

22 April 2022

Project Number: 4314.01

Auckland Council
Plans and Places Central/South

By Email: jimmy.zhang@aucklandcouncil.govt.nz

Attention: Jimmy Zhang - Planner

Dear Mr Zhang

301 AND 303 BUCKLAND ROAD PPC CLAUSE 23 - REQUEST FOR FURTHER INFORMATION RESPONSE 1 FROM REQUESTER

Further to your request for further information pursuant to clause 23 of the First Schedule of the Resource Management Act 1991 (**further information**), we are pleased to provide the following responses:

PLANNING, STATUTORY AND GENERAL MATTERS

#	Category of information	Specific Request	Reasons for request
P1	Shape files	Please provide shape files showing the proposed plan change area.	Shape files are required to show the extent of the Private Plan Change (PPC) request on the AUP(OP) GIS Viewer upon notification.

Response

Please see attached the shape files for the PPC area. They are in *.dwg and *.dxf format. Once extracted it should look like the following image

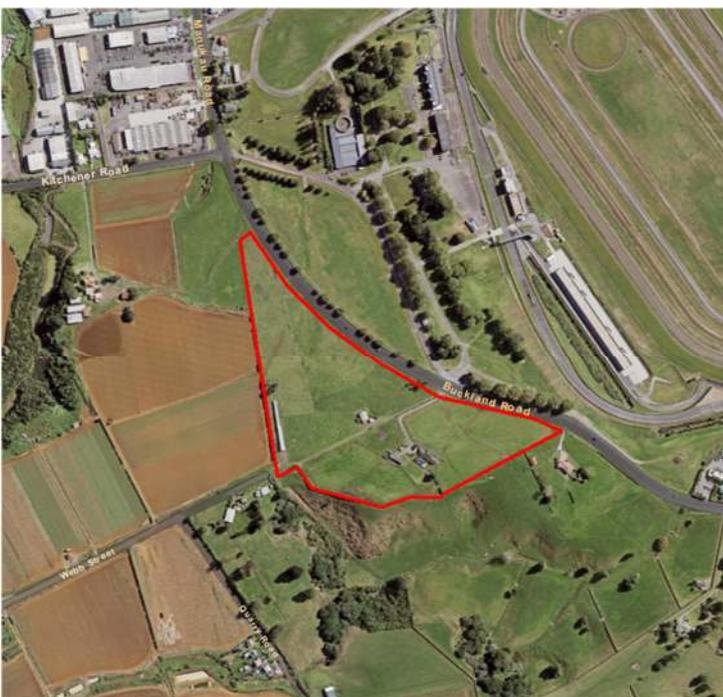


Figure 1: Shape file image

P2	Consultation	Please clarify whether Auckland Transport have been consulted with in the preparation of the PPC, and if so what the outcome of that consultation was.	Given the PPC will increase the number of trips generated on the current and future local and strategic network, it would be helpful to understand the extent of consultation undertaken with AT as the road controlling authority.
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There has been no specific consultation with Auckland Transport (AT) for this PPC. This is primarily because AT were involved with the two previous consents granted on this site for activities that would be enabled under the zoning sought. Copies of the consents granted on 301 and 303 Buckland Road are annexed to the PPC Request documentation as Attachment 3.

Of particular note is the consent for a large Trade Supplier activity at 301 Buckland Road which AT had a significant involvement in with regard to road upgrades needed to establish the activity. We note that a number of conditions in this consent require AT certification and involvement.

We note that AT were also involved in the Plan Change to rezone open space land at Pukekohe Park to Business-Mixed Use Zone which became fully operative on 12 February 2021. The comments from AT from that process and the resulting traffic recommendation and upgrades were taken into consideration as part of the assessment of this PPC request. The current request is consistent with the traffic recommendations and upgrades approved as part of that plan change process. This has also been acknowledged in the Traffic Matters response to the RFI.

P3	Integrated Planning approach	Please provide an assessment of the potential effects of the zoning proposal on the future implementation of the Pukekohe-Paerata Structure Plan, as well as any other potential risks/issues associated with rezoning the land General Business ('GB').	<p>In setting council's strategic direction for the FUZ surrounding Pukekohe-Paerata, the Pukekohe-Paerata Structure Plan has indicated a preference for the Light Industry ('LI') zone over the plan change area.</p> <p>The Urban Economics assessment notes that both the LI and GB zones are appropriate for the PC land. It appears that the GB zone is preferred due to the 'flexibility' it provides, as it enables a wider range of activities relative to the LI zone.</p> <p>The benefits of increased flexibility for a site needs to be considered alongside the strategic implications for the surrounding Future Urban zone ('FUZ') indicated for LI and the need to carefully manage the expansion of the GB zone.</p>
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Response

As set out in section 4.3 of the Request 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.

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.

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, as aspect which affects congestion across Auckland as a whole.

The plan change area is located in Area H of the Structure Plan, and in 4.4.11 it 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.

The Structure Plan has indicated that Area H (which includes the plan change area) 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 next 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.

The merits of the Business – General Business Zone (**BGBZ**) over the Business – Light Industry Zone (**BLIZ**) are then discussed in section 2.1 - 2.3 of the section 32 assessment where it is stated that a key issue identified in the Auckland Unitary Plan – Operative in Part (**Unitary Plan**) (Issue B2.1) is the continued pressure to accommodate Auckland’s population growth and provide access to housing and employment opportunities. This PPC responds to that issue with regard to providing a wide range of employment opportunity.

While this PPC does not involve residential development it provides much needed opportunities for employment growth within the community to support the residential growth already underway in Pukekohe.

The need for local employment to support growth is set out in the Structure Plan and the site included in the plan change area are in an area identified for business/employment zoning. The choice of a BGBZ will best achieve this objective as it is a zone that enables the broadest range of employment activities including light industry, office development and large format retail, all of which have a demonstrable demand in Pukekohe.

The Pukekohe-Paerata Structure Plan has identified the land to be zoned Business – Light Industry Zone (**BLIZ**). Section 3.3.2 discusses business land options and states:

Business land demand analysis was prepared for the structure plan. This estimates that approximately 80 to 100ha (net developable) of new industrial land is needed in Pukekohe-Paerata to meet future demand for employment. This assessment takes into account the capacity in existing zoned industrial areas. In addition to this 80 to 100ha, additional land will be needed for new roads, esplanade reserves, flood affected areas and any other constraints in industrial areas.

The structure plan proposes approximately 95ha (net developable) of land to be zoned Light

Industry to meet the demand discussed above. This could enable around 2370 new jobs within the new industrial areas in the structure plan area. Providing for business activities in the structure plan area can reduce the need for community and freight movement northwards, which affects congestion across Auckland as a whole.

The Light Industry Zone provides for a range of business activities that are less likely to fit within town centres. Some activities that support rural industries are also provided for in this zone. While this zone anticipates a lower level of amenity than the other business zones (except the Heavy Industry Zone), it does not anticipate activities that will generate objectionable odour, dust or noise.

The structure plan proposes new areas of Light Industry Zone in the north (part Area D), north west (part Area E) and to the east and south (part Areas F and H).

While this analysis is generally supported, the Urban Economics assessment has identified strong demand for Large Format Retail activity as well as demand for light industry and has identified this land (adjoining the existing light industry area in south Pukekohe) and opposite Pukekohe Park (with newly zoned land to BGBZ) as being particularly suitable for a wide range of business activities.

While the Urban Economics assessment concludes that the BGBZ and BLIZ are the only business zones suitable for this land it has concluded that the BGBZ is preferred due to its wider range of employment opportunities and flexibility to respond to market demand before the Structure Plan enables the release of additional land to facilitate growth. While there is clear demand for Large Format Retail to support growth in Pukekohe, the BGBZ still enables light industry as a permitted activity. On this basis, it is concluded that a BGBZ zone is also a light industry supporting zone but with additional activities enabled such as large format retail and limited office development. In that sense, the proposed zoning should not be seen as a binary choice of BGBZ or BLIZ but as a zone that enables light industry and other employment opportunities.

While the Structure Plan only identifies the BLIZ for employment growth, the BGBZ offers a wide range of business and employment related activities and the Urban Economics assessment has demonstrated that there is demand for new business land in Pukekohe to meet the current demand associated with a growing population. As set out in 5.1 of the effects assessment report the range of activities enabled in the BGBZ include light industry, office development, large format retail and food & beverage activity. The economic assessment in section 6.7 effects assessment report has shown that there is demand for both light industry and large format retail development in Pukekohe and the BGBZ is well suited to provide the flexibility of these business activities.

The proposed zoning would complement the existing business and light industry development along Manukau Road and will also complement the recently zoned BGBZ land opposite the plan change area. A BGBZ would also not inhibit the further introduction of BLIZ on FUZ land further to the south as those areas are brought into the urban fabric of Pukekohe. It is also noted that the Council has recently notified Plan Change 74 that involves 82.66 hectares of land in south-eastern Pukekohe, bounded by Golding Road, Station Road, Royal Doulton Drive, part of Yates Road and a stream that runs in a roughly southerly direction from Golding Road to Yates Road. This land is essentially on eastern side of Pukekohe Park. As part of this plan change is 19.97ha of land to be rezoned BLIZ in accordance with the Structure Plan. The proposed BGBZ zoning at Buckland Road will complement the BLIZ zoning included in Plan Change 74.

The purpose of the request to rezone the land to BGBZ is to provide a flexible and wide range of employment activities to support the planned and already established growth in Pukekohe. The BGBZ provides the most flexible and broadest range of employment activities in the Unitary Plan while also excluding or discouraging activities that are not suited to this locality (i.e. residential and small form retail).

P4	Integrated Planning approach	Please explain how the mitigation measures outlined in Table 1 of the Commute ITA can be implemented, and also delivered in a manner which ensures the safety and efficiency of the road network, if no precinct is proposed to sit over the land.	This information is required to better understand the transport effects and their management, particularly given the range of uncertainties including the future use of the land, the range and scale of activities enabled through the zoning and the potential for multiple landowners and future subdivision.
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It is expected that the identified mitigation measures (or other measures identified by Auckland Council and/or Auckland Transport) would be required at the development stage either as part of the subdivision process and/or the land use consent process. For example, vacant sites require restricted discretionary activity consent if they comply with Standard E38.9.2.2 (Table E38.4.3(A34)) otherwise this subdivision is a discretionary activity or a non-complying activity.

All buildings in the BGBZ require assessment as a restricted discretionary activity.

Chapter E27 – transport has a standard (E27.6.1) with a trigger of higher trip generating activities which includes the following business activities:

(T7)	Office		5,000 m ² GFA
(T8)	Retail	Drive through	333 m ² GFA
(T8A)		Retail activities (non-drive through)	1667m ² GFA
(T9)	Industrial activities	Warehousing and storage	20,000 m ² GFA
(T10)		Other industrial activities	10,000 m ² GFA

Any activity that exceeds these thresholds requires consent for a restricted discretionary activity.

P5	Precinct provisions	Has consideration been given to the application of a SMAF:1 overlay over the plan change area?	The AUP states that for greenfield areas adverse effects of development shall be avoided as far as practicable or otherwise remedied or mitigated and this includes changes in hydrology (Policy E1.3.8).
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Response

As part of both existing land use consents for 301 and 303 Buckland Road extensive assessments of hydrology were undertaken given that there is no reticulated stormwater system established. Both assessments determined that stormwater systems could be designed to achieve hydrologic neutrality.

The stormwater management assessment for the plan change area has already undertaken an equivalent SMAF-1 assessment for the likely impervious areas and has concluded the following (refer section 4 of the Stormwater Assessment in Attachment 9 of the Request assessment):

- *Provide for SMAF-1 equivalent hydrology treatment for all impervious areas.*
 - o *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*

- o *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*
- o *Attenuated and treated stormwater discharge points shall be to 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 (eg Gross Pollutant Traps, Oil Grit Separators etc - depending upon actual site use).*
- *Provide attenuation to ensure peak runoff is not increased up to and including the 100yr ARI Rainfall event.*

That said, the PPC location has low impervious surface and stormwater ultimately discharges into local, albeit highly modified, stream systems. As part of the plan change the Council has the discretion to extend a SMAF classification over the site.

P6	Clarification	Please confirm if the upgrade of 'footpaths' in Table 1 of Commute's ITA will include kerb and channelling.	Point of clarification on whether upgrades to kerb and channelling are included in the provision of 'footpaths'.
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It is expected that the upgrade of footpaths would also include the provision of associated kerb and channelling.

ECONOMIC MATTERS

Questions E1 through to E6 have all been answered by the Adam Thompson of Urban Economics and this is annexed as **Attachment 2**.

TRAFFIC MATTERS

Question T1 through to T29 have all been answered by Leo Hills of Commute and this is annexed as **Attachment 3**.

We trust this this response addressed the matters raised in information request. Please contact the undersigned if you require any further detail or clarification.

Yours faithfully

SCOTT WILKINSON PLANNING



Robert Scott
Planning Consultant

301 and 303 Buckland Rd PPC - RFI 1 - April 2022