

# **AUCKLAND UNITARY PLAN OPERATIVE IN PART**

## **PROPOSED PLAN CHANGE 87 (Private):**

**301 & 303 Buckland Road, Pukekohe**

## **SUMMARY OF DECISIONS REQUESTED**

**Enclosed:**

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

## **Explanation**

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 24 February 2023.
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

## **Summary of Decisions Requested**

Plan Change 87 (Private): 301 and 303 Buckland Road, Pukekohe

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Decisions Requested
1	1.1	Buckland Road Trustess Limited ATTN Ann Zhou	annzou@ymail.com	Approve the plan change	Approve the plan change as notified.
2	2.1	Auckland Thoroughbred Racing Inc C/- Glaister Ennor	vicki.toan@glaister.co.nz	Neither supports nor opposes the plan change	If the plan change is approved, Auckland Council shall require as a condition of that approval that:  (a) if the submitter completes the upgrade to the intersection of Buckland Road, Manukau Road, and Kitchener Road, the registered owners of 301 and 303 Buckland Road be required to share the costs of the intersection upgrade.
2	2.2	Auckland Thoroughbred Racing Inc C/- Glaister Ennor	vicki.toan@glaister.co.nz	Neither supports nor opposes the plan change	If the plan change is approved, Auckland Council shall require as a condition of that approval that:  (a) if the implementation of the proposal or the use of the land re-zoned under the proposal triggers an upgrade of the intersection of Buckland Road, Manukau Road, and Kitchener Road earlier than would be required under PC 30, that the registered owners of 301 and 303 Buckland Road carry out that intersection upgrade where the submitter with share the costs of the intersection upgrade.
3	3.1	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the plan change unless the matters raised within its submission (as set out in Attachment 1 of the submission) can be adequately addressed.
3	3.2	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to include a precinct plan and precinct provisions for the plan change area. The precinct provisions should include specific transport mitigation mechanisms to ensure that the matters identified in the Applicant's ITA, further information responses and within this submission can be appropriately addressed.
3	3.3	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to include a precinct plan and precinct provisions which provides for a collector road (PU-NS-2 Collector Road) with separate cycle and walking facilities linking to Buckland Road. The connection should be designed so that it does not preclude future development nor links to the south.
3	3.4	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to provide certainty that the upgrade to the Buckland Road / Kitchener Road intersection will be delivered.
3	3.5	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to ensure that the controlled access intersection on Buckland Road (roundabout or traffic signals) should be identified on a precinct plan and provisions specific to the plan change area.
3	3.6	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to require subdivision and development to provide connections (for all modes) to adjacent sites, and connections through to Buckland Road.
3	3.7	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline the Plan Change or alternatively amend the plan change to require the Buckland Road frontage to be upgraded to an urban standard with separated walking and cycling facilities in conjunction with subdivision and development of the site.

Plan Change 87 (Private): 301 and 303 Buckland Road, Pukekohe

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary of Decisions Requested
3	3.8	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections along the frontage of 32 Kitchener Road and provide for pedestrian crossings on Buckland and Kitchener Roads. Furthermore, provision for bus stops should also be provided for along the west and east sides of Buckland Road. It is considered that these transport infrastructure mitigation requirements would require precinct plan and provisions to ensure they are provided for.
3	3.9	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to include precinct provisions to include whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets as a matter for discretion and policy.
3	3.10	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Supports the Reduced speed limits on Buckland Road (past the site) to 50km/h
3	3.11	Auckland Transport ATTN: Mathew Ford	Matt.Ford@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to limit or prevent direct vehicle access onto Buckland Road.
4	4.1	EnviroWaste Services Ltd ATTN: Kaaren Rosser	kaaren.rosser@environz.co.nz	Decline the plan change, but if approved make the amendment	Amend the proposed Business: General Business zone to the Business: Light Industry zone.
5	5.1	Nomita Singh C/- Mt Hobson Group	markb@mhg.co.nz	Approve the plan change	Approve the proposed Business: General Business zone.
5	5.2	Nomita Singh C/- Mt Hobson Group	markb@mhg.co.nz	Approve the plan change with amendment	If the plan change is approved, relevant infrastructure upgrades and extensions (public road, stormwater, wastewater, stormwater) to support the development of the plan change area should be provided by the developer, and shall enable the future development of future surrounding land.
6	6.1	Hira Bhana & Co. C/- Bharat Hira Bhana	hira.bhana@xtra.co.nz	Approve the plan change with amendment	Implement buffer zones in the plan change area adjoining the submitter's land to protect against potential reverse sensitivity effects.
6	6.2	Hira Bhana & Co. C/- Bharat Hira Bhana	hira.bhana@xtra.co.nz	Approve the plan change with amendment	Implement measures to ensure that future development in the plan change area cannot complain about existing activities on the submitter's land.

## **Submissions**

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only
Submission No:
Receipt Date:

## Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) \_\_\_\_\_

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

Telephone:  Fax/Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

Plan Change/Variation Name

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

**Other (specify)** \_\_\_\_\_

1.1

## Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

\_\_\_\_\_ Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.



7 The submitter wishes to be heard in support of its submission.

**Date** 1 December 2022



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V J Toan  
Counsel for Auckland Thoroughbred Racing Inc

**Address for Service:**

Auckland Thoroughbred Racing Inc  
C/- Glaister Ennor  
PO Box 63, Shortland Street, Auckland 1140

For: Vicki Toan

Email: [vicki.toan@glaister.co.nz](mailto:vicki.toan@glaister.co.nz)

Telephone: +64 9 356 8243

1 December 2022

Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Attn: Planning Technician

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 87: 301-303 BUCKLAND ROAD,  
PUKEKOHE.**

Please find attached Auckland Transport's submission on Proposed Private Plan Change 87 to the Auckland Unitary Plan (Operative in Part). The applicant is Pukekohe Limited.

Should you have any queries in relation to this submission, please contact me on 021 240 0159 or email me at [matt.ford@at.govt.nz](mailto:matt.ford@at.govt.nz).

Yours sincerely



Matthew Ford  
**Planner, Land Use Policy & Planning Central**

Cc: [Robert@scottwilkinson.co.nz](mailto:Robert@scottwilkinson.co.nz)

## SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 87 – 301 – 303 BUCKLAND ROAD, PUKEKOHE

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Submission on:** Proposed Private Plan Change 87 from Pukekohe Limited to rezone 7.8 hectares of land at 301 and 303 Buckland Road, Pukekohe from the Future Urban Zone to the Business – General Business Zone.

**From:** Auckland Transport  
Private Bag 92250  
Auckland 1142

### 1. Introduction

- 1.1 Pukekohe Limited ('the applicant') has lodged a Private Plan Change ('PPC 87' or 'the Plan Change') to the Auckland Unitary Plan: Operative in Part ('AUP(OP)'). The Plan Change seeks to re-zone 7.8 ha from Future Urban Zone ('FUZ') to Business – General Business Zone ('BGBZ').
- 1.2 The proposed private plan change will rezone two parcels of land that are individually owned. The Plan Change documentation does not include any precinct plan or precinct provisions. There are two approved resource consents, one relating to each of the sites at 301 and 303 Buckland Road. The intention to develop these sites in accordance with the approved resource consents for a warehouse/trade supply depot at 301 Buckland Road and temporary industrial service storage yard at 303 Buckland Road is unclear/uncertain.
- 1.3 Auckland Transport is a Council-Controlled Organisation (CCO) of Auckland Council ('the Council') and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an "*effective, efficient and safe Auckland land transport system in the public interest*"<sup>1</sup>. Auckland Transport is responsible for the planning and funding of most public transport; promoting alternative forms of transport (i.e. alternatives to the private motor vehicle); operating the local roading network; and developing and enhancing the local road, public transport, walking and cycling network for the Auckland Region.
- 1.4 Urban development on greenfield land not previously developed for urban purposes generates transport effects and the need for robust implementation investment plans in transport infrastructure and services to support construction, land use activities and the communities that will live and work in these areas. Auckland Transport's submission seeks to ensure that the transport related matters raised by PPC 87 are appropriately considered and addressed.
- 1.5 The Drury-Opāheke and Pukekohe-Paerata Structure Plans ("the Structure Plans") were prepared by the Council and went through a robust process, including four stages of consultation, before being adopted by the Council's Planning Committee in 2019. The Structure Plans set out a pattern of land uses and the supporting infrastructure network

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<sup>1</sup> Local Government (Auckland Council) Act 2009, section 39.

for approximately 3,200 hectares of Future Urban zoned land around Drury-Opāheke and Pukekohe-Paerata.

- 1.6 The Plan Change site is identified in the Structure Plans as future Business – Light Industrial Zone. PPC 87 seeks to rezone the current Future Urban Zoned land (FUZ) to Business – General Business Zone (BGBZ). The proposed BGBZ zone is considered to be misaligned with the Structure Plan intent and careful consideration is needed to assess whether any adverse transport effects associated with this are able to be appropriately mitigated through the Plan Change. The proposed BGBZ zoning would provide for large format retail activities to establish as well as a range of business activities from light industry through to retail, office, food and beverage activities that would otherwise not be provided for by the anticipated Light Industrial Business Zone (LIBZ) in which the Pukekohe-Paerata Structure Plan and its associated ITA was predicated upon. The BGBZ generally has higher GFA threshold for activities, higher trip generation thresholds for activities and more intensive land use being proposed than the LIBZ. Auckland Transport is concerned that the higher intensity land use and its associated transport effects are appropriately avoided, remedied, or mitigated and that the existing and future transport network to serve the PPC87 site and the wider Pukekohe area is safeguarded and provided for. Furthermore, that active mode connections are provided beyond the site frontage to improve links to the Pukekohe Train Station and town centre located to the north.
- 1.7 In reviewing this Plan Change, Auckland Transport has had regard to the Integrated Transport Assessment ('ITA') completed by the Supporting Growth Alliance (SG) on behalf of Auckland Transport in 2019 to complement the Drury-Opāheke and Pukekohe-Paerata Structure Plans, as well as subsequent work by SGA on preparing a detailed business case ('DBC').
- 1.8 The ITA completed for the Drury-Opāheke and Pukekohe-Paerata Structure Plans ('the structure plan ITA') identified a new and upgraded arterial and collector road network, including a number of transport projects adjacent to or through the Plan Change site that are required to support the urbanisation of the area. These include:
- New indicative collector road PU-NS-2 crossing the Plan Change area and connecting Buckland Road to Quarry Road.
- This is noted in the structure plan ITA as delineating the western edge of the future industrial area and providing additional connectivity between Buckland and Tuakau Roads. The structure plan ITA identifies a natural constraint - two stream crossings and steep land around each stream and suggests alignment may require refinement to avoid (e.g. by utilising existing Quarry Road).
- Safety upgrades/improvements to Buckland Road (as well as Logan Road and Harrisville Road).
- 1.9 Auckland Transport's position is that collector and local roads, both new and where upgrading existing rural standard roads, are the responsibility of developers to provide. Developers are also responsible for providing intersection works which are required to access their development. Auckland Transport is then generally responsible for progressing any additional costs and elements associated with wider arterial standard roads. Developers are still expected to contribute to the frontage works associated with arterial roads such as footpaths, kerbs, cycle paths, berms and the required collector carriageway.

- 1.10 It is important that PPC 87 addresses the effects from development enabled by it and additionally that the form, function and alignment of the Structure Plan ITA identified collector road is also aligned to enable or provide for internal local road connections through the Plan Change area so as to avoid or reduce the need for additional road connections to Buckland Road (which is an existing arterial road).
- 1.11 Auckland Transport is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
- 1.12 Auckland Transport is available and willing to work through the matters raised in this submission with the Applicant.

## **2. Strategic context**

- 2.1 The key overarching considerations and concerns for Auckland Transport are described below.

### **Auckland Plan 2050**

- 2.2 The Auckland Plan 2050 ('Auckland Plan') is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The Auckland Plan provides for between 60 and 70 per cent of total new dwellings to be built within the existing urban footprint. Consequently, between 30 and 40 per cent of new dwellings will be in new greenfield developments, satellite towns, and rural and coastal towns. The Auckland Plan also recognises that the demand for business land and floorspace is an important consideration in planning for growth.
- 2.3 The transport outcomes identified in the Auckland Plan to enable this growth includes providing better connections, increasing travel choices, and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges; making walking, cycling and public transport preferred choices for many more Aucklanders; and better integrating land use and transport. The high-level direction contained in the Auckland Plan informs the strategic transport priorities to support growth and manage the effects associated with this plan change.

### **Managing Auckland-wide growth and rezoning**

- 2.4 The high-level spatial pattern of future development is represented at a regional level in the Auckland Plan and by the Future Urban Zone (FUZ) in the AUP(OP). It is further defined through sub-regional level planning including the Pukekohe-Paerata Structure Plan, to then be enabled through appropriate plan change processes. Development in the greenfield areas contributes to the overall growth in transport demands in parallel with the on-going smaller scale incremental growth that is enabled through the AUP(OP).
- 2.5 Wide scale growth across the region places greater pressure on the available and limited transport resources that are required to support the movement of additional people, goods, and services. In order to align the growth enabled by the AUP(OP) and plan changes with the provision of transport infrastructure and services, there needs to be a high level of certainty about the funding, financing and delivery of the required

infrastructure and services. Without this certainty, there will continue to be a significant deficiency in the transport network in terms of providing and coordinating transport responses to the dispersed growth enabled across the region. This will result in poor transport outcomes including lack of travel choice and car dependency as there will not be the transport infrastructure and services in place to support growth and the demands from development.

### **Sequencing growth and aligning with the provision of transport infrastructure and services**

- 2.6 The Future Urban Land Supply Strategy 2017 (**FULSS**) provides guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. 'unzoned' greenfield areas of development). This guidance was incorporated into the updated Auckland Plan in 2018. The FULSS sets out the anticipated timeframes for 'development ready' areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and to support development capacity to ideally be provided in a coordinated and cost-efficient way via the release of 'development ready' land.
- 2.7 The site is identified in the FULSS as part of Pukekohe which is intended to be 'development ready' between 2023 and 2027. Land is considered development ready once the following four steps are complete:
- Future urban zoned land identified in the Unitary Plan
  - Structure planning completed
  - Land rezoned for urban uses; and
  - Bulk infrastructure provided.
- 2.8 Plan changes which propose to allow future urban land to be urbanised before the wider staging and delivery of planned transport infrastructure and services has occurred need to be carefully considered. Any misalignment between the timing for providing infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is 'development ready'. The matters that need to be carefully considered include:
- Whether the Plan Change requires applicants to mitigate the transport effects associated with their development and to provide the transport infrastructure needed to service their development
  - Whether the development means that the strategic transport infrastructure being planned to service the wider growth area identified in the FULSS needs to be provided earlier
  - Whether the development impacts the ability to provide the strategic transport infrastructure identified to service the wider growth area, for example, will it foreclose route options or hinder future upgrades of existing infrastructure.
- 2.9 The above considerations need to be resolved regardless of the FULSS timeframe indications as to development readiness.
- 2.10 Adverse effects arise when development occurs before the required transport network improvements and services have been provided. Appropriate connections between jobs, housing, services including by way of public or active transport is a minimum requirement to achieve a well-functioning urban environment (Policy 1 NPS-UD). This cannot be addressed without providing clarity around the implementation of the network. There is a need to assess and clearly define the responsibilities for the required infrastructure and the delivery mechanisms. This includes considering the role of

applicants / developers, and taking into account the financially constrained environment that the Council and Auckland Transport operate within.

- 2.11 The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 (NPS-UD). Those objectives are quoted below (with emphasis in bold):

'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.'

'Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) **integrated with infrastructure planning and funding decisions;** and
- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.'

- 2.12 The Regional Policy Statement (RPS) objectives and policies in the AUP(OP) place similar clear emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B2.2.2(7)(c) and B3.3.2(5)(a). For example, Policy B3.3.2(5)(a) is to: *'Improve the integration of land use and transport by... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth'*). The alignment of infrastructure to support growth is essential to achieving a well-functioning urban environment.

### **Mitigation of adverse transport effects**

- 2.13 A critical issue is whether the Plan Change includes appropriate provisions to require development and subdivision proposals to mitigate adverse transport effects and to provide the transport infrastructure and services needed to serve it. This is addressed further in Attachment 1. The Pukekohe-Paerata Structure Plan and its associated ITA identifies a need to safeguard and provide for a future collector road connection across the Plan Change area. Auckland Transport is of the view that the potential alignment south of the plan change area is constrained and that therefore consideration through this process of access from the noted collector road and local access connections off that are important to safeguard or prevent reliance on additional connections to Buckland Road.
- 2.14 Auckland Transport is of the view that greater clarity is needed regarding the proposed transport infrastructure mitigation outlined in the Applicant's supporting documents (AEE

and ITA as well as their responses to further information requests) in terms of their scope, form, and function. This would better inform where potential differences may lie between the Auckland Transport and the Applicant providing all parties with more certainty in terms of safeguarding and delivery. Auckland Transport is of the view that precinct provisions and a precinct plan would provide an improved level of clarity and guidance for subsequent resource consent and engineering approvals processes as to responsibility for the identified transport network infrastructure upgrades and mitigation.

- 2.15 As mentioned above, adverse transport effects that arise when development occurs without required transport infrastructure and services being provided at an appropriate time and cannot be addressed without funding to support the planning, design, consenting and construction them. There is a need to assess and clearly define responsibilities relating to the required infrastructure and the potential range of funding and delivery mechanisms. This includes a consideration of what infrastructure is required at various stages of development.

### 3. Specific parts of the plan change that this submission relates to:

- 3.1 The specific parts of the plan change that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport, and include:

- The need for specific planning provisions, including a precinct plan to address matters raised in this submission;
- safeguarding and provision for the future transport network (PU-NS-2);
- Providing for active modes including connections to existing network;
- Ensuring an effective and future-proofed internal transport network which provides connections to future development on adjacent sites;
- Consideration of whole of life costs and effectiveness of public vested assets (including for public roads and stormwater assets);
- Implications for Buckland Road including:
  - frontage upgrades in conjunction with enabled subdivision and development;
  - vehicle access restrictions / flush median;
  - upgrade to the Buckland Road / Kitchener Road intersection; and
  - provision of a controlled access intersection on Buckland Road (providing for the future collector road connection and access to the internal road network for this plan change area).

### 4. The decisions sought by Auckland Transport are:

- 4.1 Auckland Transport **opposes** PPC 87 and seeks that it be declined unless the matters raised within this submission can be adequately addressed. The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**.

- 4.2 In the event that the Private Plan Change is accepted, the matters / concerns raised in this submission (including the main body and Attachment 1) should be appropriately addressed by amendments to the Plan Change, and any adverse effects of the proposal on the transport network adequately avoided or mitigated.

3.1

4.3 In all cases where amendments to the Plan Change are proposed, Auckland Transport would consider alternative wording or amendments which address the reasons for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the decisions requested.

**5. Appearance at the hearing:**

5.1 Auckland Transport wishes to be heard in support of this submission at a hearing.

5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

**Name:** Auckland Transport

**Signature:**



Sarah Wilson  
Team Manager, Land Use Policy and Planning South

**Date:** 1 December 2022

**Contact person:** Matthew Ford  
Planner, Land Use Policy and Planning Central

**Address for service:** Auckland Transport  
Private Bag 92250  
Auckland 1142

**Telephone:** 021 240 0159

**Email:** Matt.Ford@at.govt.nz

**Attachment 1**

Topic	Support / Oppose	Reason for submission	Decision requested
<p>Lack of PPC 87 specific transport provisions to provide for identified transport infrastructure mitigation</p>	<p>Oppose</p>	<p>Auckland Transport cannot be certain that the reliance on Auckland Unitary Plan (AUP(OP)) zone and Auckland-wide provisions will secure the delivery of required transport upgrades. These matters need to be addressed before Auckland Transport can be satisfied that the transport mitigation required to support the needs of development enabled by this Plan Change can be provided.</p> <p>Auckland Transport considers that the scope at the subdivision stage in the development process is limited due to the potential incremental nature of consenting programmes / staging and, depending on the reasons for consent, the potential lack of scope for matters outside lot development to be addressed.</p> <p>There are no Precinct provisions proposed relating to the transport infrastructure identified as mitigation in the Applicant's ITA. Precinct provisions will help provide sufficient guidance to the downstream consenting processes (e.g., resource consents and engineering approvals). It is noted that risks to all parties should be reduced if there is some agreed guidance rather than none.</p> <p>The indicative triggers identified in the Applicant's Implementation Plan (within the ITA) should provide clearer definition of the staging for transport upgrades that is linked to both subdivision and development applications for any proposal under the proposed zone.</p>	<p>Decline the Plan Change unless a precinct plan and precinct provisions applying to this Plan Change area are provided, for incorporation into the Auckland Unitary Plan (Operative in Part). The precinct provisions should include specific transport mitigation mechanisms to ensure that the matters identified in the Applicant's ITA, further information responses and within this submission can be appropriately addressed.</p>

3.2

<p>Future alignment of PU-NS-2 Collector Road</p>	<p>Oppose in part</p>	<p>The Auckland Unitary Plan (Operative in Part) has a number of relevant objectives and policies such as, B2.2. Urban growth and form B2.2.1. Objectives</p> <p>(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure;</p> <p>Furthermore, B2.5. Commercial and industrial growth and the following policy is relevant: Policy B2.5.2 (6) Enable commercial activities, where appropriate, in business zones in locations other than the city centre, metropolitan and town centres and identified growth corridors, having regard to all of the following: (a) the matters listed in Policy B2.5.2(5)(a) to Policy B2.5.2(5)(h). Of those, b, d and e are provided below as being of particular relevance.</p> <ul style="list-style-type: none"> <li><b>b)</b> adverse effects on the quality compact urban form including the existing and planned location of activities, facilities, infrastructure and public investment;</li> <li><b>c)</b> the efficient use and integration of land and infrastructure;</li> <li><b>d)</b> effects on the safe and efficient operation of the transport network;</li> </ul> <p>There are no roading plans proposed as part of the Plan Change. The Integrated Transport Assessment (ITA) accompanying the Plan Change identifies a collector road connection to go through the Plan Change area, to ultimately connect with Buckland Road. This is consistent with the Pukekohe-Paerata Structure Plan.</p> <p>Auckland Transport suggests that there is benefit in considering PU-NS-2 as part of the Plan Change in terms of safeguarding the alignment and providing for part of this future connection where it affects the Plan Change area. In this regard the section of the proposed PU-NS-2 route to the eastern end of Webb Street connecting to Buckland Road is relevant. Auckland Transport considers that the scope to require this part of the planned road connection at the subdivision stage in the development process is limited due to the potential incremental nature of consenting programmes / staging and depending on the reasons for consent and the potential lack of scope for matters outside of lot development to be addressed.</p> <p>The Auckland Unitary Plan's regional policies stated above are relevant and it is the view of Auckland Transport that to give proper effect to those policies greater certainty for this planned collector road is needed which are most appropriately secured through precinct provisions and plan.</p>	<p>Decline the plan change unless, a precinct plan and precinct provisions establish a requirement to provide for and form a collector road (PU-NS-2 Collector Road) with separate cycle and walking facilities linking to Buckland Road. This collector road should be readily capable of being extended to the west from Buckland Road as illustrated on Map 5 of the Pukekohe-Paerata Structure Plan 2019.</p> <p>The connection should be designed so that it does not preclude future development nor links to the south.</p>
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3.3

Topic	Support / Oppose	Reason for submission	Decision requested
		<p>The collector road alignment will need to be agreed with the Applicant to ensure the alignment and location of the connection point to Buckland Road will operate safely, that the alignment results in a workable site configuration for future development, and because there is known responsibility that developers are to form collector roads. Auckland Transport recognises that this connection (at least in its ultimate form) may not be directly needed to service the proposed development, but by virtue of its location in relation to the future planned transport network. It needs to be safeguarded and provided for to ensure that development enabled by this Plan Change is supported by appropriate infrastructure that is well connected by all modes to the existing urban edge to the north of the site and capable of becoming a well-functioning urban environment.</p> <p>The Applicant's ITA indicates that this collector road will be a 21m wide road as per the Pukekohe-Paerata Structure Plan ITA. However, this should be 22m based on current design standards as reflected within Design and Standards Table dimensions agreed as part of recent greenfield plan change precinct provisions. This width will safeguard future walking and cycling network infrastructure as per the Pukekohe-Paerata Structure Plan.</p> <p>Section 7.6 of the Applicant's ITA states Webb Street is not appropriate for significant additional traffic without a significant upgrade. The PPC 87 area does not have any direct frontage to Webb Street.</p> <p>Auckland Transport seeks further discussion regarding the most likely and appropriate future alignment of the collector road identified in the Structure Plan ITA. Given the constraints (also noted in the Structure Plan ITA) a connection to Webb Street may be determined as the most suitable.</p> <p>If a connection is made to Webb Street there may need to be some interim safety works to support any interim use of Webb Street in terms of the staging of delivery of the PU-NS-2 collector road.</p>	

Topic	Support / Oppose	Reason for submission	Decision requested
Upgrade to the Buckland Road / Kitchener Road intersection	Support in part	<p>Auckland Transport notes that the Applicant's response to further information requests identify that an upgrade to the Buckland Road / Kitchener Road intersection to a roundabout or traffic signals may be needed to mitigate development enabled by this plan change.</p> <p>Auckland Transport supports the inclusion of the above additional infrastructure upgrades / mitigation. However, to provide certainty that this upgrade / mitigation can be provided for in conjunction with subdivision and development of the land, Auckland Transport is of the view that specific precinct provisions should be included as part of this Plan Change to provide for this infrastructure upgrade.</p>	<p>Auckland Transport seeks resolution of the matters raised in this submission to provide certainty that the transport infrastructure identified as improvements / mitigation in the applicant's Integrated Transport Assessment (or associated responses to requests for further information) will be provided in conjunction with subdivision and development of the land included in the PPC 87.</p> <p>This could include site-specific amendments to the plan change and/or methods to ensure such transport effects are addressed.</p>
Buckland Road intersection	Support in part	<p>Auckland Transport notes that accessing future lots directly off Buckland Road should be limited and supports the introduction of a roundabout on Buckland Road. However, the application material provided by the Applicant suggests that the upgrade will be addressed through future resource consents.</p> <p>Auckland Transport considers that the scope at the resource consent stage in the development process is limited due to staging and the potential incremental nature of consenting strategies adopted. Other yet to be determined considerations include the reasons for consent/activity status and relevant matters of assessment, in this regard, an appropriate mechanism needs to be identified to guarantee the delivery of the roundabout as the ITA does not provide clear direction on timing, nor responsibility for delivery.</p>	<p>Auckland Transport seeks resolution of the matters raised in this submission to provide certainty that the transport infrastructure identified as improvements / mitigation in the applicant's Integrated Transport Assessment (or associated responses to requests for further information) will be provided in conjunction with subdivision and development of the land included in the PPC 87.</p> <p>Specifically, a controlled access intersection on Buckland Road (roundabout or traffic signals) should be identified as a site-specific amendment to the Plan Change (identified on a precinct plan and provisions).</p>

3.4

3.5

Topic	Support / Oppose	Reason for submission	Decision requested
Internal transport network	Oppose	<p>The proposal will enable urban development of a small site with no certainty that a road network will be provided within the site in a manner that enables connections to adjacent sites for future development. In addition, there is no certainty that all development within the site will be provided with good pedestrian access through to Buckland Road to access public transport services.</p> <p>Furthermore, given the presence of natural constraints on land south of the plan change area, a lack of consideration of wider local connections could necessitate further access from Buckland Road to provide for cul-de-sac road networks which would not be considered to deliver a well- functioning urban environment.</p>	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide connections (for all modes) to adjacent sites, and connections through to Buckland Road. This is expected to require precinct provisions.

3.6

Topic	Support / Oppose	Reason for submission	Decision requested
Frontage upgrade for – Buckland Road	Part support	<p>The existing roads adjoining the Plan Change area are only built to a rural standard and there is a need for them to be upgraded to an appropriate urban standard at the time of subdivision or development of the adjoining land. Required upgrades could include, without limitation, provision of footpath, cycle paths, kerbs and channels, earthworks to integrate with development levels, streetlights, undergrounding of overhead lines, berm and street trees, and stormwater treatment and conveyance.</p> <p>Auckland Transport seeks that the frontage of the Plan Change area along Buckland Road is upgraded as development occurs to an urban standard, with separated walking and cycling facilities. Auckland Transport notes that the Plan Change only proposes to provide frontage upgrade including pedestrian infrastructure. No cycling infrastructure is proposed as mitigation for the plan change which Auckland Transport does not support.</p> <p>PPC 87 does not include any frontage upgrade provisions as it doesn't include a precinct plan and relies on the resource consent process. Auckland Transport does not consider this approach appropriate to adequately support growth, mitigate adverse transport effects nor achieve a well-functioning urban environment.</p> <p>Section 2.3.4 of the ITA states that the site “<i>offers excellent cycling connectivity to a wider range of activities</i>”. However, this is solely because of its location (within 3km of key destinations), not because safe cycle facilities are proposed to provide for connectivity by this mode. Auckland Transport also notes that section 2.5 of the ITA states that a cyclist was seriously injured on Buckland Road. This finding supports separated cycling facilities on Buckland Road.</p> <p>The Cycle and Micro Mobility Network in AT’s Future Connect portal, includes Manukau Road and Buckland Road as supporting cycle routes, indicating that they serve a local connectivity function. In addition to this, the Pukekohe and Paerata Structure Plan Map 5 identifies a proposed walking and cycling network on Buckland Road. The network includes primary cycle routes along all arterial roads for the Pukekohe-Paerata area.</p> <p>Furthermore, the boundary-to-boundary width on Buckland Road is approximately 30m which is sufficient space to accommodate safe cycling facilities.</p>	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require the Buckland Road frontage to be upgraded to an urban standard with separated walking and cycling facilities in conjunction with subdivision and development of the site. This is likely to require precinct provisions.

3.7

Topic	Support / Oppose	Reason for submission	Decision requested
Active mode connections beyond the site	Support in part	<p>In order to meet the requirements of the RPS and the objective to achieve a well-functioning urban environment, good accessibility and travel choice needs to be provided, which includes access to safe active mode and public transport infrastructure and services. Inadequate provision for active modes will combine to result in a dependence on private motor vehicles resulting in development that has a high total vehicle kilometres (VKT) and greenhouse gas emissions.</p> <p>Active mode connections are needed to connect development on the site to the existing footpath network north of Kitchener Road. In addition to site frontage upgrades (addressed in other submission points) active mode connections are necessary along the front of 32 Kitchener Road which is a rural zoned parcel of land that separates this PPC 87 site from the established urban development north of Kitchener Road.</p> <p>Crossing points on Buckland Road and Kitchener Road to ensure that development enabled by this Plan Change is effectively connected to existing bus routes and can be served by appropriately cited bus stops on Buckland Road.</p> <p>The Applicant's response to further information requests also suggests that a crossing on Buckland Road is proposed which is supported, however a mechanism to provide for it is necessary.</p>	<p>Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections along the frontage of 32 Kitchener Road and provide for pedestrian crossings on Buckland and Kitchener Roads. Furthermore, provision for bus stops should also be provided for along the west and east sides of Buckland Road. It is considered that these transport infrastructure mitigation requirements would require precinct plan and provisions to ensure they are provided for.</p>

3.8

Topic	Support / Oppose	Reason for submission	Decision requested	
Stormwater management	Support in part	<p>Auckland Transport in-principle supports stormwater proposals which are efficient and cost-effective in managing stormwater, and appropriate for the site constraints.</p> <p>It is noted that a suite of proposed methodologies has been identified for stormwater disposal including providing stormwater treatment at source or within centralised raingardens or wetlands. Should the applicant at later stages seek to locate raingarden devices in the road corridor, attenuation of flood events in roadside raingardens would not be appropriate due to the extensive sizing requirements.</p> <p>Auckland Transport requests further information on the downstream system capacity be provided to demonstrate the effects on Auckland Transport's network of roadside drains.</p> <p>Auckland Transport seeks stormwater provisions which requires consideration of whole of life costs and effectiveness over time and the use of communal devices to treat road runoff.</p>	<p>Auckland Transport requests an assessment of the potential downstream system capacity effects on Auckland Transport's network of roadside drains.</p> <p>Amend the plan change to include specific planning provisions (including objectives, policies and rules) to include precinct provisions to include whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets as a matter for discretion and policy.</p>	3.9
Reduced speed limits on Buckland Road (past the site) to 50km/h	Support in part	Auckland Transport supports the speed on Buckland Road being reduced to 50km/h past the site as the speed limit along Buckland Road is currently 80km/hr. There is a need to ensure there are threshold treatments to support a 50km/hr speed limit.	Noting this is an action for Auckland Transport in the event that the Plan Change is supported.	3.10
Buckland Road access / flush median	Oppose	The provision of a painted flush median offered by the Applicant in the ITA requires further consideration. The Buckland Road site frontage as noted above should be upgraded to an urban standard. It should also have limited vehicle accessways owing to its arterial road function and a flush median would allude to creating additional options for access into sites from Buckland Road. Given its arterial road classification access from Buckland Road should be limited.	Amend the plan change to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to limit or prevent direct vehicle access onto Buckland Road.	3.11

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Kaaren Rosser

### Organisation Name (if submission is made on behalf of Organisation)

EnviroWaste Services Ltd

### Address for service of Submitter

Private Bag 92810, Penrose, Auckland 1642

Telephone:  Fax/Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

Plan Change/Variation Name

### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)  4.1

Or  
Property Address

Or  
Map

Or  
**Other (specify)**

## Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

The Pukekohe-Paerata Structure Plan recommended that this land and a large area of land surrounding be Light Industrial.

It is the submitters view that the new zoning should be Light Industrial to be contiguous with future area of Light Industrial and to reduce reverse sensitivity effects from permitted large retail, office, food and beverage and commercial services activities \*See attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Change zoning to Light Industrial

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



12/01/2022

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

PC 87 EnviroWaste Submission continued

...on future adjacent industrial activities and adjacent cropping land. The Light Industrial zone is a better zone in this regard, as the range of uses allowed are less sensitive to adjacent rural activities and allows for more suitable activities in relation to the existing waste management site in Austen Place.

The piecemeal approach to the rezoning of the FUZ land is not preferred, as integration with surrounding area does not result. The rezoning request should be declined until the larger proposed industrial area is rezoned.

In addition, with the potential for large format retail to occur under the General Business zoning, large format retailing should be aggregated in one location to reduce traffic load on Buckland Road.

**SUBMISSION ON PROPOSED PLAN CHANGE 87 (PRIVATE): 301 AND 303 BUCKLAND ROAD,  
PUKEKOHE**

**To:** Auckland Council (“the Council”)

**Submitter Name:** Nomita Singh (“the submitter”)

**1. INTRODUCTION**

1.1. This submission relates to Private Plan Change 87 (PC87) which seeks to rezone land at 301 and 303 Buckland Road in Pukekohe from the Future Urban zone to Business - General Business.

1.2. The submitter owns land at 1 Webb Street in Pukekohe as shown in Figure 1 below. This land is located southwest of the PC87 land.

1.3. The submitter is directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.



*Figure 1: Aerial view of the Plan Change land and submitters land*

## **2. SCOPE OF SUBMISSION**

- 2.1. The submission relates to the proposed rezoning of the property under Plan Change 87 (PC87).

## **3. NATURE OF SUBMISSION**

- 3.1. The submitter supports the proposed rezoning of the land to Business – General Business and seeks that the plan change be approved.

## **4. REASONS FOR SUBMISSION**

- 4.1. The submitter supports the intent of PC87 in terms of the rezoning of land to enable additional commercial development.

- 4.2. The rezoning of the land is considered to:

- a) promote sustainable management of resources and to help achieve the purpose of the Resource Management Act 1991 (RMA);
- b) Be consistent with the Pukekohe-Paerata Structure Plan;
- c) support the intended outcomes envisaged by the NPS-UD;
- d) enable the social and economic wellbeing of the community in Auckland Region; and
- e) represent an appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.

- 4.3. In particular, and without limiting the generality of the above:

- a) The submitter considers the rezoning would be generally consistent with the outcomes anticipated by the Pukekohe-Paerata Structure Plan (“Structure Plan”) in terms of rezoning the land for commercial activity.
- b) The submitter supports the proposed General Business zoning as being more flexible and accommodating of a wider range of business activities than the Light Industry zone identified in the Structure Plan.
- c) The submitter also supports the clear information provided as part of the plan change application that a public road extension will be formed through the plan change land to connect/extend Webb Street to Buckland Road. It would be beneficial if this could

be addressed with clarity within any decision to ensure that this link is provided in any future development on the land.

- d) The submitter also supports the public wastewater extension shown along the new public road. The Birch Surveyor’s drawing<sup>1</sup> entitled ‘Proposed Wastewater Supply’ shows the public network being extended to the current end of Webb Street which is considered appropriate to provide for the eventual development of surrounding land.
- e) In terms of water supply, the submitter supports the layout shown on Birch drawing “Proposed Water Supply” which, consistent with the wastewater drawing, shows a new watermain extending up this new road reserve. Again, this is considered appropriate to provide for the eventual development of surrounding land.

**5. SPECIFIC RELIEF SOUGHT**

5.1. The submitter therefore seeks that the zoning of the land as Business – General Business be confirmed. | 5.1

5.2. The submitter seeks that any decision makes clear the obligation that the land developer will extend the relevant public networks (roading, water, wastewater, stormwater (where appropriate) through the plan change land to enable the future development of other surrounding land. | 5.2

5.3. The submitter also seeks such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.

**6. OTHER MATTERS**

6.1. The submitter could not gain an advantage in trade competition through its submission.

6.2. The submitter wishes to be heard in support of its submission and will consider presenting a joint case with other who may make a similar submission.

**Date:** 1 December 2022

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<sup>1</sup> Wastewater and Water Supply Report dated 10 November 2021 prepared by Birch Surveyors

**Signature**

A handwritten signature in blue ink, appearing to read 'Mark Benjamin', with a long horizontal flourish extending to the right.

Mark Benjamin on behalf of the submitter

**Submitter Name:** Nomita Singh

**Contact Person:** Mark Benjamin

**Address for Service:** Nomita Singh  
C/- Mt Hobson Group  
PO Box 37964  
Parnell  
Auckland 1151

**Telephone:** 09 950 5107

**Email:** markb@mhg.co.nz



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*In the matter of:* Plan Change 87

*Site Address:* 301 and 303 Buckland Road, Pukekohe

*Applicant:* Pukekohe Limited

  

*Submitter:* Hira Bhana and Co. Limited

*Contact Person:* Bharat Hira Bhana

Hira Bhana & Co. Ltd

71 Tuakau Road, Pukekohe 2120

Mobile: 0274828305

Email: [hira.bhana@xtra.co.nz](mailto:hira.bhana@xtra.co.nz)

1. This submission is on behalf of Hira Bhana and Co. Limited (Hira Bhana's) in relation to the publicly notified Plan Change 87 to rezone Future Urban Zone land at 301 and 303 Buckland Road, Pukekohe to General Business Zone.
2. Hira Bhana and Co. Limited will gain no competitive advantage through the lodgment of this submission.
3. Hira Bhana's is a family owned and run business based in Pukekohe, devoted to growing, packing and distributing fresh produce throughout New Zealand and the world. Hira Bhana are wholesale suppliers within New Zealand to Turner's and Growers, Fresh Direct, Market Gardeners, Primor Produce, Foodstuffs and Fruit World as well as other individual vegetable outlets across New Zealand. Produce is also exported worldwide with onions going to Europe, UK, Japan, Asia, USA and Fiji and carrots and potatoes to the Pacific Islands. The company was established in 1957 and is currently run by second and third generation family members, employing up to 90 staff members. Hira Bhana & Co has grown significantly over the last 50 years, their cropping area now spans well over 1,500 acres of land and is spread over several farms across the Auckland and Northern Waikato Regions. Hira Bhana's also support their local community by donating fresh



produce to local schools and community groups for fundraising events and hosting student groups on farm tours.

4. Cropping responsibly and sustainably is an important part of the company's philosophy. All of the farms employ the latest harvesting planting, ground preparation and spraying techniques, including GPS technology, which is used for planting and drilling. Practices such as water runoff management, wheel track ripping after planting, reducing cultivation through minimum tillage practices, the use of cover crops, fertiliser and irrigation management and mulching are well established across all farms.
5. Hira Bhana's commercial vegetable production activities occur on the land immediately to the west of the proposed Plan Change area. This land remains in rural production zone and is used for rural productive activities. This land use has been further cemented by the introduction of the National Policy Statement for Highly Productive Land which will prevent any future rezoning or development of this productive land. The plan change area is separated from the rural production zone by the rural urban boundary with no identified buffer zones in between.
6. Hira Bhana support the Plan Change provided adequate buffer zones can be put in place on the land subject to the Plan Change and conditions can be enforced to ensure that the future development of the land at 301 and 303 Buckland Road, Pukekohe will not impact on the ability of the rural production zoned land to be used for rural productive activities, with reverse sensitivity being a major concern.
7. The proposed activity is to be located on a site adjoining our operations in the rural production zone, where we commercially grow vegetables. It is important that buffer zones are put in place and that new development cannot complain about the existing and ongoing commercial vegetable production operation which is located within the designated zoning. We adhere to Good Management Practices, however, this does not prevent people coming to the rural environment and complaining about our operations. In this case, the development is being intentionally placed abutting the rural productive land. We believe that mitigation strategies can prevent tension from occurring between the two zones. R
8. Hira Bhana is of the opinion that the issue of reverse sensitivity is becoming an increasing concern within the Pukekohe Hub as a result of Auckland's increasing sprawl into existing vegetable producing areas, which threatens commercial vegetable growers right to farm. Complaints from neighbours can compromise a lawful rural operation in the following manner:
  - Restricting when or how it can operate
  - Imposition of economic burdens that reduce operational viability.
9. Hira Bhana requests that the plan change be approved subject to the implementation of:
  - a. buffer zones

6.1



- 
- b. conditions that protect the ability to commercially grow vegetables in this location without complaint, provide Good Management Practices are being adhered to. | 6.2
10. Hira Bhana's wish to be heard in support of their submission.