid growth, of an approximate 50% increase over the next two decades. This will have at least a 50% increase in the demand for large format retail and trade suppliers. The assessment has calculated that there is approximately 52,500m² of large format retail in Pukekohe, and in this sector there would be demand for 25,000 - 30,000m² of additional floorspace over the period to 2038. Accordingly, the rapid rate of demand growth would offset any competitive impact on the town centre within a short time period. In terms of resilience, the Urban Economics assessment has concluded that the Pukekohe Town Centre is in very strong commercial condition, with very low vacancies and strong rental rates.

The assessment therefore concludes that the proposed BGBZ would enable additional large format retail in the Manukau Road area. It adds that this would add to the existing critical mass of large format retail in the Manukau Road area and would offer co-location of agglomeration economies. In practical terms, consumers would be able to easily visit 2-3 stores in one trip and compare goods before making a purchase. Under this scenario, retailers are more likely to compete for customers in terms of product range, price and service. Critically, the BGBZ would enable a range of commercial activities to support the planned residential growth in Pukekohe that may not be possible or practical to be located in centres.

6.7.6 ECONOMICS EFFECTS CONCLUSION

The conclusion of the Urban Economics assessment is that the proposed BGBZ is supported for the following reasons:

- The site is relatively small (7.9 hectares) and represents a modest expansion to Pukekohe's business land supply. This economic assessment has been prepared with a level of detail that reflects the scale of the proposed land use.
- There is also a requirement for specific activities that require resource consent to establish on the site to be assessed in terms of their impacts (if any) on the town centre at the Resource Consent stage. This means that a detailed assessment of the effects of a wide range of activities on the site is not required for this report.
- The proposed BGBZ would have significant economic benefits and no economic costs.

6.8 LANDSCAPE AND VISUAL EFFECTS

The site is elevated and rises steadily some 20m Buckland Road to the south west. The site, and in particular 301 Buckland Road, is visually prominent and can be readily seen from a number vantage points within the urban areas of Manukau Road, from Pukekohe Park and from the rural areas to the south.

With the exception of two dwellings and some sparse exotic trees and hedge rows, the site is entirely in pasture.

The site and its surrounding locality is not recognised as being any identified outstanding or high natural landscapes or character areas and there are no identified outstanding natural features near the site (the outstanding natural feature of Pukekohe Hill being approximately 3.7km to the north east of the site and not in direct line of sight).

The lack of any significant or remarkable landscape features is reinforced by its FUZ zoning and the basis that and landscape sensitivity assessment formed part of the zoning review of the land as part of the Unitary Plan review.

It is noted that each property that forms the PCA each have a land use consent for activities enabled in the BLIZ already approved and both of those assessments concluded that any adverse landscape effects were less than minor. This includes a large trade retail and warehousing activity approved on 301 Buckland Road.

The proposed zoning would enable the range of activities envisaged in the Structure Plan and expected within this locality. The BGBZ zoning while enabling industrial activity also enables a range of other commercial activities such as large format retail, offices and trade retail that would result in development that is more aesthetically pleasing. It is also noted that all buildings in the BGBZ require resource consent for a restricted discretionary activity with "design and appearance" being a matter of discretion for the assessment of any new buildings.

It is therefore concluded that any adverse landscape and visual effects associated with the proposed BGBZ of the site will be avoided, remedied or mitigated.

6.9 REVERSE SENSITIVITY AND INTERFACE EFFECTS

The site is located directly opposite Pukekohe Park. This is a recognised multi-purpose recreation facility zoned Special Purpose - Major Recreational Facility. Pukekohe Park provides for horse racing and training associated with the Counties Racing Club, motor racing associated with the

Pukekohe Raceway, and also operates as a events centre (including wedding, conferences and other business events).

As a result, when events are occurring there are effects from traffic volumes and noise (including late night noise) that go beyond the boundaries of Pukekohe Park and these can be experienced within the PCA. In that regard the potential for activities that are sensitive to these existing (and lawfully established) effects to restrict the activities at Pukekohe Park is relevant and is known as a “reverse sensitivity” effect.

In this regard the BGBZ is a good fit with regard to avoiding reverse sensitivity effects as it does not permit sensitive activities such as residential development, supported residential care, integrated residential development (i.e. retirement village) or visitor accommodation. The activities that are enabled can function safely within the existing environment that includes Pukekohe Park and in many ways the BGBZ could be complementary to the activities already operating at Pukekohe Park.

It is noted that some community activities enabled in the BGBZ may be of some limited sensitivity to the effects from the operation of Pukekohe Park such as healthcare, education and care centres but it is also recognised that these activities all require restricted discretionary or full discretionary activity resource consent to establish and reverse sensitivity (and the ability for these activities to internalise existing effects) would form part of the assessment for any development proposal.

Accordingly, it is concluded that any adverse reverse sensitivity effects from a BGBZ on the site can be avoided , remedied or mitigated.

7 CONSULTATION

7.1 MANA WHENUA CONSULTED

The Requester has engaged with the following iwi authorities that have mana whenua status in this area:

- Ngāi Tai ki Tāmaki - Ngāi Tai ki Tāmaki Tribal Trust
- Ngāti Maru - Ngāti Maru Rūnanga Trust
- Ngāti Tamaoho - Ngāti Tamaoho Trust
- Ngāti Te Ata - Te Ara Rangatu o Te Iwi o Ngāti Te Ata Waiohua
- Te Ākitai Waiohua - Te Ākitai Waiohua Iwi Authority
- Waikato Tainui - Te Whakakitenga o Waikato Incorporated

A consultation pack was sent to each of these iwi authorities which included a summary of the proposed plan change and executive summaries of the preliminary findings from all specialists.

The Requester was contacted by Ngāti Tamaoho and Ngāti Te Ata who requested further engagement.

CULTURAL VALUES ASSESSMENTS

Ngati Te Ata and Ngati Tamaoho indicated that would like to prepare a Cultural Values Assessment (CVA). No other responses were received from the other mana whenua groups.

7.1.1 NGĀTI TE ATA

Ngāti Te Ata are a mana whenua iwi of Pukekohe. Ngati Te Ata prepared a comprehensive CVA covering their history and whakapapa with the land and the range of resource management issues that matter to them. These include the adoption of a kaitiaki approach whereby Ngati Te Ata have a responsibility to speak for and protect those who cannot speak for themselves the earth, the trees, water, fish, birds, the crabs, every single element on this earth which man has not created, is alive. For Ngati Te Ata every element has wairua and mauri.

Matters of concern and interest in the CVA are:

- Heritage protection and recognition (physical landscapes, cultural heritage)
- The effects of urbanisation
- Soil and earthworks
- Erosion and sediment control
- Wai (Water) including waterways, water quality, groundwater, recharge and water allocation, stormwater, wastewater
- Biodiversity
- Indigenous vegetation
- Wetlands (Repo)
- Open Space and greenways
- Sustainability
- Natural hazards
- Infrastructure
- Urban Design
- Air

Having considered this wide range of matters Ngati Te Ata conclude:

Based on our understanding of cultural matters and our experience, we do not expect any significant cultural constraints to the rezoning of this site.

In principle we are supportive (at this stage) providing that further discussion takes place as more technical detail becomes known and the recommendations as outlined in Section 5: Te Kaitiakitanga o te Taiao are provided for in design, best practice and decision making moving forward.

However, this cultural values assessment represents only a starting point for initial engagement and will require further consultation and dialogue between Ngāti Te Ata and Peterex Properties and Pukekohe Limited and Auckland Council. An Addendum to this CVA report may also be required as the plan change progresses.

The Requester is grateful to Ngati Te Ata for their thoroughness and co-operation with this Requester and is committed to further engagement as required throughout the process.

7.1.2 NGĀTI TAMAHOHO

Ngāti Tamaoho are a mana whenua iwi of Pukekohe.

The CVA prepared by this iwi addresses the cultural, historical, and traditional importance of this area to Ngāti Tamaoho. The stated aim of their CVA is to:

- document Ngāti Tamaoho's cultural values, interests, and associations with the PCA;
- identify specific cultural sites and resources;
- assess the values of these sites and resources;
- identify the potential impacts that arise from project activities and assess the significance of effect; and
- provide recommendations as to how to avoid, remedy or mitigate the potential effects to Ngāti Tamaoho.

Their assessment:

- Provides a baseline of known environmental or natural features and resources that may hold cultural values.
- Provides a statement of cultural association Ngāti Tamaoho has with the study area.
- Identifies any known cultural sites and resources within the study area.
- Describes the value or significance of such sites and resources.
- Identifies the cultural constraints and risks associated with the study area and the potential significance of effects.
- Identifies the aspirations of Ngāti Tamaoho for key values and features of this site so as to give the Client a basis for working with Ngāti Tamaoho to avoid adverse effects and protect cultural values.

The conclusions of the CVA are:

1. The area of the proposed plan change is part of the traditional food-bowl of Ngāti Tamaoho. It includes maara-kai, pataka-mai, mahingakai and is part of the waahi tupuna that is Pukekohe. While the nature of the development works into the future are not yet fully known, the cumulative effects of development will risk effecting the freshwater, former wetlands, soil and land, biodiversity flora and fauna, and air. It is important for the client and their contractors and employees to recognise that these are the traditional lands of Ngāti Tamaoho as recognised by the Crown.
2. Ngāti Tamaoho understands the importance of development to provide for a growing region and country. These upgrades and works provide for that growth and were done in conjunction with Ngāti Tamaoho can retain and enhance our place as mana whenua of the area. As kaitiaki it is our duty to protect the lands, waters, flora and fauna of our rohe.
3. Ngāti Tamaoho seeks to reconnect with our traditional lands and taonga as guaranteed by both Te Tiriti O Waitangi and the Ngāti Tamaoho Settlement Act 2018. By working with Ngāti Tamaoho to protect and uphold the cultural values discussed here, the Client have the opportunity to uphold these agreements and support our self-determination as a people.
4. Ngati Tamaoho does not object to this Plan Change even though we reserve the right to do an addendum when future consents come up to recognise this overview cannot drill down

into design and concept detail.

5. Ngati Tamaoho agrees in principle subject to: ongoing meaningful engagement into the future with the developers on any future design.

The Requester is grateful to Ngati Tamaoho for their thoroughness and co-operation with this Request and is committed to further engagement as throughout the process.

7.2 PUKEKOHE PARK

Counties Racing Club owns and operates Pukekohe Park. We understand that the Counties Racing Club is currently pursuing a private plan change to rezone land opposite the site to BGBZ also.

Both parties have been in contact and are aware of each proposal and are mutually supportive of the proposed zoning change.

7.3 AUCKLAND COUNCIL

The Requester approached Auckland Council in June 2021 to discuss the prospect for a private plan change on the site. This resulted in a meeting with the Plan and Places personnel Craig Cairncross - Team Leader, Central South and Celia Davidson - Manager, Unitary Plan.

8 STATUTORY ASSESSMENT

8.1 INTRODUCTION

Sections 67(3) and 75(3) of the RMA states that a Regional Plan and District Plan must give effect to any National Policy Statement; any New Zealand Coastal Policy Statement; and any Regional Policy Statement. In addition to these documents above, Section 75(3) of the RMA states that a District Plan must not be inconsistent with a Water Conservation Order or a Regional Plan. The following assessment sets out how the PPC gives effect to the documents set out below:

- National Policy Statement for Freshwater Management 2020
- National Policy Statement on Urban Development Capacity 2020
- New Zealand Coastal Policy Statement 2010;
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health;
- Chapter B of the Auckland Unitary Plan The following assessment also sets out how the PPC is not inconsistent with the regional plan provisions of the Unitary Plan.

8.2 NATIONAL POLICY STATEMENTS

8.2.1 NATIONAL POLICY ON URBAN DEVELOPMENT 2020

National policy statements are issued by the government to provide direction to local government about matters of national significance which contribute to meeting the purpose of the RMA.

The National Policy Statement on Urban Development (**NPS:UD**) came into effect on 20 August 2020. The NPS:UD requires local authorities to ensure that sufficient land is identified and zoned to meet expected demand for integrated urban development. It sets out a range of objectives and policies that apply to local authorities, and provides a tiered approach outlining additional policies which apply to Tier 1 and 2 local authorities, being districts with medium or high growth within their

district boundaries. The policies seek to have well-functioning urban environments that have good accessibility between housing, jobs, open spaces and community services; suit different business sectors; support competitive operation of land; are resilient to climate change; and take into account the principles of the Treaty of Waitangi. Of note, Policy 8 requires local authorities to be responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments.

The NPS:UD contains a number of provisions that refer to business and employment. Section 2.1 sets out the Objectives for the NPS:UD which focusses on housing affordability acknowledging that urban environments change over time, Treaty of Waitangi matters and integration of development with infrastructure. Objective 3 states:

Objective 3: *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- (a) *the area is in or near a centre zone or other area with many employment opportunities*
- (b) *the area is well-serviced by existing or planned public transport*
- (c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

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

- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; ...*

Policy 2: *Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

3.3 Sufficient development capacity for business land

(1) *Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet the expected demand for business land:*

- (a) *from different business sectors; and*
- (b) *in the short term, medium term, and long term.*

(2) *In order to be sufficient to meet expected demand for business land, the development capacity provided must be:*

- (a) *plan-enabled (see clause 3.4(1)); and*
- (b) *infrastructure-ready (see clause 3.4(3)); and*
- (c) *suitable (as described in clause 3.29(2)) to meet the demands of different business sectors (as described in clause 3.28(3)); and*
- (d) *for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22)*

The NPS:UD focusses primarily on housing supply, heights and intensity to provide for sufficient development capacity for housing (Subpart 1 – 3.2). To support these outcomes it also requires sufficient development capacity for business land (Subpart 1 – 3.3) with an emphasis on providing

land to meet the expected demand for business from different business sectors in the short term, medium term, and long term.

The PPC recognises the policy directive set out by the NPS:UD and seeks to give effect to the objectives and policies through:

- Rezoning the land from the FUZ to the BGBZ;
- Enabling the growth of Pukekohe and catering for current demand and the anticipated future growth of the business sector in Pukekohe;
- Locating close to current business and future business areas that are well connected through proposed footpaths and roads;
- Providing for development which can be serviced by current or funded infrastructure which has been planned to enable growth in Pukekohe;
- Adopting the existing BGBZ provisions for consistency with other Auckland areas and to facilitate a employment focussed zone with quality urban design outcomes, and
- The ability to facilitate efficient development of key infrastructure to service the sites principally through the resource consent, engineering approval and building consent processes.

8.2.2 NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT 2020

The National Policy Statement for Freshwater Management (NPS:FM) came into effect on 3 September 2020. The NPS:FM sets out the objectives and policies for freshwater management under the RMA. The NPS:FM has been developed with the fundamental concept that protecting the health of freshwater protects the health and wellbeing of the wider environment. This concept is guided by six principles for management, being mana whakahaere, kaitiakitanga, manaakitanga, governance, stewardship and care and respect.

The objective of the NPS:FM is:

- (1) *The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:*
 - (a) *first, the health and well-being of water bodies and freshwater ecosystems*
 - (b) *second, the health needs of people (such as drinking water)*
 - (c) *third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*

The PPC gives effect to the NPS:FM as there are no freshwater ecosystems on the PCA. The development of the PCA for business activity, including any discharges of contaminants will be managed so that there is no negative effect to the health of people or communities that come into contact with freshwater. Furthermore the PPC recognises the policy directive set out by the NPS:FM and seeks to give effect to the objectives and policies by:

- Not including any stream or wetland areas within the PPC site.
- The provision for on-site stormwater collection treatment and disposal within each property based on the assumption that reticulated stormwater services would be provided, in the short to medium term.
- Assessment that the principles of hydrologic neutrality can be achieved via a stormwater

management plan.

- The ability to provide for stormwater management as part of any development based on land use (noting that all buildings require resource consent), discharge (s14 stormwater discharge consents, or earthworks consent requirements that would be triggered by the provisions in the BGBZ zone or Auckland Wide rules.

8.2.3 NEW ZEALAND COASTAL POLICY STATEMENT 2010

The purpose of the New Zealand Coastal Policy Statement (**NZCPS**) is to state policies in order to achieve the purpose of the Resource Management Act in relation to the coastal environment of New Zealand.

The land is not within the coastal environment and the NZCPS is not considered to be relevant.

8.2.4 NATIONAL ENVIRONMENTAL STANDARD FOR ASSESSING AND MANAGING CONTAMINANTS IN SOIL TO PROTECT HUMAN HEALTH

The National Environmental Standard (**NES**) for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 came into effect in January 2012. The NES provides statutory guidelines to address potential soil contaminants to minimise the risk to human health. The NES specifically applies to applications which seek to change the use of the land and an activity listed on the Hazardous Activities and Industries List (HAIL) has or is more than likely to have occurred on that land.

As set out in section 6.4 above, both the properties subject in the PCA have been subject to assessments under this NES and have been assessed as suitable for the activities enabled within a BGBZ.

8.3 UNITARY PLAN

8.3.1 REGIONAL POLICY STATEMENT

Chapter B of the Unitary Plan forms the Regional Policy Statement for Auckland. It provides a framework for promoting the sustainable management of the Auckland regions natural and physical resources by identifying issues and outlining objectives and policies for managing these issues.

Chapter B1 of the RPS sets out the issues of regional significance and this includes urban growth and form.

Chapter B2 - Urban growth and form sets out the objectives and policies that relate to:

- Urban growth and form (B2.2)
- A quality built environment (B2.3)
- Residential growth (B2.4)
- Commercial and industrial growth (B2.5)

The relevant provisions of Chapter B2 are set out in detail in **Attachment 12**.

With regard to B2.2 it is my view that both the BGBZ will achieve a quality compact urban form and it will enable employment growth that would promote greater productivity and economic growth, better use of existing infrastructure and efficient provision of new infrastructure, and greater social and cultural vitality. A BGBZ on the site would enable sufficient development capacity and land

supply to accommodate commercial and industrial growth to support the growing community.

With regard to B2.3 a BGBZ which requires resource consent for all new buildings (as a restricted discretionary activity) is sufficient to ensure that these objective and policies are given effect to, especially given the context of the land in close proximity to BLIZ and BGBZ land to the north (Manukau Road and likely to be rezoned from FUZ to the south).

Policy B2.5 which relates to commercial and industrial growth is met by a BGBZ as this zone meets the current and future demands for employment growth in Pukekohe and gives effect to the RPS. While this zone provides a wider range of employment activities (including industrial activities) the provisions in the zone will ensure that Council will have sufficient control over design and appearance and other matters of discretion, to ensure that the scale and nature of development is compatible with adjoining residential and other business zoned activities in the locality. As set out in the Urban Economics assessment, a BGBZ with its limits on the scale of retail development, will be able to support and reinforce the viability and function of the Pukekohe Town Centre.

The BGBZ zone will be placed within an identified growth corridor that will eventually link Pukekohe with the smaller community of Buckland with this corridor focussed on employment zoning being a mix of BGBZ and BLIZ.

8.3.2 REGIONAL/DISTRICT PLAN

The Auckland Wide chapter of the Unitary Plan is relevant, and the following sections of that chapter have been considered:

- E1 Water quality and integrated management
- E8 Stormwater - Discharge and diversion
- E11 Land disturbance – Regional
- E12 Land disturbance – District
- E25 Noise and vibration
- E30 Contaminated land
- E27 Transport

The development of land and the establishment of activities within a BGBZ will likely trigger some, if not all of these chapters and the provisions within them. The assessment of these matters can be undertaken as part of that development process and the assessment of effects has demonstrated that the land is suitable for a BGBZ.

8.3.3 RESOURCE MANAGEMENT (ENABLING HOUSING SUPPLY AND OTHER MATTERS) AMENDMENT ACT 2021.

As of 21 December 2021 the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 came into legal effect, and this includes transitional provisions that affect the provisions of the RMA and the processing of private plan changes. These changes require the implementation of the Medium Density Residential Standards (**MDRS**) across Tier 1, 2 and 3 cities into district plans.

In particular, clauses 34-37 of Schedule 3 of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 relates to plan changes that have not been approved that seek to change or modify or establish a residential zone and requires the MDRS to be incorporated into them.

In this case, the PPC is not seeking a residential zone and the zoning sought (being the BGBZ) does not enable residential activity. On this basis no changes to the PPC are required to give effect to

this act.

8.4 OTHER MATTERS – S104(1)(C)

8.4.1 FUTURE URBAN LAND SUPPLY STRATEGY

The PPC has already been assessed against FULSS in section 4.4 of this assessment. The land has been identified as ready for rezoning from 2022 and identified a suitable for BLIZ. In this case a BGBZ is consistent with the FULSS as it enables the additional activities in BLIZ such as large format retail, office and commercial services. In this sense the BGBZ should be seen as being a broader employment zone than the BLIZ.

8.4.2 PUKEKOHE STRUCTURE PLAN

The PCA has been identified in the Structure Plan as being suitable for business and employment zoning to support the planned residential growth in the Pukekohe and to support its function as a self-sustaining town which provides employment for its residents. While the Structure Plan identifies all the FUZ land to the south of the Manukau Road business area as being broadly BLIZ, the opportunity to provide a bespoke area of BGBZ land, in addition to areas recently rezoned to BGBZ adjoining Pukekohe Park, is seen as being entirely consistent with the Structure Plan.

9 RESOURCE MANAGEMENT ACT 1991

9.1 PART 2 OF THE RMA

The purpose of the PPC is consistent with the purpose of the RMA (section 5) as it will enable the social and economic wellbeing of the growing population in the Pukekohe area through the rezoning of land for a range of employment activities.

As result of the Supreme Court's decision in *Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd* [2014] NZSC 38, a plan change request does not have to refer to Part 2 unless there is a conflict, and only then should a decision-maker refer back to Part 2.

The Unitary Plan is a fully integrated regional policy, regional and district, planning instrument which has been through a rigorous planning process and has only been recently made operative in part. In this case, there is no issue of “conflict” in the relevant planning instruments or other inconsistency or incoherence which would justify a recourse to Part 2 to resolve. However, for the sake of completeness, Part 2 has been considered and the PPC will:

- Enable the use of the land resource to achieve its potential to support the projected employment growth in Pukekohe (as outlined in the Structure Plan), therefore providing for the need of future generations in the local area;
- Enable the efficient use of the land resource by developing in an area that is identified for business employment and urbanisation, thereby minimising the further urbanisation of surrounding rural zoned land. This assists to safeguard the rural land resource to meet the reasonably foreseeable needs of future generations;
- The PPC seeks to avoid any adverse effects on waterways and terrestrial ecology, and
- The existing provisions of the Unitary Plan are considered to adequately enable such development, including the provision for necessary roading and infrastructure while avoiding, remedying or mitigating any adverse effects as assessed in this assessment.

In terms of the specific matters in section 6 and section 7 of Part 2 the following assessment is provided:

Section 6 - Matters of National Importance

Section 6(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development

Comment

The sites are not in the coastal environment and there are no natural wetlands, streams or lakes within the PCA.

Section 6(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development

Comment

There are no outstanding natural features or landscapes identified on the sites

Section 6(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna

Comment

There is no significant vegetation located on the sites.

Section 6(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers

Comment

The sites are not within the coastal environment

Section (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga

Comment

Following engagement with mana whenua, two CVA's have been prepared in support of the PPC that assesses the cultural value of the sites and considers the relationship Maori have to the land.

Section (f) the protection of historic heritage from inappropriate subdivision, use, and development

Comment

There are no heritage sites located on the sites

Section (g) the protection of protected customary rights

Comment

There are no protected customary rights identified on the sites.

Section 7 – Other Matters

Section 7(a) kaitiakitanga

Section 7(aa) the ethic of stewardship

Comment

The Request considers kaitiakitanga and the importance of Maori relationships with the

land through the ongoing engagement with mana whenua.

Section 7(b) the efficient use and development of natural and physical resources

Comment

The Request supports the efficient use and development of natural and physical resources through providing transport upgrades in line with the intended zoning outlined in the Structure Plan.

Section 7(c) the maintenance and enhancement of amenity values

Comment

The Request maintains amenity values by creating an environment that was envisaged to be urbanised by the Unitary Plan in the form of a business employment area that will contribute to the future character of the area as it develops.

Section 7(d) intrinsic values of ecosystems

Comment

There are no significant ecological values present on the sites

Section 7(f) maintenance and enhancement of the quality of the environment

Comment

The Request maintains and enhances the quality of the environment through adopting best practice stormwater management techniques including low impact design which can be implemented at the consent stage under the proposed zoning.

Section 7(g) any finite characteristics of natural and physical resources

Comment

Not applicable to the scope of the PPC.

Section 7(h) the protection of the habitat of trout and salmon

Comment

There is no habitat of trout or salmon are identified on the sites.

Section 7(i) the effects of climate change

Comment

The location of the sites adjoining the existing industrial business zoning of Pukekohe will assist in reducing travel from Pukekohe to other areas in Auckland for employment.

Section (j) the benefits to be derived from the use and development of renewable energy.

Comment

Not applicable to the scope of the Request. However it is noted industrial/business buildings can be used to generate solar power.

Section 8 – Principles of the Treaty of Waitangi

In respect to section 8, Te Tiriti of Waitangi has been taken into account in the preparation of this Request through consultation with the identified iwi and a commitment to continue engaging during subsequent phases of the Project.

10 CONCLUSION

The Requester proposes to rezone the land at 301 and 303 Buckland Road from FUZ to BGBZ. The land has been identified in the Pukekohe – Paerata Structure Plan as being suitable for a business zoning. While the structure plan indicated that the BLIZ may be suitable for land, this assessment has demonstrated that a BGBZ can provide for the establishment of industrial activity as well as limited office development and the provision for Large Format Retail, for which there is a demonstrated demand in Pukekohe and in this location.

The proposed BGBZ can also be established safely and effectively within the existing roading environment and the Council has already indicated the upgrade of Buckland Road to an arterial road in anticipation of business development in this location. Associated with this is the complementary proximity to Pukekohe Park with its blend of corporate, entertainment and business zoning and facilities.

The proposed plan change request will also be able to provide three waters infrastructure to service a BGBZ including the ability to provide low impact on stormwater solutions.

The Requester has engaged with all affected iwi and mana whenua in the rohe and two CVA's have been prepared and included with this request.

The Request has been assessed against all relevant statutory and non-statutory instruments and it has been determined that it is consistent with these instruments including the regional policy statement and the relevant regional and district provisions of the Auckland Unitary Plan.