

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 118 (Private): Puhinui Precinct

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 **28 November 2025, 5PM.**
- 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 118 (Private) - Puhinui Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
1	1.1	R&B Wyllie Limited	colin.bright@jpf.co.nz	Insufficient consideration given to infrastructure (water, stormwater, drainage, wastewater) including effects on adjoining properties
1	1.2	R&B Wyllie Limited	colin.bright@jpf.co.nz	Major upgrade of Campana Road required
1	1.3	R&B Wyllie Limited	colin.bright@jpf.co.nz	Effects of water runoff from Campana Road to submitter's property need to be addressed
1	1.4	R&B Wyllie Limited	colin.bright@jpf.co.nz	Increased traffic and people movements on Campana Road - upgrade required
1	1.5	R&B Wyllie Limited	colin.bright@jpf.co.nz	Concern about need / cost of moving front boundary fence on the submitter's property
1	1.6	R&B Wyllie Limited	colin.bright@jpf.co.nz	Require side road alongside Puhinui Road, including to give access to the submitter's property
1	1.7	R&B Wyllie Limited	colin.bright@jpf.co.nz	Provide necessary wastewater infrastructure prior to rezoning
2	2.1	Ngaati Te Ata Waiohū	karl_flavell@hotmail.com	Undertake adequate consultation with the submitter
2	2.2	Ngaati Te Ata Waiohū	karl_flavell@hotmail.com	Provide a Cultural Impact Assessment from the submitter with any consequential amendments to the precinct provisions
3	3.1	Ngati Tamaoho	edith@tamaoho.maori.nz	Recognise cultural values including the protection of viewshafts from Pūkaki Marae to Matukutūreia, the inclusion of a Special Purpose – Māori Purpose Zones to enable papakāinga, marae development, and cultural activities, the integration of mātauranga Māori in stormwater design, landscape planning, and ecological restoration and the requirement for Archaeological Management Plans, including site specific mechanisms to deal with tikanga and wahi tapu through consultation with Mana Whenua prior to earthworks
3	3.2	Ngati Tamaoho	edith@tamaoho.maori.nz	Undertake adequate consultation with the submitter
3	3.3	Ngati Tamaoho	edith@tamaoho.maori.nz	Concern about extremely sensitive cultural and ecological areas (including in Sub-precincts such as H and G) - need for consultation, access for mana whenua, Authorities to Modify and destroy and stricter controls or exclusion from industrial expansion
3	3.4	Ngati Tamaoho	edith@tamaoho.maori.nz	Seek a co-governance model that reflects true partnership under Te Tiriti o Waitangi; restoration of ecological corridors and indigenous planting to revive mauri, economic opportunities that uplift Ngati Tamaoho without compromising cultural integrity; blessings for previously undeveloped land, cultural induction, cultural monitoring land and water to be included in consent conditions
4	4.1	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	By deferring critical issues including the assessment of intersection capacity, development staging, and the design and delivery of mitigation works to future resource consent applications the plan change fails to provide adequate certainty at the rezoning stage, as required under the Resource Management Act 1991 (RMA 1991). Specify the road network upgrades required to service traffic generation associated with development provided for within Sub-precincts E (north), C and C1 (including permitted, restricted discretionary and discretionary activities) and impose strict staging and transport network triggers to ensure that no development occurs until the necessary road network upgrades are operational
4	4.2	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	The wording of Standard I432.6.1.2 is ambiguous and open to various interpretations including that I432.6.1.2(5) only applies to Storage and Lock-up facilities that do not comply with I432.6.1.2(4) and standards I432.6.1.2(4) and (5) only apply to traffic 'from' the Campana Road/Puhinui Road intersection and only require assessment against the existing environment, creating significant risk eg for the operation of Sub-precinct D, as there is no mention of needing to account for either the 1,035 trips permitted in Sub-precinct D, nor the potential for further development afforded by the Precinct provisions

Plan Change 118 (Private) - Puhinui Precinct

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4	4.3	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	SIDRA modelling only considers the immediate intersection of Campana Road and Puhinui Road - there is no consideration of the intersections further afield, such as Puhinui Interchange and Vogler Drive/Roscommon Road
4	4.4	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	The plan change does not propose staging provisions that align with the delivery of future transport projects (Airport–Botany rapid transit, 20Connect) that remain uncommitted and, while relied on in part, are outside the Applicant's control. Auckland Council's Future Development Strategy 2023–2053 ('FDS') identifies this area of Future Urban zone as being released post-2030, recognising that these significant transport upgrades are prerequisites
4	4.5	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	In the absence of a regional shortage, advanced rezoning of additional land at Puhinui risks fragmenting development and diverting demand from existing live-zoned land. Many of those areas, including Sub-precinct D, have required substantial investment in transport and servicing infrastructure, and dispersing demand undermines the integrated sequencing of development
4	4.6	Fernbrook Property (PR) Limited	avs@planningfocus.co.nz	The plan change is premature and would allocate scarce wastewater capacity away from live zoned land within the wider catchment, and risks delaying integrated development of land already zoned for urban use. Within Sub-precincts E (north), C and C1, make Use and Development (Activity rule I432.4(A52)(A)) and Subdivision (Activity rule I432.4(A52)(A)) that does not comply with Standard I444.6.8 Bulk Wastewater Infrastructure a Prohibited Activity and delete development standard I444.6.8(2), which enables Standard I444.6.8 to be met where written confirmation is obtained from the infrastructure services provider that the bulk wastewater network has sufficient capacity to service the proposed subdivision or development. Connections to the public wastewater network must not be granted to development in Sub-precincts E (north), C and C1 until the southwestern Wastewater Interceptor is completed and commissioned
5	5.1	NZ Transport Agency Waka Kotahi	environmentalplanning@nzta.govt.nz	Quantify and assess the potential number of vehicle trips generated by future development enabled by the proposed plan change
5	5.2	NZ Transport Agency Waka Kotahi	environmentalplanning@nzta.govt.nz	Identify and include provisions or triggers to adequately address implications to the state highway and surrounding network
5	5.3	NZ Transport Agency Waka Kotahi	environmentalplanning@nzta.govt.nz	That the proposed structure plan (or 'Precinct Plan 6') clearly identify the location of the new access from the relocated slip road including the formation of the slip road intersection with SH20B, when it would be triggered, and who will own and maintain the slip road; or that all private accesses shall be via Campana Road in order to provide for high-capacity, efficient and reliable movement of people and goods. Where access via Campana Road is deemed not practicable (i.e. to 'Allot 190 PSH OF Manurewa' held under Record of Title NA543/148), an assessment is provided which outlines the use of the access as part of the plan change area and demonstrates that the access and associated traffic generation will not adversely impact transport users. Further, that all existing private accesses on to LAR SH20B be closed where practicable
6	6.1	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Retain rezoning of 11 Campana Road to Light Industry Zone as notified, subject to amendments sought within the submission
6	6.2	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete all references to Open Space – Informal Recreation Zone
6	6.3	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend Precinct Plan 6 to identify the spatial extent of C1 within 11 Campana Road to a width of 20m
6	6.4	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend the Precinct Description in respect of transport and wastewater (including interim solution) matters

Plan Change 118 (Private) - Puhinui Precinct

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6	6.5	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend all references to “the Campana Structure Plan area” to refer to “Precinct Plan 6 – Campana Road Development Plan”
6	6.6	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend Objective 5 in respect of wastewater (including providing for interim solutions)
6	6.7	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete Policy 2
6	6.8	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend Policy 4 (in relation to earthworks) so that it refers only to archaeological areas identified in Precinct Plan 6
6	6.9	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete Policy 6
6	6.10	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete Policy 7
6	6.11	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend Policy 8 including by replacing "avoid" subdivision (before the availability of necessary transport infrastructure) with "manage" subdivision and development
6	6.12	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend Policy 9 in respect of wastewater to not refer to subdivision and include providing for interim solutions
6	6.13	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete proposed rule (A13a) in Table I432.4.2 – Activities specific to sub precincts A-F (which requires all earthworks to gain restricted discretionary activity consent)
6	6.14	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	In Table I432.4.2 – Activities specific to sub precincts A-F amend rules (A34), (A37), (A42) and (A48) to have activity status consistent with sub-precinct D
6	6.15	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Amend standard 1432.6.1.2 (4) to make it clear that the standard relates to 50 movements per hour from the sub-precinct
6	6.16	Hapai Puhinui Whenua Limited Partnership	nickr@barker.co.nz	Delete the coastal protection yard requirements for sub-precincts C and C1 from standard I432.6.3. Yards
7	7.1	Channel Terminal Services Limited	chris.simmons@chancerygreen.com caitlin.todd@chancerygreen.com	Amend the provisions to: recognise and provide for the significance of the RAP and densitometer station as nationally critical infrastructure; recognise and provide for the RAP and densitometer station's ongoing safe and efficient operation, maintenance, repair, and upgrade (including uninterrupted access to the RAP and densitometer station and uninterrupted power supply to the densitometer station); and ensure that any development enabled by PC 118 does not introduce unacceptable risk or reverse sensitivity effects as a result of proximity of proposed structures/activities to the RAP/densitometer station
8	8.1	100 Prices Road Limited	mark.vinall@tattico.co.nz	PC118 does not acknowledge the existing constraints through this rapidly developing area, the traffic generation potential of the activities it seeks to enable, or the infrastructure (over and above that already specified within the Precinct) needed to support the additional traffic generation sought to be enabled by the Plan Change
8	8.2	100 Prices Road Limited	mark.vinall@tattico.co.nz	The proposal does not specify any transport network upgrades to support development enabled by PC118 from the outset or in the long term. The Submitter expects that an upgrade to the Campana road approach (for all modes) is provided prior to any new development being occupied within the Plan Change area
8	8.3	100 Prices Road Limited	mark.vinall@tattico.co.nz	The modelling provided only focuses on the Puhinui Road / Campana Road intersection in isolation. There has been no consideration or assessment of the wider network
8	8.4	100 Prices Road Limited	mark.vinall@tattico.co.nz	PC118 defers critical issues including the assessment of intersection capacity, development staging, and the design and delivery of mitigation works to future resource consent processes. This is inconsistent with the established approach within the Puhinui Precinct and fails to provide adequate certainty at the rezoning stage, as required under the Resource Management Act 1991. The plan change needs to be amended to identify specific transport generation limits and transport network upgrades needed to service the proposed land area

Plan Change 118 (Private) - Puhinui Precinct

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8	8.5	100 Prices Road Limited	mark.vinall@tattico.co.nz	Concerns around the baseline data, trip generation rates and the underlying assumptions that have informed the transport modelling including the traffic modelling undertaken pre-dating the Manawa Bay development and the operation of the Auckland International Airport Limited (AIAL) Park and Ride (south) facility; it being unclear what distributions have been used for AIAL and Sub-Precinct D movements; and the nature of Sub-precinct E and the activities enabled within it have the potential to act as attractors of high trip-generating activities including fast food restaurants, service stations, cafés, bars, etc, all of which would significantly impact the performance of the Campana Road intersection. The location of the proposed Sub-Precinct E (North) on Puhinui Road would act as an attractor of trips to the Precinct, rather than being a convenience catering to the Precinct
8	8.6	100 Prices Road Limited	mark.vinall@tattico.co.nz	Proposed Standard I432.6.1.2(4)(b) limits the measurement of traffic movements only “from” the Campana Road / Puhinui Road intersection. If other accesses onto Puhinui Road eventuate, such as left-in, left-out, movements from these accesses would be exempt
8	8.7	100 Prices Road Limited	mark.vinall@tattico.co.nz	In respect of wastewater out-of-sequence development compromises the efficient and coordinated delivery of infrastructure, and would create inequitable outcomes for other landowners who have planned on the basis of the FDS sequencing.
9	9.1	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	The transport assessment is not based on current vehicle movements, does not sufficiently evaluate the impacts of the development on the immediate and wider transport network, and seeks to defer significant transport assessments to future resource consent applications. Deferring detailed transport assessments to future and individual consent applications or future development proposals is not appropriate. Understanding the cumulative effects of development enabled by a proposed plan change is essential to ensure that any required mitigation on the local and wider transport network is both appropriate and feasible.
9	9.2	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	PC118 significantly underestimates both existing traffic on the network (including being out of date and not meeting AT's ITA guidance) and the movements that will arise from the proposed development (including not using industry standard trip rates)
9	9.3	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	The wider network is already congested at peak times and any increase in traffic will exacerbate existing delays and queuing. The assessment of transportation effects does not consider wider effects beyond the Campana intersection and immediate surrounds
9	9.4	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	Provisions in PC118 are insufficient to address the transport effects of the proposal, including the following: Objective 3 (fails to acknowledge that development proposals located in Sub precinct C and C1 will likely affect the wider transport network beyond the boundaries of the Puhinui Precinct) and Policy 7 (not sufficiently directive and inconsistent with the non-complying activity status proposed); Proposed rules and standards - are unclear and leave uncertainty as to how the rule framework is to be interpreted and applied - including how development proposals would be staged and assessed, and how cumulative effects would be appropriately considered in future projects / consents (see more detail in Attachment A to the submission)
9	9.5	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	Ensure that any temporary or permanent structures do not result in the penetration of the obstacle limitation surfaces (“OLS”) to compromise the safety and operation of aircraft
9	9.6	Auckland International Airport Limited	sarah.westoby@aucklandairport.co.nz	Introduce provisions to minimise wildlife attractants at the Site (critical for aircraft operational safety)

Plan Change 118 (Private) - Puhinui Precinct

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Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
10	10.1	Watercare Services Limited	planchanges@water.co.nz	Seeks amendments to the notified Precinct Provisions to: ensure that the provisions proposed as they relate to water and wastewater servicing cover sub-precinct E (north) which is being introduced through Plan Change 118; remove the reference in the special information requirements to exclusively identifying catchments "within the FUZ" that will connect to Sub-Precinct C and / or Sub-Precinct E (north) for the purposes of demonstrating the water and wastewater networks are appropriately sized (see Appendix 1 to the submission for detailed wording changes)
11	11.1	James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited	hamish@mhg.co.nz james@jkgl.co.nz	Amend the plan change to retain flexibility in permitted land uses for the submitters land
11	11.2	James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited	hamish@mhg.co.nz james@jkgl.co.nz	Amend the plan change to ensure that any changes to intersection phasing and network planning do not reduce existing traffic capacity or create unreasonable access constraints
11	11.3	James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited	hamish@mhg.co.nz james@jkgl.co.nz	Amend the plan change to defer final traffic-related restrictions until the comprehensive Puhinui Precinct traffic modelling has been completed and reviewed
11	11.4	James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited	hamish@mhg.co.nz james@jkgl.co.nz	Amend the plan change to specify the road network upgrades required to service traffic generation associated with development provided for within Sub-precincts E (north), C and C1 (including permitted, restricted discretionary and discretionary activities) and impose strict staging and transport network triggers to ensure that no development occurs until the necessary road network upgrades are operational
11	11.5	James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited	hamish@mhg.co.nz james@jkgl.co.nz	Within Sub-precincts E (north), C and C1, make Use and Development (Activity rule I432.4(A52)(A)) and Subdivision (Activity rule I432.4(A52)(A)) that does not comply with Standard I444.6.8 Bulk Wastewater Infrastructure a Prohibited Activity and delete development standard I444.6.8(2), which enables Standard I444.6.8 to be met where written confirmation is obtained from the infrastructure services provider that the bulk wastewater network has sufficient capacity to service the proposed subdivision or development. Connections to the public wastewater network must not be granted to development in Sub precincts E (north), C and C1 until the southwestern Wastewater Interceptor is completed and commissioned
12	12.1	Auckland Transport	spatialplanning@at.govt.nz	Update the transport modelling to accurately reflect current and future conditions, and amend the PC 118 Precinct provisions to include any appropriate mitigation measures
12	12.2	Auckland Transport	spatialplanning@at.govt.nz	Amend PC 118 Precinct to include a provision for the upgrade of Campana Road to an urban standard
13	13.1	CAHA Farms Limited	tonybutts1@gmail.com	Identify the roading infrastructure upgrades required to support the additional traffic generated from development of the Applicant's land and impose staging thresholds on the Applicant's land such that development on the Applicant's Land does not occur until the required traffic infrastructure upgrades are constructed and operational
13	13.2	CAHA Farms Limited	tonybutts1@gmail.com	Prevent development on the Applicant's land from occurring until sufficient wastewater capacity to service all existing live zoned land in the Puhinui Precinct and the Applicant's land is available and operational
14	14.1	Te Ākitai Waiohū Waka Taua Incorporated (Te Ākitai Waiohū)	akitai.waka.taua@gmail.com	Supports those precinct provisions (as listed in the submission) that address cultural values
14	14.2	Te Ākitai Waiohū Waka Taua Incorporated (Te Ākitai Waiohū)	akitai.waka.taua@gmail.com	Amend Policy 1 because it doesn't make sense as currently worded; Amend Rule I432.4.1(A1) reclamation of intermittent and permanent streams not identified on precinct plan 2 to be a discretionary activity; Amend Standard I432.6.4.4 to replace 'Crater Hill' with "Nga Kapua Kohuora"

Plan Change 118 (Private) - Puhinui Precinct

Summary of Decisions Requested

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15	15.1	Heritage New Zealand Pouhere Taonga	inforthern@heritage.org.nz	Supports proposed provisions relating to historic heriatge as specified in the submission
15	15.2	Heritage New Zealand Pouhere Taonga	inforthern@heritage.org.nz	Amend reference in I444.6.7 'Archaeological Management Plan' to 'Historic Heritage Management Plan'
15	15.3	Heritage New Zealand Pouhere Taonga	inforthern@heritage.org.nz	Re the presence of historic material (Bricks, ceramic fragments) in an area of dense scrub located in the south-eastern corner of at 485 Puhinui Road, given the references to historic 19th and 20th century pastoral farming activities in this area, further archaeological assessment is required to determine the time frame and nature of heritage values associated with this material, and to inform appropriate mitigation, including protection, interpretation, as part of the plan change, alongside identification of archaeological authority requirements as may be required under the HNZPTA 2014
16	16.1	The Self Trust	emma@civilplan.co.nz	Retain proposed precinct provisions that manage visual and amenity effects on the surrounding environment including Sub-precinct C and C1 objectives 1 and 2 Sub-precinct C and C1 Policies 1 and 3 Rule I432.6.4(4) which requires buildings to be screened from Crater Hill with landscape planting
17	17.1	Airface Limited	andrew@telawyers.co.nz	Remove the provisions within I432.6.1. Transport (and any other associated provisions) so that those provisions do not exist anywhere in the Precinct and do not apply to sub-precincts, C, D or E
17	17.2	Airface Limited	andrew@telawyers.co.nz	Assumptions applied to calculate vehicle trips associated with sub-Precinct C activities appear incorrect, and/or inconsistent with generally accepted figures applying to the local area
17	17.3	Airface Limited	andrew@telawyers.co.nz	The location proposed by PC118 has sub-Precinct E (north) immediately adjacent to SH20B Puhinui Road does not meet the intent of sub-Precinct E
17	17.4	Airface Limited	andrew@telawyers.co.nz	Traffic modelling has not taken into account recent developments and unimplemented resource consents. The assessment of effects (when) taking into account 'baseline environment' has failed to make reference to consents and the full range of permitted activities from sub Precinct D, or the 1,035 trips threshold. A sufficient range of intersections have not been modelled in order to properly understand the effects of the Proposal.
17	17.5	Airface Limited	andrew@telawyers.co.nz	The Proposal does not specify any wider network upgrades to support development enabled by the plan change from the outset and the key intersection for access to the site is unlikely to be achieved within the space provided installed at an appropriate time. There are insufficient controls / assessments required where access is provided by way of other access points into the land
17	17.6	Airface Limited	andrew@telawyers.co.nz	The Proposal is inconsistent with the timing set out in the Future Development Strategy and would have wider effects on infrastructure demand that cannot presently be met and/or would have impacts on other users of local and transmission infrastructure such as Watercare's infrastructure. Amend the proposal so that required infrastructure upgrades are provided prior to development and that the scale of development enabled is linked to the capacity of infrastructure capable of supporting it

Submissions

2 September 2025

Attention: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Submission for R&B Wyllie Limited in opposition to Plan Change PC 118 (Private)

Attached is submission that is being submitted for R&B Wyllie Limited.

The submission is in opposition to the above proposed plan change.

Yours faithfully

JOHNSTON PRICHARD FEE LIMITED



Colin Bright

Director

Email: colin.bright@jpf.co.nz

Document3

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 or post to :

Attn: Planning Technician
Auckland Council
Level 16, 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)

David John Wyllie

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

R & B Wyllie Limited

Address for service of Submitter

Johnston Prichard Fee Limited, Level 8 Vero Centre, 48 Shortland St
Auckland CBD

Telephone:

09-303-3295

Email:

colin.bright@jpf.co.nz

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 PC 118 (Private)

Plan Change/Variation Name Puhinui Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Zoning change sought by Campana Landowners Consortium

Or

Property Address

"

Or

Map

"

Or

Other (specify)

The zoning change sought from Future Urban Zoning (FUZ) to Business - Light Industrial Zone. The submitter is opposed to the proposed zone change for the reasons set out in this submission.

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 views set out in this submission are primarily focussed on the present inadequacies of the Council

infrastructure to support the zoning change proposed and the very serious adverse consequences that such a

zone change will have for the properties of R & B Wyllie Limited (For full submission please see attachment A)

(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. ☒

The plan change should be deferred until all of the infrastructure deficiencies specified in this objection have been

addressed and the works required completed, including, in particular, the drainage infrastructure and the Puhinui

Road road changes to provide access to the properties of R & B Wyllie Limited

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 ☐

David John Wyllie

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

Date

2nd September 2025

Authorised signatory for R & B Wyllie Limited

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.

ATTACHMENT A

Plan Change 118 (Private)
Continuation of Submission on behalf of R & B Wyllie Limited
In opposition to the Zoning change that has been sought by the
Campana Landowners Consortium

Preliminary – Inadequate time provided for Application to be considered and response provided

This application, for proposed land change PC118 (Private) , appears to have been years in the making. The documentation that has been prepared and lodged in support of the application and that is available for downloading is massive! There are 27 separate documents made available for downloading, with one of the early ones being in excess of 130 pages long. It is a huge volume of material to be reviewed and considered.

Years in the making, but a period of just 4 weeks from the notification has been granted for the making of any responding submissions.

It has just not been possible, within that timeframe, to read, understand, and address, that material, in any detail.

This submission has, therefore, had to focus on the issues and consequences immediately apparent to R & B Wyllie Limited. With that company being the immediately adjoining property owner. (Part of whose boundary also runs along Campana Road from the intersection with Puhinui Road, in a generally Northern direction.)

The R&B Wyllie Limited Properties and their location alongside the Campana Landowners Consortium Properties.

R&B Wyllie Limited is the registered owner of two properties on which rural farming activities, by Wyllie families, have taken place for a period in excess of 100 years.

The two properties are contiguous with each other. They are situated at 551 Puhinui Road and 507 Puhinui Road.

They are the two properties shown on the aerial photo map attached as **Attachment B** to this submission!

(507 Puhinui Road is the property which borders Campana Road.)

Both properties are shown as edged in red on the attached plan.

All of the indicated properties shown as edged in green on the **attached** plan, form part of the Plan Change 118. They are the **Campana Landowners Consortium**.

Those properties and the property of R&B Wyllie Limited run on either side of Campana Road.

ATTACHMENT A**Submission that the Council's approach to zoning changes appears to be piecemeal.**

R&B Wyllie Limited's concerns about this proposed plan change and other zoning changes that have already occurred for other properties on the Eastern side of Puhinui Road and in the immediate vicinity, are that the Council's approach appears to be piecemeal and being made far in advance of putting in place the necessary infrastructure development that will be needed.

Attached to this submission as **Attachment C** is the copy of a plan which shows the current zoning of the properties on either side of Puhinui Road from the Eastern Motorway towards the Airport.

On **Attachment C** the Campana Landowners Consortium properties are each identified with stars.

Their present zoning is the same as the Submitter's properties.

Future Urban Zone

With only one other exception and apart from the Submitter's properties, the granting of this application will result in all of the properties on both sides of Puhinui Road having a light industrial zoning. But what infrastructure improvements have been put in place by the Council to justify the zone change?

The Present Infrastructure does not support the zone change sought.

There seems, to the Submitter, to have been insufficient consideration given to there being no adequate infrastructure in place to properly service the area and the zoning that is sought to be applied.

It is submitted that there should be no plan, or zone change, unless or until, the Auckland Council addresses and puts in place the appropriate infrastructure that will be needed to accommodate what is now being sought.

In particular, the Council is urged to first ensure to that the infrastructure that is now in place will be appropriate to accommodate the increases in the traffic and the increased water, stormwater, drainage, and sewage, issues that the zoning changes will generate.

Also, insufficient consideration appears to have been given to the consequences that the changes made will have for adjoining properties.

What is the present state of Campana Road around which these Business – Light Industrial Properties are located?

The granting of the resource consent, referred to earlier, did lead to the improving and tar sealing the entrance to, Campana Road. However, that was the extent to which the road and traffic and drainage issues were addressed. Beyond that short entrance area into Campana Road, that road, both then and now, remains, as it has been for decades, a metal road.

1.1

ATTACHMENT A

A metal road to service those 5 new, Business-Light Industrial Zoned properties of the **Campana Landowners Consortium**.

Attached to this submission as **Attachments D1 to D5** are copies of photographs taken on 30th August 2025. The photos illustrate the present road that will be the primary point of access for all but one of the Campana Landowners Consortium sites that are seeking this zone change.

Photograph D2 also shows the present fence line to the Submitter's property. That fence was put in its present location by the Manukau City Council. It is referred to later in this submission

A major upgrade to Campana Road will be an essential consequence of the grant of this application.

That will include the putting in place of infrastructure that the sites do not yet have.

Have the consequences of the Campana Road upgrade and the zoning need for infrastructure been fully considered?

1.2

What will happen to the property of R & B Wyllie Limited when that road changes? (As it must do)?

Quite apart from the issues of the implications for the remaining rural use properties of the noise, dust and increased security concerns, what steps are proposed to ensure that when the roading upgrades and/ or improvements that are certain to be required for Campana Road have been put in place, there will be no increase in the water run-off, from Campana Road onto the Submitter's property?

1.3

The water that is already being concentrated and directed onto that farm property is not the result of a natural flow of water from a higher property, it has been concentrated and directed by the drainage under Campana Road that was put in place by the Council with no prior consultation or agreement with the Submitter.

What will happen to this Campana location when the new proposed zone is put in place is that there will be, amongst other things, greatly increased traffic movements, and people movements, up and down Campana Road and immediately alongside the farm property of the Submitter.

1.4

That zoning change will not only generate a great increase in traffic movements (including truck movements), but the zone change will also generate a significant number of people moving to and from, the adjoining properties, and/ or occupying the adjoining properties, for employment purposes.

It seems absolutely certain that this zoning change will require roading and infrastructure services for Campana Road that will include the widening and tar sealing of that road.

That will create other inevitable consequences: -

The first consequence

The Fence running down Campana Road

ATTACHMENT A

There is now in place, on Campana Road, what presently serves as part of the boundary fence to the property of R&B Wyllie Limited.

However, that fence was put in place, and it was put in its present location by the former Council (the Manukau City Council) at the request of that Council.

The fence runs along the top part of Campana Road from Puhinui Road.

(Attachment D2)

Amendment sought to the Proposed Plan Change if it is not declined. The Fence Relocation

If the present fence is to be moved back from its present location, to the boundary of the Submitter's property, as a consequence of this proposed plan/zone change, it should be the Council's/ Applicants responsibility, to move the fence from its present location, and to put it on the boundary of the Submitter's property.

The Second Consequence

The Drainage Issues that will be created by this proposed plan change.

Unless there is put in place, as part of this zoning change, the pickup of all of the water run off that will be generated by the roading upgrade of Campana Road and the widening of the road, and the tarsealing of the surface, the water will otherwise run off that new tarsealed surface onto the Submitter's property.

This proposed zoning change has the potential to turn significant parts of the Submitter's property into a semi wetland.

The roading infrastructure improvements that are going to be an essential part of this Plan Change 118 are going to create a hugely increased waterflow from the tarsealed surface of the road. That will be a hugely increased flow of water that the Submitter's property has never previously been subjected to.

Amendment sought to the Proposed Plan Change if it is not declined – Putting in place a Water Run off disposal system.

The water run off for the length of Campana Road from Puhinui Road from adjoining property should be run off that is collected and run into piped drainage running along Campana Road for the length of our property and piped to the designated discharge point on the indicated adjoining property. That property being the property of one of those Consortium members who are seeking the plan change. The proposed indicated gully on that property is steep sided and it is suitable to accept the proposed water run off. It is, in fact, ideal for the reasonable acceptance and discharge of that water run-off.

The sketch plan that is attached and marked **(Attachment E)** shows the drainage line alongside our property running to the proposed discharge point.

1.5

1.3

ATTACHMENT A

Summary

Before any plan change comes into effect there should be put in place a drainage system, on the Submitter's side of Campana Road, that picks up the water draining from the tarsealed road surface along Campana Road, from the Puhinui Road entrance, and that takes that new water run off, by generous capacity piped drains, to the drainage disposal point that is shown on the **attached plan E**. If that does not happen then the Submitter's property will be unfairly subjected to a major increase in water run off. Such that it could turn parts into a semi wet land.

1.3

**The Third Consequence
Access**

Because of the zoning changes that have already been put in place, for properties bordering Puhinui Road, traffic travelling in both directions is heavy and creates great difficulty and dangerous traffic situations.

That is, it gives rise to serious Health and Safety concerns for anyone, travelling down Puhinui Road towards the Airport and wanting to turn across the traffic to the access the Submitter's property.

This new proposed further zoning change will pretty well eliminate the Submitter's ability to access the property when travelling in the direction of the Airport (And also the ability of invitees and contractors to access the property from that direction.)

1.6

Amendment sought to the Proposed Plan Change if it is not declined – The side road solution to provide access.

That issue could be overcome by a condition being imposed for any change of use for the adjoining properties. That condition should require that there first be put in place a short parallel side road alongside Puhinui Road from the light controlled, Campana Road intersection with Puhinui Road. Traffic seeking to access the Submitter's property would then have access by a right hand turn at the Campana Road intersection, into the side road. That short side road should run to the present entrance to the Submitter's property from Puhinui Road.

The fourth consequence – Intensified zoning change is sought for area with zero sewage infrastructure.

Not only is this intensified zoning change sought for sites bordering Campana Road, ahead of the provision of any drainage and/ or stormwater run off facility, and ahead of the major upgrade that will be needed for Campana Road, to accommodate the new zone, but this is being done for an area that will need major sewage infrastructure, AND THAT HAS NONE!

1.7

The putting in place of the sewage infrastructure that will be needed to service the Campana Road area having a Business – Light Industrial Zoning will be a major undertaking and it is submitted that the infrastructure for such a service should be in place. BEFORE the zoning. Not the other way round.

ATTACHMENT A

Conclusion

Between last year and this, the Submitter's property has been made the subject to rating increases for the coming year that appear to already categorize the properties as having the zoning of a Business – Light Industrial, zoned site. Not one that continues to be rural in the land use, and with its present zoning continuing to be a Future Urban Zone.

How can the Auckland Council otherwise justify rating increases on both of the R&B Wyllie Limited properties that are not just increases of between 10% to 30% (That have caused an outcry from others endeavoring to carry out rural farming activities.)

The increases that have been imposed on both of the R&B Wyllie Limited properties seem designed to ensure that it is no longer practicable to continue under the present zoning.

In just this past year the rates for both these properties have more than doubled!

That is the increases imposed by the Council for each property are increases of well in excess of \$100% for each.

The rates have more than doubled, but there has been no change, that we are aware of, to the area infrastructure, to support such an increase.

That massive rating increase, by the Council, for the Submitter's property, surely, at least, requires the Council to put in place the infrastructure improvements that are sought by this submission, before any plan change is approved and/ or to the defer the putting in place any plan change, until those infrastructure improvements sought have been put in place.

In the general scheme of things, these pre-conditions that are sought prior to any zoning change occurring, are fair and, reasonable.



R & B Wyllie Limited

by its duly authorized signatory

David John Wyllie

Director



Date



In this Aerial Photograph of the area the Submitter's property location is edged in red. Its boundaries on two sides are Pahinui Road & Campara Road. The 5 applicant properties are shown edged in green.

C

#01

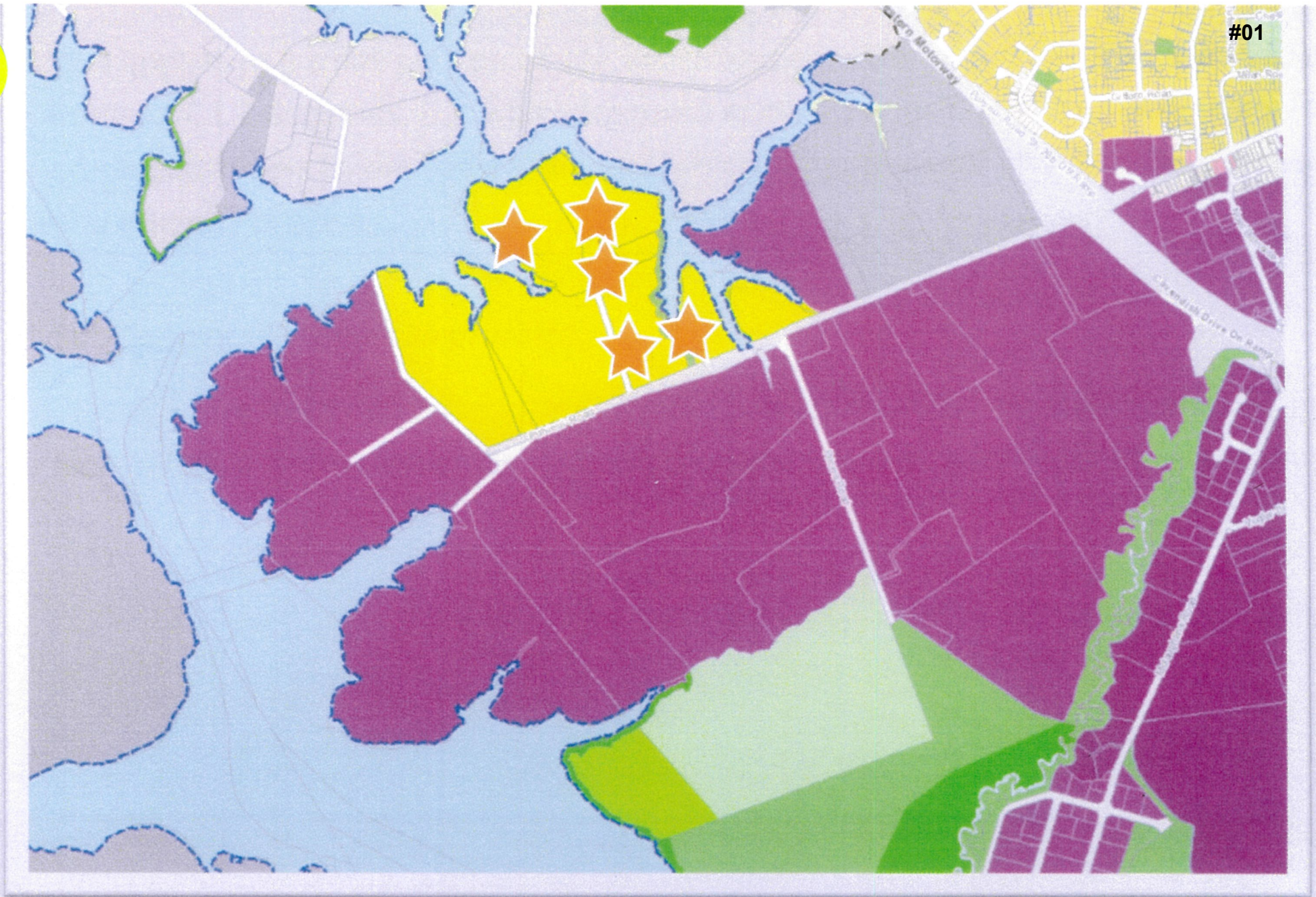


Figure 1: Current zoning under the AUP(OP) with Subject Sites identified (starred).



The entrance to Campana Road from Puhimui Road
(Date 30/08/2025)

Campana Road looking towards Pukimui Road
showing the fenceline to the submitters property
placed in that location by the previous Council
(Date 30/08/2025)

#01

D2

2





*The metal surface after rain of Campana Road
looking towards Puhinui Road
(Date 30/08/2025)*



The metal surface that is Campana Road looking
towards the end of the road from the Puhinui Road
side.
(Date 30/08/2025)

Looking from the Puhimui Road
side down the metal surface of
Campana Road from the
"No heavy vehicles beyond this point"
signage
(Date 30/08/2025)





In This Aerial Photograph That Shows
both The Campana Landowners Consortium
Properties & the Properties of R. B. Wythe Limited.
The drainage line along Campana Road to
the steep sided gully discharge point is
indicative only & shown in BLUE



NGAATI TE ATA WAIOHUA

“Ka whiti te raa ki tua o rehua ka ara a Kaiwhare i te rua”

4th September 2025

SUBMISSION REGARDING PC 118 (PRIVATE) PUHINUI PRECINCT

AUCKLAND COUNCIL
Unitary Plan Department
Submissions
Attention: Nicholas Lau
unitaryplan@aucklandcouncil.govt.nz

David Clark
Planner
Saddleback Planning Limited
(on behalf of Campana Landowners' Consortium)

Application details

Auckland Council has accepted a private plan change request to the AUP (Operative in Part) from Campana Land Owners' Consortium under Schedule 1 to the Resource Management Act 1991 (RMA).

The site comprises five properties on the northern side of Puhinui Road (SH20B), that are bound by Campana Road to the west and tributaries of the Waiokauri Creek to the north and east. The total area of the site is approximately 31.5 ha split between the following parcels: 457 Puhinui Road (Allotment 190 PSH OF Manurewa); 485 Puhinui Road (Lot 2 DP 402013); 5 Campana Road (Lot 1 DP 402013); 11 Campana Road (Lot 2 DP 71211); 12 Campana Road (Lot 3 DP 71211).

Historically, the site has been used for agricultural activities. The request seeks to modify the existing Puhinui Precinct provisions which apply to abovementioned parcels in the AUP to enable and support proposed Business – Light Industry Zoning and activities (as a new sub-precinct).

Matters of concern

1. Applicant is unaware that Ngaati Te Ata Waiohua is a manawhenua iwi of Puhinui

Ngaati Te Ata Waiohua is an iwi with customary interests that extend across Tamaki Makaurau, including the Manukau and Waitemata Harbours. Ngaati Te Ata descend from Te Waiohua and Waikato-Tainui. It is these associations that connect the iwi to the Manukau district, with particular regard to their ancestral Pa, the Manukau Harbour and tributaries such as the Puhinui Stream.

Our founding ancestress Te Ata-i-Rehia was born on Matukutuureia (McLaughlin Mt).

For Ngaati Te Ata, the entire PPC118 site is a cultural landscape. The character and integrity of the whole is made up of its constituent parts and comprises a mosaic of cultural sites, places and customary resource areas. These include Matuukuutueia Pā (McLaughlin

2.1

Hill) and surrounds which comprise of traditional mahinga kai (gardening) areas and battle sites. The cultural significance of Matuukuutureia and the surrounding area is magnified by virtue of our whakapapa connection to this place, which is the birth site of our eponymous ancestor Te Ata Rehuia. This strong whakapapa association is important for the Applicant to understand and acknowledge because it then lends itself to points 2 and 3 below around active and authentic engagement.

2. Consultation has been undertaken via the lens of another Iwi, not Ngaati Te Ata Waiohua.

The Cultural Heritage Assessment (CHA) for the Puhinui Peninsular undertaken by Te Aakitai Waiohua in 2014 is a starting point for direct engagement with all Iwi who have a strong cultural association with the site and broader Puhinui.

2.1

As the Saddleback Planning Report notes, Ngaati Te Ata Waiohua requested back in February 2024 that a CIA be developed. However, the Applicant has wrongly presumed that Te Aakitai Waiohua has pre-eminence over the site and therefore *“that consultation was being run through Te Aakitai in the first instance”* (page 34, Saddleback report).

Ngaati Te Ata was encouraged to identify cultural values through Te Aakitai Waiohua. That is not mana whenua engagement as per the relevant legislation and in line with the principles of Te Tiriti o Waitangi. It is mana diminishing to describe one Iwi's cultural values and whakapapa through (“being run through”) the perspective of another.

3. The cultural values of Ngaati Te Ata are unknown. Our environmental preferences are unknown.

Given the point made above, no cultural values assessment (CVA) or cultural impact assessment (CIA) has been provided by Ngaati Te Ata Waiohua. Therefore, the cultural, environmental iwi-specific values are unknown.

THEREFORE, WE OPPOSE THIS PLAN CHANGE APPLICATION IN ITS CURRENT FORM.

Relief Sought

1. That a comprehensive cultural impact assessment (CIA) report is undertaken by Ngaati Te Ata Waiohua.
2. After a CIA is completed, further discussions be undertaken with representatives of Ngaati Te Ata Waiohua to fully understand how the matters raised in previous *direct* communication, this PPC submission, and subsequent recommendations in our (aforementioned) CIA report will be provided for in the proposed precinct provisions.
3. That we have constructive input into the proposed precinct provisions and our historic and traditional relationship to the subject area is acknowledged in that document.
4. The Submitter wishes to be heard in support of their submission.

2.2



Karl Flavell
Te Taiao (Manager Environment)
Ngaati Te Ata Waiohua
Ph: 027 932 8998
karl_flavell@hotmail.com

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 118 - Edith Tuhimata
Date: Thursday, 4 September 2025 8:00:37 pm
Attachments: [Submission Statement Puhinui.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Edith Tuhimata
Organisation name: Ngati Tamaoho
Agent's full name: Edith Tuhimata
Email address: edith@tamaoho.maori.nz
Contact phone number: 0220445074
Postal address:
128 Hingaia Road
Karaka - PO Box 2721652,
Papakura
Auckland 2244

Submission details

This is a submission to:

Plan change number: Plan Change 118
Plan change name: PC 118 (Private): Puhinui Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
heritage provisions

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
as stated in our submission document.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: overarching amendments as outlined in our submission.

Submission date: 4 September 2025

Supporting documents
[Submission Statement Puhinui.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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Submission Statement: Ngāti Tamaoho. Plan Change 118 – Puhinui Precinct

Submitted by: Edith Tuhimata

Position: Kaitiaki Taiao Matua Ngāti Tamaoho.

Date: 4 September 2025

To: Auckland Council – Plan Change 118

Tēnā koutou,

As tangata whenua and kaitiaki of this whenua o Puhinui with Statutory Acknowledgement in this space, I submit this statement in response to the proposed changes to the Puhinui Precinct under Plan Change 118. This submission is grounded in the principles and values of Ngāti Tamaoho and reflects deep concern for the cultural, ecological, and spiritual integrity of the whenua, wai, and taonga within the precinct.

Whakapapa me te Hononga ki te Whenua

The Puhinui Precinct is not merely a parcel of land for development—it is a living entity, woven into our whakapapa and those of our whanaunga Iwi Te Ākitai Waiohū, Ngāti Te Ata Waiohū. The maunga, awa, and puna within this rohe hold ancestral significance and spiritual resonance. Any development must honour these connections and uphold the mauri of the land, the water and uphold the best environmental protections Ngāti Tamaoho kaitiaki inherently are bound too.

Ngā Tautoko – Aspects We Support

- The recognition of **cultural values** and the protection of **viewshafts from Pūkaki Marae to Matukutūreia**.
- The inclusion of **Special Purpose – Māori Purpose Zones** to enable papakāinga, marae development, and cultural activities.
- The integration of **mātauranga Māori** in stormwater design, landscape planning, and ecological restoration.
- The requirement for **Archaeological Management Plans, which includes site specific mechanisms to deal with tikanga and wahi tapu** through consultation with Mana Whenua prior to earthworks.

3.1

Ngā Āwangawanga – Concerns and Recommendations

Despite these positive steps, several concerns remain:

1. **The Original consultation** of the Puhinui Precinct Plan was done without us around the table and did not include Ngati Tamaoho aspirations or values in the original construct of the precinct.
2. **Rangatiratanga and Decision-Making Power**
Consultation alone is insufficient. Mana Whenua must be active co-authors of the development process, with decision-making authority embedded in governance structures.
3. **Protection of Wāhi Tapu and Cultural Landscapes**
Sub-precincts such as H and G contain extremely sensitive cultural and ecological areas. Development here risks degrading the mauri and wairua of the whenua. The heritage process has been responsible for the destruction of our Maunga/Mountains, our Waahi tapu/sacred sites, through Authorities to Modify and destroy. These zones should be subject to stricter controls or exclusion from industrial expansion. Site specific Plans that protect our taonga/treasures in the form of exploratory Authorities that take us back to the table to further discuss any discovery's and how to deal with them in a culturally acceptable way.
4. **Infrastructure Impacts on Tikanga Māori**
Transport and wastewater infrastructure may disrupt sacred sites and traditional landforms. All infrastructure planning must be guided by tikanga and cultural impact assessments.
5. **Fragmentation of Whenua and Access**
Subdivision and zoning boundaries risk fragmenting traditional relationships between people, land, and water, between whanaunga Iwi as well. Tribal mana whenua access to customary areas must be guaranteed and protected.

3.2

3.3

Ngā Tūmanako – Our Aspirations

We envision a future where development is not at the expense of our whakapapa, but in harmony with it. We seek:

- A co-governance model that reflects true partnership under Te Tiriti o Waitangi.
- Restoration of ecological corridors and indigenous planting to revive mauri.
- Economic opportunities that uplift Ngati Tamaoho without compromising cultural integrity.
- Blessings for previously undeveloped land, cultural induction, cultural monitoring land and water be included in consent conditions.

3.4

Hei Whakakapi – Conclusion

We urge Auckland Council to uphold its obligations under Te Tiriti o Waitangi and ensure that the development of the Puhinui Precinct is guided by the principles and values of Ngati Tamaoho. Let this be a precedent for how urban growth can honour the past, protect the present, and empower the future.

Nāku iti noa, nā



Edith Tuhimata

Kaitiaki Taiao Matua

Ngati Tamaoho

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E: edith@tamaoho.maori.nz

[128 Hingaia Road, Karaka](#)

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Auckland 2244

www.tamaoho.maori.nz

Subscribe to our [e-panui](#)

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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 or post to :

Attn: Planning Technician
Auckland Council
Level 16, 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)

Alex van Son

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

Fernbrook Property (PR) Limited

Address for service of Submitter

c/o Planning Focus Limited, PO Box 911-361, Auckland 1142

Telephone:

93795020

Email:

avs@planningfocus.co.nz

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

PC 118 (Private)

Plan Change/Variation Name

Puhinui Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

PC 118 (Private): Puhinui Precinct

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:

Please refer to submission 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. ☐

Please refer to submission attached.

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 09/05/2025

(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.

SUBMISSION ON A NOTIFIED PLAN CHANGE – PC 118 (Private): Puhinui Precinct

Clause 6 of Schedule 1 to the Resource Management Act 1991

To: **Auckland Council**
Unitary Plan Private Bag 92300
Auckland 1142
Attention: Planning Technician

Submitter: Fernbrook Property (PR) Limited

-
1. This is a submission on the Campana Landowners Consortium's (the 'Applicant') Proposed Plan Change 118 (Private) – Puhinui Precinct (the 'PPC') to the Auckland Unitary Plan (AUP).
 2. The submission has been prepared by Alex van Son of Planning Focus Limited, on behalf of Fernbrook Property (PR) Limited (the 'Submitter').
 3. The Submitter is in the process of developing a 28.7852-hectare property that they own at 31 Prices Road, within the Puhinui Precinct, Sub-precinct D.
 4. The submitter is a trade competitor for the purposes of section 308 of the Resource Management Act 1991. However, this submission is not made for the purpose of gaining an advantage in trade competition. It is made solely on resource management grounds.
 5. The Submitter is opposed to the PPC in its entirety, notably by virtue of potential traffic, economic distributional effects, and infrastructure capacity constraints.

Reasons for Submission

Traffic Effects

6. The Traffic Assessment submitted with the application considers only low-intensity uses (storage, SPCA facility), generating approximately 50 vehicle movements per hour ('vph'), whereas full Light Industry development enabled by the rezoning would generate 10–15 times higher volumes (560–875 vph). The application material acknowledges that *"adding the additional Campana Plan Change volumes [associated with fully developed land use scenario] results in an unacceptable intersection performance with long queues and high delays..."*¹.
7. The PPC defers critical issues including the assessment of intersection capacity, development staging, and the design and delivery of mitigation works to future resource consent applications. This approach fails to provide adequate certainty at the rezoning stage, as required under the Resource Management Act 1991 (RMA 1991). Effects need to be considered in sufficient detail at the plan change stage to provide decision-makers and the community with information concerning the nature and scale of impacts. The PPC fails to demonstrate that adverse effects on

4.1

¹ Letter: Proposed Private Plan Change – Campana Road Additional Clause 23 Request for Further Information Response (Transport), prepared by Don McKenzie Consulting, dated 19 November 2024 (page 3).

the State Highway 20B ('SH 20B') corridor and the Campana Road intersection can be avoided, remedied, or mitigated.

8. Notwithstanding (7), above, the wording of Standard I432.6.1.2 is ambiguous and open to various interpretations. For example, it could be argued that I432.6.1.2(5) only applies to Storage and Lock-up facilities that do not comply with I432.6.1.2(4), where as our expectation is that I432.6.1.2(5) is intended to apply to any other activity within Sub-precinct C or E. Furthermore, standards I432.6.1.2(4) and (5) only applies to traffic 'from' the Campana Road/Puhinui Road intersection, as opposed to any traffic associated with development within the Precinct.
9. Should traffic effects of any new development within Sub-precinct C or Sub-precinct E need to be assessed against the provisions listed in Standard I432.6.1.2(5), the standard only requires assessment against the existing environment (*"for the purposes of Standard I432.6.1.2(5) the 'baseline scenario' is the operation of the road network at the time of the first resource consent is lodged..."*). This creates significant risk for the operation of Sub-precinct D, as there is no mention of needing to account for either the 1,035 trips permitted in Sub-precinct D, nor the potential for further development afforded by the Precinct provisions.
10. SIDRA modelling provided by the Applicant only considers the immediate intersection of Campana Road and Puhinui Road. There is no consideration of the intersections further afield, such as Puhinui Interchange and Vogler Drive/Roscommon Road.
11. The PPC relies, in part, on future transport projects (Airport–Botany rapid transit, 20Connect) that remain uncommitted and are outside the Applicant's control. The PPC does not propose staging provisions that align with the delivery of these projects. Auckland Council's Future Development Strategy 2023–2053 ('FDS') identifies this area of Future Urban zone as being released post-2030, recognising that these significant transport upgrades are prerequisites.

4.2

4.3

4.4

Distribution Effects

12. The PPC propositions the proposed rezoning addresses a shortage of industrial land in Manukau. However, as stated in the Applicant's Economic Assessment², the Auckland Council Housing and Business Assessment 2023 states that the Auckland Region has sufficient existing capacity to accommodate the anticipated growth in industrial employment over the forecast period by 2052 (p. 21).
13. In the absence of a regional shortage, advanced rezoning of additional land at Puhinui risks fragmenting development and diverting demand from existing live-zoned land. Many of those areas, including Sub-precinct D, have required substantial investment in transport and servicing infrastructure, and dispersing demand undermines the integrated sequencing of development.
14. For clarity, these concerns are raised solely in relation to the efficiency of infrastructure provision and the integrated sequencing of development under the Auckland Unitary Plan and Future Development Strategy, and are not advanced for the purpose of protecting the submitter's commercial interests.

4.5

² Report: Campana Road Industrial Plan Change Economic Assessment, prepared by Property Economics Limited, dated February 2024.

Infrastructure Capacity

15. Watercare's letter (11 April 2025) states that:

- a. While it is technically feasible to service the PPC, doing so would consume most of the remaining capacity in the Southwestern Interceptor, precluding development of existing live-zoned areas until the Southwestern Interceptor Duplication Project is delivered, which is not expected until 2036.
- b. Servicing the PPC would risk delaying development in areas already prioritised for growth or force reprioritisation of Watercare's investment programme. In both cases, out-of-sequence development compromises efficient, coordinated infrastructure delivery and creates inequitable outcomes for other landowners who have planned on the basis of the FDS sequencing.

4.6

16. The PPC is therefore premature and would allocate scarce wastewater capacity away from live zoned land within the wider catchment, and risks delaying integrated development of land already zoned for urban use.

Relief Sought

17. Without limitation, the Submitter seeks the following relief:

- a. Decline the PPC in its current form.

18. Alternatively, if Council is minded to approve the PPC, without limitation, the Submitter seeks the following relief:

- a. Specify the road network upgrades required to service traffic generation associated with development provided for within Sub-precincts E (north), C and C1 (including permitted, restricted discretionary and discretionary activities) and impose strict staging and transport network triggers to ensure that no development occurs until the necessary road network upgrades are operational.
- b. Within Sub-precincts E (north), C and C1, make Use and Development (Activity rule I432.4(A52)(A)) and Subdivision (Activity rule I432.4(A52)(A)) that does not comply with Standard I444.6.8 Bulk Wastewater Infrastructure a Prohibited Activity and delete development standard I444.6.8(2), which enables Standard I444.6.8 to be met where written confirmation is obtained from the infrastructure services provider that the bulk wastewater network has sufficient capacity to service the proposed subdivision or development. Connections to the public wastewater network must not be granted to development in Sub-precincts E (north), C and C1 until the southwestern Wastewater Interceptor is completed and commissioned.

4.1

4.6

The Submitter would consider presenting a joint case.

Dated this 05 September 2025

Fernbrook Property (PR) Limited

By its planner and duly authorised agent, Planning Focus Limited:



Alex van Son of Planning Focus Limited
Planner/Partner

Address for Service: Planning Focus Limited, c/- Planning Focus Limited, PO Box 911-361, Auckland 1142, Attn: Alex van Son (avs@planningfocus.co.nz)

NZ Transport Agency Waka Kotahi Reference: 2025-1089

04 September 2025

Auckland Council
C/- John Duguid
General Manager – Planning and Resource Consents
Private Bag 92300
Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

Dear John,

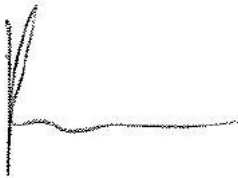
Submission on Proposed Plan Change 118 (Private) - 5, 10 and 11 Campana Road, and 467 and 485 Puhinui Road

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed rezoning of 31.5 hectares of land at 5, 10 and 11 Campana Road, and 467 and 485 Puhinui Road, Auckland from Future Urban Zone to Business – Light Industrial. It also addresses the proposed sub-precincts C, C1 and E (north) under Puhinui Precinct Plan.

We welcome the opportunity to discuss the contents of our submission with council officers and/or the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Rory Power
Team Lead Environmental Planning – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: +64 9 928 8751

Email: EnvironmentalPlanning@nzta.govt.nz

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**Submission on Proposed Plan Change 118 (Private) – Puhinui Precinct**

To: Auckland Council
C/- John Duguid
General Manager – Planning and Resource Consents
Private Bag 92300
Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

From: NZ Transport Agency Waka Kotahi
AON House, 29 Customs Street West
Auckland CBD 1010

1. This is a submission on the following:

Plan Change 118 (**PC118**) proposes 31.5 hectares are rezoned from Future Urban Zone to Business – Light Industrial and Open Space.

The proposed PC118 land area sits within the Puhinui Precinct. As proposed, it would introduce sub-precinct areas C, C1 and E (north) and modify provisions within the Puhinui Precinct chapter to enable and support proposed Business-Light Industry activities.

This submission relates to the totality of the land proposed for this rezoning.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.**3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context

State Highway 20B (SH20B) within the vicinity of the plan change is a key strategic access route to Auckland Airport, that connects to East and South Auckland and the wider network via the transport network. It is one of two routes to Auckland Airport, the other being via State Highway 20A.

SH20B is classified as a Transit Corridor under NZTA's One Network Framework (ONF) classification. As such, maintaining fast and consistent travel times for all modes along this corridor is a priority for NZTA.

The subject section of SH20B operates at a 60km/h speed limit and has an annual average daily traffic volume of 17,563. Between 2022 and 2024, a total of eight crashes were recorded along the stretch between Orrs Road and the State Highway 20 on-ramp from SH20B. These comprised four minor injury crashes and four non-injury crashes. Rear-end collisions were the most prevalent, accounting for half of the incidents, three of which resulted in minor injuries and one in no injury, indicating potential concerns related to driver attention or signal timing. Two crashes were associated with

vehicle movements at access points. The remaining crashes involved a collision with a parked vehicle and a loss of control.

SH20B is a Limited Access Road (LAR). Per Section 91 of the Government Roadway Powers Act 1989, all private access onto a LAR require an authorised crossing place.

The surrounding land use is largely Business – Light Industrial and Future Urban Zone. There is no dedicated pedestrian or active modes infrastructure to the subject plan change area.

The site is earmarked for development in 2030+ under Auckland Council's Future Development Strategy 2023-2053 contingent on infrastructure upgrades associated with the 20Connect project stage 2. The Campana Road/ SH20B intersection falls within the Southwest Gateway area, which includes both 20Connect and Airport to Botany transport initiatives.

5. The specific provisions of the proposal that this submission relates to are:

Provisions relating to the transport network to the extent that they impact NZTA's obligations in terms of ensuring an integrated, safe, and sustainable transport system. It seeks to ensure that appropriate transport infrastructure is provided at the right time to support the plan change and anticipated future growth.

6. The submission of NZTA is:

- (i) NZTA is opposed to PC118 subject to the relief sought and outlined below.
- (ii) NZTA is of the position that PC118 does not demonstrate adequate assessment of:
 - a. The potential number of trips generated by any future development enabled by the proposed plan change, and the implications on the surrounding road network .
 - b. The transport infrastructure or mitigation required to support the development of the site and appropriate provisions or triggers within the precinct.
 - c. The operation and safety of the current and proposed vehicle accesses to the site onto SH20B, and the operation of the Campana Road intersection.

7. NZTA seeks the following decision from the local authority:

- (i) NZTA seeks that Auckland Council decline this proposed plan change unless the issues raised below are adequately addressed within the precinct provisions:

a) Development of Plan Change Area, and Resulting Trip Generation

While not opposed in principle to the proposed rezoning of the plan change area, NZTA is not satisfied the applicant's traffic assessment has adequately assessed the potential number of vehicle trips generated by future development enabled by the proposed plan change. The plan change proposes to rezone an area that would enable a range of activities and further intensification. This needs to be quantified and assessed.

5.1

b) Transport Infrastructure Requirements

Appropriate provisions or triggers should be identified within the precinct provisions to adequately address implications to the state highway and surrounding network. As drafted, NZTA is not satisfied that appropriate assessment has been provided demonstrating wide ranging scenarios and cumulative impact on SH20B, including its accesses and intersections.

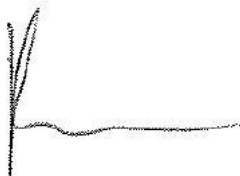
5.2

c) Operation and Safety of Vehicle Accesses on SH20B

NZTA seeks that:

- a. The proposed structure plan (or 'Precinct Plan 6') clearly identifies the location of the new access from the relocated slip road and:
 - i. the formation of the slip road intersection with SH20B,
 - ii. when it would be triggered,
 - iii. and who will own and maintain the slip road.
 - b. If the matters outlined in a) cannot be adequately addressed, all private accesses shall be via Campana Road in order to provide for high-capacity, efficient and reliable movement of people and goods.
 - c. Where access via Campana Road is deemed not practicable (i.e. to 'Allot 190 PSH OF Manurewa' held under Record of Title NA543/148), an assessment is provided which outlines the use of the access as part of the plan change area and demonstrates that the access and associated traffic generation will not adversely impact transport users.
 - d. All existing private accesses on to LAR SH20B be closed where practicable.
- (ii) Any other relief that would provide for the adequate consideration of potential effects on the state highway network.
- 8. NZTA does wish to be heard in support of this submission.**
 - 9. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**
 - 10. NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Team Lead Environmental Planning – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 05 September 2025

Address for service: NZ Transport Agency Waka Kotahi
AON House, 29 Customs Street West
Auckland CBD 1010

Contact Person: Vonnie Veen-Grimes
Telephone Number: +64 9 928 8751
Alternate Email: EnvironmentalPlanning@nzta.govt.nz

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 or post to :

Attn: Planning Technician
Auckland Council
Level 16, 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)

Hapai Puhinui Whenua Limited Partnership

Address for service of Submitter

C/- Barker and Associates, PO Box 1986, Shortland Street, Auckland 1140

Telephone:

296668330

Email:

nickr@barker.co.nz

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

PC 118 (Private)

Plan Change/Variation Name

Puhinui Precinct

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)

See attached submission for further detail.

See attached submission for further detail.

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:

See attached submission for further detail.

(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. ☐

See attached submission for further detail.

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)

09/05/2025

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.

Hapai Puhinui Whenua Limited Partnership

Submission on PC118

Full Name: Hapai Puhinui Whenua Limited Partnership

Address for Service: Barker & Associates Attention: melissam@barker.co.nz

Date: 29 August 2025

Re: Submission on Private Plan Change Application PC118 (**PC118**) – Hapai Puhinui Whenua Limited Partnership

Submission Information:

Hapai Puhinui Whenua Limited Partnership generally support the rezoning proposed by PC118.

Hapai Puhinui Whenua Limited Partnership seeks amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions that Hapai Puhinui Whenua Limited Partnership wishes Auckland Council to make to ensure the issues raised by Hapai Puhinui Whenua Limited Partnership are dealt with are also contained in the attached document.

Hapai Puhinui Whenua Limited Partnership could not gain an advantage in trade competition through this submission.

Hapai Puhinui Whenua Limited Partnership wishes to be heard in support of this submission.

If others make a similar submission, Hapai Puhinui Whenua Limited Partnership will consider presenting a joint case with them at a Hearing.



Nick Roberts, Director Barker & Associates, on behalf of Hapai Puhinui Whenua Limited Partnership

Hapai Puhinui Whenua Limited Partnership

Submission on PC118

1.0 Introduction

Hapai Puhinui Whenua Limited Partnership (**HPWLP**) welcomes the opportunity to submit on the proposed Private Plan Change 118 request to the Auckland Unitary Plan from the Campana Landowners' Consortium (**the Applicant**) at 5, 10 & 11 Campana Road and 467 & 485 Puhinui Road (State Highway 20B), Papatoetoe (**the subject land**) seeking to rezone the subject land from Future Urban Zone to Business - Light Industry Zone, with accompanying revised Puhinui Precinct provisions.

HPWLP own 11 Campana Road, Wiri, Manukau, Auckland legally described as Lot 2 Deposited Plan 71211 (Record of Title NA46A/1012), which is located within the plan change area (**figure 1**). At the time of drafting this submission HPWLP is not part of the Campana Landowners' Consortium.

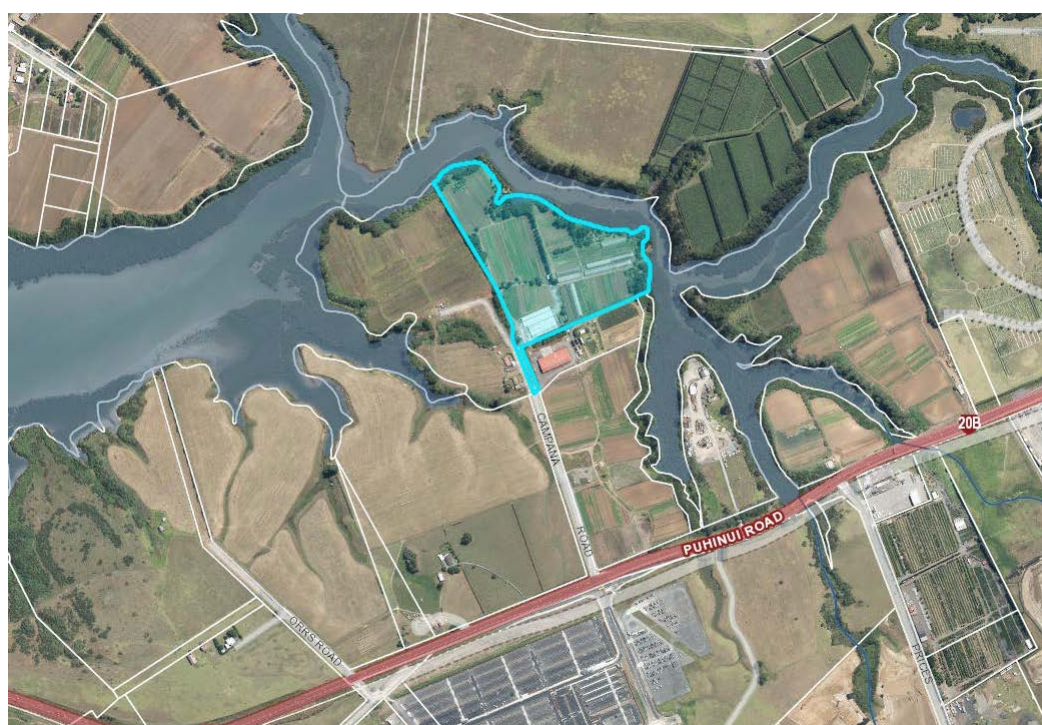


Figure 1: Subject site – Source Emaps

2.0 General Feedback

HPWLP generally support the proposed rezone of the plan change area, including 11 Campana Road to Light Industry Zone as proposed by PC118 but have concerns with respect to the workability, efficiency and effectiveness of the changes proposed to the Puhinui Precinct Plans and Provisions.

HPWLP have made a number of specific submission points as outlined within **Attachment 1** to improve the outcomes sought by the Plan Change and to efficiently and effectively achieve the proposed objectives of the plan change package, and the purpose of the RMA.

HPWLP would welcome the opportunity to work with the Applicant to improve the plan change provisions.

Hapai Puhinui Whenua Limited Partnership

Submission on PC118

3.0 Conclusion

In conclusion, HPWLP seeks the following relief:

- (a) That 11 Campana Road, Wiri, Manukau, Auckland legally described as Lot 2 Deposited Plan 71211 (Record of Title NA46A/1012) be rezoned Light Industry Zone.
- (b) That the specific feedback in **Attachment 1** is addressed and necessary changes incorporated into the Puhinui Precinct provisions' or relief with similar effect.
- (c) Any further necessary consequential amendments required to achieve (a) and (b) above.

HPWLP looks forward to working collaboratively with Auckland Council and the Applicant to address the above relief and is happy to meet with policy staff or consultants to work through these matters.

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Attachment 1: HPWLP specific submissions

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
Zoning and Sub-precincts				
1.	Zoning	Support	HPWLP support the rezoning of the plan change area, in particular 11 Campana Road, Light Industry Zone. The rezone will establish consistent zoning pattern with Business – Light Industry Zoning to the south, providing for integrated development and provision of infrastructure enabling the efficient use of land.	Retain rezoning of 11 Campana Road to Light Industry Zone as notified, subject to amendments sought within this submission.
2.	Zoning	Seek amendment	As proposed PC118 proposes to establish two sub-precincts C and C1 which are identified in Puhinui Precinct I432.1. Precinct Description as “Sub-precinct C and C1 (Business – Light Industry Zone & Open Space – Informal Recreation Zone – Campana Road)”. The proposed zone maps and Precinct Plan 6 do not identify the spatial location of the proposed open space, it is considered that the provisions proposed to apply to the C1 Sub-precinct	Delete all references to Open Space – Informal Recreation Zone.

6.1

6.2

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
			are effective without the reference to Open Space – Informal Recreation Zone.	
3.	Sub-precinct Plan 6	Seek amendment	C1 as identified in proposed Precinct Plan 6 extends further than 20m inland from the CMA, which is considered to be onerous when compared to existing sub-precincts F and G and the existing Open Space-Informal Recreation Zone located at the eastern edge of 5 Campana Road.	HPWLP seeks amendment to Precinct Plan 6 to identify the spatial extent of C1 within 11 Campana Road to a width of 20m.

6.3

1432.1. Precinct Description

4.	Description of Sub-precinct C & C1	Seek amendment	As proposed the sub-precinct description is overly restrictive, inconsistent with operative sub-precinct descriptions and does not accurately reflect the activities proposed.	Amend the Precinct Description as follows: Due to the constrained nature of existing transport infrastructure, and the bulk wastewater network, development within Sub-precinct C is subject to a number of staging and infrastructure requirements. <u>These are</u> designed to ensure a safe and efficient transport network and to ensure that development is restricted within Sub-precinct C until <u>upgrades are completed to provide sufficient bulk wastewater infrastructure capacity to service</u>
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6.4

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
				development of Sub-precinct C. The sub-precinct allows for unmanned storage yard activities as a permitted activity, however further development must be supported by additional infrastructure. the Precinct is able to connect to functioning bulk wastewater infrastructure with sufficient capacity to service subdivision and development in the Precinct, except where an interim solution and associated decommissioning for wastewater servicing is proposed.
5.	Precinct Description	Seek amendment	As proposed the sub-precinct description refers to a structure plan that does not exist.	Amend all references to “the Campana Structure Plan area” to refer to “Precinct Plan 6 – Campana Road Development Plan”.

6.5

Objectives and Policies Sub-precinct C & C1

6.	Objective (5)	Seek amendment	Amendments to objective 5 are proposed to ensure that bulk wastewater infrastructure has capacity to service development within proposed sub-precinct C and to enable onsite solutions. It is considered that this will better achieve	Amend objective 5 as follows: Subdivision and development that requires reticulated wastewater and/or water servicing does not occur in advance of the completion of upgrades to the bulk wastewater network <u>infrastructure with</u>
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6.6

Barker & Associates

+64 375 0900 | admin@barker.co.nz

Kerikeri | Whangārei | Warkworth | **Auckland** | Hamilton | Cambridge | Tauranga | Napier | Wellington | Christchurch | Queenstown | Wānaka

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
			Part 2 of the RMA, enabling efficient use of land and integrated land use.	<u>capacity to service the development within required to provide sufficient capacity to service the development of the Sub-precinct C area, except where an interim solution and associated decommissioning for wastewater self servicing is proposed.</u>
7.	Policy (2)	Seek amendment	As proposed policy 2 would apply to all development across sub-precinct C, unnecessarily restricting future development within the proposed LIZ.	Delete policy 2.
8.	Policy (4)	Seek amendment	Proposed Precinct Plan 6 identifies areas of archaeological significance, not 'protected archaeological sites'. Consistency of language is considered important to enable effective implementation of the plan. HPWLP have consent to undertake extensive earthworks across 5 Campana Road, which does not contain archaeological sites. As such the policy as proposed is not appropriate to apply across sub-precinct C.	Amend policy 4 as follows: Avoid earthworks within protected archaeological <u>areas identified in in Precinct Plan 6 sites and manage earthworks throughout the wider sub-precincts C & C1 to avoid, remedy or mitigate adverse effects on archaeological values and the Māori cultural landscape values.</u>

6.7

6.8

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought	
9.	Policy (6)	Seek amendment	Policy 6 effectively duplicates precinct wide policy (3). HPWLP have consent to undertake extensive earthworks across their site at 11 Campana Road, which does not contain archaeological sites. As such the policy as proposed is not appropriate to apply across sub-precinct C.	Delete policy 6.	6.9
10.	Policy (7)	Seek amendment	Policy 7 duplicates precinct wide policies (6) – (8).	Delete policy 7.	6.10
11.	Policy (8)	Seek amendment	Avoid is an onerous and high test to meet, particularly given the wider transport LOS requirements were established approximately 10 years ago (when the AUP was made operative). As drafted this includes a high level of uncertainty for plan users as to what transport infrastructure would be required to give effect to the policy due to the inclusion of words “necessary transport infrastructure becomes available”. It is unclear what “support full” light industrial development is.	Amend policy 8 as follows (1) <u>Avoid</u> <u>Manage</u> subdivision <u>and development</u> before the necessary transport infrastructure becomes available to support full light industrial development unless: (a) The proposed subdivision is for the purpose of minor boundary adjustments and the creation of esplanade strips and reserves; or (b) The proposed subdivision is around the existing development at 485 Puhinui Road; and	6.11

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
				(c) The proposed subdivision will not compromise the development of future light industrial activities.
12.	Policy (9)	Seek amendment	It is considered that proposed policy 9 is unnecessarily restrictive stopping development prior to upgrades to service development of the entire sub-precinct and the mitigation of potential effects beyond that of the proposed development.	Amend policy 9 as follows: Avoid subdivision and development that <u>is in advance of the provision of functioning bulk wastewater infrastructure with sufficient capacity to service development within the precinct area, except where an interim solution and associated decommissioning for wastewater self-servicing is proposed.</u> requires reticulated wastewater and/or water servicing that is in advance of the completion of upgrades to the bulk wastewater network required to provide sufficient capacity to service development of Sub-precinct C.

6.12

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
I432.4. Activity table				
13.	Table I432.4.2 – Activities specific to sub-precincts A-F	Seek amendment	It is considered that a rule requiring all earthworks to gain restricted discretionary activity consent is onerous, unnecessary and duplication of the Regional and District wide rules. It is considered that the rule duplicates provisions of the Operative Unitary Plan, E11 and E12. It is considered that E11.6.1. Accidental discovery rule affords appropriate protection should earthworks result in the accidental discovery of archeology. HPWLP have consent to undertake extensive earthworks across their site at 11 Campana Road, which does not contain archaeological sites.	Delete proposed rule (A13a).
14.	Table I432.4.2 – Activities specific to sub-precincts A-F	Seek amendment	Operative sub-precinct D provides for the Light Industrial Zone, it is unclear from the s32 evaluation as to why the proposed Light Industrial Zoning for sub-precinct C has different activity status for activities. HPWLP consider that it the provision of	Amend rules (A34), (A37), (A42) and (A48) to have activity status consistent with sub-precinct D as follows: (A34) Retail accessory to industrial activities - Permitted activity

6.13

6.14

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
			activities accessory to and complementary to industrial activities contribute to the economic vitality of the zone and enable efficient use of land.	(A37) Trade suppliers – Permitted activity (A42) Education facilities that are accessory to an industrial activity – Permitted activity (A48) Tertiary education facilities that are accessory to an industrial activity – Permitted activity.
1432.6. Standards				
15.	1432.6.1.2. Road infrastructure standards (4) and (5)	Seek amendment	As drafted the standards have a high level of uncertainty for plan users as to what transport infrastructure would be required to comply with the standard. As proposed the total number of traffic movements from the Campana Road / Puhinui Road intersection is limited to 50 movements per hour which storage and lock up activities shall comply with. 50 movements per hour for the entire intersection is overly restrictive and does not reflect the intent of the traffic specialist reporting which is based on 50 movements per hour from the sub-precinct .	Amend standard 1432.6.1.2 (4) as follows (to make it clear that its 50 movements per hour from the sub-precinct). (1) Storage and lock up activities within sub-precinct C or sub-precinct E (north) shall comply with the following: (a) The storage and lock up facility shall be unmanned. (b) The total traffic movements from the Campana Road to Puhinui Road intersection (excluding movements associated with SPCA activities) shall

6.15

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
			All other activities default to compliance with standard (5) which is a replication of standard (3), the inter-relationship of these standards are unclear.	not exceed a maximum of 50 movements per hour. (c) The total traffic movements from the existing access to 457 Puhinui Road shall not exceed a maximum of 5 movements per hour. Any other activities shall comply with standard (5) below. Amend standard 5 to reflect any up to date information available on wider transport capacity. Change the activity status to infringe standard 5 to a Restricted Discretionary activity to better enable changes in wider infrastructure capacity and future changes in technology to be assessed through a targeted resource consent process.
16.	I432.6.3. Yards Coastal protection yard	Seek amendment	It is considered that the proposed standard is unnecessary and duplicates the sub-precincts proposed.	Delete the coastal protection yard requirements for sub-precincts C and C1.

6.16

Hapai Puhinui Whenua Limited Partnership Submission on PC118

Sub-#	Feedback Topic	Support/Oppose/Seek Amendment	Comments/Reasons	Relief Sought
			As proposed sub-precinct C will not be located within 30m of the MHWS as it is separated by proposed sub-precinct C1. Sub-precinct C1 proposed be <i>“reserved for open space and passive recreation purposes to provide a buffer between light industrial development and the coastal margins”</i> undertaking the same function as the coastal protection yard.	



IN THE MATTER of the Resource Management Act 1991
("RMA")

AND

IN THE MATTER of a submission under clause 6 of the
First Schedule to the RMA on Private
Plan Change 118: Puhinui Precinct to the
Auckland Unitary Plan (Operative in Part)

**SUBMISSION OF CHANNEL TERMINAL SERVICES LTD ON PRIVATE PLAN CHANGE
118: PUHINUI PRECINCT**

To: Auckland Council; unitaryplan@aucklandcouncil.govt.nz

Name of submitter: Channel Terminal Services Ltd

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(09) 357 0600

Date: 5 September 2025

INTRODUCTION

1. This is a submission by Channel Terminal Services Limited (“CTS”) on Private Plan Change 118: Puhinui Precinct to the Auckland Unitary Plan (Operative in Part) (“AUP(OP)”) (“PC 118”) proposed by Campana Land Owners Consortium (“the Applicant”).

BACKGROUND TO CTS AND RELEVANT ASSETS

2. CTS is a wholly-owned subsidiary of Channel Infrastructure NZ Limited, who operates the Marsden Point liquid fuel import terminal in Whangārei.

The Ruakaka to Auckland Pipeline

3. CTS owns and operates the Ruakaka to Auckland Pipeline (“RAP”), a 170km high-pressure pipeline which transmits liquid fuels from the Marsden Point terminal to the Auckland region and beyond.
4. The location of the RAP, where it traverses the PC 118 site, is shown in **Figure 1**.
5. The RAP was first commissioned in 1985. It is buried along almost its entire length. Regular, premium, diesel and Jet A1 aviation fuel are transported down the RAP. It provides the vast majority of Auckland’s road transport fuel, and all of Auckland International Airport’s aviation fuel, and can transmit over 400,000 litres of product an hour.
6. CTS is the RMA requiring authority responsible for the RAP designations in the AUP(OP).¹ The designated corridor is generally 12m wide (i.e. 6m either side of the centre of the RAP).² CTS holds easements over each property through which the RAP traverses.
7. Section 176 of the RMA provides that no person may, without the prior written approval of CTS do anything in relation to land that is subject to the RAP designations that would prevent or hinder the RAP, including: undertaking any use of the land; subdividing the land; and changing the character, intensity, or scale of the use of the land. There is also a range of specific conditions set out in the relevant designations and easements,

¹ In Auckland, the RAP is subject to Designations 6500 (applying generally to more rural areas in the north of the city) and 6501 (applying generally to more urban areas in the south of the city).

² This is reduced to 6m total (i.e. 3m either side of the centre of the RAP) width where the RAP is located under roads and rail corridors.

including requiring CTS's written approval for: the erection of any structure; the planting of any tree or shrub, and any activities that disturb the soil below certain depths.

8. The RAP is nationally significant infrastructure and is critically important to the national economy. It forms an essential part of the network for the transmission and distribution of petroleum throughout the upper North Island. CTS is deemed to be a "lifeline utility" under the Civil Defence Emergency Management Act 2002.
9. CTS, as a pipeline operator, has strict obligations under the Health and Safety in Employment (Pipelines) Regulations 1999, including with respect to prevention of the release of fuels from the RAP³ and ensuring the RAP is appropriately operated and maintained.⁴

CTS densitometer station on Campana Road

10. CTS owns and operates a densitometer station located at 10 and 11 Campana Road, within the PC 118 site.
11. The location of the densitometer station in the context of the PC 118 site is shown in **Figure 1**.
12. The densitometer station is an above ground facility installed on the RAP and measures the density of the fuels flowing through it. This information is important for CTS to monitor the type and quality of product moving through the RAP, to manage batches of different products, and to help detect any leaks or issues. The densitometer station is within CTS's designation.
13. CTS, as a pipeline operator, also has strict obligations under the Health and Safety in Employment (Pipelines) Regulations 1999 with respect to the densitometer station.

³ Regulation 6(a).

⁴ Regulation 8(1).

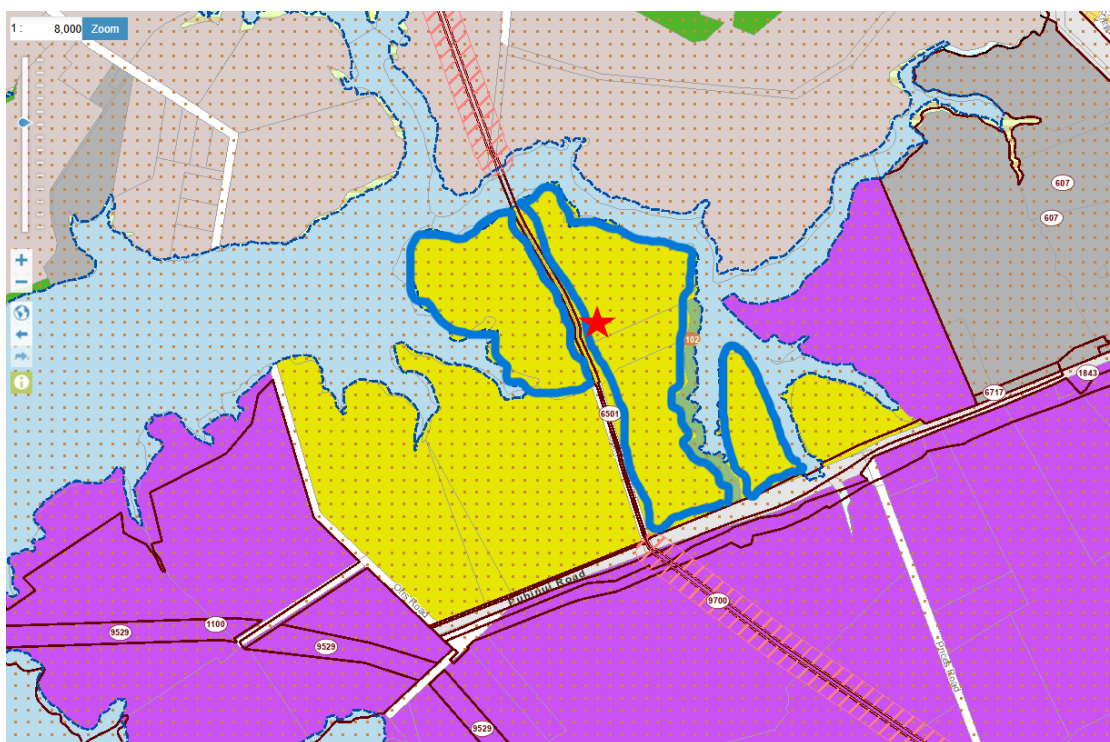


Figure 1: The PC 118 site relative to the RAP (parallel maroon lines labelled “6501”); densitometer station (red star); and AUP(OP) Emergency Management Area (pink hatched area).

Potential impacts of development proximate to the RAP and densitometer station

14. CTS implements a comprehensive suite of protections for the RAP – comprising physical, procedural and legal mechanisms – aimed to prevent third-party interference with the safe and uninterrupted operation of the RAP and/or to identify and avoid (or manage effects of) development of sensitive activities proximate to the RAP. The RAP designations form one part of the suite of protections.
15. Increasing third-party activities/development proximate to the RAP generally increases the likelihood of conduct having the potential to damage the RAP or otherwise hinder the operation, maintenance, repair, and upgrade of the RAP. It can also introduce a change to the risk environment around the RAP from a public safety perspective. Development, particularly the introduction of “sensitive” activities and other activities introducing people proximate to the RAP, can materially change the risk profile proximate to the RAP.
16. The intensification of urban activities proximate to the Pipeline is therefore a very important issue for CTS. For proposals for relatively intensive urban development proximate to the RAP, the company allocates considerable time and resources to understand the implications for CTS, and where necessary (and possible) to become

involved in third-party applications for resource consent and/or plan changes. This is both to ensure that the potential for third-party interference with the Pipeline – due to new activities and land-uses – is appropriately managed; but also to ensure that the risks presented by the Pipeline (for example risks to the public in the event of an incident involving the Pipeline) are appropriately minimised.

AUP(OP) PROVISIONS RELEVANT TO THE RAP (AND DENSITOMETER STATION)

17. A range of provisions in the AUP are relevant to the RAP and/or densitometer station.⁵
18. Policy E31.3(2) in the AUP(OP) relates to hazardous substances and states “[R]equire adequate separation distances between hazardous facilities and activities sensitive to hazardous facilities to avoid or adequately mitigate risk to people and property and to avoid reverse sensitivity effects.”
19. Policy E31.3 (above) relates to Objective E31.2(1): *“The risks of hazardous facilities to people, property and the environment are minimised to acceptable levels while recognising the benefits of these facilities.”*
20. Chapter J of the AUP(OP) defines ‘activities sensitive to hazardous facilities and infrastructure’ (including the RAP and densitometer station) as including a range of activities.⁶
21. Section E29 of the AUP(OP) provides a framework to manage the risk of adverse effects on activities located in proximity to existing hazardous facilities and infrastructure (namely the Wiri Oil Terminal, Wiri LPG Depot and the RAP).
22. E29.1 Background provides the following:

“Restricting or managing the encroachment of land uses in proximity of certain existing hazardous facilities and infrastructure may be necessary to ensure that risk to those land uses is appropriately managed. This is also to ensure that the operation and potential expansion of the facilities and infrastructure is not compromised by surrounding incompatible or conflicting land uses. Incompatible activities may create a lower threshold of acceptable risk in the receiving environment and generate reverse sensitivity effects. Some of these hazardous facilities and infrastructure are critical to the functioning of Auckland and New

⁵ The below is not an exhaustive list of relevant provisions.

⁶ Visitor accommodation; care centres; hospitals; healthcare facilities; educational facilities; tertiary education facilities; community facilities; marae; retirement villages; organised sport and recreation; recreation facilities; entertainment facilities; dwellings; and boarding houses.

Zealand.”

23. Objectives E29.2(1), (2) read:

(1) Activities sensitive to hazardous facilities and infrastructure are avoided in emergency management areas.⁷

(2) The use and development of identified hazardous facilities and infrastructure are not unreasonably constrained by the establishment or expansion of sensitive and incompatible activities.

(3) The risk to activities in proximity to identified hazardous facilities and infrastructure is at a level acceptable to those types of activities.

24. Policy E29.3(3) and Rule E29.5(1) apply specifically to the RAP.⁸ Policy E29.3(3) reads:

“Consider the risk to activities sensitive to hazardous facilities and infrastructure within 34 metres of the boundary of designations 6500 and 6501 (Petroleum Pipeline) where the pipeline is constructed to a “thin wall” specification.”

25. Reference to “thin wall specification” relates to the thickness of the RAP structure.

26. Rule E29.5(1) gives effect to Policy E29.3(3). It requires any application for an activity sensitive to hazardous facilities and infrastructure (including controlled activities) located within 34m of the boundary of designations 6500 and 6501 where the RAP is constructed to a “thin wall” specification will be subject to the normal tests for notification under the RMA. The outcome is a mapped Emergency Management Area control applying within 34m of the boundary of the RAP designations⁹ for the RAP where it is constructed to “thin wall” specification (“Emergency Management Area” or “EMA”) (see **Figure 1**).¹⁰

RELEVANT PC 118 CONTEXT

27. Overall, PC 118 seeks to enable the Site to be developed for light industrial activities.

⁷ The AUP(OP) Emergency Management Area in the context of the PC 118 site is shown in Figure 1.

⁸ The remaining policies and rules do not apply to the RAP.

⁹ These are designations 6500 and 6501. The designation width where the RAP is constructed to “thin walled” specification is generally 12m, meaning that the Emergency Management Area control extends 40m either side of the RAP itself.

¹⁰ Rule E29.5(1) therefore acts as a basis for the notification to CTS under the RMA of applications for sensitive activities within the Emergency Management Area. It assists with enabling the consideration of the very important safety and risk issues involved (including those set out in E29.1 Background).

28. PC 118 proposes to rezone 5, 10, and 11 Campana Road, and 467 and 485 Puhinui Road, Papatoetoe (the “Site”) (broadly outlined in dark blue in **Figure 1** above) from Future Urban (yellow) to Business – Light Industry¹¹ (light purple in **Figure 1**).
29. PC 118 also seeks to amend and repurpose the existing Puhinui Precinct (I432) (“**Precinct**”) to enable and support the proposed Business – Light Industry activities. This includes the following proposed sub-precincts:
 - (a) **Sub-precinct C:** Business – Light Industry Zone for light industrial activities;
 - (b) **Sub-precinct C1:** Open Space – Informal Recreation Zone to provide a buffer between light industrial activities and the coastal margins (including a future coastal walkway); and
 - (c) **Sub-precinct E:** Business – Light Industry Zone for local convenience retail activities and amenities for visitors and employees.
30. The general location of the RAP and densitometer station in the context of the proposed sub-precincts is shown in **Figure 2**.

¹¹ Light Industry is the zoning of the land to the east, west and south of the Site.

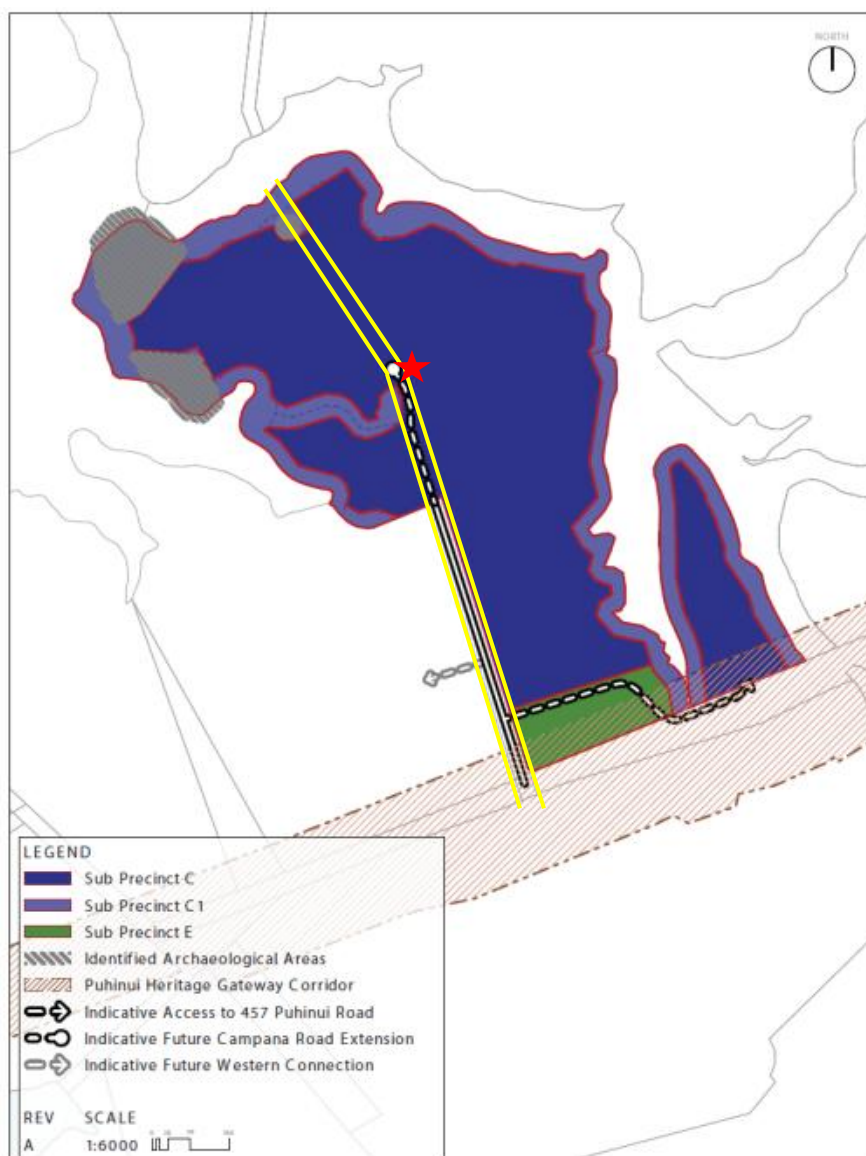


Figure 2: The proposed PC 118 sub-precinct provisions relative to the RAP (parallel yellow lines (indicative only)) and densitometer station (red star).

31. PC 118 therefore enables a range of activities over and proximate to the RAP and the RAP designation. In addition, several activities sensitive to hazardous facilities and infrastructure are currently provided for in PC 118's proposed sub-precinct activity table, including some as permitted activities.¹²

¹² For example, in sub-precinct E education facilities are restricted discretionary or, if accessory to industrial activities, are permitted, and organised sport and recreation are restricted discretionary, and informal recreation and leisure are permitted.

32. Precinct Plan 6 – Campana Road Development Plan in PC 118 also provides for the extension of Campana Road directly over the RAP, and through or adjacent to the densitometer station (see the red star in **Figure 2**).

References to the RAP/RAP designation or the densitometer station in the PC 118 application material or PC 118 provisions

33. CTS has only identified a few brief references to CTS, the RAP, the RAP designation, the EMA, or the densitometer station in the PC 118 application material, including:
- (a) The Planning Report which briefly identifies the designation and EMA.¹³
 - (b) The Infrastructure Report which notes the presence of the RAP along the alignment of Campana Road imposing restrictions on what earthworks and excavation can be carried out.¹⁴
 - (c) The Applicant's RFI response states that the RAP and its designation bisects the Precinct.¹⁵
 - (d) The Preliminary Site Investigation identifies CTS's densitometer station on Campana road as a potential contamination source.¹⁶
34. CTS has not identified any references to the RAP, the RAP designation, the EMA, or the densitometer station in the Precinct provisions proposed by PC 118,¹⁷ notwithstanding that the RAP bisects the Site.

CTS'S REASON FOR THE SUBMISSION

35. As shown in **Figure 1**, the RAP and the RAP designation (see the maroon parallel lines labelled designation 6501) bisect the Site.¹⁸ Part of the Site¹⁹ is subject to the AUP(OP)'s EMA applying to the RAP (see the pink-hatched area to the south in **Figure 1**). CTS's

¹³ 'Applicant and Site Details' section, page 9.

¹⁴ Page 11 – *"The presence of a transmission oil pipe along the alignment of Campana Road imposes restrictions on significant earthworks or excavation in this area. Consequently, major alterations to the existing road's vertical and horizontal alignment are not anticipated. A typical roading cross-section has been developed for the upgrade of Campana Road, and additional details can be found in Figure 4. Works on the existing batter on the western edge are proposed to be limited to reduce the requirement for retaining along with any reducing any potential disturbance to the existing buried oil pipeline situated within the reserve."*

¹⁵ Clause 23 Request and Response, page 58.

¹⁶ It concludes that the NES-CS will apply as proposed development will not meet the permitted activity thresholds. Pages 5 and 12.

¹⁷ Modified I432 Puhinui Precinct Provisions from Watercare dated 27 June 2025.

¹⁸ 5, 10, and 11 Campana Road.

¹⁹ 485 Puhinui Road.

densitometer station (covered by its designation) is also located centrally within the Site (see the red star in **Figure 1**).

36. Overall, CTS considers that PC 118 as currently proposed does not appropriately recognise and provide for the safe and efficient operation of the RAP and densitometer station; societal risk associated with development proximate to the RAP and densitometer station; or reverse sensitivity effects associated with the RAP and densitometer station.
37. CTS is concerned to ensure the continued safe and efficient operation, maintenance, repair, and upgrade of the RAP and densitometer station. It is important that that appropriate management of RAP risk (and related issues) is provided for in the proposed PC 118 provisions.
38. As outlined above, PC 118 does not currently address CTS's concerns.
39. Given the above context, including the national significance of the RAP, CTS is concerned that the Applicant has undertaken limited engagement with CTS regarding PC 118.²⁰ For completeness, CTS has given no written approvals for PC 118 or works associated with it.²¹

PC 118 does not appropriately provide for the safe and efficient operation, maintenance, repair, and upgrade of the RAP and densitometer station

40. CTS is concerned that if development on the Site is not managed appropriately, the development enabled by PC 118 has the potential to adversely impact the ongoing safe and efficient operation, maintenance, repair, and upgrading of the RAP and the densitometer station (which plays a key role in the operation of the RAP).
41. As one example, CTS notes that there are existing flooding risks at the Site. CTS is concerned that recontouring and development of the land could exacerbate the flooding risk which could adversely impact the RAP and the densitometer station.
42. In addition, it is unclear how uninterrupted access to the RAP and densitometer station is intended to be provided for within the PC 118 Site. It is also critical that power supply is maintained at all times to the densitometer station.

²⁰ CTS's Pipeline Manager met with the Applicant's engineer at the Site in 2024.

²¹ Under s176 of the RMA or otherwise.

43. As outlined below, CTS therefore seeks changes to PC 118 to recognise and provide for the RAP and densitometer station's ongoing safe and efficient operation, maintenance, repair, and upgrade. CTS seeks to ensure that any development on the Site proximate to the RAP and the densitometer station is appropriately considered and controlled. Earthworks and buildings should be appropriately designed/located with respect to the RAP and densitometer station. The same applies to infrastructure needed to service the development enabled by PC 118, including stormwater, wastewater, and roading infrastructure.

PC 118 does not adequately manage public safety risk

44. CTS is concerned to avoid sensitive activities, and other inappropriate activities, in proximity to the RAP and densitometer station, including to manage risks to public safety if a RAP emergency were to occur and to avoid reverse sensitivity type effects.
45. The Precinct provisions enable a range of activities over and proximate to the RAP, without any regard to risks associated with the RAP.
46. CTS therefore considers that PC 118 should:
- (a) avoid/manage development and activities proximate to the RAP and densitometer station, particularly activities sensitive to hazardous facilities and infrastructure and other inappropriate activities;
 - (b) include provisions and controls (e.g. setbacks) ensuring that any development enabled by PC 118 does not introduce unacceptable risk or reverse sensitivity effects as a result of proximity of proposed structures/activities to the RAP/densitometer station.

Summary

47. In summary, in terms of the RAP and densitometer station, PC 118 does not:
- (a) appropriately achieve the integrated management of the effects of the use, development, or protection of land as required by ss31 and 74 of the RMA;
 - (b) sustainably manage the RAP which is a significant physical resource;

- (c) represent the most appropriate way to achieve the purpose of the RMA or the objectives and policies of the Unitary Plan.²²

SUMMARY OF RELIEF SOUGHT

48. CTS opposes PC 118 in its current form and seeks:

- (a) that PC 118 be declined;

OR, in the alternative:

- (b) PC 118 is amended to include objectives, policies, and rules (or other provisions) to:

- (i) recognise and provide for the significance of the RAP and densitometer station as nationally critical infrastructure;
- (ii) recognise and provide for the RAP and densitometer station's ongoing safe and efficient operation, maintenance, repair, and upgrade (including uninterrupted access to the RAP and densitometer station and uninterrupted power supply to the densitometer station); and
- (iii) ensure that any development enabled by PC 118 does not introduce unacceptable risk or reverse sensitivity effects as a result of proximity of proposed structures/activities to the RAP/densitometer station.

AND/OR consequential or related/alternative relief addressing CTS's concerns raised above.

7.1

49. CTS is willing to engage with the Applicant regarding the precise form of relief sought.

CONCLUSION

50. CTS could not gain an advantage in trade competition through this submission.

51. CTS wishes to be heard in support of its submission.

52. If others make a similar submission, CTS would be prepared to consider presenting a joint case with them at a hearing.

²² Refer s32 of the RMA.

Dated this 5th day of September 2025

CHANNEL TERMINAL SERVICES LTD by its solicitors,
ChanceryGreen:



CH Simmons / CM Todd
5 September 2025

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SUBMISSION ON PLAN CHANGE 118 (PRIVATE) – PUHINUI PRECINCT
THAT IS SUBJECT TO FULL NOTIFICATION

To: Auckland Council

Attention: Unitary Plan team

By email: unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: 100 Prices Road Limited ('the Submitter' or '100 Prices Road')

1. This is a submission on Private Plan Change 118 (**PC118**) to the Auckland Unitary Plan – Operative in Part (**the Unitary Plan**) on behalf of 100 Prices Road. PC118 was publicly notified by Auckland Council (**Council**) on 8 August 2025.
2. 100 Prices Road could not gain an advantage in trade competition through this submission.

Background to this submission

3. 100 Prices Road is a subsidiary of James Pascoe Properties Limited, and own approximately 26.5 ha of land at 100 and 102 Prices Road which is located within Puhinui Precinct: Sub-Precincts D and E. It also owns the property at 69 McLaughlins Road, which sit just outside the Precinct.
4. 100 Prices Road's specific interest in PC118 derives from its ownership of the abovementioned properties and their location within or adjoining the Puhinui Precinct under the Unitary Plan. 100 Prices Road has delivered roading infrastructure (including a bridge across Aerovista Place Reserve) from its land through to McLaughlins, as required under the Puhinui Precinct. It has resource consent for site-wide enabling works across its Prices Road landholdings and has established the internal roading network on site. Development of the first industrial development on the Prices Road parcels has recently commenced, while the McLaughlins Road properties have been developed for industrial purposes and are operational.
5. 100 Prices Road forms part of the Southern Gateway Consortium (**SGC**), being a collective of landowners within Puhinui Precinct: Sub-Precincts D and E to manage and address the transport restrictions set out within the Precinct provisions. The SGC owns approximately 183ha of land on the southern side of Puhinui Road (State Highway 20B) and broadly to the west of State Highway 20. PC118 relates to land on the northern side of Puhinui Road, in close proximity to the SGC land and within the same transport catchment.

Scope of Submission

6. This submission relates to PC118 in its entirety.

The Submission is:

7. The Submitter opposes PC118 in its entirety. Without limiting the generality of the Submitter's concerns, the primary reasons relate to the following matters.

Transport effects

- | | |
|--|-----|
| 8. The operative Puhinui Precinct provisions include rigorous controls on the scale and nature of development and the transport infrastructure that is needed to support it. PC118 does not acknowledge the existing constraints through this rapidly developing area, the traffic generation potential of the activities it seeks to enable, or the infrastructure (over and above that already specified within the Precinct) needed to support the additional traffic generation sought to be enabled by the Plan Change. | 8.1 |
| 9. The proposal does not specify any transport network upgrades to support development enable by PC118 from the outset or in the long term. Similar to the transport network upgrades for Sub-Precinct D, the Submitter would expect that an upgrade to the Campana road approach (for all modes) is provided prior to any new development being occupied within the Plan Change area. | 8.2 |
| 10. There has been no consideration or assessment of the wider network. The modelling provided only focuses on the Puhinui Road / Campana Road intersection in isolation. | 8.3 |
| 11. For the above reasons, PC118 defers critical issues including the assessment of intersection capacity, development staging, and the design and delivery of mitigation works to future resource consent processes. This is inconsistent with the established approach within the Puhinui Precinct and fails to provide adequate certainty at the rezoning stage, as required under the Resource Management Act 1991. | 8.4 |
| 12. The Submitter also has concerns around the baseline data, trip generation rates and the underlying assumptions that have informed the transport modelling. Most notably:

a. The traffic modelling undertaken is based on 2023 volumes, which pre-date the Manawa Bay development and the operation of the Auckland International Airport Limited (AIAL) Park and Ride (south) facility

b. It is unclear what distributions have been used for AIAL and Sub-Precinct D movements | 8.3 |

- c. The nature of Sub-precinct E and the activities enabled within it have the potential to act as attractors of high trip-generating activities including fast food restaurants, service stations, cafés, bars, etc, all of which would significantly impact the performance of the Campana Road intersection. The location of the proposed Sub-Precinct E (North) on Puhinui Road would act as an attractor of trips to the Precinct, rather than being a convenience catering to the Precinct.

8.5

13. Proposed Standard I432.6.1.2(4)(b) limits the measurement of traffic movements only “from” the Campana Road / Puhinui Road intersection. If other accesses onto Puhinui Road eventuate, such as left-in, left-out, movements from these accesses would be exempt. By comparison, traffic movement for land use activities within SGC land are measured at source across Sub-Precincts D and E.

8.6

Infrastructure capacity effects

14. Watercare Services Limited (**Watercare**) has provided feedback PC118, and in a letter dated 11 April 2025, advises that:
- a. While it is technically feasible to service the Plan Change area, doing so would consume most of the remaining capacity in the Southwestern Interceptor, precluding development of existing live-zoned land until the Southwestern Interceptor Duplication Project is delivered (anticipated circa 2036).
- b. Servicing the Plan Change area would risk delaying development in areas already prioritised for growth, or require the reprioritisation of Watercare’s investment programme. In both scenarios, out-of-sequence development compromises the efficient and coordinated delivery of infrastructure, and would create inequitable outcomes for other landowners who have planned on the basis of the FDS sequencing.

8.7

Decision Requested

15. The Submitter seeks that the Council decline PC118 for the reasons set out in this submission.
16. In the alternative to and without limiting the primary relief of declining PC118, the secondary relief 100 Prices Road seeks is that:
- a. PC118 be amended to identify specific transport generation limits and transport network upgrades needed to service the proposed land area. This would need to be on the basis that the network capacity being established by the infrastructure upgrades currently being delivered by the SGC are to establish capacity for the development of the existing Sub-Precinct D and E land. Any introduction of new urban land within the Precinct would need to be supported by transport assessments and

8.4

proposed local and network upgrades that use the full build-out of the existing Precinct as the baseline scenario, and an acknowledgement that those upgrades be delivered in advance of any demand on the network. 8.4

- b. Any other alternative or consequential relief, including in relation to PC118's objectives, policies, rules, methods and maps, that reflects or responds to the reasons for this submission.

Reasons for relief sought

17. The submitter seeks that PC118 be declined as it:

- a. does not give effect to the objectives and policies of the NPS-UD
- b. will not contribute to a well-functioning urban environment
- c. is inconsistent with the sustainable management of natural and physical resources and the purpose and principles of the RMA
- d. will not meet the reasonably foreseeable needs of future generations
- e. does not satisfy the requirements of section 32 of the RMA; and
- f. is inconsistent with sound resource management practice.

Appearance at hearing

18. The Submitter wishes to be heard in support of its submission.

19. The Submitter will consider presenting a joint case with others making a similar submission.

DATED at this day of 4 September 2025



Mark Vinall

On behalf of 100 Prices Road Limited

5 September 2025

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c/- Tattico

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SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN CHANGE UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991

TO: Auckland Council

SUBMITTER: Auckland International Airport Limited ("**Auckland Airport**")

SUBMISSION ON: Proposed Plan Change 118 ("**PC118**") (Private): Puhinui Precinct to the Auckland Unitary Plan - Operative in Part ("**AUP**")

Introduction and Context

1. Auckland Airport is the owner and operator of one of New Zealand's most strategic infrastructure assets.
2. Spanning over 1,500 hectares of land, Auckland Airport is the country's gateway airport. The Airport precinct plays an important role in the region's economic and social wellbeing. It is the second-largest employment hub in Auckland, supporting 25,000 jobs that in turn help lift the region's household incomes by an estimated \$1.4 billion each year. Auckland Airport also plays a key role in the growth of New Zealand towns and cities, supporting \$6.8 billion in domestic tourism expenditure each year.
3. Access to Auckland Airport is provided primarily via the state highway ("**SH**") network, namely SH20B to the south-east and SH20A connecting to the north, both of which connect to the South-Western Motorway (SH20).
4. Within the Airport precinct, George Bolt Memorial Drive and Puhinui Road/Tom Pearce Drive link the SH network to the international and domestic terminals, while also providing access to various destinations across the precinct and supporting airport operations. These roads are part of Auckland Airport's wider road network¹, which comprises 24 kilometres of roads and accommodates more than 80,000 vehicles per day ("**vpd**"), of which some 7% are heavy vehicle movements.
5. Auckland Airport's road network is also used as a thoroughfare for people and freight to bypass the heavy congestion on SH20 between SH20B and SH20A. Auckland Airport is delivering road capacity and intersection improvements across the precinct. This programme of improvements is ongoing and is only effective in conjunction with wider network improvements. The nature and timing of many of these improvements is still to be confirmed and existing network constraints must be appropriately recognised in the interim.
6. The AUP provisions recognise the importance of providing for Auckland Airport's activities, including future growth, and were developed through detailed submissions and hearings, including expert transport evidence before an Independent Hearing Panel. This differs fundamentally from the planning provisions for future urban zoned land, where development is subject to more restrictive provisions and further structure planning to manage land use and infrastructure demands.

¹ Auckland Airport is the Road Controlling Authority for these roads.

7. Maintaining safety is also critical to Auckland Airport's operations, and this includes implementing controls to manage risks to aircraft safety.
8. In this context, Auckland Airport welcomes the opportunity to submit on PC118, which proposes to rezone approximately 31.5 hectares of land located at Campana Road and Puhinui Road (SH20B), (**"the Site"**) located approximately halfway between Puhinui Bridge and the SH20B-SH20 interchange from Rural – Future Urban Zone (**"FUZ"**) to Business – Light Industry (**"BLI"**). PC118 also proposes to incorporate the Site into the Puhinui Precinct as a new sub-precinct with corresponding provisions proposed. This submission relates to the totality of the land proposed for rezoning.
9. Primary access to the Site is proposed via Campana Road, which is connected to SH20B via a signal-controlled intersection which also serves Auckland Airport's Park & Ride South (**"the Campana intersection"**). The posted speed limit at the Campana intersection is 60km/hr. During peak hours, SH20B and the wider network are congested and there are significant delays, particularly during the evening peak.
10. Auckland Airport could not gain an advantage in trade competition through this submission and the submission does not relate to trade competition or the effects of trade competition.

Submission on PC118

11. Auckland Airport opposes PC118 because it does not demonstrate that potential adverse transport effects can be managed appropriately, including on Auckland Airport's road network. In particular, the transport assessment is not based on current vehicle movements, does not sufficiently evaluate the impacts of the development on the immediate and wider transport network, and seeks to defer significant transport assessments to future resource consent applications. A number of specific issues are identified below to give context to Auckland Airport's transport concerns but do not limit the scope of the submission which relates broadly to the transport effects of PC118 on the surrounding roading network.
12. Auckland Airport also seeks to ensure that PC118 includes appropriate controls to help manage risks to aircraft safety.

Reasons for Submission

Transport

13. Without limiting the generality of the position in paragraph 11 above, the submitted transport assessment does not adequately assess the transport effects of PC118. In the absence of a detailed and robust assessment, the full transport impacts of PC118 are unable to be understood, including cumulative effects on the network. Deferring detailed transport assessments to future and individual consent applications or future development proposals is not appropriate. Understanding the cumulative effects of development enabled by a proposed plan change is essential to ensure that any required mitigation on the local and wider transport network is both appropriate and feasible. PC118 has not demonstrated this.
14. PC118 significantly underestimates both existing traffic on the network and the movements that will arise from the proposed development. In particular:

9.1

9.2

- (a) The daily traffic volumes of 27,000 to 29,000 vpd are based on 2016-2020 traffic flows (prior to Covid)². The Airport has obtained the SH20B (east of Prices Road) traffic counts from NZTA's Traffic Monitoring System across 2024 and 2025 (to 30 June 2025). This demonstrates that weekday two-way traffic volumes are consistently between 30,000 and 35,000 vpd and weekend volumes frequently exceed 25,000 vpd. The current weekday flows are therefore much higher than those stated in the transport assessment.
- (b) Both the office and retail activity trip rates are lower than industry standards³.
15. PC118⁴ estimates traffic generation of 661 and 757 vehicles per hour ("vph") in AM and PM peaks respectively under the full development scenario. These movements are significant, particularly on an already congested SH network, and require a full and comprehensive Integrated Transport Assessment ("ITA") to be prepared in accordance with Auckland Transport's guidelines.
16. The level of assessment provided does not meet Auckland Transport's ("AT") ITA guidance⁵. This document makes it clear that transport modelling is a key component of any ITA where there are concerns about the potential traffic effects of a proposal⁶. This is especially relevant for plan changes that enable activities that will trigger the thresholds in Chapter E27.9(5) of the AUP. The AT ITA guidance recommends the use of the regional transport model to establish trip generation and distribution across all modes. It also expects that detailed modelling such as network-wide modelling is carried out to understand wider effects. In this instance the only modelling undertaken is a Sidra Intersection model at one intersection (the Campana intersection) with no consideration of wider network effects.
17. The limitations of the transport assessment are particularly notable given the scale of potential development enabled by the future development (661 – 757 vph) and the potential for significant changes in travel demand and network performance arising from PC118. Without robust modelling, the transport assessment cannot demonstrate the existing or planned transport infrastructure can accommodate the proposal, nor can it identify where mitigation may be required.

9.2

Scope of effects considered

18. The assessment of transportation effects does not consider wider effects beyond the Campana intersection and immediate surrounds, despite proposing 661-757 vehicle movements in peak hours.
19. The wider network is already congested at peak times and any increase in traffic will exacerbate existing delays and queuing. Any deterioration in the performance of the SH20B corridor will be detrimental, including to the Airport's road network with corresponding effects

9.3

² Annual Average Daily Traffic (AADT) volumes reported in Don McKenzie Consulting Transport Assessment, dated October 2023, page 4.

³ The warehouse rates assumed are typical however the office trip rate of one trip per 100 sqm GFA is lower than industry standards (NSW Guide of Transport Impact Assessment 2024 recommends 1.28-1.32, NZTA Research Report 453 recommends 2.5 (NZ) and 2 (Australia) trips per 100 sqm GFA). The retail activity (at 2 and 5 trips per 100 sqm GFA) is very low (NSW Guide of Transport Impact Assessment 2024 recommends 6.66-7.90, NZTA Research Report 453 recommends 16 (NZ) and 18.9 (Australia) trips per 100 sqm GFA). This suggests that any such retail activity would be ancillary to light industrial activity only, which is not necessarily how it will operate.

⁴ Don McKenzie Consulting Clause 23 Response, dated 19 November 2024

⁵ Available online at <https://at.govt.nz/about-us/manuals-guidelines/integrated-transport-assessment-guidelines>

⁶ Refer section 3.5 of AT ITA guidelines

on Airport operations including staff, contractors and travellers seeking to arrive at the airport on time with a good degree of travel time reliability.

20. PC118 identifies that 31% (220 of a total of 661) of the morning peak hour traffic generated by the full development of the Site will travel via the Airport's precinct. During the evening peak hour, 32% of the traffic generated by the Site's full development travel via the Airport (being 258 vehicles out of a total of 757)⁷. No assessment has been undertaken of the impact of this additional traffic on the operation of roads and intersections within the Airport.
21. It is further noted that should the SH20 / 20B interchange experience significant delays or disruption, an even greater quantum of PC118 traffic may divert through the Auckland Airport road network.

9.3

Traffic modelling

22. PC118 has not demonstrated that traffic effects from a full development scenario can be accommodated on the road network at an acceptable level of service.
23. The Transport Assessment finds the addition of 50 vph via the Campana intersection will not notably degrade the performance of the Campana intersection and a corresponding 50vph standard is proposed under the PC118 provisions. The information provided does not clarify the current levels of delay represented in the base models, which appear to rely on outdated vehicle count data. As a result, there is no evidence to confirm that the model has been calibrated to accurately reflect current intersection performance.
24. PC118 includes modelling of a full development scenario, with four options of corresponding intersection upgrades presented⁸. PC118 suggests that the preferred option 4 intersection layout, which includes an additional approach lane on the Campana Road south approach and three approach lanes (including left slip lane) on the Campana Road north approach, will accommodate the effects of the full development of the Site. There is insufficient information presented to demonstrate that appropriate calibration has been carried out, and there is potential for under-estimation of traffic generation and demand.
25. The outputs of the option 4 evening peak model fail to meet the performance criteria under I432.6.1.2(5) which are the standards required to be achieved for any development exceeding the permitted 50 vph limit at the Campana intersection. For example, Standard I432.6.1.2(5)(b)(i) requires that no individual traffic movement has a Level of Service ("LoS") worse than LoS E. PC118 shows that in the evening peak hour, the right turn from SH20B east into Campana Road North is LoS F⁹. There are several other breaches of these performance criteria in the evening peak modelling provided including degree of saturation and queuing metrics. PC118 has therefore not adequately demonstrated a feasible roading infrastructure solution that will appropriately address traffic effects.

9.2

Objective and policy framework

26. Auckland Airport is concerned the proposed provisions in PC118 are insufficient to address the transport effects of the proposal, including the following policies:
 - (a) Proposed Objective (3) seeks to "*maintain the safe and efficient operation of the transport networks across the Puhinui Precinct*". As drafted, the objective fails to

9.4

⁷ Don McKenzie Consulting Clause 23 response, dated 19 November 2024

⁸ Don McKenzie Consulting Clause 23 Response, dated 19 November 2024

⁹ Attached to Don McKenzie's Clause 23 Response dated 21 February 2025.

acknowledge that development proposals located in Sub precinct C and C1 will likely affect the wider transport network beyond the boundaries of the Puhinui Precinct. This is inappropriate.

- (b) Proposed Policy (7) requires “*development of properties accessed off Campana Road to adequately address traffic effects. Including, if necessary, upgrades to Campana Road in accordance with Precinct Plan 6*”. Given the potentially significant traffic generated by land use activities in the plan change area, and the potentially significant adverse effects on the road network of the same, this policy is not sufficiently directive. It is also inconsistent with the non-complying activity status proposed.

9.4

Rules and standards

27. The suite of proposed rules and standards is unclear and leaves uncertainty as to how the rule framework is to be interpreted and applied. It is particularly unclear how development proposals would be staged and assessed, and how cumulative effects would be appropriately considered in future projects / consents. Without clarity in the proposed provisions around application, staging, and integration, there is a risk of piecemeal development leading to cumulative transport impacts that are unable to be adequately mitigated. **Attachment A** provides further analysis of the proposed rules and standards but does not limit the scope of Auckland Airport's submission relating to the transport impacts of PC118 more broadly.

Other matters

Obstacle limitation surfaces

28. The Site is covered by Auckland Airport Designation 1102 – Protection of aeronautical functions – obstacle limitation surfaces (“**OLS**”) under the AUP. The OLS is critical to ensure aircraft can maintain a satisfactory level of safety while manoeuvring at low altitude in the vicinity of Auckland Airport and is an important consideration for potential future development at the Site.
29. PC118 proposes to change the zoning of the Site to BLI which permits building heights of up to 20m measured from ground level. It is important to note that the height of buildings (and other structures) needs to be measured from sea level to determine compliance with the OLS.
30. Auckland Airport seeks to ensure that any temporary or permanent structures do not result in the penetration of the OLS to compromise the safety and operation of aircraft. Auckland Airport's written consent is required to enable anything at the Site that would prevent or hinder the designation.

9.5

Wildlife management

31. Management of wildlife hazards, including bird strike, is critical for aircraft operational safety. The Civil Aviation Act mandates aerodrome operators to have a programme in place to control wildlife hazards. Wildlife attractions of key concern include:
- Wetlands;
 - Other natural and artificial waterbodies, including, stormwater ponds, drainage channels and stagnant water;
 - Large areas of exposed soil; and
 - Landscaping or planting that provides sanctuary to particular bird species.

9.6

32. Auckland Airport's programme to manage wildlife hazards includes ongoing monitoring surveys, discouraging birds from high-risk areas around the airport using deterrent technologies, and encouraging birds to relocate to areas where they pose less harm. Auckland Airport also carefully manages wildlife attractants, such as earthworks, waterbodies, and landscaping areas within the Airport's landholdings.
33. The way in which land is managed and developed in the vicinity of airports can also significantly influence the risk of wildlife hazards. While recognising both the value some of these features can provide and the requirements of planning legislation, Auckland Airport seeks that PC118 introduces provisions to minimise wildlife attractants at the Site. Section 6.7 of the Christchurch District Plan provides a helpful example of provisions which address this matter but alternative drafting may achieve similar outcomes. Auckland Airport would be pleased to discuss this further.

9.6

General Reasons for Submission

34. Without limiting the above, the general reasons for this submission are that PC118 does not:
- (a) promote sustainable management of resources, and will not achieve the purpose and principles of the Resource Management Act 1991;
 - (b) meet the reasonably foreseeable needs of future generations;
 - (c) enable social, economic and cultural wellbeing; and
 - (d) avoid, remedy or mitigate adverse effects on the environment.

Decision Sought

35. Auckland Airport seeks PC118 is amended to ensure the potential adverse effects of PC118 including transport effects on Auckland Airport's road network, and on aircraft safety, are avoided, remedied or mitigated.
36. If those effects are unable to be managed appropriately, Auckland Airport seeks that PC118 is declined.
37. Auckland Airport wishes to be heard in support of this submission.

AUCKLAND INTERNATIONAL AIRPORT LIMITED:**Signature:**

Andrea Marshall
Head of Environmental Planning and Sustainability
Auckland International Airport Limited

Date: 5 September 2025

Address for Service: C/- Sarah Westoby
Auckland International Airport Limited

PO Box 73020
MANUKAU 2150

Telephone: +64 2102223527

Email: sarah.westoby@aucklandairport.co.nz

Attachment A – Identified issues with the rule framework

Example 1

- Activity Table I432.4.1 permits industrial activities (which include storage and lock up facilities) in Sub-precinct C and E North, subject to standards. The applicable transport standards are contained in I432.6.1.2(4) and (5). Development in Sub-precinct C that complies with Standard I432.6.1 Transport is a permitted activity Rule (A51). Development in sub-precinct C and E North that does not comply with Standard I432.6.1 Transport is a non-complying activity under Rule (A52).
- Proposed standards I432.6.1.2(4) and I432.6.1.2(5) are identified as “permitted activity standards” (refer second sentence at I432.6). Proposed standard I432.6.1.2(4) provides for storage and lock up activities¹⁰ that (a) are unmanned, and (b) do not exceed 50 vph at the Campana intersection and (c) do not exceed 5 vph at the Campana intersection from 457 Puhinui Road.

Issue

- Any storage and lock up facility unable to comply with this standard presumably cascades to require consent for a non-complying activity under Rule I432.4.1(A52) but this is unclear based on the standards as drafted. For instance, it could be suggested that if I432.6.1.2(4) is not met, I432.6.1.2(5) applies.

Example 2

- Standard I432.6.1.2(5) applies to ‘any land use’ generating traffic that exceeds the vph caps in the preceding standard (4(b) and 4(c)) relating only to unmanned storage and lock up facilities.

Issue

- Reference in Standard (5) to the sub clauses in Standard (4) creates a confusing pathway through the plan for any other land use that is not applicable under (4) in the first place. This creates the potential for misinterpretation and consenting uncertainties particularly where an activity is permitted under Rule (A50), is not a storage or lock up facility, whether it generates more or less than 50 vph.

Example 3

- Warehousing is permitted in Sub-precinct C and E North (see Rule (A50)) and, presumably would be subject to the standards in I432.6.1.2(5). If the warehousing were to generate traffic which led to the exceedance of the relevant vph cap in I432.6.1.2(4), it can proceed as a permitted activity if it meets the transport criteria in standard I432.6.1.2(5)(a) to (c).

Issue

- Standard I432.6.1.2(5) is a permitted activity standard. The fact that it is directing a plan user / developer to prepare a traffic assessment and submit that with a resource consent application is flawed.
- This approach seems to overlook that the activity may be permitted and not trigger consent, thus removing the mechanism for an assessment. This highlights that the standards are not appropriate and will not achieve the intent of the plan change.

¹⁰ The terminology in this standard switches between “activities” and “facility”. This should be “facility/ies”, for consistency with the defined term ‘storage and lock up facility’.

Auckland Council
Unitary Plan Private Bag 92300
Auckland 1142

Attn: Planning Technician
unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 118 (Private): 5,10 and 11 Campana Road
and 467 and 485 Puhinui Road

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: planchanges@water.co.nz

DATE: 5 September 2025

1. WATERCARE'S PURPOSE

- 1.1. Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").
- 1.2. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the Auckland region.
- 1.3. Watercare's purpose, embodied in the Māori whakatauki (proverb) below, reflects the connection between Watercare's services and the wellbeing of our community and the local environment:

Ki te ora te wai, ka ora te whenua, ka ora te tangata.

When the water is healthy, the land and the people are healthy.

- 1.4. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels,

consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets¹.

- 1.5. Watercare is subject to interim economic regulation under the Watercare Charter ("**Charter**"). The Charter imposes minimum service quality standards, financial performance objectives, and an interim price-quality path. The Commerce Commission has been appointed as the Crown monitor and has regulatory oversight of Watercare's compliance with the Watercare Charter.
- 1.6. Subject to the Charter, Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council² including the Auckland Unitary Plan (Operative in Part) ("**AUP(OP)**"), the Auckland Plan 2050 and the Auckland Future Development Strategy 2023-2053 ("**FDS**").

2. SUBMISSION

General

- 2.1 This is a submission on a private plan change requested by Campana Landowners' Consortium ("**Applicant**") to the AUP(OP) that was publicly notified on 8 August 2025 ("**Plan Change 118**").
- 2.2 Plan Change 118 proposes to rezone approximately 31.5 ha of land from Future Urban Zone ("**FUZ**") to Business-Light industry and modify the existing Puhinui Precinct provisions ("**Precinct Provisions**"). The Plan Change Area is made up of 5 parcels of land owned by the Applicant (5, 10 and 11 Campana Road and 467 and 485 Puhinui Road) ("**Plan Change Area**").
- 2.3 The objective of Plan Change 118 is to fully realise the development potential of the land while adequately addressing mana whenua concerns in relation to the potential effects on the adjacent estuary, the potential for discovering archaeological materials and the effects on cultural landscape values. Appropriate provisions are also needed to address potential effects on infrastructure networks.
- 2.4 The purpose of this submission is to ensure the technical feasibility of the proposed water and wastewater servicing is addressed and that the potential adverse effects of the future development enabled under Plan Change 118 on Watercare's existing and planned water and wastewater networks, and the services they provide, are appropriately considered and managed in accordance with the Resource Management Act 1991 ("**RMA**").
- 2.5 In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, the Long-term Plan 2024-2034 (10-year Budget), Watercare's Statement of Intent 2025-2028, the FDS, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision, the Watercare Business Plan 2025-2034 (10-Year Business Plan) and the current Watercare Asset Management Plan.

¹ Local Government (Auckland Council) Act 2009, s57(1)

² Local Government (Auckland Council) Act 2009, s58.

Watercare has also considered the relevant RMA documents including the AUP(OP) and the National Policy Statement on Urban Development 2020 (amended May 2022).

- 2.6 Watercare does not support out-of-sequence development that might put pressure on Watercare to reprioritise or reallocate funding in the Watercare Asset Management Plan. If this were to occur, other projects such as infrastructure for other growth areas or renewals and upgrades required to ensure level of service and/or improved environmental outcomes may need to be deprioritised.
- 2.7 Where funding reallocation is not possible, which is most likely, and connections are granted, existing and planned infrastructure capacity may be taken up faster than planned, resulting in constraints to growth in live zoned areas (ie areas with operative urban zoning). In addition, approval of out of sequence growth results in considerable, additional operational costs being brought forward.
- 2.8 For the reasons set out below, and on the basis the amendments sought in this submission are included in the Precinct Provisions, Watercare **does not oppose** Plan Change 118. In making this submission, it is noted that any infrastructure delivery dates provided in this submission are forecast dates only and therefore subject to change.

Specific Parts of Plan Change 118

- 2.9 Watercare's submission relates to Plan Change 118 in its entirety but, without limiting the generality of its submission, the parts of Plan Change 118 that Watercare has a particular interest in are:
- (a) the actual and potential effects of Plan Change 118 on Watercare's existing and planned water and wastewater networks; and
 - (b) the proposed Puhinui Precinct provisions insofar as they relate to water supply and wastewater servicing.

Sequencing of development

- 2.10 Watercare's bulk infrastructure programme is planned, funded and sequenced in line with the Auckland Plan 2050, the Auckland Council Development Strategy (this is currently the FDS, which replaced the Future Urban Land Supply Strategy 2017 in December 2023), the Auckland Council Growth Scenario ("**AGS**"), and the AUP(OP).
- 2.11 Plan Change 118 is located within the Puhinui (Stage 2) Future Urban Area ("**FUA**") which is not anticipated under the FDS to be urbanised until 2030+.
- 2.12 Appendix 6 of the FDS identifies the infrastructure prerequisites that enable the development of the FUAs.³ This Appendix states:⁴

The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding

³ As defined and introduced in the FDS 2023 Appendix 6 at p. 32.

⁴ FDS, Appendix 6 at p. 35.

infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS.

- 2.13 The FDS does not identify any bulk water supply or wastewater prerequisites necessary to support the development of the Puhinui (Stage 2) FUA, however as noted in the FDS, this is not an exhaustive list.⁵
- 2.14 Watercare has identified the Southwestern Interceptor Duplication Project as a bulk infrastructure prerequisite required to support the Puhinui (Stage 2) FUA. This project is currently anticipated to be completed by 2036, with feasibility anticipated to begin in 2030.
- 2.15 Watercare's key concern is that Plan Change 118 is "out of sequence" with the timing for development set out in the FDS and the bulk wastewater infrastructure planned to support development of this FUA. As outlined above, the Southwestern Interceptor Duplication Project is currently anticipated to be delivered by 2036.
- 2.16 Watercare does not support live zoning of land that cannot be supported by bulk infrastructure within the typical 10-year planning horizon for RMA plans. Watercare notes that this plan change request comes over a decade before essential bulk wastewater infrastructure is anticipated to be available.
- 2.17 However, the Business-Light industry Zone anticipates industrial activities that can occur without water supply or wastewater servicing i.e. storage facilities,⁶ and the Plan Change 118 application includes carefully formulated Precinct Provisions that require alignment of any development requiring public wastewater servicing with the completion and commissioning of the Southwestern Interceptor Duplication Project. Therefore, Watercare considers that although PPC118 is out of sequence with the FDS timing, development timing can align with the provision of bulk infrastructure in the area, and therefore will not adversely impact Watercare's networks or the servicing of anticipated development in the existing live zoned areas.

Water Supply and Wastewater Servicing in Puhinui

- 2.18 In relation to water supply, there is currently available capacity in the existing bulk water supply network to service development of the Plan Change Area without compromising the ability to service growth in live zoned areas.
- 2.19 The closest bulk wastewater main is the Southwestern Interceptor which is approximately 800m west of the Plan Change Area. As Watercare advised the Applicant in late 2023, there is currently available capacity in the Southwestern Interceptor to receive the proposed wastewater flows from the Plan Change Area, but this would take up most of the available capacity in the Southwestern Interceptor. It was also noted that the wastewater flows anticipated from the development may vary depending on the industry type, size and operational techniques and therefore the actual wastewater flow from the Plan Change Area may be different than what has currently been calculated.

⁵ FDS, Appendix 6 at p. 35.

⁶ H17 Business – Light Industry Zone, Table H17.4.1 Activity Table (A35)

- 2.20 Given the current capacity constraints in the Southwestern Interceptor, if the Plan Change Area were to connect to the public wastewater network this would preclude further development of the wider live-zoned catchment (and could lead to a future constraint) until further capacity is provided through delivery of the Southwestern Interceptor Duplication Project. This is currently anticipated to be delivered by 2036, with feasibility anticipated to begin in 2030.

Applicant consultation with Watercare

- 2.21 Prior to lodgement of Plan Change 118, the Applicant requested an assessment of water and wastewater capacity from Watercare. As set out above, Watercare advised the Applicant (by letter dated 14 December 2023) that, at that time, there was capacity in the Southwestern Interceptor to accommodate the demand anticipated by the development of the Plan Change Area but that this would take up most of the available capacity.
- 2.22 Since then, Watercare has worked with the Applicant to develop Precinct Provisions that would ensure development that requires public wastewater servicing does not occur in advance of capacity being available in the bulk wastewater network, which is anticipated to be provided via the Southwestern Interceptor Duplication Project.
- 2.23 The Applicant has included all amendments sought by Watercare in the updated Precinct provisions except those outlined at **Appendix 1**. Watercare seeks that the amendments in **Appendix 1** are made to the Precinct Provisions.

10.1

3. DECISION SOUGHT

- 3.1 Watercare does not oppose Plan Change 118 subject to minor additional amendments being made to the notified Precinct Provisions as set out in **Appendix 1**. These additional amendments are to:
- (a) ensure that the provisions proposed as they relate to water and wastewater servicing cover sub-precinct E (north) which is being introduced through Plan Change 118; and
 - (b) remove a reference the Applicant has included in the special information requirements to exclusively identifying catchments "within the FUZ" that will connect to Sub-Precinct C and / or Sub-Precinct E (north) for the purposes of demonstrating the water and wastewater networks are appropriately sized.
- 3.2 In addition Watercare notes that, if Plan Change 118 is approved and made operative, the constraints on the local water supply and wastewater network and any upgrades required to support development of the Plan Change Area would be assessed and confirmed by Watercare at the time of resource consent application and engineering plan approval. All local network upgrades required to service the Plan Change Area would be the responsibility of the developer to deliver at their cost.

4. HEARING

4.1 Watercare wishes to be heard in support of its submission.

5th September 2025

A handwritten signature in blue ink, appearing to read 'Helen Shaw'.

Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Address for Service:
Amber Taylor
Development Planning Team Lead
Watercare Services Limited
Private Bag 92521
Victoria Street West Auckland 1142
Phone: 021 242 8153
Email: Planchanges@water.co.nz

APPENDIX 1

I432.1. Precinct description

Due to the constrained nature of existing transport infrastructure, and the bulk wastewater network, development within Sub-precinct C and Sub-precinct E (North) is subject to a number of staging and infrastructure requirements designed to ensure a safe and efficient transport network, and to ensure that development is restricted within Sub-precinct C and Sub-precinct E (North) until upgrades are completed to provide sufficient bulk wastewater infrastructure capacity to service development of Sub-precinct C and Sub-precinct E (North).

I432.9. Special Information Requirements

I432.9.2. Development or subdivision of land within sub-precincts A-G

- (14) Within the application for the first stage of subdivision of development of any site existing at [date of plan change approval] within Sub Precinct C or Sub-precinct E (north) that requires reticulated services, the applicant must provide a Water and Wastewater Servicing Plan for the Sub-Precinct C and Sub-Precinct E (north) area. The Water and Wastewater Servicing Plan must:
- i. Identify the timing, location, size and capacity of the key water supply and wastewater infrastructure dependencies located outside of the Precinct Area
 - ii. Identify the timing, location, size and capacity of the key water supply and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service Sub-Precinct C and Sub-Precinct E (north).
 - iii. Identify all catchments outside Sub-Precinct C and sub-precinct E (north) (but within FUZ) that may when developed connect to the Sub-Precinct C and / or sub-precinct E (north) water supply and wastewater networks and demonstrate that the Sub-Precinct C and sub-precinct E (north) networks are adequately sized to provide capacity for these catchments.

SUBMISSION ON PLAN CHANGE 118 PC 118 (PRIVATE): PUHINUI PRECINCT

To: Auckland Council

Submitter: James Kirkpatrick Group Limited (JKGL), Altrend Properties Limited and Warehouse World Limited (the submitter).

1. SUBMISSION SUMMARY

- 1.1. The submitter owns the properties at 352, 356 and 358 Puhinui Road, Papatoetoe and is directly affected by the proposed plan change.
- 1.2. The submitter opposes Proposed Plan Change 118 in its current form and seeks that it be declined in its entirety.
- 1.3. While JKGL supports good planning outcomes and integrated transport solutions, the Plan Change restricts the ability to realise the full development potential of its landholdings and creates additional constraints on efficient traffic movements within and surrounding the Puhinui Precinct.
- 1.4. PC118 raises significant issues in terms of potential traffic and economic distributional effects along with infrastructure capacity constraints.

2. SUBMITTERS LAND

- 2.1. The submitter owns the properties at 352, 356 and 358 Puhinui Road, Papatoetoe and is directly affected by the proposed plan change.
- 2.2. Together these sites represent over 61 hectares of light industrial zoned land and form a strategically located part of the wider Puhinui Precinct.

3. SCOPE OF SUBMISSION

- 3.1. This submission relates to Proposed Plan Change 118 to the Auckland Unitary Plan (Campana) and the provisions as they affect the submitter's landholdings and the wider Puhinui Precinct.

4. NATURE OF SUBMISSION

- 4.1. JKGL opposes Plan Change 118 in its current form.
- 4.2. The plan change introduces restrictions that would unduly limit the efficient and flexible development of the submitter's landholdings and would prejudice the ability to achieve integrated, strategic planning outcomes for the wider precinct.
- 4.3. PC118 raises significant issues in terms of potential traffic and economic distributional effects along with infrastructure capacity constraints.

5. REASONS FOR SUBMISSION

- 5.1. JKGL does not support the specific provisions of Plan Change 118.
- 5.2. Those provisions require amendment as sought below. Without such amendments, the provisions:
 - a) will not promote sustainable management of resources, will not achieve the purpose of the Resource Management Act 1991,
 - b) will not enable the social and economic wellbeing of the community.
 - c) do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 5.3. In particular, and without limiting the generality of the above:

Adverse Effects on Strategic Land Use

- a) The proposed plan change introduces additional restrictions on land use and activity mix, limiting opportunities for more flexible and economically productive development.
- b) JKGL considers that the Puhinui Precinct should retain maximum flexibility to respond to market demand, evolving transport infrastructure, and future employment growth.

Traffic and Access Impacts

- c) The plan change introduces changes to the signalised intersection phasing and internal road network, resulting in reduced efficiency for vehicle movements to and from the submitters land as well as the wider Precinct.
- d) JKGL's sites are strategically located on a key arterial corridor, and any additional delays or restrictions will undermine the economic viability of future development.
- e) These constraints are inconsistent with Auckland Council's strategic goals to enable growth near transport infrastructure and to integrate land use and transport planning.
- f) The Traffic Assessment submitted with the application considers only low-intensity uses (storage, SPCA facility), generating approximately 50 vehicle movements per hour ('vph'), whereas full Light Industry development enabled by the rezoning would generate 10–15 times higher volumes (560–875 vph). The application material acknowledges that *"adding the additional Campana Plan Change volumes [associated with fully developed land use scenario] results in an unacceptable intersection performance with long queues and high delays..."*¹.
- g) The PPC defers critical issues including the assessment of intersection capacity, development staging, and the design and delivery of mitigation works to future resource consent applications. This approach fails to provide adequate certainty at the rezoning stage, as required under the Resource Management Act 1991 (RMA 1991). Effects need to be considered in sufficient detail at the plan change stage to provide decision-makers and the community with information concerning the nature and scale of impacts. The PPC fails to demonstrate that adverse effects on the State Highway 20B ('SH 20B') corridor and the Campana Road intersection can be avoided, remedied, or mitigated.
- h) Notwithstanding (g), above, the wording of Standard I432.6.1.2 is ambiguous and open to various interpretations. For example, it could be argued that I432.6.1.2(5) only applies to Storage and Lock-up facilities that do not comply with I432.6.1.2(4), whereas the expectation is that I432.6.1.2(5) is intended to apply to any other

¹ Letter: Proposed Private Plan Change – Campana Road Additional Clause 23 Request for Further Information Response (Transport), prepared by Don McKenzie Consulting, dated 19 November 2024 (page 3).

activity within Sub-precinct C or E. Furthermore, standards I432.6.1.2(4) and (5) only applies to traffic 'from' the Campana Road/Puhinui Road intersection, as opposed to any traffic associated with development within the Precinct.

- i) Should traffic effects of any 'new' development within sub-Precinct C or sub-Precinct E need to be assessed against the provisions listed in Standard I432.6.1.2(5), there is a significant risk for Sub-precinct D, as the standard only requires assessment against the existing environment (*"for the purposes of Standard I432.6.1.2(5) the 'baseline scenario' is the operation of the road network at the time of the first resource consent is lodged..."*). There is no mention of needing to account for either the 1,035 trips permitted in Sub-precinct D, nor the control flexibility accorded to Sub-precinct D.
- j) SIDRA modelling provided by the Applicant only considers the immediate intersection of Campana Road and Puhinui Road. There is no consideration of the intersections further afield, such as Puhinui Interchange and Vogler Drive/Roscommon Road.
- k) The PPC relies, in part, on future transport projects (Airport–Botany rapid transit, 20Connect) that remain uncommitted and are outside the Applicant's control. The PPC does not propose staging provisions that align with the delivery of these projects. Auckland Council's Future Development Strategy 2023–2053 ('FDS') identifies this area of Future Urban zone as being released post-2030, recognising that these significant transport upgrades are prerequisites.

Distribution Effects

- l) The PPC propositions the proposed rezoning addresses a shortage of industrial land in Manukau. However, as stated in the Applicant's Economic Assessment², the Auckland Council Housing and Business Assessment 2023 states that the Auckland Region has sufficient existing capacity to accommodate the anticipated growth in industrial employment over the forecast period by 2052 (p. 21).
- m) In the absence of a regional shortage, advanced rezoning additional land at Puhinui creates potential distributional effects, diverting demand from existing live-zoned

² Report: Campana Road Industrial Plan Change Economic Assessment, prepared by Property Economics Limited, dated February 2024.

land. Many of those areas, including Sub-precinct D have required substantial investment in transport and servicing infrastructure, and dispersing demand undermines the integrated sequencing of development

Infrastructure Capacity

- n) Watercare's letter (11 April 2025) states that:
 - i. While it is technically feasible to service the PPC, doing so would consume most of the remaining capacity in the Southwestern Interceptor, precluding development of existing live-zoned areas until the Southwestern Interceptor Duplication Project is delivered, which is not expected until 2036.
 - ii. Servicing the PPC would risk delaying development in areas already prioritised for growth or force reprioritisation of Watercare's investment programme. In both cases, out-of-sequence development compromises efficient, coordinated infrastructure delivery and creates inequitable outcomes for other landowners who have planned on the basis of the FDS sequencing.
- o) The PPC is therefore premature and would allocate scarce wastewater capacity away from live zoned land within the wider catchment, and risks delaying integrated development of land already zoned for urban use.

Inconsistency with the Puhinui Precinct Vision

- p) JKGL is a long-term stakeholder in the Puhinui Precinct and supports a coordinated master planning approach. However, Plan Change 118 introduces piecemeal restrictions ahead of finalising the consolidated precinct framework.
- q) These changes could prejudice the ability to plan comprehensively for the entire precinct, including appropriate traffic modelling.

6. SPECIFIC RELIEF SOUGHT

6.1. JKGL seeks the following decision from Auckland Council:

a) Decline Proposed Plan Change 118 in its current form; or

b) Amend the plan change to:

- Retain flexibility in permitted land uses for the submitters land. | 11.1
- Ensure that any changes to intersection phasing and network planning do not reduce existing traffic capacity or create unreasonable access constraints. | 11.2
- Defer final traffic-related restrictions until the comprehensive Puhinui Precinct traffic modelling has been completed and reviewed. | 11.3
- Specify the road network upgrades required to service traffic generation associated with development provided for within Sub-precincts E (north), C and C1 (including permitted, restricted discretionary and discretionary activities) and impose strict staging and transport network triggers to ensure that no development occurs until the necessary road network upgrades are operational. | 11.4
- Within Sub-precincts E (north), C and C1, make Use and Development (Activity rule I432.4(A52)(A)) and Subdivision (Activity rule I432.4(A52)(A)) that does not comply with Standard I444.6.8 Bulk Wastewater Infrastructure a Prohibited Activity and delete development standard I444.6.8(2), which enables Standard I444.6.8 to be met where written confirmation is obtained from the infrastructure services provider that the bulk wastewater network has sufficient capacity to service the proposed subdivision or development. Connections to the public wastewater network must not be granted to development in Sub-precincts E (north), C and C1 until the southwestern Wastewater Interceptor is completed and commissioned. | 11.5

c) Such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.

7. OTHER MATTERS

- 7.1. JKGL could not gain an advantage in trade competition through its submission.
- 7.2. JKGL wishes to be heard in support of this submission.
- 7.3. JKGL would consider presenting a joint case.



HAMISH FIRTH

**AS AUTHORISED AGENT FOR: JAMES KIRKPATRICK GROUP LIMITED / ALTREND PROPERTIES
LIMITED / WAREHOUSE WORLD LIMITED**

Date: 5 September 2025

Address for service: C/- Mt Hobson Group

P O Box 37964

Parnell

Auckland 1151

Contact person: Hamish Firth

Telephone: 021 661 973

Email: hamish@mhg.co.nz and james@jkgi.co.nz

5 September 2025

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Proposed Private Plan Change 118 – Puhinui Precinct

Please find attached Auckland Transport's submission on **Proposed Private Plan Change 118 – Puhinui Precinct**. The applicant is Campana Landowners Consortium.

If you have any queries in relation to this submission, please contact me at spatialplanning@at.govt.nz or on 09 930 5001 ext. 2418.

Yours sincerely



Emeline Fonua
Planner, Spatial Planning Policy Advice

cc:
Joe Gray, Saddleback Planning Limited
by email: joe@saddleback.nz

Submission by Auckland Transport on Private Plan Change 118: Puhinui Precinct

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 118 from Campana Landowners Consortium for land located at 4, 10 and 11 Campana Road and 485 and 467 Puhinui Road

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 The Campana Landowners Consortium (**the applicant**) is applying for a private plan change (**PC 118** or **the plan change**) to the Auckland Unitary Plan – Operative in Part (**AUP(OP)**) to rezone approximately 31.5 hectares of land (**the site**) in Papatoetoe from Future Urban Zone to Business – Light Industry Zone. The plan change also proposes to amend the existing Puhinui Precinct provisions which apply to the site. This submission relates to the totality of the land proposed for this rezoning.
- 1.2 Auckland Transport (**AT**) is a Council-Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. AT has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.¹ In fulfilling this role, AT is responsible for the following:
 - a. The planning and funding of most public transport, including bus, train and ferry services.
 - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle).
 - c. Operating the roading network.
 - d. Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Urban development on greenfield land not previously developed for urban purposes generates transport effects, and needs transport infrastructure and services to support construction, land use activities and the communities that will live and work in these areas. AT's submission seeks to ensure that the transport related matters raised by PC 118 are appropriately considered and addressed.
- 1.4 AT is available and willing to work through the matter raised in its submission with the applicant.
- 1.5 AT is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

2. Submission

- 2.1 AT **oppose in part** PC 118 to rezone approximately 31.5 ha of Future Urban Zone land to Business – Light Industry Zone. This submission is made to ensure that AT's interest

¹ Local Government (Auckland Council) Act 2009, section 39.

is appropriately addressed. While AT is not opposed in principle to the rezoning, AT has concerns with the plan change for the reasons outlined below.

Campana Road Upgrade

- 2.2 AT has concerns with the existing form of Campana Road, which remains a rural standard road and is not suitable to accommodate the urbanisation of land enabled by the PC 118. AT believes that the applicant's proposed trip generation thresholds do not provide a reliable mechanism to deliver upgrades to Campana Road. Subdivision or development of adjoining land, rather than traffic volumes, should trigger the delivery of upgrades to ensure that the road is constructed to an appropriate urban standard.
- 2.3 AT considers that these upgrades should be incorporated into the Precinct provisions, rather than left to be addressed at the resource consent stage. While a section of Campana Road is expected to be upgraded as part of an approved resource consent (BUN60415270), relying solely on individual resource consents will not ensure a consistent and coordinated urban standard road through the Precinct.
- 2.4 AT seeks that the Precinct provisions be amended to require Campana Road to be upgraded to an urban standard, including delivery of a full carriageway. This is necessary to achieve a safe and efficient urban road that supports the development, and anticipated volume of traffic, enabled by PC 118.

Transport Modelling

- 2.5 AT has concerns that the applicant's transport modelling does not accurately reflect current or future conditions on Campana Road and the wider Puhinui Road / State Highway 20B (**SH20B**) corridor. AT has reviewed the transport modelling for PC 118, as documented in the Traffic Memo (dated 6 October 2023) and Clause 23 Addenda, and identified several issues that affect the robustness of the assessment in evaluating transport effects.
- 2.6 In particular, the surveyed traffic volumes applied to Puhinui Road during the PM peak appear to underestimate actual demand. Sydney Coordinate Adaptive Traffic System (**SCATS**) detector counts (dated 26 March 2025) record eastbound flows of approximately 1,400 vehicles per hour, compared to 1,000 vehicles per hour assumed in the applicant's modelling. AT also notes that the modelled signal phase splits allocate the highest green time to the Campana South and North approach, due to higher traffic volumes input into the model, which is not accurate. SCATS data indicates that the SH20B east-west movement, as the designated priority corridor, receives greater green time in practice currently and will in the future.
- 2.7 It is important that the traffic scenarios used for the transport memo are based on accurate information to inform a robust assessment of transport effects. This should include future traffic associated with the Auckland Airport expansion, seasonal peak variation and the Airport to Botany rapid transport corridor along SH20B, which may influence operational performance and interactions with the wider network. AT considers it essential that the applicant updates the transport modelling to reflect current and future conditions, and address any issues identified through appropriate mitigation measures. These mitigation measures should be incorporated into the Precinct provisions to ensure safe and efficient operation of the network.

3. Decision Sought

3.1 AT seeks the following relief:

- a. Update the transport modelling to accurately reflect current and future conditions, and amend the PC 118 Precinct provisions to include any appropriate mitigation measures; and | 12.1
- b. Amend PC 118 Precinct to include a provision for the upgrade of Campana Road to an urban standard. | 12.2

3.2 In cases where amendments to the plan change are proposed, AT would consider alternative wording or amendments to like effect, which addresses the reason for AT's submission. AT also seeks any consequential amendments required to give effect to the amendments and decision requested.

4. Appearance at the hearing

4.1 AT wishes to be heard in support of this submission, subject to the outcome of any discussions with the applicant prior to the hearing.

4.2 If others make a similar submission, AT will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:



Patrick Buckley
Manager, Spatial Planning Policy Advice

Date: 5 September 2025

Contact person: Emeline Fonua
Planner, Spatial Planning Policy Advice

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 09 930 5001 ext. 2418

Email: spatialplanning@at.govt.nz

**Submission by CAHA Farms Limited on
Private Plan Change 118 – Puhinui Precinct**

To: Auckland Council
Unitary Plan Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Submitter: CAHA Farms Limited

Background:

- a. This submission is made by CAHA Farms Limited (CAHA) to Auckland Council in respect of Proposed Plan Change 118 (PPC118) to the Auckland Unitary Plan by the Campana Land Owners Consortium (the 'Applicant').
- b. CAHA is the owner of a 10.5215 ha property located at 55 Prices Road, Puhinui, live zoned Business – Light Industry.
- c. CAHA is opposed to PPC118 due to their concerns in relation to traffic impacts and wastewater infrastructure constraints.
- d. CAHA confirms they will not gain an advantage in trade competition as a result of this submission.
- e. This submission is self-prepared by CAHA.

Reasons for CAHA Submission:

Traffic Impacts:

1. CAHA is concerned PPC118 will permit activities on the Applicant's land likely to generate high traffic volumes that will, in turn, cause disruption and congestion in the Puhinui Precinct roading network, which is already significantly limited as to capacity.
2. The additional traffic volumes PPC118 will generate, are likely to reduce the ability of existing live zoned land in the area to be developed in an efficient and sensible manner, potentially resulting in existing live zoned land not being developed to its full capacity.
3. CAHA does not consider this to be an efficient use of the already scarce industrial zoned land resource in the Auckland region.

Infrastructure Constraints:

4. CAHA is concerned PPC118 will consume a significant part of the remaining capacity in the Southwestern Interceptor wastewater reticulation system, negatively impacting on the ability to develop existing live zoned areas in the Puhinui Precinct.
5. If PPC118 is allowed to proceed, existing live zoned land may not be able to be developed to full capacity or result in land being developed in an inefficient and/or out of sequence manner.

Summary:

6. CAHA Farms consider the promotion of PPC118 to be in advance of when appropriate infrastructure will be available and will limit the ability of existing live zoned land to be developed in an efficient and sensible manner.

Relief Sought:

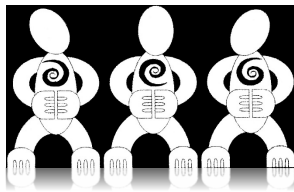
7. CAHA seeks the following relief from Council:
 - a. Decline PPC118
8. Alternatively, if Council elects to approve PPC118, Council should impose the following conditions:
 - a. Identify the roading infrastructure upgrades required to support the additional traffic generated from development of the Applicant's land and impose staging thresholds on the Applicant's land such that development on the Applicant's Land does not occur until the required traffic infrastructure upgrades are constructed and operational. 13.1
 - b. Similarly, prevent development on the Applicant's land from occurring until sufficient wastewater capacity to service all existing live zoned land in the Puhinui Precinct and the Applicant's land is available and operational. 13.2

CAHA Farms Limited would be pleased to present in person to any hearing in relation to their submission on PPC118.

5 September 2025

Address for Service:

Tony Buttimore
tonybutts1@gmail.com



**Te Ākitai Waiohū
Waka Taua
Incorporated**

5 September 2025

Submission on proposed plan changes

Clause 6 of Schedule 1, Resource Management Act 1991

Form 5

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

1. Submitter Details

Name of submitter: Te Ākitai Waiohū Waka Taua Incorporated (**Te Ākitai Waiohū**)

This is a submission on the following proposed plan changes to the Auckland Unitary Plan (Operative in Part):

- Proposed Plan Change 118 (PC118)

Te Ākitai Waiohū could not gain advantage in trade competition through this submission. In any event, Te Ākitai Waiohū is directly affected by effects of the subject matter of the submission that:

- a) Adversely affect the environment; and
- b) Do not relate to trade competition or the effects of trade competition.

2. Introduction

The Puhinui region is of fundamental significance to the people of Te Ākitai Waiohū because it is an ancient area of occupation from time immemorial through to the present day. Given the fertile soils of the region, much of the land was suitable for cultivating food and other materials for medicine and weaving. The coastal location and numerous waterways made it an ideal location for fishing and gathering kaimoana (seafood). The broader region is also a key transport route with open access to the Manukau Harbour from the various creek estuaries and craters that sit further inland.

The Puhinui area is recognised to be culturally significant because of the relationship and associations of the people of Te Ākitai Waiohū and their culture and traditions with their ancestral land and waters.

The area of Puhinui includes the marae and papakāinga at Pūkaki on the northern bank of the Waokauri Creek where Te Ākitai Waiohū currently reside, as well as a raft of historical and spiritual sites and places, including pa and settlement sites, the strategic portage route through

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Auckland 2151

Mobile 021 167 5999
Email: akitai.waka.taua@gmail.com

Waokauri Creek to the Tāmaki Estuary, and extensive areas of cultivation, including the Matukutūreia stonefields.

In addition, there are a number of prominent natural features, including Te Pūkaki Tapu o Poutūkeka (Pūkaki Crater), Ngā Kapua Kohuora (Crater Hill), Matukutūruru and Matukutūreia. These features, combined with the network of streams and creeks and the relationship between land and sea, form part of the Māori cultural landscape of Te Ākitai Waiohūa at Puhinui.

Te Ākitai Waiohūa consider the Puhinui area as taonga, with the water, coast and landforms being interrelated. The physical and spiritual wellbeing of tangata whenua continues to be linked to their ancestral lands and waterways. There is an enduring physical and spiritual connection with ancestral lands and wāhi tapu and other taonga and those of their tupuna.

3. Puhinui Precinct

As part of the analysis of this area, and as part of the Puhinui Structure Plan work, an assessment of the cultural landscape values for Puhinui has been undertaken by the Council in partnership with Te Ākitai Waiohūa to spatially identify the Māori cultural landscape.

The Māori cultural landscape is a key reason for the Puhinui Precinct, and it is proposed to apply across the entire precinct. To address potential adverse effects on the identified cultural landscape values the following provisions are proposed:

- a) Objectives to set out the outcomes for Māori cultural landscapes;
- b) Policies that identify the cultural landscape values and the methods to avoid, remedy or mitigate potential adverse effects;
- c) Rules and related assessment criteria to manage adverse effects on Māori cultural landscape values including:
 - (i) Retention of intermittent and permanent streams;
 - (ii) 50m coastal protection yard along the southern banks of the Waokauri Creek;
 - (iii) Minimum requirements for riparian planting of 10m adjoining streams and 20m adjoining
- d) the coastal edge;
- e) (iv) Stormwater management to address quality and flows; and
- f) (v) Protection of the local view shaft from Pūkaki Marae to Matukutūreia.
- g) Special information requirements for cultural impact assessments for resource consents that may adversely affect cultural landscape values;
- h) The following precinct plans are proposed to support the cultural landscape provisions:
 - (i) Māori cultural landscape values map to spatially identify the cultural landscape values;
 - (ii) Map of intermittent and permanent streams to be retained; and
 - (iii) Map of the view shaft from Pūkaki Marae to Matukutūreia.

The proposed cultural landscape provisions give effect to the Regional Policy Statement (RPS) Chapters 5.2 and 5.4 relating to mātauranga Māori and Māori cultural landscapes and achieve the sustainable management purpose of section 5 of the Resource Management Act (RMA) in accordance with the other Part 2 matters (section 6(e), section 7(a) and section 8). Recognising and providing for the Māori cultural landscape at Puhinui whilst enabling urban development is important for the identity and wellbeing of Te Ākitai Waiohūa.

Cultural landscape maps form the basis of the identification of the Māori Cultural Landscape of Te Ākitai Waiohūa at Puhinui. The cultural landscape mapping process spatially identifies

the cultural landscape values as expressed by Te Ākitai Waiohūa and demonstrates the rich cultural context and how the iwi relate to the land within the area of Puhinui.

Wai Tai / Wai Māori

The protection of freshwater and mauri of freshwater is a key priority for kaitiaki. For Te Ākitai Waiohūa, the wai (water) is an inseparable part of our whakapapa and our identity and is a fundamental part of what drives our very existence. The future health and wellbeing of our waters are a matter of utmost importance to Te Ākitai Waiohūa, and action is required to protect, restore and maintain the health and mauri of our waterways, stop further degradation and loss and reverse past damage.

Genuine partnership in water governance and planning is sought to give effect to Te Ākitai Waiohūa customary dominion (ownership) of freshwater within their rohe. Te Ākitai Waiohūa have an intergenerational responsibility to future-proof this natural resource for future generations. Te Ākitai Waiohūa assert that the mauri of wai must be maintained as a resource management priority throughout their rohe, and that the traditional and contemporary relationship between Te Ākitai Waiohūa and freshwater resources be maintained.

4. Consultation with Te Ākitai Waiohūa

Submission

Genuine efforts have been made to consult with Te Ākitai Waiohūa in good faith throughout the development of the plan change. Information has been shared, opportunities provided for feedback, and changes made to precinct provisions in response to feedback.

Relief

Te Ākitai Waiohūa requests ongoing engagement throughout the plan change process in the event of any amendments proposed to the precinct provisions to address submissions.

5. Precinct provisions

Submission

Input to the plan change process has ensured that the relationship and associations of Te Ākitai Waiohūa with the whenua, moana and awa are acknowledged and protected through precinct provision. Te Ākitai Waiohūa supports those precinct provisions that address cultural values.

Specific precinct provisions include:

- I432.1 Precinct description recognition of the importance of Waokauri Creek and its tributaries as significant to Te Ākitai Waiohūa.
- I432.3 Objectives and policies (sub-precinct C & C1) - Objectives 1 and 4; and Policies 1, 4, 5, and 6, including maintenance or enhancement of Māori cultural landscape values.
- Rule I432.4.1(A1) reclamation of intermittent and permanent streams as a non-complying activity.
- Rule I432.4.1(A13a) earthworks as a restricted discretionary activity to protect cultural landscapes and archaeology.

14.1

- Standard I432.6.3 yards in particular a coastal protection yard to protect cultural landscapes and archaeology.
- Standard I432.6.4 Landscaping to screen buildings from Pūkaki marae and Crater Hill.
- Standard I444.6.7 Archaeological Management Plan.
- Standard I444.6.8 Stormwater treatment.
- Matters of discretion I432.8.1(9) for earthworks in the Campana Road Structure Plan area.
- Assessment criteria I432.8.2(9) Earthworks in the Campana Road Structure Plan area.
- I432.10.5 Precinct Plan 6 – Campana Road Development Plan.

14.1

Relief

1. Te Ākitai Waiohū seeks that the provisions outlined above are retained as notified unless specified below.
2. Amend Policy 1 because it doesn't make sense as currently worded.

(1) Enable the provision for open space and passive recreation activities appropriate to the coastal environment where Sub-precinct C1 adjoins and the cultural significance of this location.

14.2

3. Amend Rule I432.4.1(A1) reclamation of intermittent and permanent streams not identified on precinct plan 2 to be a discretionary activity.
4. Amend Standard I432.6.4.4 to replace 'Crater Hill' with "Nga Kapua Kohuora".

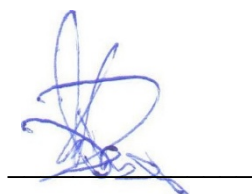
I seek the following decision by Council: The plan change be amended.

I wish to be heard in support of my submission.

6. Address for Service

Te Ākitai Waiohū Waka Taua Incorporated
C/- Karen Wilson
PO Box 59185
Mangere Bridge
Auckland 2151

Email: akitai.waka.taua@gmail.com



Contact: Nigel Denny
Date: 5 September 2025

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 118 - Heritage New Zealand Pouhere Taonga
Date: Friday, 5 September 2025 5:30:19 pm
Attachments: [_HNZPT submission on PPC118_final.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Heritage New Zealand Pouhere Taonga

Organisation name:

Agent's full name:

Email address: infonorthern@heritage.org.nz

Contact phone number: 0272921445

Postal address:

Auckland City
Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 118

Plan change name: PC 118 (Private): Puhinui Precinct

My submission relates to

Rule or rules:
Please see attached

Property address: Please see attached

Map or maps: Please see attached

Other provisions:
Please see attached

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Please see attached

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: see attached

Submission date: 5 September 2025

Supporting documents
[_HNZPT submission on PPC118_final.pdf](#)

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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5 September 2025

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PPC 118 (PRIVATE): PUHINUI PRECINCT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga ("HNZPT")

1. HNZPT is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 ("HNZPTA") for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.
2. Heritage New Zealand could not gain an advantage in trade competition through this submission.
3. The protection of historic heritage from inappropriate subdivision, use and development is identified as a matter of national importance under Part 2 Section 6(f) of the Resource Management Act 1991 (RMA).
4. Private Plan Change 118 involves rezoning rural land at 5, 10 and 11 Campana Road, and 467 and 485 Puhinui Road, Papatoetoe from future urban zone to active urban development zones.
5. The private Plan change area is within a coastal location with a rich history of Māori settlement, occupation and . There are many archaeological features already recorded and/or destroyed in this location and its surrounds.

Heritage New Zealand's submission is:

6. HNZPT is concerned that development enabled by the proposed plan change could have adverse effects on historic cultural heritage, in particular archaeology both recorded and unrecorded.
7. The HNZPT Act provides a process to regulate activities that may affect archaeological sites, defined as any place associated with human activity prior to 1900 that through investigation by archaeological method may provide evidence on the history of New Zealand. It is an offence to modify or destroy an archaeological site without an archaeological authority from HNZPT irrespective of whether the works are permitted, or a consent has been issued under the RMA

The reasons for Heritage New Zealand's position are as follows:

8. Archaeology

- 8.1. *Archaeological Assessment Campana Road Plan Change report to Captstone Projects, CFG Feb 2025* Identifies three recorded shell midden sites located inside the plan change area (R11/2855, R11/1111, R11/1112) visible from the creek banks, and shell and stone flakes



were scattered across the market gardens and ploughed fields, as well as in the mudflats along the creek.

8.2. Exploratory archaeological investigation was conducted under authority 2024/581 issued by HNZPT to characterise the nature, extents and significance of these sites, prior to implementation of a plan change and to inform potential protection. Their results identified, twelve storage pits located and recorded across both sites, (seven at R11/1111 and five at R11/2855) all found across areas of slightly higher ground. Several other features were located, including ten postholes and one firescoop at R11/1111. Indicating the presence of structures. Cooking was occurring alongside food consumption and storage at both R11/1111 and R11/2855.

8.3. The assessment notes R11/1111, R11/1112 and R11/2855 and R11/3513 as connected to the wider Waokauri Creek landscape and could provide important information regarding pre-European and historic Māori occupation of South Auckland and recommends the identified extents of these sites be incorporated into sub-precinct C1 providing for open space and recreation activities protecting these sites from future development.

15.1

8.4. HNZPT supports this recommendation, noting any future coastal walkway should be designed to minimise effects on the sites, noting also the potential for further unidentified subsurface sites to be located within sub-precinct C1.

8.5. Further, HNZPT considers it appropriate for provisions to be included in the plan requiring consideration of appropriate interpretation of the archaeological and cultural values to further enhance social and public amenity values of the sites.

8.6. Accordingly, HNZPT considers any works for amenity/public and or ecological enhancement (such as walkways, planting, interpretation etc) should be subject to further archaeological assessment to minimise modification to sites and to inform archaeological requirements under the HNZPTA 2014.

15.2

8.7. HNZPT notes the assessment further indicates the presence of historic material (Bricks, ceramic fragments) in an area of dense scrub located in the south-eastern corner of at 485 Puhinui Road, which may be indicative of 19th or 20th century historic occupation.

8.8. Given the references to historic 19th and 20th century pastoral farming activities in this area, further archaeological assessment is required to determine the time frame and nature of heritage values associated with this material, and to inform appropriate mitigation, including protection, interpretation, as part of the plan change, alongside identification of archaeological authority requirements as may be required under the HNZPTA 2014.

15.3

8.9. The assessment further identifies investigation as identifying features as concentrated in areas of slightly higher ground, likely taking advantage of the better drainage, noting it is probable that further unrecorded shell midden, fire features, postholes, and storage pits may be located beneath the plough zone in areas that were not trenched on high ground and along the creek banks (Arrell & Campbell CFG Heritage Ltd 2025: 21).

HNZPT concurs It is highly probable that further archaeological sites/ features will be present in both Subprecinct C1 and C any works that have potential for modification or destruction of sites within these areas are best managed through the provisions of the Heritage New Zealand Pouhere Taonga Act 2014.



- 8.10 Further, any evaluation of archaeological values should include use of HNZPT national accepted criteria for the assessment of effects on archaeological values and not solely that of the AUP as is presented in the current assessment, so as to enable efficient use of documentation for both RMA and HNZPTA purposes.

9. Cultural Heritage

- 9.1. HNZPT notes that consultation has been initiated and supports meaningful engagement with all iwi who identify as having associations with this area.

10. Historic Heritage Management Plan

- 10.1 HNZPT supports the following proposed objectives and policies:

- Proposed Sub-precinct C & C1 objective (4) – *the cultural heritage values of the Waiokauri Creek and Māori cultural landscape are maintained and enhanced.*
- Proposed Sub-precinct C & C1 policy (4) – *Avoid earthworks within extents of protected archaeological sites and manage earthworks through the wider sub-precincts C & C1 to avoid, remedy or mitigate adverse effects on archaeological values and the Māori cultural landscape values.*
- Proposed Sub-precinct C & C1 policy (6) – *Require development to avoid where practicable or minimise the impacts of land disturbance on cultural, heritage and ecological values while enabling light industrial activities.*
- Proposed I432.6.4(4) – *Proposed buildings within sub-precinct C must, at the time of construction, be screened from Pukaki Marae and Crater Hill with landscape planting in accordance with a landscape concept prepared in consultation with mana whenua.*
- Proposed Assessment Criteria I432.8.2(9) – *Earthworks in the Campana Road Structure Plan area*

15.1

- 10.2 We suggest amending 'Archaeological Management Plan' to 'Historic Heritage Management Plan'. An archaeological Management plan as identified below forms part of the conditions of an archaeological authority under the HNZPTA 2014 which focuses specifically on effects on archaeological values. A historic heritage Management plan however provides for consideration of a wider ambit of heritage matters and outcomes as might be provided for under the RMA and avoids conflicting with those that have been imposed in respect of an Archaeological Authority,

15.2

- Proposed I444.6.7 Archaeological Management Plan – *As part of the first stage of development within sub-precinct C, an Archaeological Management Plan must be prepared by an archaeologist, in consultation with mana whenua, council and Heritage New Zealand Pouhere Taonga.*

Heritage New Zealand seeks the following decision from the local authority:

- 11 That any approval of Private Plan Change 118 address the matters discussed in Sections 6-10.2 of this submission.
- 12 HNZPT does wish to be heard in support of this submission.
- 13 If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.



Yours sincerely

B Parslow

Bev Parslow
Director Northern Region

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Form 5

Submission on the Proposed Plan Change 118

To: Auckland Council

Name of Submitter: The Self Trust

Address for Service: C/- CivilPlan Consultants Limited
PO Box 97796
Manukau City
Auckland 2241

Attn: Emma Bayly

Telephone: (09) 222 2445

Email: emma@civilplan.co.nz

This is a submission on Plan Change 118 (Private) ("the proposal").

The submitter is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 ('RMA').

1. Specific provisions of the proposal that this submission relates to

This submission relates to the change of zoning of the subject land from Future Urban Zone to Business – Light Industry and the introduction of sub-precincts C and C1 to the Puhinui Precinct.

2. Submission

The submitter owns land at 286 Portage Road, Mangere, to the north of the proposed plan change area on the opposite side of the Waiokauri Creek. The submitter's landholding incorporates Crater Hill and is primarily zoned Rural-Rural Production zone, with part of the site being Special Purpose – Quarry zone.

The submitter is neutral with respect to whether the proposed plan change is confirmed or refused. However, if the Council is mindful to approve the plan change, the submitter supports the inclusion of the following key policies and rules that manage the visual and amenity effects of industrial development in the plan change area on the surrounding environment, including the rural environment of the submitter's landholding. These include:

- Sub-precinct C and C1 objectives 1 and 2
- Sub-precinct C and C1 Policies 1 and 3
- Rule I432.6.4(4) which requires buildings to be screened from Crater Hill with landscape planting.

3. Relief Sought

The submitter requests the following relief:

- a) That if the plan change is confirmed, the proposed precinct provisions that manage visual and amenity effects on the surrounding environment are retained, including:
 - i) Sub-precinct C and C1 objectives 1 and 2
 - ii) Sub-precinct C and C1 Policies 1 and 3
 - iii) Rule I432.6.4(4) which requires buildings to be screened from Crater Hill with landscape planting.
- b) Any additional or consequential relief to address the concerns of the submitter
- c) Any alternative relief to address the concerns of the submitter.

16.1

The submitter does not wish to be heard in support of its submission.

Signature:


.....
Emma Bayly - Associate, CivilPlan Consultants Ltd
on behalf of The Self Trust

Date: 5 September 2025

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SUBMISSION ON A NOTIFIED PLAN CHANGE¹ – PC 118 (Private): Puhinui Precinct

To: **Auckland Council**
Unitary Plan Private Bag 92300
Auckland 1142
Attention: Planning Technician
By email: unitaryplan@aucklandcouncil.govt.nz

Submitter: Airface Limited

1. INTRODUCTION

- 1.1 This is a submission on Proposed Plan Change 118 (Private) – Puhinui Precinct to the partly operative Auckland Unitary Plan (“AUP”) – the Proposal.
- 1.2 The Submitter could not gain an advantage in trade competition through this submission. However, and in any event²:
- (a) The Submitter is directly affected by an effect of the Proposal; and
 - (b) This effect does not relate to trade competition or the effects of trade competition.
- 1.3 The Submitter owns and is in the process of developing 440 Puhinui Road. This land is subject to the additional controls of the Puhinui Precinct (AUP Chapter I432) and Sub-Precinct C.

2. SPECIFIC PROVISIONS OF THE PROPOSAL THAT THE SUBMISSION RELATES TO

- 2.1 This submission relates to the entire Proposal.

3. SUBMISSION

- 3.1 The entire proposal is problematic and should be declined for the following reasons.

¹ Clause 6 of Schedule 1 to the Resource Management Act 1991.

² in the event that it is alleged that a trade competition advantage could be obtained

Traffic effects

- 3.2 The integrated transport assessment filed with the proposal is incorrect and manifestly inadequate as it does not properly assess the likely average and peak traffic flows from the range of activities enabled by the Proposal. In broad terms:
- (a) The text of proposed new Standards I432.6.1.2(4)(b) and Standard I432.6.1.2(5) are unclear and does not appear to be effective in achieving the outcomes it seeks to achieve. 17.1
 - (b) Assumptions applied to calculate vehicle trips associated with sub-Precinct C activities appear incorrect, and/or inconsistent with generally accepted figures applying to the local area. 17.2
 - (c) The location proposed by PC118 has sub-Precinct E (north) immediately adjacent to SH20B Puhinui Road does not meet the intent of sub-Precinct E. 17.3
 - (d) The assessment of effects taking into account 'baseline environment' has failed to make reference to consents and the full range of permitted activities from sub-Precinct D, or the 1,035 trips threshold. 17.4
 - (e) The Proposal does not specify any wider network upgrades to support development enabled by the plan change from the outset and the key intersection for access to the site is unlikely to be achieved within the space provided installed at an appropriate time. There are insufficient controls / assessments required where access is provided by way of other access points into the land. 17.5
 - (f) Traffic modelling has not taken into account recent developments and unimplemented resource consents. 17.4
 - (g) A sufficient range of intersections have not been modelled in order to properly understand the effects of the Proposal. 17.4
- 3.3 Given the present framework of specific objectives, policies, standards and other provisions in the Puhinui Precinct, the additional traffic would have adverse impacts on Airface and the traffic coming to and exiting from its site in the context of existing and enabled activities. The traffic assessment also relies on infrastructure upgrades that are either not fully consented and/or are unfunded.

Infrastructure effects

- 3.4 The Proposal is inconsistent with the timing set out in the Future Development Strategy and would have wider effects on infrastructure demand that cannot presently be met and/or would have impacts on other users of local and transmission infrastructure such as Watercare's infrastructure. 17.6

Planning hierarchy

3.5 As a result of the foregoing, the Proposal would have material adverse environmental effects and is inconsistent with:

- (a) The Regional Policy Statement particularly relating to the efficient provision and use of infrastructure;
- (b) The Future Development Strategy;
- (c) Other provisions of the AUP contained in Chapters A, C, E26 and E27 and H17, particularly relating to the efficient provision and use of infrastructure; and
- (d) Part 2 of the Resource Management Act 1991.

4. RELIEF SOUGHT

4.1 For the foregoing reasons, the Submitter seek the following outcome in relation to PC118:

- (a) Decline the Proposal in its current form; or
- (b) Amend the proposal so that required infrastructure upgrades are provided prior to development and that the scale of development enabled is linked to the capacity of infrastructure capable of supporting it; and/or 17.6
- (c) Amend the Proposal and the provisions of the Precinct Plan by removing the provisions within I432.6.1. Transport (and any other associated provisions) so that those provisions do not exist anywhere in the Precinct and do not apply to sub-precincts, C, D or E; and/or 17.1
- (d) Such further or other consequential relief as may be necessary to give full effect to the issues raised, submission points set out and relief sought in this submission.

4.2 The Submitter wishes to be heard in support of this submission.

4.3 If others make a similar submission, the Submitter will consider presenting a joint case with them at hearing.

DATED at **AUCKLAND** this 5th day of September 2025



A W Braggins
Counsel for the Airface Limited

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