



MT HOBSON GROUP

Town Planning & Resource Consent Solutions

PROPOSED PLAN CHANGE

**1, 3, 5, 7, 10, 12 Florence Carter
Avenue, Flatbush**

JKGL Group Ltd



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1. THE APPLICANT AND PROPERTY DETAILS

Site Address: No.'s 1, 3, 5, 7, 10, 12 Florence Carter Avenue, Flatbush (Formerly part of 79 Ormiston Rd), Flat Bush

Applicant's Name: JKGL Group Ltd

Address for Service: MHG. Box 37964 Parnell, Auckland 1151. Attention: Hamish Firth

Legal Description: Lot 1, 2, 3, 4, 5,6 DP 508357,

Site Area: 93444m² (approx.)

Operative District Plan: Auckland Unitary Plan

Zone: Light Industry

Precinct: N/A

Overlays: N/A

Controls: Macroinvertebrate Rural and Urban

Modification: NOR No.7 Proposed Northern Runway

Designation: Airspace Restriction ID 1102

Description of proposal: Plan change to rezone land from Light Industry to Mixed Use with height variation and maximum GFA controls as per the attached proposed plan being **Appendix 1.**



2. INTRODUCTION

2.1 BACKGROUND

The land subject to the plan change request (the site) is located on the corner of Te Irirangi Dr and Ormiston Rd in a commercial portion of Flatbush. The sites were formerly part of a subdivision of 79 Ormiston Rd, which gave rise to 12 Lots and a new road being Florence Carter Avenue. Six of the lots form part of the plan change as noted on the attached proposed plan. All of the 9.344Ha (approx.) land subject to the plan change request, which is owned by the applicant, is vacant.

The balance of the subdivision (2, 4, 6, 8 Florence Carter Avenue), adjacent to 55 Ormiston Rd are not subject to this plan change request. The applicant and owner recently obtained resource consents for various discretionary activities in the light industry zone.

2.2. PROPOSED AUCKLAND UNITARY PLAN PROCESS AND CONSENT PROCESS

Under the notified version of the Proposed Auckland Unitary Plan ('PAUP'), the land was zoned Light Industry. Through submissions on the PAUP, the previous owner requested that the site be rezoned General Business. However, the current owner of the site did not wish to pursue the site to be zoned General Business.

It was the intention of the current owner to develop the site in a way that maximised the previous Operative plan's zoning and the site's location being on a major intersection. As such, a number of resource consents were approved for a wide range of activities including traveller's accommodation, hotel use and retail. These consents are still valid at this time.

The site was previously known as 79 Ormiston Rd. A 12 lot subdivision, referenced as 49033 & SP12145, including a new road, was approved on the 16th of May 2016. This consent has been given effect to and the individual titles have been issued and the road vested to Auckland Council. The land remains vacant at the behest of the owner.

On three of the sites that adjoin 55 Ormiston Rd (not part of this proposal but owned by the applicant) resource consent, through a notified process, under the PAUP have been recently issued, for a supermarket, retail and department store.



2.3. SITE LOCATION AND DESCRIPTION OF SURROUNDS

The land subject to this plan change request is flat and comprised of six vacant lots recently created by an approved subdivision consent. All of the lots have access from Florence Carter Avenue and front Ormiston Rd to the east, Te Irirangi Dr to the north and Rongomai Park to the south.

To the north of the sites, on the opposite side of Ormiston Rd, is a pocket of sites zoned Mixed Use, described as the Bishop Lenihan Place subdivision. All of these sites have been development with predominance of 1-2 level buildings used for retail, commercial and industrial uses.

Diagonally across from Te Irirangi Dr is sleeve of land zoned Open space covered in native bush, centred by a stream.

Across Te Irirangi Dr to the east is land zoned Business – Local Centre, known as the ‘Botany Junction’ shopping centre. The centre contains several two-storey retail/commercial buildings and ancillary parking. Immediately to the east of this shopping centre are several three-storey apartment buildings, whilst to the south/south-east is a typical single lot residential zoned and developed subdivision, currently zoned Terrace House and Apartment and Mixed Housing Urban.

To the South is Rongomai Park, zoned Open Space – Sport and Active Recreation zone, and currently used as sports fields.

To the west, running for approximately 700m, sites on both the north and south of Ormiston Road are zoned Light Industry, with a wide range of uses from childcare centres to industrial uses.

Attached in **Appendix 2** of this application are the Auckland Council Geo Maps and Unitary Plan maps set out the matters described.



3. STATUTORY CONSIDERATIONS

3.1. PLAN CHANGE REQUEST

It is noted that a plan change needs to be prepared in accordance with the requirements of Clause 22 of Schedule 1 of the Resource Management Act 1991 (RMA) which states:

22 Form of request

(1) A request made under clause 21 shall be made to the appropriate local authority in writing and shall explain the purpose of, and reasons for, the proposed plan or change to a policy statement or plan and contain an evaluation report prepared in accordance with section 32 for the proposed plan or change.

(2) 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.

Section 32 of the Act sets out the requirements for an evaluation report.

32 Requirements for Evaluation Reports

(1) An evaluation report required under this Act must—

(a) Examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) Examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—

(i) identifying other reasonably practicable options for achieving the objectives; and

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) summarising the reasons for deciding on the provisions; and



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(c) Contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) Identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) If practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) Assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

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4. DESCRIPTION OF PLAN CHANGE REQUEST

The proposed amendments to the plan are two changes to the Auckland Unitary Plan ('AUP') GIS Viewer (the planning maps):

1. Amend the zone of the subject site from Light Industry to Mixed Use; and
2. Provide for a height variation control.
3. Provide for a maximum total retail GFA control of 15,000m².
4. Provide for a maximum total office GFA control of 15,000m².
5. Provide for a maximum total commercial services control of 2,500m².
6. Provide for a 'Florence Carter Avenue' precinct, which will contain the additional rules proposed for the plan change area.

These amendments are also shown on the plans contained in **Appendix 1**.

4.1. AUCKLAND UNITARY PLAN ZONE

The site is currently zoned Light Industry. The Light Industry zone, noted in the zone description as being:

"The Business – Light Industry Zone anticipates industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. The anticipated level of amenity is lower than the centres zones, Business – General Business Zone and Business – Mixed Use Zone. Due to the industrial nature of the zone, activities sensitive to air discharges are generally not provided for. The air quality of the zone is managed by the air quality provisions in E14 Air quality"

Provisions for the zone are contained in Chapter H17 of the AUP.

The proposed change to the AUP GIS viewer is to amend the zone to Mixed Use. The Mixed Use zone is *"typically located around centres and along corridors served by public transport. It acts as a transition area, in terms of scale and activity, between residential areas and... [other business zones]. It also applies to areas where there is a need for a compatible mix of residential and employment activities"*. Provisions for the Mixed Use zone are contained in Chapter H13 of the AUP.

Amending the zone will provide consistency with the zoning of surrounding land uses, will better enable the type of development that Council has signalled for this area (based on the



AUP zoning pattern) and will also remove a fragmented piece of Light Industrial land that has no connection to the existing consented uses on the sites and on the other Lots created by the recent subdivision of 79 Ormiston Rd.

4.2 AUCKLAND UNITARY PLAN CONTROLS

4.2.1 Maximum Height

Under the current Light Industry zoning, the height limit for the site is 20m. The default maximum building height in the Mixed Use zone is 16m with an additional 2m allowed for roof form.

As shown on the proposed plans (Appendix A), a 20m maximum height limit is proposed for the first 24m of frontage to Te Irirangi Drive and Ormiston Road, a 26m maximum height limit is proposed for the next 26m from the road, and for a 24m setback from Rongomai Park. A 28m height limit is proposed for the rest of the sites.

We believe that a height control to alter the maximum permitted height on these sites is appropriate, given the context of the wider Ormiston area. Approximately 1km to the east is the Ormiston Town Centre, which has a maximum permitted height of 32.5m. In addition, given the width of Te Irirangi Drive and the 20m maximum height proposed at these frontages, any potential building dominance to the adjacent residential area will be minimised.

This proposed height variation control is discussed in more detail in the Visual Impact Assessment attached as **Appendix 7**.

4.2.2 Maximum Retail, Office and Commercial Services GFA

A 15,000m² maximum GFA cap is proposed for both retail and office use within the sites identified under this plan change. As discussed in the Economic Cost-Benefit Analysis provided in **Appendix 4**, these controls have been proposed to ensure the proposed plan change does not impact the commercial performance of existing centres, particularly the Ormiston Town Centre to the east. Given that the site has 12,000m² of retail and 11,000m² of office space already consented, it is considered that there would not be a discernible difference between the permitted baseline, and the proposed GFA caps.



As commercial services perform a similar function to both office and retail, and have similar potential effects to the environment, a GFA cap of 2,500m² is also proposed for the same reasons stated above.

4.2.3 Florence Carter Avenue Precinct

A precinct is proposed for the plan change area, to be called the Florence Carter Avenue Precinct.

The primary purpose of the precinct is to contain the additional rules and provisions discussed above, in particular the additional height and GFA caps.

In addition, the precinct chapter will outline triggers for when a comprehensive traffic assessment is required, which will in turn inform if and when an upgrade is required to the Ormiston Road and Florence Carter Avenue intersection.



5. STRATEGIC FRAMEWORK

5.1. AUCKLAND UNITARY PLAN

The AUP is now Operative in Part and is a combined document that provides one comprehensive planning framework for the Auckland Region, replacing the previous district plans, regional plans and regional policy statement. The purpose of the AUP is to achieve the purpose of the Resource Management Act 1991 ('the RMA') and promote the sustainable management of natural and physical resources. As stated in the AUP itself, the plan has three key roles:

(1) it describes how the people and communities of the Auckland region will manage Auckland's natural and physical resources while enabling growth and development and protecting the things people and communities value;

(2) it provides the regulatory framework to help make Auckland a quality place to live, attractive to people and businesses and a place where environmental standards are respected and upheld; and

(3) it is a principal statutory planning document for Auckland. Other relevant planning documents include the Auckland Plan, the Auckland Long-Term Plan and the Auckland Regional Land Transport Plan.

The Plan has a hierarchical framework with regional and district plan provisions required to effect to the Regional Policy Statement ('RPS').

The AUP (OIP) sets out Auckland-wide provisions (Chapters A to G), followed by zone and then precinct provisions. The Auckland-wide provisions apply to the use and development of natural and physical resources across the region and the zone provisions manage the use, development and protection of land and the coastal marine area. The plan change only seeks a change to the zone of a group of adjacent and related sites, with the only changes to the zone provisions being a height variation control, and two maximum GFA controls.

With regard to the individual zone objectives and policies, development in the Mixed Use zone is guided by the following objectives and policies of the AUP (OIP):

MIXED USE ZONE OBJECTIVES

(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone,

The proposed plan change will provide for high density residential and employment opportunities in a location that is in close proximity to a Local Centre and the public transport network.



Business – Town Centre Zone and the public transport network.

(7) Activities within the zone do not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Local Centre Zone.

The proposed GFA caps for office, retail and commercial service use has been provided to ensure future development does not compromise nearby Town Centre and Metropolitan Centre zones.

(8) A mix of compatible residential and non-residential activities is encouraged.

The proposed plan change will enable a mix of compatible residential and commercial uses within the sites.

(9) Business – Mixed Use Zone zoned areas have a high level of amenity

While the proposed plan change will enable a far greater level of amenity than the Light Industry zone, this objective will be more relevant at the resource consent stage, when detailed design proposals can be scrutinised by Council.

MIXED USE ZONE POLICIES

(16) Locate the Business – Mixed Use Zone in suitable locations within a close walk of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone or the public transport network.

The sites are directly adjacent to a Local Centre and are within walking distance to the Ormiston Town Centre and the public transport networks, including a future rapid transit line.

(17) Provide for a range of commercial activities that will not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Local Centre Zone, beyond those effects ordinarily associated with trade effects on trade competitors.

The proposed GFA caps for office, retail and commercial service use has been provided to ensure future development does not compromise nearby Town Centre and Metropolitan Centre zones.

(18) Enable the development of intensive residential activities.

The proposed plan change will enable high-density residential dwellings and visitor accommodation.

(20) Promote and manage development to a standard that: (a) recognises the moderate scale, intensity and diversity of business, social and cultural activities provided in the zone; (b) recognises the

While the proposed plan change will provide for a greater scale, intensity and diversity of business, social and cultural activities than the current Light Industry zoning, any adverse effects on residents



increases in residential densities provided in the zone; and (c) avoids significant adverse effects on residents.

cannot be managed until the resource consent stage, when detailed design proposals can be scrutinised by Council.

(21) Require activities adjacent to residential zones to avoid, remedy or mitigate adverse effects on amenity values of those areas.

While the proposed plan change will enable a far greater level of amenity than the Light Industry zone, this objective will be more relevant at the resource consent stage, when detailed design proposals can be scrutinised by Council.

It is considered that future development on the subject site is better aligned with these objectives in achieving the strategic direction of the AUP, particularly when compared to the objectives of the current zone (Light Industry) which are:

(1) Light industrial activities locate and function efficiently within the zone

(2) The establishment of activities that may compromise the efficiency and functionality of the zone for light industrial activities is avoided.

(3) Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed.

(4) Development avoids, remedies or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones.

Furthermore the sites subject to this plan change are subject to a number of approved resource consents which are not considered compatible with the provisions and outcomes sought by the Light Industry zone. These approved resource consents ensure that in essence the light industrial zoned land is not being lost to light industrial use as the approved resource consents ensured it should never have been included in overall land use for this category. These consents were approved under the previous Auckland District Plan – Manukau Section for various uses including hotels, traveller’s accommodation and retail uses.

As stated, it is unlikely that future development of the site will achieve the objectives of the zone. It is not currently developed in an industrial manner, and remains a vacant greenfield site. The plan change relates to land in an existing commercial area of Flatbush, adjacent to a Local Centre and existing residential area. The proposed zone change will allow for the establishment of pre-dominantly higher density accommodation activities located in a mixed use environment. The sites also have over 650m of frontage to a major intersection



and over 350m of frontage to Rongomai Park. It is considered that better built form and urban design objectives will be achieved and reinforced by the Mixed Use zone.

As discussed throughout this preliminary report, it is considered that the Mixed Use zone is more appropriate for this site.

5.2 AUCKLAND PLAN

Section 79 of the Local Government (Auckland Council) Act 2009 required Auckland Council to prepare a spatial plan (the Auckland Plan). The purpose of the plan is to:

Contribute to Auckland's social, economic, environmental, and cultural well-being through a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development.

A central component of the Auckland Plan is the high-level development strategy that sets out how Auckland will change and grow over the next 30 years to become the world's most liveable city. Key elements of the development strategy include integration between land use and infrastructure and moving towards a quality, compact urban form based on intensification of activity around urban centres and transport nodes. The Auckland Plan has guided the approach to preparing the Auckland Unitary Plan which will shape the way Auckland grows.

The plan change seeks to enable the development of the site for mixed use purposes, consistent with surround zoning and developing activities in the area that has access to public transport (including bus and the future Botany to Airport transit line). The plan change is considered to be consistent with the overall intent of the Auckland Plan.

5.3 AUCKLAND REGIONAL POLICY STATEMENT

The statutory framework for the Auckland regional policy statement is in sections 59 to 62 of the Resource Management Act 1991. The purpose of the regional policy statement is to achieve the purpose of the Resource Management Act 1991 by providing:

(1) an overview of the resource management issues of the region; and

(2) policies and methods to achieve integrated management of the natural and physical resources of the whole region.



The regional policy statement must be prepared in accordance with:

(1) the Auckland Council's functions as a regional council and as a territorial authority under sections 30 and 31 of the Resource Management Act 1991;

(2) the provisions of Part 2 of the Resource Management Act 1991; and

(3) the requirement to complete an evaluation report in accordance with section 32 of the Resource Management Act 1991.

As well, the Council must:

(1) have regard to other relevant statutory planning documents and regulations as set out in section 61(2) and (2A) of the Resource Management Act 1991; and

(2) not have regard to trade competition or the effects of trade competition.

The proposed plan change has been assessed against the relevant provisions of the Auckland Regional Policy Statement below.

| RPS SECTION | ASSESSMENT |
|--|---|
| 2.2 Urban Growth and form | <p>B2.2 seeks to enable a quality, compact urban form that provides for greater productivity and economic growth, better use of infrastructure, improved public transport and social vitality.</p> <p>The proposed plan change will be consistent with the goal above, as it will enable a high-density mixed use development within the existing urban area, thereby using a scarce land use far more efficiently than the existing light industry zoning.</p> |
| 2.3 A quality built environment | <p>B2.3 seeks to enable a high-quality built environment, with development responding to the characteristics of the site and area, and reinforcing the hierarchy of centres and corridors.</p> <p>The proposed plan change will be consistent with this goal, as it will respond to the characteristics of the site and area by providing for additional height</p> |



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| | <p>in an appropriate location, while also providing an appropriate transition from the Botany Junction Local Centre to the east of the sites and the Light Industry zoned land to the west.</p> |
| 2.4 Residential growth | <p>B2.4 seeks to enable residential intensification and an increased range of housing choice, particularly within or adjacent to centres, growth corridors, public transport, public open space or employment opportunities.</p> <p>The proposed plan change will be consistent with this goal, as it will provide for residential opportunities on a collection of sites that are adjacent to the Botany Junction Local Centre, a large park and several public transport routes.</p> |
| 2.5 Commercial and industrial growth | <p>B2.5 seeks to enable commercial development, primarily within centres and growth corridors to support a compact urban form and employment opportunities.</p> <p>The proposed plan change will be consistent with this goal, as it will enable a wide range of employment opportunities, such as retail, commercial services or offices adjacent to a Local Centre.</p> |

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6. ASSESSMENT OF ENVIRONMENTAL EFFECTS

Schedule 4 of the Act sets out the matters to be considered when preparing an Assessment of Effects on the Environment. In this case it is considered that the relevant effects that require consideration as part of the plan change request are:

1. Bulk and location
2. Loss of land zoned for light industrial activities
3. Traffic
4. Infrastructure
5. Visual Impact

These matters are set out and discussed below.

6.1 BULK AND LOCATION (URBAN DESIGN)

The existing maximum height of the light industrial zone is 20m. The proposed height limit varies from 20-28m. The proposed 20m height limit runs adjacent to Te Irirangi Dr and Ormiston Rd with the height limit increasing to 28m in from the two main roads.

With regards to the increase in height and the effects generated by that in terms of bulk, Mr Ian Munro has provided an urban design assessment, attached as **Appendix 3**. Mr Munro makes the following comments:

“The existing zoning enables built form of a low-to-modest quality and is unlikely to respond ideally to the site’s context and urban design opportunities, specifically the local centre and residential zones adjacent to the site; the large public open space abutting the site to the immediate south; and the width and scale of both Ormiston and Te Irirangi Roads. The Mixed Use zone is more likely to result in development that positively responds to those characteristics and contributes to a high-quality urban node around this major transport junction.

The site’s previous subdivision and approved resource consents have established a framework of lots which are of dimensions and orientations that lend themselves to workable and well-laid out Mixed Use building footprints.

The loss of 9.34ha of Light Industry-zoned land in this part of Auckland will not give rise to any urban design effects of concern, and overall the change to Mixed Use zone is a



considerably more efficient use of land within walkable access of a Local Centre zone and schools, and along major passenger transport routes. The change will also be very likely to result in much-improved built form outcomes.

The proposed additional height overlay, for buildings up to 28m tall, has been located logically within the site and well away from any external road boundary. The overall flatness of Flat Bush means that the additional height will likely be screened from the immediate environment by buildings along the site's frontage within the zone height limit, and will not be prominent or block any existing views from within the wider environment.

The existing Mixed Use zone methods (including the additional height overlay) will be sufficient to manage the built form urban design effects of development on the land.

No additional Plan methods are required to manage the interface along the site's western boundary with the existing Light Industry zone at 2, 4, 6 and 8 Florence Carter Avenue because that land is within the control of the JKGL Ltd and has already been consented by the Council for a supermarket / department store (2, 4 and 6 Florence Carter Avenue) and a trade supplies outlet (8 Florence Carter Avenue). The proposed Mixed Use zoning will not negatively impact these activities (and in the case of the supermarket and department store are likely to support them).

The Private Plan Change could be approved on urban design grounds subject to the recommendations outlined in this report."

Based on this assessment and relying on the professional opinion of Mr Ian Munro, it is concluded that the proposed plan change will result in no adverse urban design effects.

6.2 LOSS OF LAND ZONED FOR LIGHT INDUSTRIAL ACTIVITIES

Urban Economics have provided an economic analysis of the potential loss of land zoned for 'Light Industry' activities, attached at **Appendix 4**. They conclude that:

"The permitted baseline for the site includes 12,000m² of retail space. In the MU zone retail stores of up to 200m² GFA are permitted. Based on a conventional at grade development yield of 35%, 33,000m² of retail space could occur on the site under the MU zone, around three times the permitted baseline. When combined with the retail on the balance of the JKGL site (2, 4, 6 and 8 Florence Carter Avenue) the proposal could result in a total of around 45,000m² of retail GFA, the scale of a small sub-regional shopping centre such as Glenfield Mall.



The MU zone provisions do not in themselves enable a large shopping centre to establish, as only smaller retail store are generally permitted and sub-regional retail centres require a number of larger anchor tenants, most notably department stores. However, the proposed MU zone in combination with the retail enabled by the consented development could result in a large sub-regional centre establishing on the site, and this would potentially have adverse economic effects, particularly on the Ormiston Town Centre.

A retail GFA cap is common mechanism to address such potential effects. Given the permitted baseline of 12,000m² of retail space, it is recommended that a retail GFA cap of 15,000m² is applied to the site. The net difference between the consented baseline for retail GFA and the recommended retail cap, of 3,000m², would not have any discernible effect on existing centres.

The permitted baseline for the site includes 11,000m² of office floorspace. In the MU zone offices of 500m² GFA per site are permitted. The MU zone allows sites of 200m² and the site could therefore enable over 200,000m² of office space.

An office GFA cap is also common mechanism to address the potential effects relating to the distribution of office. Given the permitted baseline of 11,000m² of office space, it is recommended that an office GFA cap of 15,000m² is applied to the site. The net difference between the permitted baseline for office GFA and the recommended office cap, of 4,000m², would not have any discernible effect on existing centres.

The recommended retail and office GFA caps would fully remove any potential for adverse trade competition and associated economic effects on centres raised by the application of the MU zone to the site. There are no other potential adverse economic effects from the proposal. Council's consulting economists (Market Economics Limited) have not identified any other potential economic effects in the list provided by the Auckland Council¹.

The existing resource consents were based on a concept plan for 20-30 buildings with a total of 65,000m² GFA. The concept plan was based on estimates of demand and the building requirements for a range of tenants. It is however inevitable that the consented development plan is not the optimal commercial use of the site, and that particular parts of the consented development plan may not find suitable tenants. As a development of this scale moves through the construction period of 5-10 or more years, the consented plan is likely to become increasingly out of step with the market.

The MU zone would ensure the significant investment in land and building resources on the site (several hundred million dollars) is directed to its most efficient use over time. For example, the owner could allocate parts of the site and design buildings to meet the specific

¹ Email from Mr Michael Luong to Mr Hamish Firth, dated Thursday, August 30, 2018.



needs of businesses as they arise over time. This flexibility and ability to change over time is fundamental to the success of mixed-use developments and precincts.

Since the AUP became operative, around half of commercial development has been consented on greenfield rather than urban infill sites, highlighting the inherently difficult and slow process of redeveloping brownfield sites in existing centres. The same trend has been evident in the housing market, with two thirds of new dwellings being built on peripheral greenfield rather than urban infill sites. The economic value of a large undeveloped urban infill site within this context is significant, particularly as it would make an important contribution to the AUP's 'quality compact city' objective.

It is worth noting the principles for allocating business zones land outlined by Mr John Duguid in his evidence for the Plan review. Mr Duguid describes the MU zone as being applied to areas that are adjacent to centres and along arterial roads, and to enable a range of uses which will not impact the vitality and viability of centre existing centres. The proposal meets both business zone allocation principles outlined by Mr Duguid.

When considered in terms of the ex Territorial Authority areas, Manukau has a disproportionately low 'per capita supply' of 'centre zone' land (around 85% of regional average) and the lowest supply of 'other commercial' zone² land (around 41% of regional average). By contrast, the ex Manukau TA area has a relatively strong supply of industrial zone land (around 163% of the regional average).

Within the sub-regional area including Botany, Ormiston and Manukau CBD, there is only 2 hectares of vacant 'other commercial' zone land. Auckland Council's recent comprehensive study estimates demand for a further 130 hectares of 'other commercial' zone land in Urban South area over the next decade. This indicates a significant shortage of this type of land.

The proposal would enable a large intensive commercial mixed-use development, and thereby would increase the supply of 'other commercial floorspace' in this part of Auckland which is presently in short supply.

Based on this assessment and relying on the professional opinion of Urban Economics, it is concluded that the proposed plan change will result in no adverse effects relating to the loss of industrial zoned land.

² Mixed Use, General Business and Business Park zones.



6.3 TRAFFIC

Following on the comprehensive work undertaken by TDG to provide for the consented and proposed environment for the sites, TPC have provided a full traffic assessment attached at **Appendix 5**. In summary, they conclude that:

“Based on the analyses described in this report, the following conclusions can be made in respect of the Proposed Plan Change to enable the Proposed Mixed-Development to be accommodated at 79 Ormiston Road:

- *The weekday peak hour traffic generation of the activities enabled by the Plan Change will be in the order of 1,150 and 2,360 traffic movements per hour in the AM and PM Peak hours respectively. This is 180 and 45 traffic movements per hour higher in the AM and PM Peak hours respectively than that anticipated for the currently consented development of the site.*
- *To cater for PM Peak Hour traffic generation above that previously consented for the site the intersection of Florence Carter Avenue and Ormiston Road will need to be upgraded to include a double right turn exit from Florence Carter Avenue onto Ormiston Road. A Traffic Generation Threshold provision should be included in the Plan Change such that if anticipated traffic flows exceed the trigger level, the upgrade works are carried out.*
- *The intersection of Florence Carter Avenue and Te Irirangi Drive will continue to operate with adequate capacity to cater for the anticipated additional traffic generated by the Proposed Plan Change.*
- *An analysis of the potential traffic effects of the Plan Change traffic on the intersection of Te Irirangi Drive and Ormiston Road indicates that the traffic effects associated with the activities enabled by the Plan Change are similar to those anticipated for the previously consented development.*
- *To appropriately manage transport demands generated by the commercial activities that may be developed on the site, TDM measures can be implemented to appropriately mitigate the effects of transport demands in this location.*
- *Development enabled by the Plan Change will be served by parking, loading and servicing arrangements designed to an appropriate standard consistent with the requirements of the AUP-OIP or as otherwise approved by way of a Resource Consent.*

Overall, it is considered that the traffic engineering effects of the potential activities enabled by the Proposed Plan Change can be accommodated on the road network without compromising its function, capacity or safety. Therefore, the proposal is considered to have a less than minor impact.”



As mentioned previously, the proposed Florence Carter Avenue Precinct will contain detailed provisions relating to traffic generation, and will require any activity within each 'block' that generates traffic beyond what was previously consented to undertake a detailed traffic assessment. This will inform if and when an upgrade is required to the intersection of Florence Carter Avenue and Ormiston Road.

Based on this assessment and relying on the professional opinion of TPC, it is concluded that the proposed plan change will result in no adverse traffic or transport effects.

6.4 INFRASTRUCTURE

An assessment prepared by AR and Associates covering infrastructure capacity matters is attached at **Appendix 6**. Andres Roa concludes that:

"The subdivision has existing stormwater infrastructure available which connects to the 1050mm diameter stormwater pipe on Ormiston Avenue. As agreed with Auckland Council, this infrastructure has been designed for a 1 in 5-year ARI event (climate change) to be consistent with underlying legacy council design requirements. An assessment of the downstream network confirms that there is adequate capacity to service the contributing catchments from the site under a maximum probable development scenario, based on the agreed design criteria.

The site is also subject to a Discharge Consent (Permit 25478) as modified through consent variation No. 47993, and is located in a SMAF1 area. The water quality and SMAF1 requirements will be addressed at source for the lot areas while biofiltration devices have been constructed to address the quality of runoff from road areas.

Utility services including power, gas and telecommunications have been provided as part of the underlying subdivision and are adequate for the development.

In conclusion, all services available within the subdivision will adequately support the proposed Plan Change and intended land use."

Based on this assessment and relying on the professional opinion of Mr Roa, it is concluded that the proposed plan change will not result in adverse infrastructure issues.



6.6 VISUAL IMPACT

A Visual Impact Assessment has been undertaken by LA4 Landscape Architects, and they conclude the following:

“The site is part of an established and varied predominantly commercial environment with peripheral residential activities, adjacent to two main arterial roads and an expansive area of open space. The site and surrounding landscape has the capacity to visually absorb the landscape and visual effects of development enabled by the Plan Change through the physical characteristics and prevailing commercial attributes and urban fabric within the Te Irirangi Drive and Ormiston Road environs.

The development will have minimal adverse landscape or visual effects on the streetscape and surrounding environment and can be readily accommodated in the prominent location adjacent to the arterial roads.

The additional height will have minor adverse visual effects over and above the permitted height limit for the zone. The hierarchy and location of heights within the site has reduced the bulk and scale of the building and addressed the prominent site in a sensitive and appropriate manner.

The potential adverse effects upon the landscape character and visual amenity values will be minimised to an acceptable level. The additional height of the development will introduce low adverse visual effects and on the whole the development will be compatible with the surrounding existing and future planned urban environment.”

Based on this assessment and relying on the professional opinion of Mr Rob Pryor, it is concluded that the proposed plan change will not result in adverse visual impact.

6.5 CONCLUSION

The above assessment has concluded that the built form and land use activity enabled by the plan change is appropriate to the site and surrounding environment in terms of bulk and location, character and amenity, loss of business zone land, traffic and urban design/visual impact outcomes, and that any adverse effects arising from the plan change will be less than minor.



7. SECTION 32 ANALYSIS

7.1 APPROPRIATENESS OF PROPOSAL TO ACHIEVE THE PURPOSE OF THE ACT

Section 32(1)(a) of the Act requires an evaluation to examine the extent to which the objectives of the proposed plan change are the most appropriate way to achieve the purpose of the Act.

The objectives of the plan change are to enable an intensity and scale of built form and development that is consistent existing and preferred development on surrounding land, while also responding to the particular context and characteristics of the local environment.

Section 5 of the Act identifies the purpose of the RMA as being the sustainable management of natural and physical resources. This means managing the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

It is considered that the plan change will achieve this purpose in that it will provide for the redevelopment of the land resource for residential and mixed use activities and enable the community to provide for their economic and social wellbeing. It is intended that the zoning will facilitate more appropriate redevelopment than what the current zoning has, and encourage and enable the establishment of a high quality mixed use development. Therefore, the plan change will not detract from people's social wellbeing. The assessment of effects has confirmed that adverse effects on the environment arising from the plan change will be less than minor.

Section 6 of the Act sets out a number of matters of national importance which need to be recognised and provided for in achieving the purpose of the RMA. This includes the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins; protection of outstanding natural features and landscapes, the protection of areas of significance indigenous vegetation and significant habitats of indigenous fauna; maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers; the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga; the protection of historic heritage; the protection of protected customary rights and the management of significant risks from natural hazards.



The proposed plan change does not compromise the recognition of or provision for these matters of national importance within the Auckland Region, as none of the above are present on the site.

Section 7 of the Act identifies a number of “other matters” to be given particular regard by Council. Specific matters from section 7 that are relevant to the plan change include:

- b) The efficient use and development of natural and physical resources* – The plan change will enable and encourage the development of the site to provide for the community’s economic wellbeing;
- c) The maintenance and enhancement of amenity values;* and
- f) Maintenance and enhancement of the quality of the environment* – The proposed zone is cognisant of the surrounding development and established land uses and will maintain and enhance the amenity and the quality of the existing environment by encouraging the development of the site.

Section 8 requires Council to take into account the principles of the Treaty of Waitangi. It is considered that this proposal will not offend against the principles of the Treaty of Waitangi.

The proposed zone change is a more effective means of achieving the sustainable management purpose of the Act than the current zone for which development is unlikely to meet the intent of the zone. It is considered that the objectives of the plan change are the most appropriate way to achieve the purpose of the Act.

7.2 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE PLAN CHANGE OBJECTIVES

Section 32(1)(b) of the Act requires an evaluation to examine whether the provisions in the proposed plan change are the most appropriate way to achieve its objectives by:

- Identifying other reasonably practicable options for achieving the objectives.
- Assessing the efficiency and effectiveness of the objectives.
- Summarising the reasons for deciding on the provisions.

These matters are addressed overleaf.



7.2.1 Other Reasonably Practicable Options

In determining the most appropriate method for achieving the objectives of the plan change, consideration has been given to the following other reasonably practicable options:

- Option One: Do nothing (Status Quo) and rely on resource consent application(s)
- Option Two: Alternative provisions for the land
- Option Three: Wait for Auckland Council to undertake a corrections plan change

Each of these alternatives is discussed below:

Option One: Do nothing (status quo)

Under this option, rather than proceeding with the proposed plan change, the owners would rely on the existing AUP provisions to develop the land and make resource consent applications according to the process under Part 6 of the Act.

Sections H17.2 and H17.3 set out the objectives and policies for the Light Industry zone. Section H17.4 sets out the activity status of land use and development activities.

The existing provisions generally facilitate the development of industrial and manufacturing activities, in addition to other lower amenity uses such as drive-through restaurants and service stations.

Activities such as retail, residential accommodation and offices, unless accessory to an industrial activity, are non-complying and will require assessment against the objectives and policies of the zone, which are focussed on industrial use. As such, these activities are unlikely to be seen as compatible with the intended outcomes of the zone.

The resource consent option to facilitate residential and mixed use development of the site (which is considered the most desirable option at this location) therefore carries a time and cost burden and uncertainty of outcome due to the process for assessing non-complying consent applications. It is considered that this option may result in the land being underutilised, as this option does not address the identified issue.

It is therefore considered that the 'do nothing' option is not an appropriate means of managing the future development of the land.



Option Two: Alternative provisions for the site

The plan change will enable the redevelopment of the site and the establishment of new built form and activities. In deciding upon what provisions may be appropriate for the site, consideration was given to:

- The purposes and principles of the Resource Management Act 1991;
- The relevant strategic and statutory planning documents;
- The provisions applying to the surrounding land and established activities on properties within the immediate vicinity; and
- The character of the site in terms of its immediate environment and also its wider context within the Light Industry zone.

Having regard to the above, it was considered that there are two options for alternative provisions may be considered as reasonably practicable alternatives for the site:

- Apply the provisions of an alternative AUP zone, for example General Business or Residential Terrace Housing and Apartment Building. Given the Local Centre and Terraced Housing & Apartment Building zoning immediately to the east of the sites, and the Light Industry zoning to the west, it is considered that a transition zone would be more appropriate on this site.
- Create a new set of provisions that apply to the subject site and provide for mixed use type development. It is considered that creating an individual set of controls would not be the best way to achieve the purpose of the plan change as the request applies to a relatively small collection of sites. In addition, bespoke, site-specific provisions are not considered to be efficient plan development.

Either of these options may address the issue however they are not the most efficient means to do so and the resultant outcomes can be more efficiently addressed through a proposed zone change.

Having regard to the above, it is considered that the most appropriate provisions to achieve the purpose of the plan change are those that currently apply to the Mixed Use zone.

Option Three: Wait for Council-initiated Plan Change(s)

As mentioned earlier in this report, resource consents have been granted to this site for a mixed use development, including the provision for visitor's accommodation, retail, commercial services and other such activities provided for in the former Business 5 zoning



of the Auckland District Plan (Manukau Section). If this was the case, then the Council may consider including the proposed rezoning in a 'corrections' plan change that bundles other possible rezoning inconsistencies or anomalies.

While this would result in less financial cost for the applicant, there is no certainty that this site would be included in a corrections plan change, or when such a plan change might occur. If the applicant were to wait for a Council-initiated plan change, the potential delay creates a risk that the regulatory environment or market conditions may have changed so that future development of the land would be uncertain.

The current plan change request will therefore provide the land owner and the public with a greater level of certainty regarding the future expectations for the site and will allow development to proceed in a co-ordinated and integrated manner.

7.2.2 Costs and Benefits

| OPTION | OBJECTIVES OF THE UNITARY PLAN | COSTS | BENEFITS |
|--------------------------------|--|--|---|
| Do Nothing (Status Quo) | <p>If the do nothing option was progressed, development on the site would likely entail 20m tall warehouse buildings.</p> <p>This option would not meet the objectives of the Unitary Plan, as the sites would have a low standard of amenity, and</p> | <ul style="list-style-type: none">•Activities that have previously been consented on these sites are not provided for and will be a non-complying activity;•The land may be underutilised due to unsuitable zoning;•Industrial zoned land will be located immediately adjacent to a future | <ul style="list-style-type: none">•No loss of land specifically zoned for industrial use. |



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would not support residential and employment growth in a location that is in close proximity to the public transport network, public open space and other employment opportunities.

Alternative Provisions

Alternative provisions for the site, such as a new or different zone, may achieve some of the objectives of the Unitary Plan, notably they may provide for new medium to high residential and/or employment opportunities in an appropriate location.

However, a different zone, such as the THAB or General Business zones

- No transition zone between the existing Local Centre and Light Industrial zoned sites;

- Creating a new set of provisions specifically for the site would not be the best way to achieve the purpose of the Unitary Plan, and would lead to spot zoning.

- A different zone or site-specific provisions may address the underlying issue in part.

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will not be able to provide for a range of both housing types and employment choice for the surrounding area.

Further, creating a new zone or site-specific provisions would not meet the overall intent of simplicity and consistency of planning provisions across the Auckland Region.

Wait for Council-initiated PC

As with the do-nothing option, waiting for a Council-initiated Plan Change will likely result in development entailing 20m tall warehouse buildings due to a lack of certainty or other viable options.

This option would not meet the objectives of the

- Potential uncertainty for the public and landowner over the future zoning of the sites;
- Potential uncertainty regarding timing of possible changes to the sites;
- Council may not include these sites in a future Plan Change or Unitary

- Some of the burden of cost can be shared with Council;
- Council may have a greater say in the future provisions for the sites.



Unitary Plan, as Plan review.
the sites would
have a low
standard of
amenity, and
would not
support
residential and
employment
growth in a
location that is in
close proximity to
the public
transport
network, public
open space and
other
employment
opportunities.

Preferred Option

Due to the reasons described above, the preferred option is for a change in zoning to the Mixed Use Zone, with corresponding GFA caps and height variation controls.

The PPC will be consistent with the intent of both the Regional Policy Statement and the Auckland Unitary Plan (Operative in Part), as it will enable a high-density mixed use development in an appropriate location, in close proximity to public transport services, public open space, a growth corridor and employment opportunities.

The Mixed Use zoning would act as an appropriate transition between the Local Centre and residential Terraced Housing and Apartment zones to the east, and the Light Industry zone to the west. The proposed zone provides for more efficient development than the existing zone, for which development is unlikely to be in accordance with the intent of the zone, especially given the mixed use development already consented for this site.



The simplicity of this plan change request is a reflection that is consistent with the relevant objectives of the Mixed Use zone and that the existing provisions are robust and have been tested against s32 of the RMA through the AUP:OIP process.

7.2.3 Efficiency and Effectiveness of Provisions

In summary, it is considered that the provisions of the plan change are the most efficient and effective means for providing for the future development of this strategically located site. In particular:

- The Mixed Use zoning would act as an appropriate transition between the Local Centre and residential Terraced Housing and Apartment zones to the east, and the Light Industry zone to the west.
- The proposed zone provides for more efficient development than the existing zone, for which development is unlikely to be in accordance with the intent of the zone, especially given the mixed use development already consented for this site.
- The simplicity of this plan change request is a reflection that is consistent with the relevant objectives of the Mixed Use zone and that the existing provisions are robust and have been tested against s32 of the RMA through the PAUP process

7.2.4 Risk of Not Acting

It is considered that sufficient information has been gathered to justify proceeding with the plan change request and that the risk of acting on this information is less than not acting. It is also considered that there is sufficient information to enable timely processing of the Plan Change request.

7.3 SECTION 32 EVALUATION CONCLUSION

Pursuant to Section 32 of the Resource Management Act 1991, the evaluation contained in this report confirms that the proposed zone is considered to be the most appropriate way to achieve the purpose of the Act, being a better zoning than the existing zone, meeting the requirements of the Resource Management Act 1991 and are the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future.



8.0 CONSULTATION

As part of preparing the application for the plan change and in assessing the proposal against s32 of the RMA, Mt Hobson Group has undertaken consultation with a number of parties on behalf of the applicant. This is summarised below and a table containing who has been contacted and outcomes to date is provided at **Appendix 8**.

8.1 OTARA-PAPATOETOE LOCAL BOARD

The Otara-Papatoetoe Local Board was first contact on the 10th of September regarding this proposed plan change. We met with the Local Board on 23rd of October to discuss this plan change in detail, answer any questions they may have, and to respond to feedback. No concerns were raised by the Local Board.

8.2 IWI

10 Mana Whenua Groups who have expressed interest in the sites were contacted on the 11th of September regarding this proposed plan change, with follow up contact on the 18th and 25th of September.

We received responses from Ngāi Tai Ki Tāmaki and Ngāti Paoa, who both had no objections to the proposal. No other Iwi provided responses.

A full list of the responses we received is attached in **Appendix 8**.



9. CONCLUSION

This report has been prepared in support of JKGL Group Ltd's request for a plan change to the provisions of the Auckland Unitary Plan – Operative in Part as they relate to 1, 3, 5, 7, 10, 12 Florence Carter Avenue, Flatbush. The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991.

Based on an assessment of environmental effects and a specialist traffic and infrastructure input, it is concluded that the proposed plan change rezoning will ensure that effects result in less than minor adverse effects.

An assessment against the provisions of Section 32 of the RMA is provided in section 7 of the report. This includes an analysis with respect to the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the Act and an examination of whether the provisions of the plan change are the most appropriate way to achieve its objectives.

For the above reasons, it is considered that the proposed plan change accords with the sustainable management principles outlined in Part 2 of the Act and should be accepted and approved.

Regards

HAMISH FIRTH

Mt Hobson Group



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Appendix 1

Plans

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Appendix 2

Auckland Council's Planning and GIS Maps

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Appendix 3

Urban Design Assessment

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Appendix 4

Cost-Benefit Analysis

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Appendix 5

Traffic Assessment

Appendix 5a

Travel Plan Strategy

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Appendix 6

Infrastructure Report

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Appendix 7

Visual Impact Assessment

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Appendix 8

Consultation Responses

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Appendix 9

Clause 23 Response

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Appendix 10

Florence Carter Avenue Precinct Chapter

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