

# **AUCKLAND UNITARY PLAN OPERATIVE IN PART**

## **PROPOSED PLAN CHANGE 123 (Private)**

### **Franklin 2 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 5pm on 22 May 2026.
- 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 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
1	1.1	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Do not extend Business – Local Centre Zone boundary beyond Puhitahi Hill Road so that land beyond this boundary retains its residential zoning and associated amenity protections.
1	1.2	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request a maximum building height of no more than two storeys within Business – Local Centre and Business – Mixed Use zones where sites adjoin residential land.
1	1.3	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request interface controls where business zoning adjoins residential land, including: upper-storey setbacks and step-downs; screening and building design measures to avoid overlooking; and controls on building bulk and massing at zone boundaries.
1	1.4	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request controls to manage non-residential operational effects at residential interfaces, including: noise limits appropriate to residential environments; restrictions on excessive external lighting and light spill; and management of hours of operation.
1	1.5	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request waste storage, waste collection, servicing areas and service vehicle access for business-zoned sites are internally located or orientated away from residential boundaries and not located at, or directly adjacent to, the residential–business zone boundary, including along Puhitahi Hill Road.
1	1.6	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request the protection of streams, waterways, riparian margins, and overland flow paths including: retention and strengthening of setbacks; protection of riparian corridors; and controls to avoid adverse effects on water quality, flood risk, and ecological values.
1	1.7	PDH Chanson & A Chanson	<a href="mailto:David_chanson@hotmail.com">David_chanson@hotmail.com</a>	Request safe and connected pedestrian and cycling infrastructure including: separated walking and cycling paths; safe crossing points; traffic calming at residential interfaces; and strong connections to Paerata Station and local centres.
2	2.1	Hossein Hadi Najafabadi	<a href="mailto:hhad225@aucklanduni.ac.nz">hhad225@aucklanduni.ac.nz</a>	Request traffic impact assessments, with particular attention to local residential roads within Paerata Rise that address increased density and business activity near the Paerātā Railway Station.
2	2.2	Hossein Hadi Najafabadi	<a href="mailto:hhad225@aucklanduni.ac.nz">hhad225@aucklanduni.ac.nz</a>	Request that (traffic) mitigation measures (including recommended mitigation measures from requested traffic impact assessments) be implemented where required to maintain safety and amenity (with particular attention to local residential roads within Paerata Rise).
2	2.3	Hossein Hadi Najafabadi	<a href="mailto:hhad225@aucklanduni.ac.nz">hhad225@aucklanduni.ac.nz</a>	Request improvements to walking and cycling connections between residential areas, the station and local centres.
2	2.4	Hossein Hadi Najafabadi	<a href="mailto:hhad225@aucklanduni.ac.nz">hhad225@aucklanduni.ac.nz</a>	Request staged and timed infrastructure upgrades (transport, stormwater, and community facilities) to keep pace with development enabled by the rezoning.
2	2.5	Hossein Hadi Najafabadi	<a href="mailto:hhad225@aucklanduni.ac.nz">hhad225@aucklanduni.ac.nz</a>	Maintain strong urban design outcomes to ensure new development integrates well with surrounding residential neighbourhoods.
3	3.1	Sarah McDowall	<a href="mailto:sarahmcdowall@me.com">sarahmcdowall@me.com</a>	Support the plan change.
4	4.1	Rachel Hughes	<a href="mailto:rachel811518@gmail.com">rachel811518@gmail.com</a>	Support the plan change.
5	5.1	Hayden Cargo	<a href="mailto:clutchhtown@gmail.com">clutchhtown@gmail.com</a>	Support the plan change.
6	6.1	Rosalie McFarlane	<a href="mailto:rmac@slingshot.co.nz">rmac@slingshot.co.nz</a>	Support the change in retail and commercial areas being located in the northern and southern areas of Paerata Rise.

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
6	6.2	Rosalie McFarlane	<a href="mailto:rmac@slingshot.co.nz">rmac@slingshot.co.nz</a>	Do not support intensification of the residential area near the Paerata Train Station, particularly 4 storey building heights.
6	6.3	Rosalie McFarlane	<a href="mailto:rmac@slingshot.co.nz">rmac@slingshot.co.nz</a>	Ensure that Wesley College continues to operate and redevelop as needed and retain its place in the heart of the subdivision.
7	7.1	Lara Cargo	<a href="mailto:larahfcargo@gmail.com">larahfcargo@gmail.com</a>	Support the plan change.
8	8.1	Corvus Karaka Ltd	<a href="mailto:russell@rdbconsult.com">russell@rdbconsult.com</a>	Rezone properties at 673 Karaka Road,675 Karaka Road,677 Karaka Road,679 Karaka Road and 683 Karaka Road from Residential - Mixed Housing Urban (MHU) to [Business-] Local Centre zone
8	8.2	Corvus Karaka Ltd	<a href="mailto:russell@rdbconsult.com">russell@rdbconsult.com</a>	Amend Proposed Precinct Rule IXXX.6.13 Vehicle Access to SH22 (to provide limited but no specific number of direct vehicle access/egress points to SH22).
9	9.1	AV2023 LTD	<a href="mailto:khar@xtra.co.nz">khar@xtra.co.nz</a>	Defer the Plan Change until infrastructure capacity is independently verified, or otherwise only approve the Plan Change with provisions stating that additional development rights cannot be exercised until infrastructure capacity are demonstrably available to all affected landowners.
9	9.2	AV2023 LTD	<a href="mailto:khar@xtra.co.nz">khar@xtra.co.nz</a>	Defer the Plan Change until access availability is independently verified, or otherwise only approve the Plan Change with provisions stating that additional development rights cannot be exercised until access connections are demonstrably available to all affected landowners.
10	10.1	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	[Inferred] Amend the reporting to adequately demonstrate whether an appropriate basis has been used in relation to the development enabled by the proposed plan change.
10	10.2	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 reporting to adequately demonstrate that the proposed zoning and precinct provisions are the most appropriate way to achieve AUP objectives.
10	10.3	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 reporting to adequately demonstrate that adverse effects (particularly cumulative traffic and infrastructure effects) are appropriately avoided, remedied, or mitigated.
10	10.4	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 reporting to adequately demonstrate that geotechnical risks are appropriately remedied or mitigated.
10	10.5	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 (scale and significance of effects) assessment [of affected persons] from low to medium.
10	10.6	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 (scale and significance of effects) assessment of degree of impact on, or interest from iwi/Māori from low to medium.
10	10.7	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the Section 32 (scale and significance of effects) assessment of the geographic scale of impacts from low to medium.
10	10.8	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	[Inferred] Ensure adequate provision is made for affordable / community housing.

**Plan Change 123 (Private) - Franklin 2 Precinct**

**Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
10	10.9	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Provide further economic assessment on yield considering: Fisher and Paykel Healthcare's Plan Change 121 Karaka Road Precinct; Sunfield development which is about to receive fast-track approval (Expert Panel released draft decision to approve on 11 February 2026); Plan Change 124 - Pukekohekohe Gateway Precinct, which is also out for public submission; and updated yield plans for Hingaia / Park Green, Drury South, and Auranga.
10	10.1	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that urban intensification is subject to confirmed infrastructure capacity.
10	10.11	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Amend the proposal to adequately address stated high risk geotechnical matters in the applicant's geotechnical report (matters being liquefaction and lateral spreading, consolidation settlement, expansive soil, slope instability, groundwater intersect and multiple flood plain and overland flow paths).
10	10.12	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure subdivision does not occur ahead of necessary transport infrastructure.
10	10.13	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Demonstrate that the proposal's effects on rural/low-density character, landscape values, residential amenity, privacy and noise environment are avoided or appropriately mitigated in accordance with requirements under AUP amenity and character provisions.
10	10.14	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon: confirming funding and physical delivery of water, wastewater, stormwater and transport infrastructure.
10	10.15	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon the provision of] updated and independently reviewed traffic modelling.
10	10.16	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon [the provision of] updated and independently reviewed housing yields in the Franklin / Papakura area.
10	10.17	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional [upon the provision of an] updated and independently reviewed economic assessment [covering the period] from the mid-2024 date of economic plan change report [to the present date].
10	10.18	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon [the provision of] solutions/mitigation to the high risks identified in the applicant's ENGEO geotechnical report.
10	10.19	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon reduced [residential] density and/or scale to align with infrastructure capacity.
10	10.20	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon confirming that community housing providers or builders that build specifically to actual housing need e.g. elderly, disability peoples, Māori housing, first home buyer models, are part of the applicant's future procurement process

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
10	10.21	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon evidence being provided of an authentic engagement plan, its implementation, and outcomes with its current residents/households.
10	10.22	Navigator Limited	<a href="mailto:peter.faafiu@navigator.kiwi.nz">peter.faafiu@navigator.kiwi.nz</a>	Ensure that the development is strictly staged and conditional upon progressive procurement approaches being taken by the applicant that align with the values and housing and economic outcomes of their parent entity, the Methodist Church of Aotearoa New Zealand.
11	11.1	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Confirm the occupancy / vacancy rates of the 311 approximately dwellings assumed to form the basis of the 0.58 trips per dwelling. . confirm whether the assessment has considered upgrades to SH22 not being carried out, and need for alternative transport threshold triggers or consideration of effects, and determine compliance with the transport threshold triggers, pay for reporting or upgrades necessary (i.e. if they are dwelling no. 1,200, etc.).
11	11.2	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide further assessment on the adequacy of the trip rates applied specific to the likely transport behaviour and use to the precinct, or further justification of the rates previously applied for the Golding Meadows Private Plan Change.
11	11.3	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide further rationale for the car vs public or active transport assumptions.
11	11.4	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide details on the anticipated job creation within the development and uptake by residents
11	11.5	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide an analysis of development changes since 2014 that could impact on assumptions, including but not limited to the National Environmental Standards for Detached Minor Residential Units and changes to the Building Act 2016.
11	11.6	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide an update on commercial trip rates based on more up to date guidance, including the updated TS00085 V1.1 NSW Guide to Transport Impact Assessment and the draft Auckland Transport's 2025 ITA Guidelines.
11	11.7	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide further details on the assumed mix of commercial and confirm whether it is purely based on the changes to the Local Centre Zone, or whether it has accounted for the Mixed Use Zone.
11	11.8	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Confirm whether the ITA has assumed high trip-attractor or conservative trip-attractor rates for retail and commercial scenarios.
11	11.9	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Provide a sensitivity test for a more conservative scenario that does not apply trip reductions for internal capture and multi-purpose trips to assessment potential impacts on the transport network
11	11.10	NZ Transport Agency Waka Kotahi (NZTA)	<a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>	Clarify the impact of increased commercial trip movements on the Drury Interchange and the required staging of SH22 access improvements.

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
11	11.11	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Run a SATURN model with 1.2 trips per dwelling trip generation rates.
11	11.12	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Run a SIDRA analysis using revised future forecasts to ensure the access arrangements remain appropriate under PC123.
11	11.13	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Confirm whether the assessment has considered upgrades to SH22 not being carried out, and need for alternative transport threshold triggers or consideration of effects.
11	11.14	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Confirm how a single, once off owner or developer, will determine compliance with the transport threshold triggers, and pay for reporting or upgrades necessary (i.e. if they are dwelling no. 1,200, etc.).
11	11.15	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Remove Table IXXX.4.1 (A7)
11	11.16	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Replace Table IXXX.4.1 (A8) with: <u>Subdivision and development that triggers the thresholds set out in standard IXXX.6.5.1.</u>
11	11.17	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend IXXX.6.5 Purpose 1 with the following deletions and additions: The number of dwellings or residential lots in the Franklin 2 precinct must not exceed the numbers in the table below until the relevant access measure upgrade assessment has been undertaken to determine whether any of the specified access upgrade(s) is required <u>is constructed and operational.</u>
11	11.18	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend IXXX.6.5 Purpose 2 with the following deletions and additions: <u>If the A transport assessment may identify determines that an access measure upgrade(s) is not required or propose alternative timing and threshold for construction and operation, for consideration.</u> <del>it shall be constructed and be made operational prior to the number of dwellings or residential lots in the Franklin 2 precinct exceeding the threshold specified in Table IXXX6.5.1.</del>
11	11.19	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend IXXX.6.5 Purpose 3 with the following addition: For the purposes of this rule “dwelling” is a dwelling that has been granted building consent under the Building Act 2004 or <u>has notified Council that a dwelling is proposed that is exempt from building consent</u> , and residential lots where a section 224(c) certificate has been issued that creates additional vacant lots.
11	11.20	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 Access Measure (a) with the following deletion: <del>A transport assessment that assesses the potential additional effects and whether</del> (i) Upgrades to the existing accesses (Te Rata Boulevard, Puhitahi Hill Road, and Link Road) and/or (ii) the final access between Puhitahi Hill Road and Link Road is required.
11	11.21	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 Access Measure (a) threshold as follows: Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed <u>400 lots or 1,200 dwellings.</u>

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
11	11.22	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 Access Measure (b) with the following additions and deletions: A transport assessment that assesses the potential additional effects and whether there is a need for: (i) The upgrade(s) in Table IXXX.6.5.1(a) above; and (ii) <u>An upgrade of the SH22 Karaka Road / Sim Road intersection and associated Sim Road Upgrade.</u> <del>An upgrade of the SH22 Karaka Road / Sim Road intersection and associated Sim Road upgrade; and</del> (iii) <del>the timing and implementation of such upgrade(s) if assessed to be necessary.</del>
11	11.23	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 Access Measure (b) threshold as follows: Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed <u>850 lots or 2,500 dwellings.</u>
11	11.24	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 by adding an Access Measure (c) threshold as follows (the Access Measure itself to be confirmed once more assumptions and updated traffic modelling is carried out). <u>Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 1,300 lots or 3,900 dwellings.</u>
11	11.25	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Amend Table IXXX.6.5.1 Access Measure (d) once more information on assumptions and updated traffic modelling is carried out.
11	11.26	NZ Transport Agency Waka Kotahi (NZTA)	environmentalplanning@nzta.govt.nz	Oppose IXXX8.1 Matters of Discretion (1) on the basis that the matters of discretion only relate to the upgrades that are proposed, rather than impacts on the wider network.
12	12.1	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Update precinct plans 1-3 to show Connectivity Points with a crossreference to the relevant standard, and to highlight the area along Karaka Road where additional crossing(s) may be needed.
12	12.2	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following paragraph to IXXX.1 Precinct Description: <u>However, as development has unfolded within the Franklin 2 precinct a number of spite strips have been established, which prevent the Precinct from achieving the outcomes intended. The Franklin 2 precinct now contains provisions that require the removal of such spite strips and the establishment of new Connectivity Points shown in the Franklin 2 precinct plan 4, before any further development or subdivision may take place. New provisions seeking to prevent spite strips being established in the future are also included. These provisions are intended to ensure that the intended outcomes of the Precinct are delivered promptly.</u>
12	12.3	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add "DP / RP" to the heading IXXX.2 Objectives
12	12.4	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.2 Objectives: <u>(10) Commercial and retail activities are enabled at a scale and intensity which complements and serves the precinct.</u>

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
12	12.5	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.2 Objectives: <u>(11) Ensure that the Connectivity Points shown in Precinct Plan 4 are established with roading and 3 waters services (water, wastewater and stormwater) as defined in the relevant standard, before:</u> <u>(a) land development or land disturbance takes place;</u> <u>(b) activities requiring consent under sections 13, 14 or 15 of the Resource Management Act 1991 or the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 including any replacement legislation or regulations are undertaken (defined as “River, Wetland, Water and Discharge Activities” in this Precinct); and</u> <u>(c) land is subdivided.</u>
12	12.6	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(x) Require the development of framework plans prior to subdivision, the establishment of land use activities or development to ensure that the precinct is developed in a co-ordinated, integrated and comprehensive manner.</u>
12	12.7	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(xx) Require the framework plan to demonstrate the interrelationship and future integration with other land and features in the precinct, including the National Grid Corridor.</u>
12	12.8	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(xxx) Avoid further subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct until 3 waters and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that any adjacent property has a direct connection to the 3 waters services and roading network.</u>
12	12.9	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(xxxx) Ensure that any further resource consents for subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct require 3 waters (water, wastewater and stormwater) and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that adjacent property has a direct connection to the 3 waters infrastructure and roading network, prior to:</u> <u>(a) in the case of a subdivision consent, prior to a certificate pursuant to s224(c) of the RMA being issued for the first stage of any subdivision;</u> <u>(b) in the case of a land use consent (including earthworks) prior to the commencement of construction of works (land disturbance or construction of buildings or structures); and</u> <u>(c) in the case of River, Wetland, Water and Discharge Activities, prior to the commencement of works.</u>

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
12	12.10	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Amend IXXX.3 Policy 1 with the following addition and deletion: (1) Require all subdivision and development to incorporate the structural elements of the Franklin 2 precinct plans to achieve: a) ... b) ... c) a logical north-south local road network which <del>provides</del> <u>include</u> the following connections: (i) Glenbrook Road roundabout to Paerātā train station; (ii) links to Sim Road to the east; (iii) links to the identified access points to State Highway 22 to the west; and d)...
12	12.11	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(xxxxx) Enable activities for the local convenience needs of the surrounding residential area, including local retail, commercial services, office, food and beverage and supermarkets.</u>
12	12.12	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.3 Policies: <u>(xxxxxx) Require subdivision to give effect to an approved framework plan.</u>
12	12.13	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Amend IXXX.3 Policy 12 with the following additions and deletions: (12) Require the construction of new roads and access upgrades to State Highway 22 to achieve a highly interconnected pedestrian and road system that provides for all modes of transport, particularly cycling <del>as shown in precinct plan 2</del> <u>comprehensively throughout the Precinct.</u>
12	12.14	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Amend IXXX.3 Policy 13 with the following addition and deletion: (13) Require pedestrian and cycle links to allow for safe and efficient movements within the precinct and where practicable the surrounding network, <del>as shown in precinct plan 2.</del>
12	12.15	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Delete IXXX.3 Policy (14).

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
12	12.16	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Add the following activities into activity table IXXX.4:</p> <p><b>Development</b>  <u>Development prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points (RD)</u>  <u>Development prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points (Pr (Prohibited))</u>  <u>Development following the Connectivity Points being established (no activity status given)</u></p> <p><b>Subdivision</b>  <u>Subdivision prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points (RD)</u>  <u>Subdivision prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points (Pr (Prohibited))</u>  <u>Subdivision following the Connectivity Points being established (no activity status given)</u></p> <p><b>Resource consent River, Wetland, Water and Discharge Activities [rp]</b>  <u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which application which complies with Standard IXXX.6.X Connectivity Points (RD)</u>  <u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points (Pr (Prohibited))</u>  <u>River, Wetland, Water and Discharge Activities following the Connectivity Points being established (no activity status given)</u></p>
12	12.17	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Amend IXXX.5 Notification with the following additions:</p> <p>(1) Any application for a resource consent which is listed above which also requires resource consent under other standards in the Plan will be subject to the normal tests for notification under the relevant sections of the RMA, <u>subject to (3) below if applicable.</u></p> <p>(2) When deciding who is an affected person in relation to any activity for the purpose of section 95E of the Resource Management Act 1991, the Council will give specific consideration to those persons listed in Rule C1.13(4) <u>and also notify those in (3) below if applicable.</u></p> <p>(3) <u>Restricted Discretionary activities for Connectivity Points must be limited notified to adjacent landowners, including.</u></p> <p>i. <u>Part Lot 1 Deposited Plan 49602 in relation to the Connectivity Point at the end of Manatika Road.</u></p> <p>ii. <u>Lot 1 Deposited Plan 211133 in relation to the Connectivity Point at the end of Arohanui Road.</u></p> <p>iii. <u>Lot 10 Deposited Plan 148431 in relation to the Connectivity Point off of Meteoriti Crescent</u></p>
12	12.18	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Amend IXXX.6 Standards with the following addition:</p> <p>(1) All relevant overlay, Auckland-wide and zone standards apply to all activities in the IXXX Franklin 2 precinct.</p> <p>(2) All activities listed in Activity Table IXXX.4.1 must comply with standards IXXX.6.1 – IXXX.6.6 <u>and an approved framework plan.</u></p> <p>...</p>

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
12	12.19	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Amend IXXX.6.4 Vehicle Access to State Highway 22 with the following deletion and additions: (1) Paerātā Road and Karaka Road form part of State Highway 22 (SH 22) and are Limited Access Roads. The maximum number of direct vehicle access/egress points from the precinct to SH 22 is limited to <del>four</del> <u>six</u> and these will be located generally at the points shown on precinct plan 1, <u>with an additional two of which may be included along Karaka Road before the Gleenbrook Roundabout</u> , with the final location and design of each intersection to be approved by the New Zealand Transport Agency. ...
12	12.20	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add the following to IXXX.6.7 Subdivision: <u>Framework Plan</u> <u>A resource consent application for a framework plan, amendment(s) to a framework plan or for a replacement framework plan:</u> <u>1. Must comply with the rules, assessment criteria and special information requirements for framework plans specified for the Franklin 2 precinct;</u> <u>2. May seek consent for the following land uses:</u> <u>a. mix and location of housing types; and/or</u> <u>b. the design and location of public open spaces, community or social infrastructure; and/or</u> <u>c. the design and location of blocks, roads and pedestrian connections; and/or</u> <u>d. stormwater, water and wastewater infrastructure; and/or</u> <u>e. earthworks associated with the development; and/or</u> <u>f. vehicle accessways.</u> <u>3. Identify the location of pedestrian, cycle and other transport connections in the precinct and to the surrounding neighbourhood.</u>
12	12.21	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Amend IXXX.6.7 Subdivision with the following deletion: <u>Precinct Plans</u> (1) Vacant site subdivision shall provide for the following structural elements <del>shown on Figure- IXXX.10 Franklin 2 precinct plans</del> , unless they are shown on the precinct plans to be within any proposed allotment 4 ha or greater in area or identified as a balance lot: (a) boulevard and collector roads; (b) riparian reserve separated cycleway, pedestrian/cycleway, and pedestrian walkway; (c) indicative Neighbourhood Parks and Open Space Informal Recreation areas in the locations indicated on the precinct plans; and (d) riparian margins and wetlands in the locations indicated on the precinct plans. (e) National Grid Corridor

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
12	12.22	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Add the following new Standard: <u>IXXX.6.X Connectivity Points [DP / RP]</u> Purpose, to ensure that Connectivity Points shown in Precinct Plan 4 are provided as a priority within the precinct.</p> <p>(1) A Resource consent for subdivision must include the establishment of all Connectivity Points shown in Precinct Plan 4 for construction prior to a certificate pursuant to s224(c) of the RMA being issued for the first stage of any subdivision.</p> <p>(2) A Resource consent for land use (including earthworks) must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to land disturbance or construction of buildings or structures commencing.</p> <p>(3) A resource consent for River, Wetland, Water and Discharge Activities must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to prior to the commencement of works.</p> <p>For the purpose of this Precinct and any Connectivity Point provisions, establishing a Connectivity Point is defined as requiring:</p> <p>(1) Constructing and vesting in Auckland Council or Watercare as the case may be, water, wastewater, stormwater and roads, such that the land adjacent to the Connectivity Point can connect into those services without the further permission of any person other than Auckland Council or Watercare as relevant.</p> <p>(2) Designing and constructing Water, Wastewater, Stormwater and Roads in accordance with the applicable Auckland Council Code of Practice and sized for the maximum probable yield of the relevant land being connected.</p>
12	12.23	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Add the following to IXXX.8.1 Matters of Discretion <u>Connectivity Points [DP / RP]</u> The Council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the precinct activity table in relation to Connectivity Points:</p> <p>(1) A Resource consent for subdivision, compliance with the standard and the establishment of infrastructure and services.</p> <p>(2) A Resource consent for land use (including earthworks), compliance with the standard and the establishment of infrastructure and services.</p> <p>(3) A resource consent for River, Wetland, Water and Discharge Activities, compliance with the standard and the establishment of infrastructure and services.</p>
12	12.24	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	<p>Add the following to IXXX.8.2 Assessment Criteria: The Council will consider the relevant assessment criteria below for restricted discretionary activities:</p> <p>(7) Whether the standard and policies related to Connectivity Points are achieved. [DP / RP] ...</p>
12	12.25	Scott Rd Jixiang Garden Limited	andrew@telawyers.co.nz heather@telawyers.co.nz	Add a new Precinct Plan 4 (connectivity points) as shown in Annexure C to the submission
13	13.1	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Amend the plan change to give effect to national instruments, specifically the NPS-EN and any revised NES ETA.

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
13	13.2	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Show the existing GLN-DEV-A transmission line on the Masterplan.
13	13.3	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the reference to 'other overlay controls' in the Precinct Description
13	13.4	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain proposed objective (6).
13	13.5	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Amend policy (6) as follows: (6) 47. Managing subdivision and development to <del>minimise</del> <u>avoid</u> adverse effects on the efficient and safe operation, maintenance and development of <del>Incorporating the Electricity National Transmission Grid eCorridor as part of the east west, informal recreation open space corridor-</del> traversing the precinct.
13	13.6	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the deletion of policy 28.
13	13.7	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the deletions of provisions relevant to the National Grid) including 5. Assessment criteria 5.1 - 1 Framework Plans; 6.Sub Precinct: Wesley: Matters of Discretion 4.1.1 - 1 Framework Plans; 6.Sub Precinct: Wesley: Assessment Criteria 4.1.2. ; 8.Special Information Requirement 1.Framework Plans; 10.Subdivision Controls - 3.2 Size Shape; IXXX.6.4 Yards - Table IXXX.6.4.1 Yards (on the basis that it is currently appropriate that Chapter D26 applies).
13	13.8	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the clarification within IXXX.4 Activity Table that all relevant overlays apply unless otherwise specified (on the basis that it is currently appropriate that Chapter D26 applies).
13	13.9	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the proposed IXXX.6 Standards (reference to all relevant overlays including D26 applying).
13	13.10	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Retain the reference to the National Grid within proposed IXXX.6.17 Subdivision - Precinct Plans.
13	13.11	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	IXXX.8. Assessment - Restricted Discretionary Activities - IXXX.8.1 Matters of Discretion - Retain the proposed provisions including the broad nature of the reference to the National Grid within clause (3)(f).
13	13.12	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Amend the plan Amend IXXX.8.2. Assessment Criteria as follows:  (e) The extent to which the design and layout of subdivision within the National Grid Corridor considers: <u>(i) the assessment criteria within D26.8.2(1A);</u> (i) the amenity of future residents; (ii) the safe and efficient operation of the National Grid Corridor; and (iii) where practicable, the National Grid Corridor is located within the road or open space networks.

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
14	14.1	Vivek Kumar	vivek@fourwords.co.nz	Support the plan change.
15	15.1	Paerātā Rise Residents Society	blairhellyer@gmail.com	Ensure necessary infrastructure upgrades, particularly transport improvements, are delivered alongside development to meet the needs of the growing population, including through appropriate staging and timing controls.
16	16.1	Ngati Tamaoho	edith@tamaoho.iwi.nz	[Inferred oppose] filling of wetlands
16	16.2	Ngati Tamaoho	edith@tamaoho.iwi.nz	[Inferred address] lack of engagement,
16	16.3	Ngati Tamaoho	edith@tamaoho.iwi.nz	[Inferred request] better layout of the proposed town centre and the smaller proposed retail area.
17	17.1	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	[Inferred address] the plan change resulting in large areas of Paerata no longer being within an easy walking or cycling distance of a local centre.
17	17.2	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	[Inferred request] provide for a town square or other recreation space with the centres.
17	17.3	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	Include rules to remedy (third party) land being effectively landlocked by spite strips and roads/infrastructure not connecting/vesting to boundaries.
17	17.4	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	[Inferred request] retain current planning.
17	17.5	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	Provide for the recommendations in the Ngaati Te Ata Waiohua CIA Report.
17	17.6	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	Incorporate and integrate into the proposed development and associated precinct provisions; iwi (manawhenua) interests and values; and cultural, economic and social wellbeing [inferred of iwi].
17	17.7	Ngaati Te Ata Waiohua	karl_flavell@hotmail.comas	Continue engagement and consultation between the applicant and Ngaati Te Ata Waiohua as the plan change develops, particularly what eventuates from the hearing process.
18	18.1	Ministry of Education	<a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	Support the proposed multi-modal provisions through the Plan Change area.
18	18.2	Ministry of Education	<a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	Request consideration of the transport and traffic effects on existing schools within the Plan Change area, particularly in relation to the safety of the road environment for students entering and leaving school grounds during school start and finish times.
18	18.3	Ministry of Education	<a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	Include reference to Construction Traffic Management Plans within the following new objective 6(a): <u>(6a) Adverse effects of subdivision and development construction are avoided or mitigated through incorporating the use of Construction Traffic Management Plans, including specific measures to manage traffic during school pick-up and drop-off times.</u>
18	18.4	Ministry of Education	<a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	Request regular engagement from the applicant with the Ministry of Education and Auckland Council, including prior to the hearing to keep up to date with the housing typologies being proposed, staging and timing of this development so that potential impact of the plan change on the local school network can be planned for.

Plan Change 123 (Private) - Franklin 2 Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
19	19.1	Alastair Bull	westbull2008@gmail.com	Oppose proximity of proposed business district to submitter's site and the new area around Paerata Railway Station [inferred should instead be considered] as it would be a much better place for retail.
19	19.2	Alastair Bull	westbull2008@gmail.com	Amend the mapped terraced housing and apartments area to only about half of that area so that it is within a 5-minute walkable catchment of the railway station.
20	20.1	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address accessibility concerns for future residents in the wider Pukekohe-Paerata structure plan area associated with the proposed splitting of the centre zone particularly the largest area proposed at the northern end of the plan change area at the intersection of Karaka Road and Glenbrook Road.
20	20.2	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the questioned need for the Mixed-Use zone in addition to the Local Centre zone at the railway station. [e.g.] the precinct provisions do not restrict activities such as light manufacturing and servicing, or warehousing and storage for example which are potentially at odds with the intended [Mixed-Use zone] outcomes sought.
20	20.3	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	[inferred]: Consider an alternative Mixed-Use zone location adjacent to the railway as it enables a higher number of commercial activities than the THAB zone].
20	20.4	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Reconsider the Pukekohe – Paerata Structure Plan as part of this plan change process, particularly the location of the local centre relative to the wider catchment area.
20	20.5	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the inadequacy of the s32 analysis in relation to not appropriately demonstrating the proposed zoning is the most appropriate method for managing the land resource or assisting with the development of a well-functioning urban environment.
20	20.6	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Revise the Pukekohe – Paerata structure plan so that it includes the plan change area and reflects the proposed changes, and also includes the options for the location of the centre or centres within the structure plan area, rather than just within the Plan Change area.
20	20.7	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Adjust the Plan Change urban design drawings to show the correct Drury – Pukekohe Link alignment in the Pukekohe – Paerata structure plan (refer to drawing and structure plan map on page 4 of the submission).
20	20.8	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the absence of the NZTA Drury – Pukekohe Link designation in the Plan Change assessment given the Plan Change urban design statement includes reference to it.
20.1	20.9	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Provide a s32 analysis of options for changing the location of the centres and zones outside the plan change area.
20	20.10	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the submitter's concern that the proposed provisions enable outcomes that are different to the Plan Change concept design illustrated for the centre adjacent to the train station.
20	20.11	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Reconsider whether a buffer along the railway corridor is required.

**Plan Change 123 (Private) - Franklin 2 Precinct**

**Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
20	20.12	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Clarify whether the buffer along the railway corridor is a riparian margin to the north of Sim Road along the north western side of the railway within the Plan Change area, and if so, [clarify] why the proposed buffer is 50-100m in width, compared with the precinct provision which is only requires 10m wide restorative planting either side of the stream.
20	20.13	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the absence of provisions for a buffer along the railway at the THAB or business zones, and therefore how [railway operation interface] effects are appropriately managed.
20	20.14	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Consider whether the proposed THAB zone along the railway corridor is the best method for the development and use of this land, including considering alternative urban uses rather than a wide vegetative buffer in order to maximise the opportunity provide by the railway station.
20	20.15	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Correct Activity table IXXX.4.1 (A1) as it has no activity status in the right column.
20	20.16	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address the contrary intent of IXXX.6.2 limiting height in the THAB zone where 6 stories are envisaged.
20	20.17	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Clarify how the 21m height standard IXXX.6.10 will be used as it appears that development more than three dwellings is controlled by the zones and this has a 16m height limit.
20	20.18	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Clarify how IXXX.6.11 HIRB will be applied given it appears to only apply to developments with three storeys, three dwellings as the standard is linked to the activity table IXXX.4.1 and does not override the zone provisions, and may therefore need to be corrected by inserting an activity status in IXXX.4.1. (A1).
20	20.19	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Address contradictory statements in the plan change documents regarding density being about the same and that there will be an increase in density.
20	20.20	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Confirm that the planned capacity for servicing the Submitters land is not impacted by this plan change.
20	20.21	Paerata 5 Farms Limited	<a href="mailto:nick.rae@transurban.co.nz">nick.rae@transurban.co.nz</a>	Consult with Watercare.

## **Submissions**

**From:** [Adeliana Chanson](#)  
**To:** [Unitary Plan](#)  
**Cc:** [Baby ICE](#); [Adeliana Chanson](#)  
**Subject:** Proposed Plan Change 123 (Private) – Franklin 2 Precinct  
**Date:** Friday, 23 January 2026 9:58:06 pm

---

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

Kia ora,

Please accept this email as our **formal submission** on **Proposed Plan Change 123 (Private) – Franklin 2 Precinct**, made pursuant to **Clause 6 of Schedule 1 of the Resource Management Act 1991**.

---

## SUBMITTER DETAILS

**Full Name(s):**

PDH Chanson & A Chanson

**Organisation Name:**

N/A

**Address for Service:**

4 Wesleyan Street  
Paerata

**Telephone:**

0212101221

**Email:**

[David\\_chanson@hotmail.com](mailto:David_chanson@hotmail.com)

**Contact Person:**

David Chanson

---

## SCOPE OF SUBMISSION

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

**Plan Change Number:**

PC 123 (Private)

**Plan Change Name:**

Franklin 2 Precinct

**The specific provisions this submission relates to include:**

- Franklin 2 Precinct zoning and maps
- Business – Local Centre Zone extent
- Removal of Franklin 2 sub-precinct controls

- Building height and interface controls
- Infrastructure, transport, and servicing provisions

**Property address affected:**

- 4 Wesleyan Street, Paerata

## DECISION SOUGHT

We seek that Auckland Council **accept the proposed plan change with amendments**, as outlined below.

## SUBMISSION

### 1. Conditional Support for Business Rezoning

*(Non-negotiable boundary condition)*

We support the rezoning of land within the Franklin 2 Precinct to **Business – Local Centre Zone and related business zones only where** the business zoning is clearly confined and bounded in a manner that protects adjoining residential land.

Our support is **expressly conditional and non-negotiable** on the **Business – Local Centre Zone boundary being limited to Puhitahi Hill Road**.

Puhitahi Hill Road must function as the **outer and permanent edge of business zoning**, forming a clear and legible transition between business activity and residential living environments.

Any extension of business zoning beyond Puhitahi Hill Road would result in unacceptable adverse effects on residential amenity, privacy, outlook, and the quiet, semi-rural character of adjoining properties, and would be inconsistent with the Auckland Unitary Plan's approach to managing zone interfaces.

If the Business – Local Centre Zone boundary is not fixed to Puhitahi Hill Road, our support for the plan change does not apply.

### 2. Business Zone Boundary Alignment

*(Mandatory mapping and rule amendment sought)*

We require that the **Business – Local Centre Zone boundary** within the Franklin 2 Precinct be **aligned exclusively to Puhitahi Hill Road**, such that the road corridor forms the definitive and enduring boundary between business and residential zoning.

**Requested amendment:**

The Business – Local Centre Zone boundary shall not extend beyond Puhitahi Hill Road. Land beyond this boundary shall retain residential zoning and associated amenity protections.

### 3. Building Height and Development Scale

*(Specific rule amendment sought)*

We seek that all business-zoned land within the Franklin 2 Precinct be subject to a **maximum building height of no more than two storeys** where sites adjoin or are in proximity to residentially zoned land.

Building heights above two storeys at the residential interface would result in adverse effects on residential amenity, privacy, outlook, shading, and visual dominance.

#### **Requested amendment:**

Maximum building height of **no more than two storeys** within Business – Local Centre and Business – Mixed Use zones where sites adjoin residential land.

1.2

### 4. Interface Controls and Privacy Protection

*(Specific rule amendment sought)*

Mandatory interface controls are required where business zoning adjoins residential land, including:

1.3

- upper-storey setbacks and step-downs;
- screening and building design measures to avoid overlooking; and
- controls on building bulk and massing at zone boundaries.

These controls are necessary to protect residential amenity and align with Auckland Unitary Plan objectives relating to privacy, outlook, and shading.

### 5. Noise, Lighting, and Operational Effects

*(Specific rule amendment sought)*

Controls are required to manage non-residential operational effects at residential interfaces, including:

1.4

- noise limits appropriate to residential environments;
- restrictions on excessive external lighting and light spill; and
- management of hours of operation.

These measures are necessary to protect the quiet and semi-rural residential living environment at the precinct edge.

### 6. Waste Management and Servicing Location

*(Mandatory servicing control sought)*

We request that **waste storage, waste collection, servicing areas, and service vehicle access** for business-zoned sites **not be located at, or directly adjacent to, the residential–business zone boundary**, including along Puhitahi Hill Road.

**Requested amendment:**

Waste storage, servicing areas, loading bays, and service vehicle access shall be internally located within business sites or oriented away from residential boundaries and shall not be located along the residential–business zone interface.

1.5

---

## 7. Protection of Streams, Waterways, and Riparian Margins

*(Specific rule amendment sought)*

Explicit protection of **streams, waterways, riparian margins, and overland flow paths** is required, including:

1.6

- retention and strengthening of setbacks;
- protection of riparian corridors; and
- controls to avoid adverse effects on water quality, flood risk, and ecological values.

---

## 8. Traffic, Safety, and Active Transport

We request that increased development intensity be supported by **safe and connected pedestrian and cycling infrastructure**, including:

1.7

- separated walking and cycling paths;
- safe crossing points;
- traffic calming at residential interfaces; and
- strong connections to Paerata Station and local centres.

Transport outcomes should prioritise safety and accessibility alongside vehicle movement.

---

## HEARING

We **wish to be heard** in support of this submission.

---

Please confirm receipt of this submission.  
If any further information is required, we are happy to provide it.

Ngā mihi,

Adel Chanson  
(on behalf of PDH Chanson & A Chanson)  
0210312246

**From:** [Hossein Hadi Najafabadi](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on Plan Change 123 (Private) – Franklin 2 Precinct  
**Date:** Saturday, 24 January 2026 10:53:41 am

---

Tēnā koutou,

My name is Hossein Hadi Najafabadi, and I am a homeowner and resident of Paerata Rise, living at 17 Pūhitahi Hill Road. I am writing to make a submission on Plan Change 123 (Private) proposed by Grafton Downs Limited.

I support the plan change in principle, particularly its intent to strengthen the Paerātā town centre, enable higher-density development around the railway station, and support transit-oriented growth. Concentrating housing, services, and employment opportunities around high-quality public transport aligns well with Auckland’s long-term growth strategy and contributes positively to housing supply, local amenity, and sustainability outcomes.

As a resident within the Franklin 2 Precinct, I see clear community benefits from the proposed changes, including improved access to local services, a more vibrant and functional centre, and stronger justification for ongoing investment in public transport infrastructure. Over time, these outcomes will improve both liveability and resilience for Paerata as a growing community.

However, I respectfully request that the following matters be given careful consideration as the plan change progresses:

1. Traffic and transport impacts

Increased density and business activity near the Paerātā Railway Station should be accompanied by robust traffic impact assessments, with particular attention to local residential roads within Paerata Rise. Mitigation measures should be implemented where required to maintain safety and amenity.

2.1

2.2

2. Pedestrian and cycling safety

Improvements to walking and cycling connections between residential areas, the station, and local centres should be prioritised to support mode shift and ensure safe access for all age groups.

2.3

3. Infrastructure sequencing

Infrastructure upgrades (transport, stormwater, and community facilities) should be delivered in a timely and staged manner to keep pace with development enabled by the rezoning.

2.4

4. Urban design quality

As higher-density and mixed-use development is enabled, strong urban design outcomes should be maintained to ensure new development integrates well with surrounding residential neighbourhoods.

Subject to the above considerations, I believe Plan Change 123 represents a positive and forward-looking step for Paerātā and the wider Franklin area, and I am supportive of its overall direction.

Thank you for the opportunity to make this submission.

Nāku noa, nā,

Hossein Hadi Najafabadi

Homeowner and resident, Paerata Rise

17 Pūhitahi Hill Road

Auckland

**From:** [Sarah McDowall](#)  
**To:** [Unitary Plan](#)  
**Subject:** Paerata Rise  
**Date:** Thursday, 29 January 2026 11:33:55 am

---

Kia ora,

Thanks for the letter dated 16 January, 2026. I am a Paerata Rise resident, and I for one support Plan Change 123. The increased provision for local centres and mixed-use zoning near Paerata Railway Station sounds great. Paerata definitely lacks sufficient local amenities and shops, and I think this change will improve liveability and reduce the need to travel for basic services.

3.1

Kind regards,  
Sarah McDowall  
29 Walter Lawry Road, Paerata

## **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.

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](mailto: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)

Mrs Rachel Hughes

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

### Address for service of Submitter

22 Walter Lawry Road, Paerata Rise, Auckland

Telephone: 0275990556

Email: rachel811518@gmail.com

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 123 (Private)

Plan Change/Variation Name Franklin 2 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 123 (Private) - Franklin 2 Precinct

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

I seek the following decision by Council:

Accept the proposed plan change / variation

4.1

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.

Paerata Rise residents along with residents within the wider catchment area would really benefit from rezoning the area adjacent to the Glenbroook roundabout to Business Local Centre Zone. This was promised to residents sometime ago to ensure the community has access to local businesses and services.

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

Rachel Hughes

Signature of Submitter

*(or person authorised to sign on behalf of submitter)*

3 February 2026

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.

## **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.

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](mailto: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/Ms/Ms (Full Name)

Hayden Cargo

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

### Address for service of Submitter

28 Meteoriti Crescent

Karaka 2124

Telephone: 0226824996

Email: [clutchhtown@gmail.com](mailto:clutchhtown@gmail.com)

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 123 (Private)

Plan Change/Variation Name Franklin 2 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)

General support for the whole Plan Change as presented

**Submission**

I seek the following decision by Council:

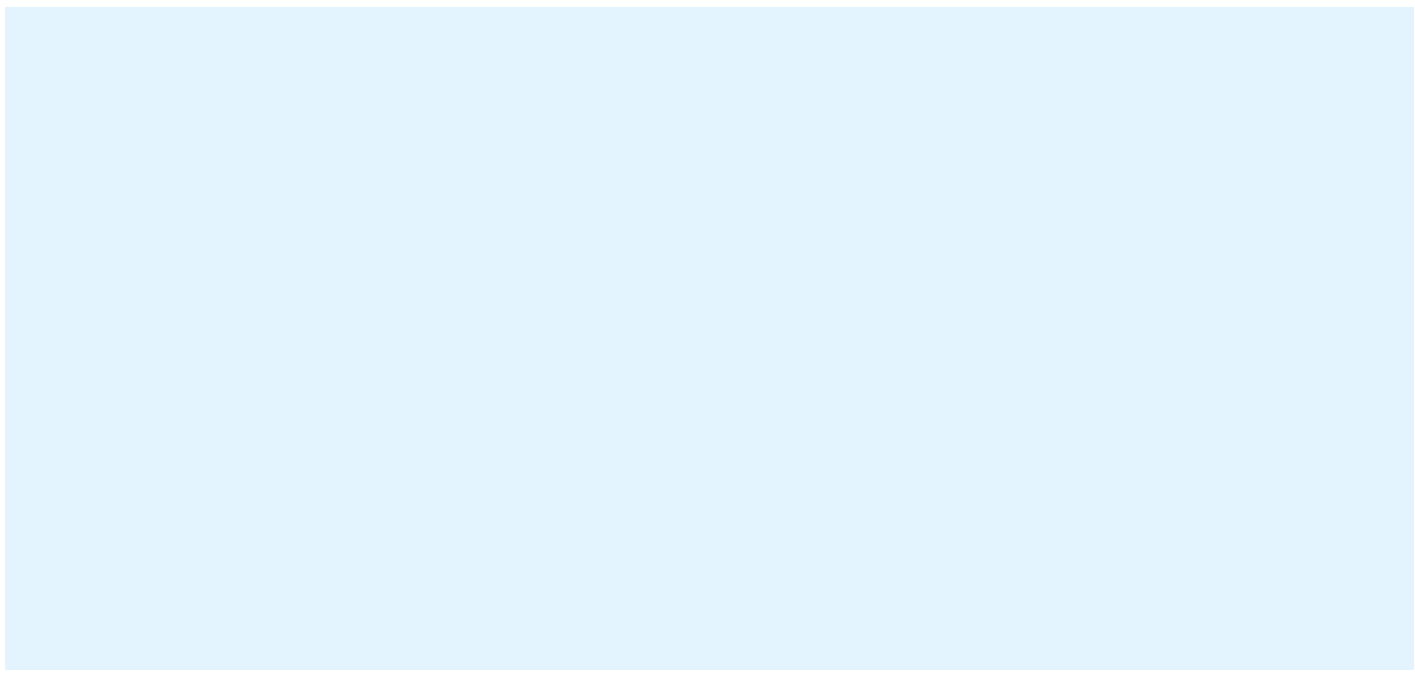
Accept the proposed plan change / variation

5.1

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

Decline the proposed plan change / variation

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



I wish to be heard in support of my submission

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

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

Hayden Cargo

13-2-2026

Signature of Submitter

Date

*(or person authorised to sign on behalf of submitter)*

**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.

**From:** [Rosalie McFarlane](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission Plan123 (Private) - Franklin 2 Precinct  
**Date:** Monday, 16 February 2026 11:29:15 am

---

Dear Council

I want to support the plan noted above.

My support is especially for the change in retail and commercial areas being located in the northern and southern areas of Paerata Rise. This change makes sense given the way the development is occurring. The northern area will be easy to access and provide much needed services to our growing community and also serve as a handy point of service for much of the wider Franklin area as it grows. It also will reduce traffic flow within the community and this provides for safety for families and especially children as they walk and ride around the streets. The southern makes sense given the Train Station which will allow people coming and going being able to access retail and other commercial services.

6.1

I am NOT in support of the intensification of the residential area near the Paerata Train Station. I do not see this sort of intensification as consistent with the rural aspect of the surrounding area. I accept that this is part of the wider unit tree plan for Auckland, however I do think careful consideration needs to be given to the location and nature of the wider community around it. While potentially 3 stories high would not stand out excessively but I do feel that 4 stories is not going to look as if it belongs and is a cohesive part of the community.

6.2

I believe it is important the Wesley College can continue to operate and redevelop as needed and retain its place in the heart of the subdivision as it is central to the community existing and functioning.

6.3

Kind regards  
Rosalie McFarlane

Sent from my iPad

**From:** [Lara Cargo](#)  
**To:** [Unitary Plan](#)  
**Subject:** PC 123 (Private): Franklin 2 Precinct  
**Date:** Monday, 16 February 2026 1:23:11 pm  
**Attachments:** [Franklin 2 Precinct.pdf](#)

---

Hello

Please see my submission on the PC 123 (Private): Franklin 2 Precinct.

Thanks  
Lara

## **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.

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](mailto: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)

### Address for service of Submitter

Telephone:  Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number	PC 123 (Private)
Plan Change/Variation Name	Franklin 2 Precinct

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

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

Plan provision(s) rezoning the area adjacent to the Glenbrook Roundabout from Residential +  
rezone the area adjacent to the Paerātā Railway Station from Residential – N  
rezoning the residential area within a 10-minute walkable catchment of the  
rezoning a small area (approximately 0.3 ha) in the vicinity of Sim Road with

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

I seek the following decision by Council:

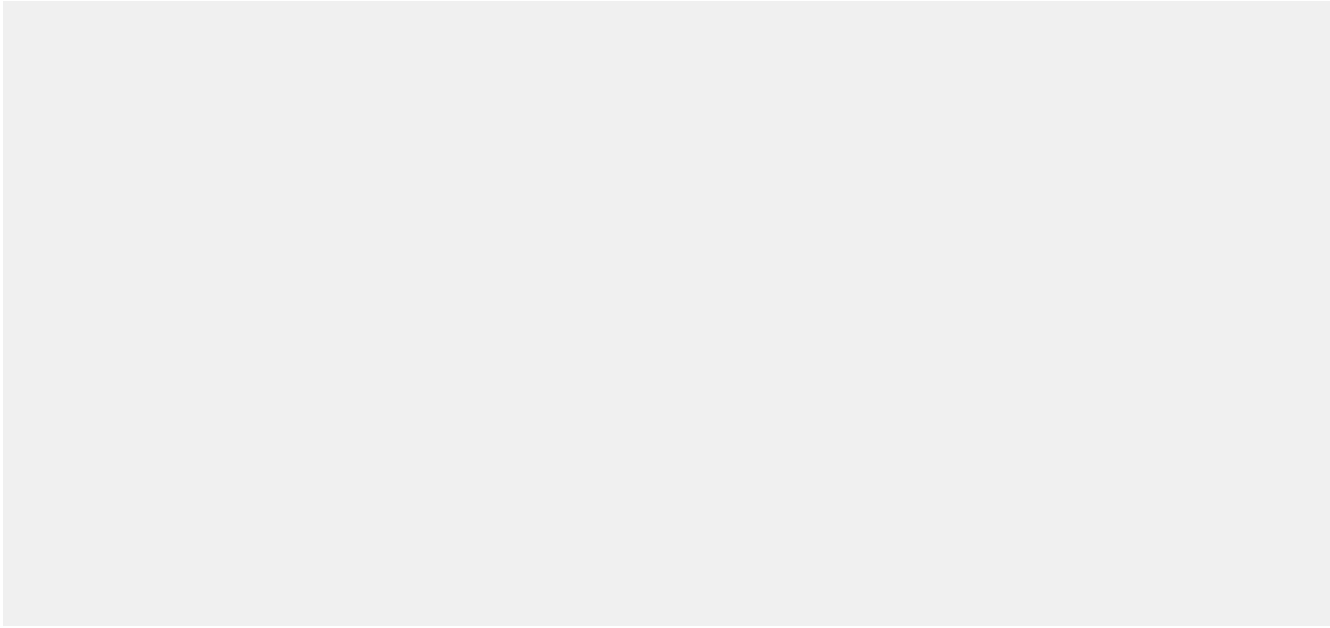
Accept the proposed plan change / variation

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.

7.1



I wish to be heard in support of my submission

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

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

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

\_\_\_\_\_  
Date

**Notes to person making submission:**

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

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

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

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

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

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

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

DIPAK BAGIA

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

CORVUS KARAKA LTD

Address for service of Submitter

RUSSELL BAIKIE RDBCONSULT  
2 GOLDSTONE PLACE ROYAL OAK 1023

Telephone: 0274 612215 Email russell@rdbconsult.com

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 123 (Private)

Plan Change/Variation Name Franklin 2 Precinct

The specific provisions that my submission relates to are:  
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Proposed amended Franklin 2 Precinct and accompanying zone maps

Or Property Address 673,675,677,679,683 Karaka Road Papakura

Or Map

Or Other (specify)

Submitter supports in part and opposes in part the proposed Plan Change  
Supports in part changes to the Precinct including rezoning the area adjacent to the Glenbrook Roundabout from Residential – Mixed Housing Urban Zone to Business – Local Centre; the removal of the sub precincts A and B  
Opposes the nature of the vehicle access restriction under proposed Precinct Rule IXXX.6.13

**Submission**

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.

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Relief 1a: Rezone properties at 673,675,677,679 and 683 Karaka Road from Residential MHU to Local Centre zone | 8.1

1b: Amend Proposed Precinct Rule IXX.6.13 Vehicle Access to SH22 as per attached | 8.2

1c: Such further consequential or additional relief to the satisfaction of the submitter

Reasons: No consultation took place on the plan change preparation between applicant and submitter. Comprehensive planning should include appropriate land zoning and provisions for the entire precinct including land not owned by the applicant to PPC 123. The extension of the Local Centre zone (northern location) to include the above properties is appropriate and suitably reflects the contemporary environment of existing commercial activity at 673 Karaka Road, (land surveying office) and 679-683 Karaka Road (Service Station), and/or are sites of such minor size and of singular ownership to incorporate suitable Local Centre activities without significant adverse effects on the environment. The submitter is the owner of the above properties excluding 673 Karaka Road.

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

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

*R. B. Carter*

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

20/2/26

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.

ATTACHMENT TO SUBMISSION TO PC123  
BY CORNUS KARAKA LTD

# 08

**IXXX. Franklin 2**

**Amend Precinct Rule IXXX.6.4 as described below:**

**IXXX.6.4 Vehicle Access to State Highway 22**

**(1) 1. Paerātā Road and Karaka Road form part of State Highway 22 (SH 22) and are Limited Access Roads. The ~~maximum~~ number of direct vehicle access/egress points from the precinct to SH 22 is limited to ~~four~~ and these will be located generally at the points shown on precinct plan 1, with the final location and design of each intersection to be approved by the New Zealand Transport Agency.**

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

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



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

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

For office use only
Submission No:
Receipt Date: <i>04/07/2023 13:00</i>

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name) VEER KHAR  
AV2023 LTD

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

Address for service of Submitter

09 GRACECHURCH DRIVE AUCKLAND 2016

Telephone:  Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or Property Address

Or Map

Or Other (specify)

**Submission**

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.

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

*PL SEE 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

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

*[Handwritten Signature]*

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

*22/02/26*  
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 Proposed Plan Change PC123

**Submitter:** AV2023 Ltd

**Affected Property:** 595 Karaka Road, Auckland

**Position:** Oppose

---

### 1. Introduction

AV2023 Ltd opposes Proposed Plan Change **PC123** because it seeks to enable further development intensification in an area where we are given to believe that the infrastructure servicing is already constrained for surrounding landowners, including our property.

Our development consent application has been held since 2021 due to confirmed wastewater capacity limitations. In this context, enabling further development capacity in the same locality is premature and inconsistent with infrastructure-led planning principles.

---

### 2. Evidence of Existing Infrastructure Constraints

Our resource consent application has remained on hold since 2021 due to servicing constraints identified by **Auckland Council** and **Watercare Services Limited**.

This demonstrates that infrastructure limitations are real, ongoing, and materially affecting development outcomes in the area.

Approving additional zoning capacity while existing developments cannot proceed due to servicing constraints would represent inconsistent and inequitable planning. Correspondence with Watercare and Auckland Council is attached.

---

### 3. Applicant's Own Evidence Confirms Available Wastewater Capacity

However the plan change documentation itself states:

- the existing wastewater pump station has capacity to service **1,000 residential lots**; and
- approximately **311 houses have been constructed** to date.

This means that **substantial unused wastewater capacity currently exists**. This raises a question about information being provided by Council/Watercare.

---

### 4. Preferential Allocation Concern

If available infrastructure capacity exists but is effectively reserved for a single development, this raises serious planning concerns including:

- inequitable allocation of public infrastructure.
- distortion of development opportunities.
- inefficient use of existing network capacity.
- inconsistent treatment of neighbouring landowners.

Infrastructure funded, consented, or constructed to serve a growth area should be allocated transparently and fairly across that area.

---

## 5. Failure to Demonstrate Infrastructure Justification for Intensification

Before approving additional density under PC123, decision-makers must be satisfied that infrastructure capacity is genuinely available.

9.1

However:

- neighbouring landowners cannot currently connect.
- yet the applicant's report confirms capacity exists.

This inconsistency creates uncertainty regarding:

- how capacity is allocated.
- whether capacity is reserved.
- whether allocation criteria are equitable.

Without clarification, the infrastructure evidence supporting PC123 is incomplete.

---

## 6. Access Constraints Created by Deferred Infrastructure Delivery

The approved consent framework for the neighbouring development provided for access to our site via an internal road connection.

That road:

- has largely been constructed.
- has services installed.
- was intended to serve multiple neighbouring properties.

However, a Section 127 consent change reportedly allows deferment of vesting of the final link. As a result, affected landowners including AV2023 Ltd are left without effective access despite infrastructure being substantially delivered.

9.2

This creates:

- stranded land parcels.
- fragmented infrastructure delivery.
- inefficient urban form.
- inequitable planning outcomes.

---

## 7. Inconsistent Planning Outcomes

PC123 would enable intensified development within the Precinct while neighbouring landowners:

- cannot obtain infrastructure connections; and
- cannot secure effective access.

Planning decisions should operate consistently across similarly situated land. PC123 risks producing the opposite result.

---

## 8. Information Requested

Before any decision is made, AV2023 Ltd requests disclosure of:

- actual wastewater network capacity.
  - current allocation commitments.
  - remaining available capacity.
  - criteria used to allocate capacity.
  - whether any capacity has been contractually reserved.
  - status and reasoning for deferred road vesting.
- 

## 9. Risk of Adverse Effects if Plan Change Proceeds

Approving additional development rights without resolving these issues risks:

- inefficient infrastructure utilisation.
  - inequitable development outcomes.
  - reduced public confidence in planning processes.
  - constrained future growth options.
- 

## 10. Relief Sought

AV2023 Ltd respectfully requests that Proposed Plan Change PC123 be:

**Declined**

or alternatively

**Deferred** until infrastructure capacity and access availability are independently verified.

If neither occurs, then:

**Approved only with provisions stating that additional development rights cannot be exercised until infrastructure capacity and access connections are demonstrably available to all affected landowners.**

---

## **11. Further Relief**

Such further or consequential relief as is necessary to ensure infrastructure allocation, access provision, and development sequencing occur in a fair, efficient, and integrated manner.

---

**Submitted by:**

**AV2023 Ltd**

Owner — 595 Karaka Road

**CORESSPONDENCE with Auckland Council**

----- Original Message -----

From: Veer Khar <khar@xtra.co.nz>

To: David Snowdon <David.Snowdon@aucklandcouncil.govt.nz>

CC: Sam Young <Sam.Young@aucklandcouncil.govt.nz>, Craig Hobbs  
<craig.hobbs@aucklandcouncil.govt.nz>, Rajinesh Kumar  
<Rajinesh.Kumar@aucklandcouncil.govt.nz>, Maria Baring  
<Maria.Baring@aucklandcouncil.govt.nz>

Date: 04/08/2023 10:52 NZST

Subject: RE: 595 Karaka Road

Hi David

Thanks for your email.

Please note that the limited access to Karaka Road has already been mitigated by Council issuing a resource consent to Paerata Rise development with a road connection for our site.

This road connection has already been built by Paerata Rise development.

It is only the vesting process that has not been actioned and I question the way Council has agreed to stage the development. It needs to be rectified asap please.

Regards

Veer Khar

On 03/08/2023 12:35 NZST David Snowdon <david.snowdon@aucklandcouncil.govt.nz> wrote:

Hi Veer,

Attaching the current 1992 land title for 595 Karaka Road, which I appreciate you may have overlooked previously. It appears from the title that the provision of access directly onto SH 22 remains unaltered since 1992.

While you may wish to discuss the access implications of a limited access road with a planning and/or traffic engineering professional, your statement that the property is landlocked is incorrect.

From an RMA perspective it is also difficult to see how Council could have imposed any condition on a subdivision consent requiring Paerata Rise to grant a third party access over their land to solve an access issue for that third party.

I note that you've asked for copies of all the consents and amendments for Paerata Rise. Clearly that is a reasonably large job and in light of the above may now be unnecessary? Please let us know.

Ngā mihi nui

**David Snowdon | Team Leader – Subdivision (Central & South)**

**Regulatory Engineering and Resource Consents Department | Auckland Council**

**Mob: 021 803 517**

Level 6, 135 Albert Street, Te Wharau O Tamaki, Auckland; &

Level 1, 4 Osterly Way, Kotuku House, Manukau

----- Original Message -----

From: Maria Baring <Maria.Baring@aucklandcouncil.govt.nz>

To: Veer Khar <khar@xtra.co.nz>

CC: Sam Young <Sam.Young@aucklandcouncil.govt.nz>

Date: 10/08/2023 16:14 NZST

Subject: RE: 595 Karaka Road

Hi Veer,

Thank you for our phone conversation.

1. Is the road on lot 513 part of the approved EACC?

*Please refer to the attached plans ENG60370098 for the road connectivity to 595 Karaka Road.*

2. Can you provide me a copy of all the consents/amendments for the development at Paerata Rise?

*LUC60346622 – Framework Plan for the Phase 3 area of the Paerata Rise Development within the Franklin 2 Precinct. The Framework Plan sets out the conceptual development strategy for approximately 700 dwellings and identifies the high-level layout for this development including movement network, open space network, riparian margins, and urban structure. I have provided the decision of the Phase 3 Framework Plan. You may request to Council for the approved plans.*

*Watercare stamp plans [water supply and wastewater] attached serving stage 8 of the development which includes the provision of the upstream catchment.*

*However, the upstream catchments [595, 663, and 671 Karaka Road] are in discussion with Watercare.*

3. Has an easement been registered on Lot 513 as part of the already released subdivision?

*Watercare's discussion with the property owners of 595 Karaka Road is that there is not enough capacity to provide services [water supply and wastewater].*

4. How is the Council proposing to resolve the issue?

*Please speak to Watercare to discuss timeframes. You may take this issue with Sam Young, my manager, included in this email.*

Kind Regards,

Maria

**From:** Veer Khar <[khar@xtra.co.nz](mailto:khar@xtra.co.nz)>  
**Sent:** Tuesday, August 1, 2023 5:37 PM  
**To:** Maria Baring <[Maria.Baring@aucklandcouncil.govt.nz](mailto:Maria.Baring@aucklandcouncil.govt.nz)>  
**Cc:** Sam Young <[Sam.Young@aucklandcouncil.govt.nz](mailto:Sam.Young@aucklandcouncil.govt.nz)>; Craig Hobbs <[craig.hobbs@aucklandcouncil.govt.nz](mailto:craig.hobbs@aucklandcouncil.govt.nz)>; David Snowdon <[David.Snowdon@aucklandcouncil.govt.nz](mailto:David.Snowdon@aucklandcouncil.govt.nz)>; Rajinesh Kumar <[Rajinesh.Kumar@aucklandcouncil.govt.nz](mailto:Rajinesh.Kumar@aucklandcouncil.govt.nz)>  
**Subject:** Re: 595 Karaka Road

Hi Maria

Thaks for the email.

By staging the subdivision, council has actually landlocked 595 Karaka Road till the neighbor progresses with stage 8H. As a senior officer, you must very well understand that is a serious lapse and I hope you understand the gravity of the situation.

I would appreciate if you can advise about the following: -

1. Is the road on lot 513 part of the approved EACC.
2. Can you provide me a copy of all the consents/amendments for the development at Paerata Rise.
3. Has an easement been registered on Lot 513 as part of the already released subdivision.
4. How is the Council proposing to resolve the issue.

Please note that we will have to go legal and even highlight this in the press, if we do not get a satisfactory response immediately.

Appreciate if you can take this extremely urgently as this council oversight may result in a major financial loss (in millions of dollars) to the owners of the property - 595 Karaka Road.

I shall be happy to meet, even at a short notice to assist.

Regards

Veer Khar

*(CPEng, REA, BE Civil)*

Director Khar Consultants Limited

+64 22 197 1916 | [khar@xtra.co.nz](mailto:khar@xtra.co.nz)

On 01/08/2023 16:40 NZST Maria Baring <[maria.baring@aucklandcouncil.govt.nz](mailto:maria.baring@aucklandcouncil.govt.nz)> wrote:

Hi Veer,

Hope you are well.

I've been informed by my manager Sam Young to forward the approved subdivision plans and advise you of the road connectivity to 595 Karaka Road.

The approved subdivision plans indicate Road 13 Lot 513 Road to Vest. However, GeoMaps is not showing the road to vest at this stage due to the stages of the subdivision. The road to vest Lot 513 is Stage 8H.

Please see attached approved plans. Hope this helps.

Ngā mihi | Kind Regards,

**Maria Baring | Project Manager**

**Regulatory Engineering Resource Consents**

**Waea pūkoro | Mobile:** 021 814

193

Auckland Council, Level 5 Manukau Civic

31 - 33 Manukau Station Road, Manukau

**Paetukutuku | Website :** [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)



**Watercare Correspondence:**

----- Original Message -----

From: Oliver MacKinnon <Oliver.MacKinnon@water.co.nz>

To: Veer Khar <khar@xtra.co.nz>

Date: 13/12/2024 13:26 NZDT

Subject: RE: 595 Karaka Road

Hi Veer,

My name is Oliver and I am the Development Programme Lead for Pukekohe and Paerata. Regarding your query for a connection at 595 Karaka Road, there is currently no spare capacity available in the Paerata wastewater scheme. Watercare are progressing with several projects to unlock capacity. These include:

**Wastewater**

Isabella Pump Station – expected delivery date March 2028.

Te Paea Pump Station Upgrade – no exact date for this, however, it cannot be completed before March 2028 as it is dependent on the delivery of the Isabella PS. As a rough guide expected completion is between 2028-2030.

Rising main between Te Paea PS and Isabella PS – similar timing to the above.

**Water**

Wesley-Paerata watermain – expected delivery date 2029-2030

These dates are indicative only and subject to change. Due to this uncertainty, there is a risk in granting new consent applications until we have concrete time frames for delivery to ensure there is infrastructure in place to service new development.

Please let me know if you'd like to discuss this further. I am happy to set up a meeting.

Ngā mihi

**Oliver MacKinnon** | Development Lead

**Watercare Services Limited**

**Mobile:** +64 21 224 2097

**Customer service line:** +64 9 442 2222

**Postal address:** Private Bag 92 521, Wellesley Street, Auckland 1141, New Zealand

**Physical address:** 73 Remuera Road, Remuera, Auckland 1050, New Zealand

**Website:** [www.watercare.co.nz](http://www.watercare.co.nz)

----- Original Message -----

From: Katja Huls <Katja.Huls@water.co.nz>

To: Veer Khar <khar@xtra.co.nz>

CC: "BTelfer (Blair)" <Blair.Telfer@water.co.nz>, Mark Iszard <Mark.Iszard@water.co.nz>

Date: 11/08/2022 18:00 NZST

Subject: RE: 595 Karaka Road, Karaka

Hi Veer,

We've completed an initial review of the wastewater strategy for this area. It's still in draft and requires further operational feedback. Based on what we know, we're of the view that there is adequate stretch capacity in the wastewater network to accommodate flows from your site until our capital works programme catches up in the wake of the Covid-19 pandemic. Details for how and when connections can be made haven't been assessed yet. Minor upgrades will be needed to enable use of the stretch capacity, and we don't currently have approved business cases to implement these. But there is a pathway there to work this through in timeframes that may be more acceptable to your client than waiting for the ultimate public network to be installed.

Water upgrade solutions are yet to be finalised, but are likely to be implemented along Karaka Rd, or in the vicinity of Karaka Rd. Further information should be available by the end of the month.

In summary, there is still a lot of uncertainty while we work through the implications of the new budgetary regime and evolving national direction on growth which has impacted the expected timing and location of growth. However, it does appear that a relatively small investment in the short-term can provide servicing to your client's site.

I'm finishing up at Watercare/Auckland Council in just over a week, but I'll hand your project over to another staff member before I go so that we can follow up and work through the next steps.

Regards,

**Katja Huls** | Development Programme Lead

**Watercare Services Limited**

**DDI:**

**Mobile:** +64 21 830 119

**Customer service line:** +64 9 442 2222

**Postal address:** Private Bag 92 521, Wellesley Street, Auckland 1141, New Zealand

**Physical address:** 73 Remuera Road, Remuera, Auckland 1050, New Zealand

**Website:** [www.watercare.co.nz](http://www.watercare.co.nz)

----- Original Message -----

From: Katja Huls <Katja.Huls@water.co.nz>

To: Veer Khar <khar@xtra.co.nz>

CC: Mark Iszard <Mark.Iszard@water.co.nz>, "BTelfer (Blair)" <Blair.Telfer@water.co.nz>

Date: 12/07/2022 11:58 NZST

Subject: FW: 595 Karaka Road, Karaka

Hi Veer,

We are working to find an agreeable solution to service your client's development. There are a number of matters that need to be met and managed to allow the development to proceed. Capital works are required to create capacity, but our capital works programme has been delayed and reduced due to the Covid-19 pandemic. There is a lot of proposed development in the Pukekohe/Paerata area that Watercare needs to consider and allow for via a water and wastewater Servicing Plan. Optioneering is currently underway on this plan, and we have a preferred wastewater solution that will ultimately service your development. There is currently some financial allowance in our Asset Management Plan that, subject to an approved business case, that can be committed for the works. However, until the plan is complete it is not known if the budget allocation is sufficient or not.

We need to coordinate your development with the adjacent Grafton Downs Ltd (GDL) development. As you've set out, drainage from your development to the existing public wastewater network will need to occur via a network that has been installed by Grafton Downs Limited (GDL) to serve their own development. While this infrastructure will ultimately be vested to Watercare in its entirety, there are restrictions on connections to it at this time. This will require commercial negotiations, in accordance with an existing commercial agreement, with GDL. Watercare will enter into these discussions on your behalf, but we cannot guarantee the outcome. Notwithstanding this, connections will not be possible earlier than 2024.

Regards,

**Katja Huls** | Development Programme Lead

**Watercare Services Limited**

**DDI:**

**Mobile:** +64 21 830 119

**Customer service line:** +64 9 442 2222

**Postal address:** Private Bag 92 521, Wellesley Street, Auckland 1141, New Zealand

**Physical address:** 73 Remuera Road, Remuera, Auckland 1050, New Zealand

**Website:** [www.watercare.co.nz](http://www.watercare.co.nz)

**From:** Mark Iszard <Mark.Iszard@water.co.nz>

**Sent:** Monday, 11 July 2022 10:46 am

**To:** Veer Khar <khar@xtra.co.nz>; Katja Huls <Katja.Huls@water.co.nz>

**Cc:** Anurag Rasela <anuragrasela@yahoo.com>; SMortezaNia (Shahram) <Shahram.MortezaNia@water.co.nz>

**Subject:** Re: 595 Karaka Road, Karaka

Hi Katja,

Are you able to provide an estimate for when available infrastructure will be available?

Veer, your already aware of the constrains in this area.

Get [Outlook for Android](#)

---

**From:** Veer Khar <[khar@xtra.co.nz](mailto:khar@xtra.co.nz)>  
**Sent:** Monday, July 11, 2022 10:37:07 AM  
**To:** Mark Iszard <[Mark.Iszard@water.co.nz](mailto:Mark.Iszard@water.co.nz)>  
**Cc:** Anurag Rasela <[anuragrasela@yahoo.com](mailto:anuragrasela@yahoo.com)>  
**Subject:** 595 Karaka Road, Karaka

CAUTION:External Email!

Dear Mark

I am managing the development at 595 Karaka Road and the site is already zoned urban.

My client has already progressed with the resource consent applications and key aspect for any further progress is the time frames for the infrastructure for the wastewater collection and water supply system being designed and constructed in the Karaka area.

I request you to please provide detailed time frames for trunk services that are being designed/constructed by Watercare in this area.

Please treat this extremely urgent as it impacts the developments in this 'Urban Zoned' area.

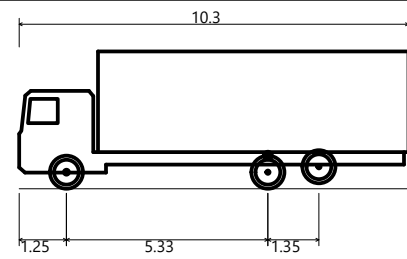
Regards

Veer Khar

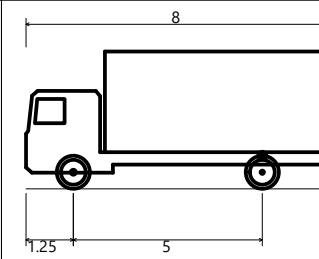
REA, Chartered Member (EngNZ), IntET (NZ); BE (Civil); Dip (Mgmt.), Masters (HR&IR)

Khar Consultants Limited M +64 22 197 1916 | [Ekhar@xtra.co.nz](mailto:Ekhar@xtra.co.nz)

**LOCALITY PLAN**  
NOT TO SCALE



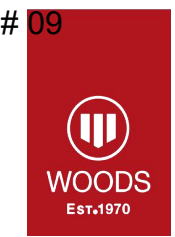
**Rubbish - Side load Steerable Rear 10.3m**  
 Overall Length 10.300m  
 Overall Width 2.500m  
 Overall Body Height 3.632m  
 Min Body Ground Clearance 0.427m  
 Track Width 2.500m  
 Lock-to-lock time 6.00s  
 Max Steering Angle (Virtual) 47.00°



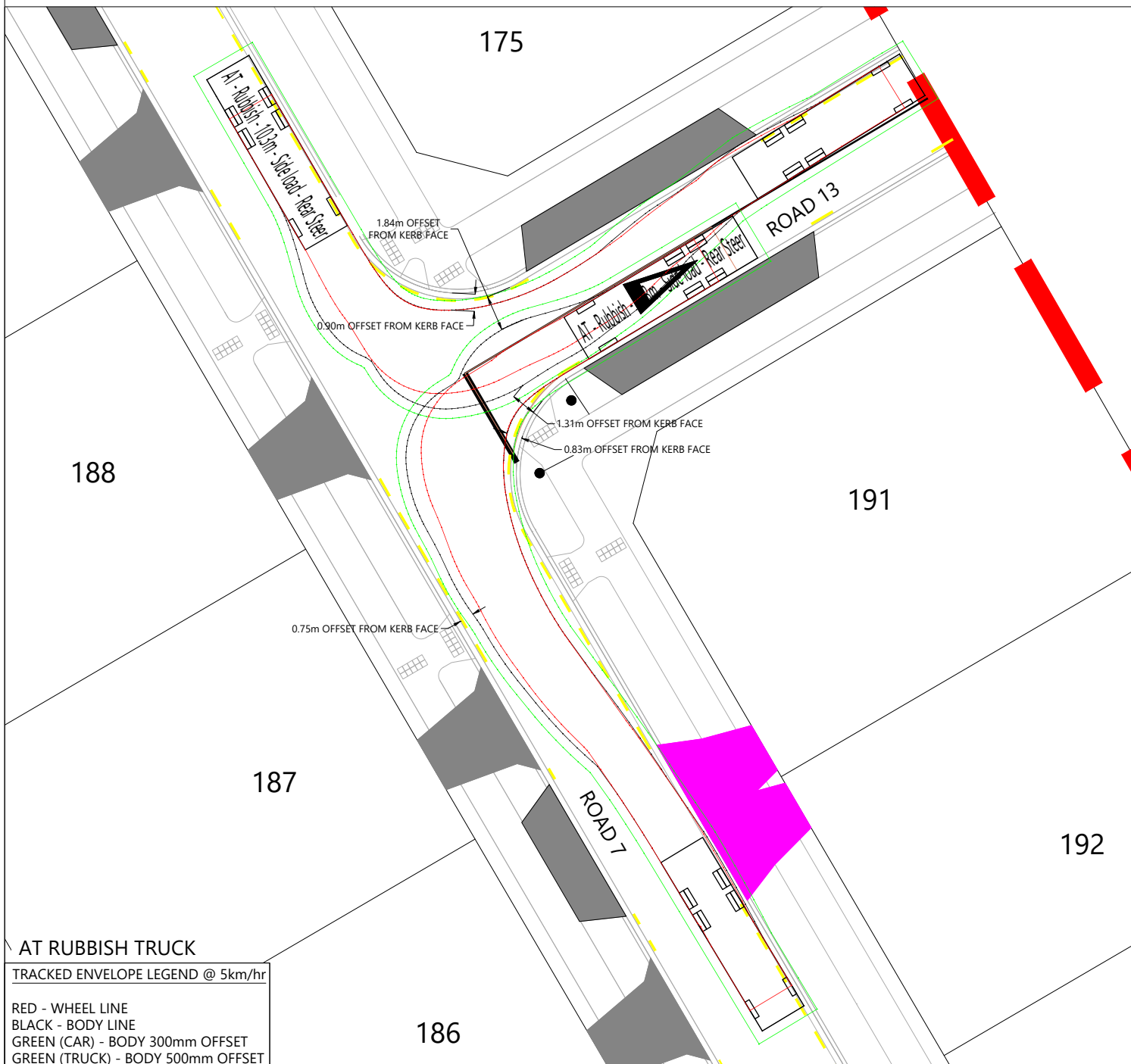
**Medium Rigid Truck**  
 Overall Length 8.000m  
 Overall Width 2.500m  
 Overall Body Height 3.632m  
 Min Body Ground Clearance 0.427m  
 Track Width 2.500m  
 Lock-to-lock time 6.00s  
 Wall to Wall Turning Radius 10.000m

**LEGEND**

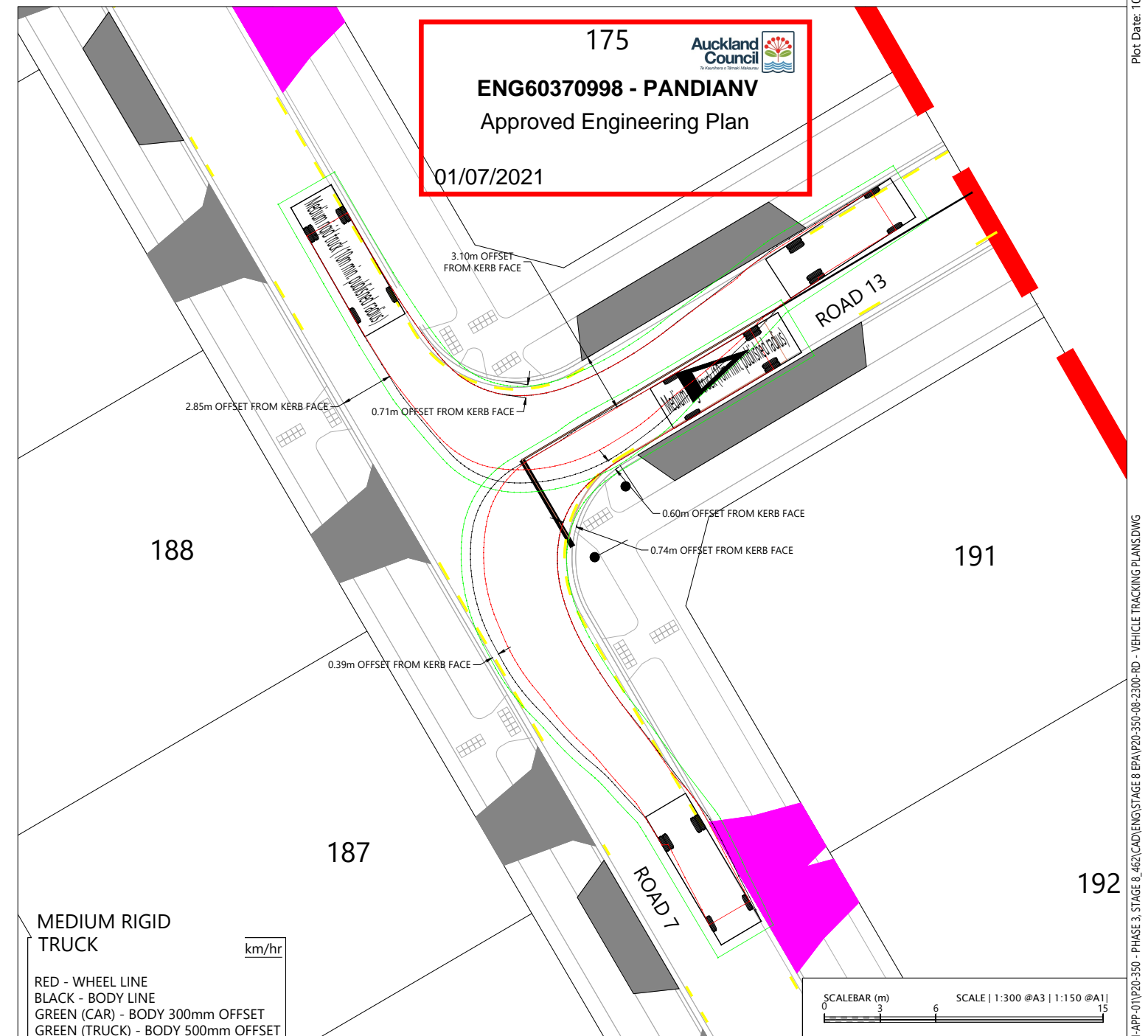
- STAGE 7 & 8 BOUNDARIES (Red dashed line)
- PEDESTRIAN WALKWAY (Blue wavy line)
- EXISTING STREAM (Blue line with arrows)
- VEHICLE CROSSINGS (Grey rectangle)
- COMBINED VEHICLE CROSSINGS (Pink rectangle)
- PARKING BAYS (Grey rectangle)
- WALKWAY / JOAL (Grey rectangle)



# 09



**AT RUBBISH TRUCK**  
 TRACKED ENVELOPE LEGEND @ 5km/hr  
 RED - WHEEL LINE  
 BLACK - BODY LINE  
 GREEN (CAR) - BODY 300mm OFFSET  
 GREEN (TRUCK) - BODY 500mm OFFSET



**MEDIUM RIGID TRUCK**  
 TRACKED ENVELOPE LEGEND @ 5km/hr  
 RED - WHEEL LINE  
 BLACK - BODY LINE  
 GREEN (CAR) - BODY 300mm OFFSET  
 GREEN (TRUCK) - BODY 500mm OFFSET

**175**  
 Auckland Council  
**ENG60370998 - PANDIANV**  
 Approved Engineering Plan  
 01/07/2021



REVISION DETAILS	INT	DATE	SURVEYED	WOODS	
1 ISSUED FOR EPA	CB	15/01/21	DESIGNED	SP	741 PAERATA ROAD PUKEKOHE AUCKLAND
5 ISSUED FOR AT RFI	JR	19/05/21	DRAWN	SP	
			CHECKED	CD	
			APPROVED	CD	WOODS.CO.NZ



**PAERATA RISE - PHASE 3 STAGE 8**  
 VEHICLE TRACKING AND SWEEP PATH ANALYSIS - MRT & AT WASTE TRUCK




















STATUS	FOR EPA	REV	
SCALE	1:300 @ A3		5
COUNCIL	AUCKLAND COUNCIL		
DWG NO	P20-350-08-2311-RD		

Plot Date: 10:10:39 am:30 June 2021, DIETRICH  
 File: C:\1205\DATA\WP-REV-APP-01\P20-350 - PHASE 3, STAGE 8, 462\CAD\ENG\STAGE 8 EPA\P20-350-08-2300-RD - VEHICLE TRACKING PLANS.DWG



**TACTILE PAVER NOTE:**  
 TACTILE PAVERS ARE SHOWN AS INDICATIVE BLOCKS AND ARE TO BE CONSTRUCTED AS PER AT CODE OF PRACTICE / TRANSPORT DESIGN MANUAL AND RTS 14.

**LEGEND**

STAGE 7 & 8 BOUNDARIES	
EXISTING STAGE BOUNDARIES	
SUB-STAGE BOUNDARY	
VEHICLE CROSSINGS	
COMBINED VEHICLE CROSSINGS (DUPLIX SITES)	
STREET TREES	
PARKING BAYS	
CARRIAGEWAY	
FOOTPATHS (1.8m)	
GRAVEL PATH	
CYCLEWAYS (3.0m)	
ON-STREET PARKING	
STREETLIGHTS	
RAINGARDENS	
SPEED HUMP	
EXISTING STREAMS	
TACTILE PAVERS	

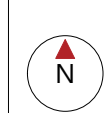
SCALEBAR (m) 0 5 10 25  
 SCALE | 1:500 @A3 | 1:250 @A1

REVISION DETAILS	INT	DATE	SURVEYED	WOODS
1 ISSUED FOR EPA	CB	15/01/21	DESIGNED	YC
5 ISSUED FOR AT RFI	JR	19/05/21	DRAWN	YC
			CHECKED	CD
			APPROVED	CD

741 PAERATA ROAD  
 PUKEKOHE  
 AUCKLAND  
 WOODS.CO.NZ



**PAERATA RISE - PHASE 3 STAGE 8**  
 LINEMARKING AND SIGNAGE PLAN SHEET 4 OF 6



STATUS	FOR EPA	REV
SCALE	1:500 @ A3	5
COUNCIL	AUCKLAND COUNCIL	
DWG NO	P20-350-08-2704-RD	
	Page 20 of 127	

Plot Date: 10:11:01 am:30 June 2021, DIETRICH  
 File: C:\1205\DATA\WP-REV-APP-01\P20-350 - PHASE 3, STAGE 8, 462\CAD\ENG\STAGE 8 EPA\20-350-08-2704-RD - SIGNAGE AND LINEMARKING PLANS.DWG

**LEGEND**

- STAGE 7 & 8 BOUNDARIES:
- SUB STAGE BOUNDARIES:
- PROPOSED WASTEWATER:
- PROPOSED RETAINING WALLS:
- EXISTING STREAM:
- JOAL:
- VEHICLE CROSSINGS:
- COMBINED VEHICLE CROSSINGS:
- PROPOSED PARKING BAYS:
- BLANK CAP:

**NOTE:**  
CONTOURS SHOWN AS PROPOSED ARE APPROVED AND HAVE BEEN CONSTRUCTED UNDER EARTHWORKS CONSENT LUC60345998

- NOTES**
- ALL WORKS AND MATERIALS TO COMPLY WITH **AUCKLAND COUNCIL STANDARDS AND WATERCARE STANDARDS**.
  - FOR PIPE BEDDING DETAILS REFER TO STANDARD DETAIL SHEETS UNLESS OTHERWISE NOTED ON THE DRAINAGE LONG SECTIONS IN WHICH CASE SUCH NOTES TAKE PRECEDENCE.
  - WW PIPES ARE TO BE **150mm DIA.** UNLESS OTHERWISE NOTED ON THE DRAINAGE LONG SECTION IN WHICH CASE SUCH NOTES SHALL TAKE PRECEDENCE.
  - ALL PIPE CROSSINGS UNDER ROADS TO BE **HARDFILL BACKFILLED**.
  - ALL MANHOLES ARE TO BE **1050mm DIA.** UNLESS OTHERWISE NOTED ON THE DRAINAGE LONG SECTION IN WHICH CASE SUCH NOTES SHALL TAKE PRECEDENCE.
  - ALL SW AND WW 100mm DIA. RAMPED RISERS ARE TO BE EXTENDED AND CAPPED OFF 1.0m BELOW THE FINISHED GROUND SURFACE.
  - STAGE 7 & 8 WASTEWATER IS TO BE TRANSMITTED TO THE PAERATA RISE WASTEWATER PUMPSTATION CONSTRUCTED UNDER CONSENT R-LUC-2016-5110
  - PROPOSED CONTOURS APPROVED EARTHWORKS COMPLETED UNDER RESOURCE CONSENT #LUC60345998
  - EXISTING CONTOURS IS A COMBINATION OF SURVEY AND LIDAR DATA.
  - BLANK CAP TO BE USED AT THE END OF WASTEWATER NETWORK WHERE THE PIPE LENGTH IS LESS THAN 55m

**NOTE:**  
STAGE 7 NETWORK APPROVED UNDER ENG60364183 AND WSL EPA-39231

**Watercare**  
An Auckland Council Organisation

**Network Extension Peer Review**

Application Number: **EPA-60353**

Approved By:

Date: **31/5/2021**

This is a review for water and/or wastewater network extension only. EPA must be secured from Auckland Council.

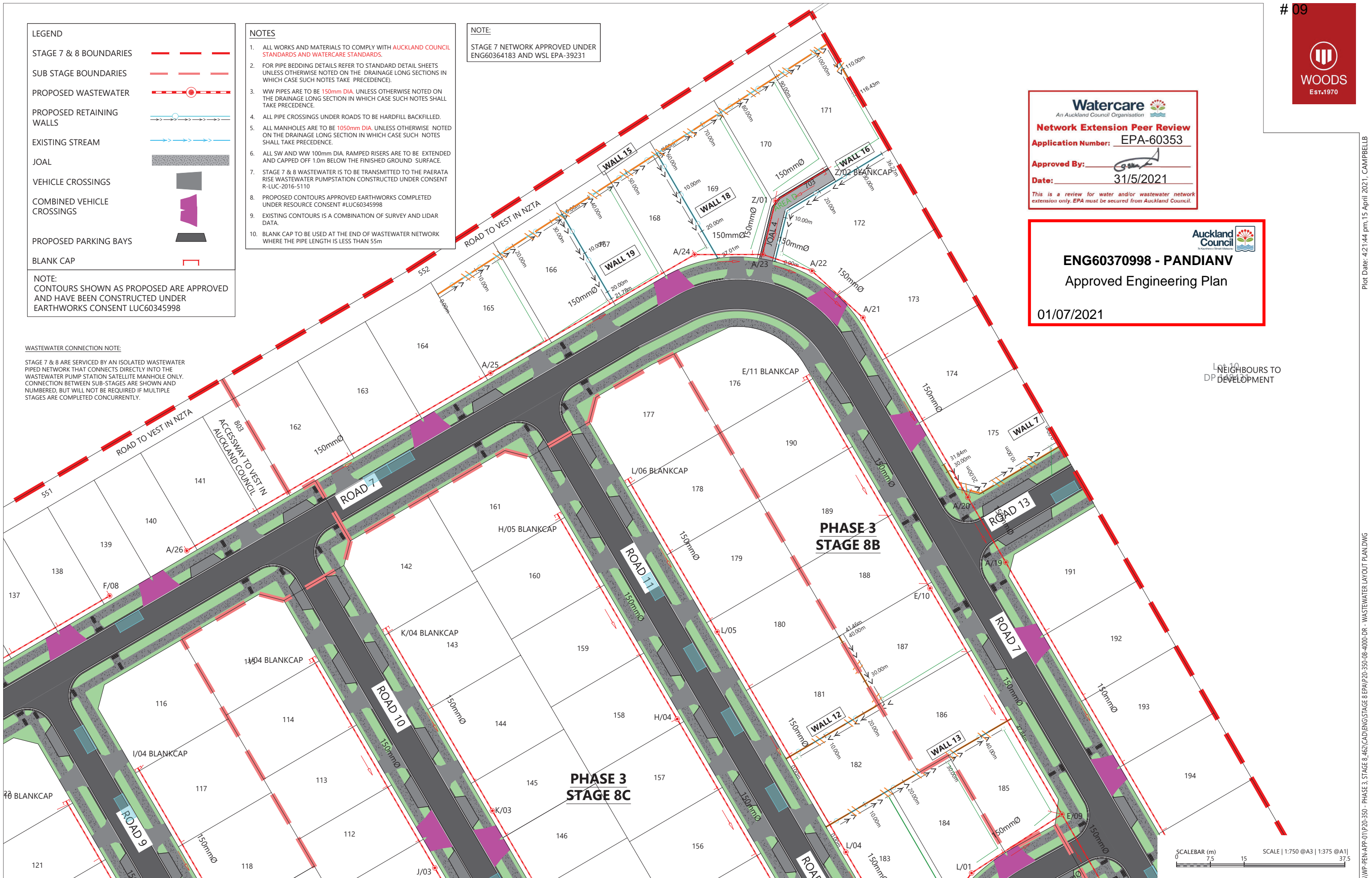
**Auckland Council**

**ENG60370998 - PANDIANV**

Approved Engineering Plan

01/07/2021

**WASTEWATER CONNECTION NOTE:**  
STAGE 7 & 8 ARE SERVICED BY AN ISOLATED WASTEWATER PIPED NETWORK THAT CONNECTS DIRECTLY INTO THE WASTEWATER PUMP STATION SATELLITE MANHOLE ONLY. CONNECTION BETWEEN SUB-STAGES ARE SHOWN AND NUMBERED, BUT WILL NOT BE REQUIRED IF MULTIPLE STAGES ARE COMPLETED CONCURRENTLY.



REVISION DETAILS	INT	DATE	SURVEYED	WOODS
1 ISSUED FOR EPA	CB	15/01/21	DESIGNED	SP
2 WW RFI AMENDMENT	RZ	15/03/21	DRAWN	SP
3 UPDATED FOR WATERCARE RFI	CB	09/04/21	CHECKED	DT
			APPROVED	DT

**Grafton Downs Ltd.**

741 PAERATA ROAD  
PUKEKOHE  
AUCKLAND

WOODS.CO.NZ

**PAERATA RISE - PHASE 3 STAGE 8**

WASTEWATER LAYOUT PLANS

STATUS	FOR EPA	REV
SCALE	1:750 @ A3	3
COUNCIL	AUCKLAND COUNCIL	
DWG NO	P20-350-08-4002-DR	
	Page 21 of 127	

LEGEND:			
250 OD PE WATERMAIN		STORMWATER NETWORK	
180 OD PE WATERMAIN		WASTEWATER NETWORK	
125 OD PE WATERMAIN		DI FLANGED REDUCER	
63 OD PE RIDER MAIN		PEET VALVE	
25 OD PE PRIVATE LINE		DI FLANGED HYDRANT	
EXISTING WATERMAIN		DI FLANGED TEE	
STAGE BOUNDARY		DI FLANGED BEND	
DI FLANGED SLUICE VALVE		TEMPORARY BLANK CAP	
		LOT CONNECTION	

NOTE:  
CONNECTION BETWEEN SUB-STAGES ARE SHOWN AND NUMBERED, BUT WILL NOT BE REQUIRED IF MULTIPLE STAGES ARE COMPLETED CONCURRENTLY.

- NOTES
1. ALL MATERIALS AND CONSTRUCTION TO COMPLY WITH WSL COP WS4.
  2. ALL PIPES >63mm OD TO BE PN12.5 PE100.
  3. 63mm OD PE TO BE PN12.5 PE80
  4. ALL VALVES, HYDRANTS, BENDS, TEES AND REDUCERS TO BE FLANGED DUCTILE IRON.
  5. PIPE FITTING, VALVES, AND HYDRANTS SHOWN AT INCREASED SCALE. ALL VALVES AND HYDRANT SURFACE LIDS TO BE LOCATED EITHER ENTIRELY IN THE CONCRETE FOOTPATH OR BERM.
  6. IN NO INSTANCE WILL FITTINGS LIDS BE LOCATED HALF IN PATH/BERM OR CLASH WITH VEHICLE CROSSINGS OR TACTILES.
  7. PIPES 125Ø AND BIGGER TO UTILISE BENDS AT INTERSECTIONS, PIPES SMALLER THAN 125Ø CAN BE CURVED PER MANUFACTURERS SPECIFICATIONS.

**Watercare**  
An Auckland Council Organisation

**Network Extension Peer Review**

Application Number: EPA-60353

Approved By:

Date: 31/5/2021

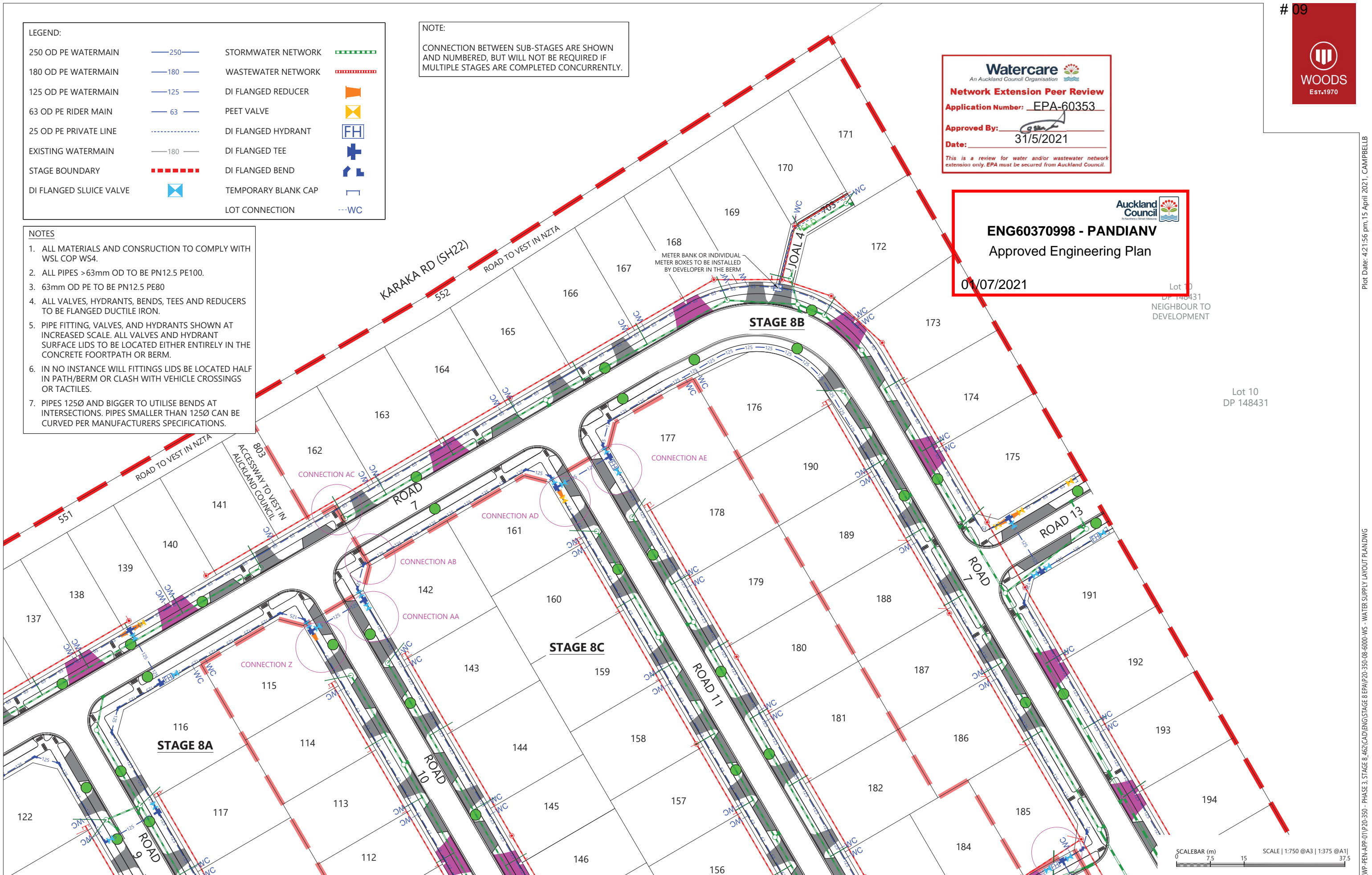
This is a review for water and/or wastewater network extension only. EPA must be secured from Auckland Council.

**Auckland Council**

**ENG60370998 - PANDIANV**

Approved Engineering Plan

01/07/2021



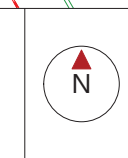
REVISION DETAILS	INT	DATE	SURVEYED	WOODS
1 ISSUED FOR EPA	CB	15/01/21	DESIGNED	SP
2 UPDATED FOR RFI	JR	15/03/21	DRAWN	RZ
3 UPDATED FOR WATERCARE RFI	JR	09/04/21	CHECKED	DT
			APPROVED	DT

741 PAERATA ROAD  
PUKEKOHE  
AUCKLAND



**PAERATA RISE - PHASE 3 STAGE 8**

WATER LAYOUT PLANS



STATUS	FOR EPA	REV
SCALE	1:750 @ A3	3
COUNCIL	AUCKLAND COUNCIL	
DWG NO	P20-350-08-6004-WS	
	Page 22 of 127	

# Decision on an application for resource consent under the Resource Management Act 1991



Restricted discretionary activity

**Application number:** LUC60346622  
**Applicant:** Grafton Downs Ltd  
**Site address:** 51 Puhitathi Hill Road, Pukekohe  
 741 Paerata Road, Pukekohe  
 801 Paerata Road, Pukekohe  
**Legal description:** Lot 402 DP518449  
 Section 2 SO 528292  
 Lot 96 DP 526514

## Proposal:

Framework Plan for the Phase 3 area of the Paerata Rise development within the Franklin 2 Precinct. The Framework Plan sets out the conceptual development strategy for approximately 700 dwellings and identifies the high-level layout for this development, including movement network, open space network, riparian margins and urban structure.

Resource consent is required for the following reasons:

Land use consent (s9) – LUC60346622

### Auckland Unitary Plan (Operative in part)

- A Framework Plan for the Franklin 2 sub-precincts A and B, and Wesley sub-precinct is a Restricted Discretionary Activity under Rules I6.30.1, and I6.30.6.1.

## Decision

I have read the application, supporting documents, and the report and recommendations on the application for resource consent. I am satisfied that I have adequate information to consider the matters required by the Resource Management Act 1991 (RMA) and make a decision under delegated authority on the application.

Acting under delegated authority, under sections 104, 104C, and Part 2 of the RMA, the resource consent is **GRANTED**.

## Reasons

The reasons for this decision are:

1. In accordance with an assessment under ss104(1)(a) and (ab) of the RMA, the actual and potential effects from the proposal are found to be acceptable for the following reasons:
  - a) The proposed layout of the Phase 3 Framework Plan is generally acceptable, the layout of the roading, riparian margin reserves, and neighbourhood parks are considered to be suitably located and consistent with that approved in the earlier phases.
  - b) The applicant has advised that the Phase 3 Framework Plan is premised on the construction of either the Glenbrook roundabout (with a fourth leg), or an interim solution to the upgrade the Puhitahi Hill Road intersection with SH22. Such interim solutions at the Puhitahi Hill Road intersection could include lowering the speed limit and minor upgrade works such as an exclusive exit lane. These solutions are currently being investigated by the applicant and it is intended that these will be developed and finalised in consultation with New Zealand Transport Agency prior to applying for any subdivision consent within Phase 3.
  - c) While the road layout is not in strict accordance with the Franklin 2 Precinct provisions and indicative transport network (Precinct Plan 5), the proposed layout shown in the Framework Plan for Phase 3 will generally achieve the overall strategic intent of the movement network sought by Auckland Transport.
  - d) The proposed roading layout, with a variety of different road typologies and additional cycling and walking routes, provides for a well-connected street network supporting pedestrian, cycle and public transport use, as per the Franklin 2 Precinct Plan. The proposed roading layout provides legible connections within the area as well as to the local and wider surroundings, encouraging walkability and cycling within the area.
  - e) The proposed Framework Plan shows a mix of lot sizes, enabling different typologies including terraces, duplexes and standalone dwellings, and levels of intensification, allowing a choice of living environments. It is understood that the lots proposed are expected to be in accordance with the minimum lot size requirements of the Franklin 2 Precinct, and these details will be established at the forthcoming subdivision stages.
  - f) The many proposed north-south building blocks, with east-west orientated lots, provide maximum solar access for each individual lot.
  - g) The location of the two neighbourhood parks proposed have been reviewed by Auckland Council Parks Planning Team and the location and size of these two parks are supported.
  - h) Riparian reserves are proposed along the tributaries of the Whangapouri Stream which run through the Phase 3 development area, and form the basis of the future open space network, with a 10m wide strip on either side proposed to be planted. There has been discussion regarding whether planting along the riparian margins should be a minimum of 10m wide, or as the applicant has proposed "an average of 10m wide". It has been agreed that minor variations to the 10m riparian margin would more appropriately be assessed within the subsequent subdivision consent applications. It is appropriate that at the framework stage, the 10m riparian margin either side of the streams and wetlands

would be applied to avoid confusion and to achieve the positive outcomes for the ecology of the site.

- i) Following the completion of the development, most riparian areas and all wetlands are proposed to be incorporated into the proposed open space, and extensively replanted (as is occurring elsewhere on site). This planting will ensure an improvement in the local ecology over time and that the draft Riparian Enhancement Plan provides best practice guidance for riparian restoration with detailed plans to be provided at the subdivision stage.
  - j) In relation to the infrastructure provisions of Phase 3, the detailed engineering information will be provided at subdivision resource consent stage. It is noted that the previously approved Network Discharge Consent (including the existing wastewater pump) has the capacity to service up to 1000 lots, and towards the end of Phase 3 being developed, the total number of dwellings within the development may have exceeded this. The detail of this will be addressed in the subsequent subdivision consent applications.
  - k) The Phase 3 area is identified as being in the Ngāti Tamaoho claims settlement area. Ngāti Tamaoho has exercised rangatiratanga over the area as cultivation and settlement area and important travel route. Ngāti Tamaoho were actively involved in the preparation of the Plan Variation to rezone the Wesley SHA land from future urban to urban, and prepared a Cultural Impact Assessment that set out details of the Iwi's cultural associations with the broader area which the Wesley College SHA is located. Iwi consultation has been undertaken by the applicant, and representatives from local iwi (including Ngāti Tamaoho) were involved in the recent site walkover.
2. In accordance with an assessment under s104(1)(b) of the RMA, the proposal is found to be consistent with the relevant statutory documents, including the following:
- a) The proposed development is consistent with Objectives 1 – 4, 6 – 7, 9-12 and Policies 1 – 4, 13 -16, 22 – 24, 27 – 30 of the Franklin 2 Precinct as that the development of Phase 3 will be in a comprehensive and integrated way that provide for a compatible mix of residential living, housing typologies with well-connected and integrated, roads, cycling and pedestrian facilities, with appropriately located parks and open spaces to contribute to the amenity of future residents.
  - b) The proposal is consistent with Objectives H5.2 – (1), (2), and (3) and Policies H5.3 (1)-(4) as the development has been designed to be in keeping with the neighbourhood's planned urban built character, in a variety of forms and surrounded by open space. The orientation of the proposed lots and streets have been designed to provide for quality on-site residential amenity for residents and adjoining sites and the street.
  - c) It is noted that a very small section of the Phase 3 area is located within the Business - Local Centre zone. Given that it is such a small area, and any business or commercial uses are intended to be centred around Wesley College, which is to the south of this site, limited weight has been given to these objectives and policies.
3. As a restricted discretionary activity, the other matters that can be considered under s104(1)(c) of the RMA must relate to the matters of discretion restricted under the plan. In

this case the proposal is consistent with the matters of discretion specified in I6.30.5.1.1 of the Franklin 2 Precinct Plan.

4. There is no need to look to Part 2 of the RMA in making this decision, as the objectives and policies and matters of discretion of the relevant statutory documents were prepared having regard to Part 2 of the RMA and they have captured all relevant planning considerations. They also contain a coherent set of policies designed to achieve clear environmental outcomes and provide a clear framework for assessing all relevant actual and potential effects. An assessment against Part 2 would not add anything to the evaluative exercise
5. Overall the proposal is considered to be acceptable.

## Conditions

Under sections 108 and 108AA of the RMA, this consent is subject to the following conditions:

### General conditions

1. This consent shall be carried out in accordance with the documents and drawings and all supporting additional information submitted with the application, detailed below, and all referenced by the council as resource consent number LUC60346622.
  - Application Form and Assessment of Environmental Effects prepared by Woods, titled Paerata Rise Phase 3 Framework Plan, 51 Puhitahi Hill Road, 741 Paerata Road, and 801 Paerata Road, Pukekohe dated 3/10/2019.
  - Emails from Euan Williams of Woods providing additional information and clarification dated 3<sup>rd</sup> and 12<sup>th</sup> February 2020.

Report title and reference	Author	Rev	Dated
Paerata Rise Phase Three Framework Plan – Infrastructure Report	Woods	V1.5	30 Sept 2019
Paerata Rise Development – Phase 3 Framework Plan – Urban Design Report <i>(please note that the development drawings in this report have been superseded by those in the list of drawings below)</i>	Woods	V4	24 Sept 2019
Ecological Impact Assessment – Paerata Rise Phase 3	Boffa Miskell	6	6 Sept 2019
Paerata Rise Phase Three Framework Plan – Transport Assessment	Arrive	A	9 Sept 2019
Riparian Margin Assessment for Esplanade Reserve	Woods	-	29 May 2019
Paerata Rise Phase 3. Draft Riparian Enhancement Plan	Boffa Miskell	-	21 June 2018

S92 response – LUC60346622 – Paerata Rise Phase 3 Framework Plan	Euan Williams, Woods	-	13 Dec 2019
S92 Urban design Report – Paerata Rise Development Phase 3 Framework Plan	Woods	-	-

<b>Drawing title and reference</b>	<b>Author</b>	<b>Rev</b>	<b>Dated</b>
P18-265-03-001-GE Overall Site Plan	Woods	1	01/10/19
P18-265 Phase 3 Concept Plan	Woods	B	31/01/20
P18-265 Movement Network – Roading Hierarchy	Woods	B	31/01/20
P18-265 – Movement Network – Street Typology Plan	Woods	B	31/01/20
P18-265 – Indicative cross section – Boulevard Road	Woods	B	31/01/20
P18-265 – Indicative cross section – Precinct Road (Puhitahi Hill Road extension)	Woods	B	31/01/20
P18-265 – Indicative cross section - New Precinct Road	Woods	B	31/01/20
P18-265 – Indicative cross section – Local Road	Woods	B	31/01/20
P18-265 – Indicative cross section – Reserve Edge Road with shared pedestrian / cycle path	Woods	B	31/10/20
P18-265 – Indicative cross section – Reserve Edge Road with separated two way cycleway	Woods	B	31/01/20
P18-265 – Indicative cross section – Greenway	Woods	B	31/01/20
P18-265 Pedestrian and Cycle Network	Woods	B	31/01/20
P18-265 – Indicative Public Transport Route	Woods	B	31/01/20
P18-265 – Open Space Plan	Woods	B	31/01/20
P18-265 – Block Structure	Woods	B	31/01/20
P18-265 – Indicative Staging Plan	Woods	B	31/01/20

*The following drawings were submitted for information purposes only, and do not form part of the approved set of drawings*

<b>Drawing title and reference</b>	<b>Author</b>	<b>Rev</b>	<b>Dated</b>
P18-265 Franklin 2 Precinct – Framework Plan Comparison (Transport Network)	Woods	B	31/01/20
P18-265 Phase 3 Framework Plan – Pedestrian Walkway Examples	Woods	B	31/01/20
P18-265 Indicative wider cycle network in Franklin 2 Precinct	Woods	B	31/01/20
P18-265 Phase 3 Framework Plan – Precinct Plan – Open Space Strategy Showing Central Park to the south of Phase 3 area	Woods	B	31/01/20
P18-265 Phase 3 Framework Plan	Woods	B	31/01/20
P18-265 Movement Network	Woods	B	31/01/20
P19-217CD-02 Phase 3, Stage 7 – Lot Size	Woods	-	-
P18-265-00-100-EW existing Contour Plan – Overall	Woods	1	1/10/19
P18-265-00-101-EW existing Contour Plan – (Sheet 1 of 4)	Woods	1	1/10/19
P18-265-00-102-EW existing Contour Plan – (Sheet 2 of 4)	Woods	1	1/10/19
P18-265-00-103-EW existing Contour Plan – (Sheet 3 of 4)	Woods	1	1/10/19
P18-265-00-104-EW existing Contour Plan – (Sheet 4 of 4)	Woods	1	1/10/19
P18-265-00-300-FW Overall Preliminary Stormwater Layout	Woods	1	1/10/19
P18-265-00-301-FW Preliminary Stormwater Layout Plan (Sheet 1 of 4)	Woods	1	1/10/19
P18-265-00-302-FW Preliminary Stormwater Layout Plan (Sheet 2 of 4)	Woods	1	1/10/19
P18-265-00-303-FW Preliminary Stormwater Layout Plan (Sheet 3 of 4)	Woods	1	1/10/19
P18-265-00-304-FW Preliminary Stormwater Layout Plan (Sheet 4 of 4)	Woods	1	1/10/19
P18-265-00-400-FW Overall Preliminary Wastewater Layout Plan	Woods	1	1/10/19
P18-265-00-401-FW Preliminary Wastewater Layout Plan (Sheet 1 of 4)	Woods	1	1/10/19
P18-265-00-402-FW Preliminary Wastewater Layout Plan (Sheet 2 of 4)	Woods	1	1/10/19

P18-265-00-403-FW Preliminary Wastewater Layout Plan (Sheet 3 of 4)	Woods	1	1/10/19
P18-265-00-404-FW Preliminary Wastewater Layout Plan (Sheet 4 of 4)	Woods	1	1/10/19
P18-265-00-600-FW Overall Preliminary Water Supply Layout Plan	Woods	1	1/10/19
P18-265-00-601-FW Preliminary Water Supply Layout Plan (Sheet 1 of 4)	Woods	1	1/10/19
P18-265-00-602-FW Preliminary Water Supply Layout Plan (Sheet 2 of 4)	Woods	1	1/10/19
P18-265-00-603-FW Preliminary Water Supply Layout Plan (Sheet 3 of 4)	Woods	1	1/10/19
P18-265-00-604-FW Preliminary Water Supply Layout Plan (Sheet 4 of 4)	Woods	1	1/10/19

2. Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:
  - a. The consent is given effect to; or
  - b. The council extends the period after which the consent lapses.
3. That riparian margins within Phase 3 shall be a minimum of 10m in width and where a walkway/ cycleway is located within the riparian reserve, the width shall be at least 13m.

**Advice Note:**

*A reduction in the width of the riparian margin may be appropriate in locations where there are challenges with topography or for other reasons, and where compensated elsewhere. However, this shall be assessed on a case by case basis at the subsequent subdivision stage when a full design assessment has been undertaken. The 10m of riparian planting zone is to be measured horizontally and at right angles from the top of the stream bank and horizontally at right angles from the edge of any wetland as delineated by an ecologist.*

## Advice notes

1. Any reference to number of days within this decision refers to working days as defined in s2 of the RMA.
2. For the purpose of compliance with the conditions of consent, “the council” refers to the council’s monitoring inspector unless otherwise specified. Please email [monitoring@aucklandcouncil.govt.nz](mailto:monitoring@aucklandcouncil.govt.nz) to identify your allocated officer.
3. For more information on the resource consent process with Auckland Council see the council’s website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz). General information on resource consents, including making an application to vary or cancel consent conditions can be found on the Ministry for the Environment’s website: [www.mfe.govt.nz](http://www.mfe.govt.nz).

4. *If you disagree with any of the above conditions, and/or disagree with the additional charges relating to the processing of the application(s), you have a right of objection pursuant to sections 357A and/or 357B of the Resource Management Act 1991. Any objection must be made in writing to the council within 15 working days of your receipt of this decision (for s357A) or receipt of the council invoice (for s357B).*
5. *The consent holder is responsible for obtaining all other necessary consents, permits, and licences, including those under the Building Act 2004, and the Heritage New Zealand Pouhere Taonga Act 2014. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007 and the Health and Safety at Work Act 2015), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004.*
6. *Prior to the occupation of dwellings within Phase 3, either the existing Puhitahi Hill Road intersection will be upgraded, or the new Glenbrook roundabout will be constructed and fully operational. Please be aware that s224c applications are unlikely to be approved for any residential subdivision development within Phase 3, until either of these access upgrades are operational.*
7. *All necessary design details shall be provided at subdivision stage to confirm that there is adequate infrastructure capacity to service the proposed dwellings. The infrastructure drawings submitted have not been fully assessed and have been treated as being for information purposes only.*
8. *Watercare has reviewed the information submitted with the Phase 3 Framework Plan and note that the wastewater pump station has the capacity to service up to 1000 lots, whereas it appears by the end of the Phase 3 development, there will be 1125 lots. Additional network upgrades may be necessary to accommodate Phase 3.*
9. *As required by the Franklin 2 Precinct Plan, phase 3 will trigger the need for 49 affordable lots / houses (which is 7% of the total yield). It is noted that these will be distributed throughout the Phase 3 areas. Please identify their locations in the forthcoming subdivision consent applications.*

Delegated decision maker:

Name: Jane Masters

Title: Team Leader, Resource Consents

Signed:



Date: 2 March 2020

# Proposed Plan Change Franklin 2 Precinct

Request for Change to the Auckland Unitary Plan Operative in Part  
Prepared for Grafton Downs Limited

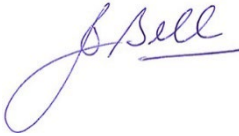

19 December 2025





Boffa Miskell is proudly a  
Toitū net carbonzero certified consultancy

## Document Quality Assurance

<p><b>Bibliographic reference for citation:</b> Boffa Miskell Limited 2025. <i>Proposed Plan Change Franklin 2 Precinct: Request for Change to the Auckland Unitary Plan Operative in Part</i>. Report prepared by Boffa Miskell Limited for Grafton Downs Limited.</p>		
Prepared by:	Janine Bell Planner / Partner Boffa Miskell Limited	
Reviewed by:	Nick Pollard Planner / Partner Boffa Miskell Limited	
Status: [FINAL]	Revision / version: [01]	Issue date: 19 December 2025
<p><b>Use and Reliance</b> This report has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Boffa Miskell does not accept any liability or responsibility in relation to the use of this report contrary to the above, or to any person other than the Client. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.</p>		

Template revision: 20230505 0000

File ref: Proposed Plan Change Franklin 2 Precinct\_20241126\_FINAL.docx  
Cover photograph: [Paerātā Rise, © Nick Pollard, 2024]

# CONTENTS

Executive Summary	1
1.0 Applicant and Property Details	4
2.0 Purpose of the Report	5
3.0 Site Context	5
3.1 Precinct Description	5
3.2 Surrounding Area	6
4.0 Planning Context	8
4.1 Background	8
4.2 Existing Planning Context	9
4.3 Changes Since 2015	13
4.4 Masterplan Update	18
5.0 Plan Change Request	18
5.1 Scope of the Plan Change	18
5.2 Purpose and Reasons for the Plan Change	19
6.0 Statutory Analysis	21
7.0 Assessment of Environmental Effects	22
7.1 Urban Form and a Quality Built Environment	23
7.2 Economic Effects	25
7.3 Transport Effects	28
7.4 Infrastructure Effects	29
7.5 Natural Hazards	33
7.6 Ecological Effects	34
7.7 Cultural Values	35
7.8 Natural Heritage	35
7.9 Effects Summary	37
8.0 Higher Order RMA Documents	38
8.1 National Policy Direction	38
8.2 The Auckland Unitary Plan (Operative in Part)	40
8.3 Auckland Plan 2050	43
8.4 Tāmaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053 (2023)	44

9.0	Consultation	45
10.0	Clause 25 Assessment	46
11.0	Conclusion	47

## Appendices

Appendix 1: Location Plan

Appendix 2: List of Properties subject to the Plan Change Request  
and Certificates of Title

Appendix 3: Auckland Unitary Plan Maps

Appendix 4: Proposed Provisions (clean)

Appendix 5: Proposed Provisions (marked up)

Appendix 6: Comparison of AUP Zones to Franklin 2 Sub-Precinct

Appendix 7: Section 32 Assessment

Appendix 8: Assessment against Relevant Policy Framework

Appendix 9: Urban Design Plan Set (Updated Masterplan Drawings)

Appendix 10: Urban Design Assessment Report

Appendix 11: Economic Report

Appendix 12: Integrated Transport Assessment Report

Appendix 13: Infrastructure Report

Appendix 14: Subdivision and Consenting Report

Appendix 15: Arboricultural Report

Appendix 16: Consultation

## Executive Summary

The Franklin 2 precinct (“the Precinct”) is located approximately 6km north of the centre of Pukekohe and forms the northern edge of the rural urban boundary that surrounds Pukekohe, identified by Auckland Council (“Council”) as a rural satellite town. The Precinct is applied to 294 hectares (“ha”) of land bounded by State Highway 22 (“SH22”) to the north and west (Karaka and Paerātā Roads respectively) and the North Island Main Trunk rail line to the east.

In 2014 Grafton Downs Limited (“GDL”) a charitable company within the Methodist Church of New Zealand, made a request to rezone the land for urban development under the Housing Accords and Special Housing Areas Act 2013. The plan variation request was granted in 2015 resulting in the bulk of the land being rezoned to Residential – Mixed Housing Urban (“Mixed Housing Urban”) with the exception of a centrally located area of Business – Local Centre (“Local Centre”) zoning (17.8 ha) applied to the land currently occupied by Wesley College fronting Paerātā Road. The area was identified as a Precinct recognising there were certain place-based provisions applied to the land. In 2016, the enabling earthworks and development of bulk infrastructure commenced for the first stage of subdivision. Known today as “Paerātā Rise”, resource consent has been obtained for 947 residential lots, with approximately 648 individual titles having been issued and some 311 houses having been constructed to date.

Over the past nine years, the development of Paerātā Rise has occurred in general accordance with the original Wesley College Special Housing Area (“SHA”) Masterplan. The Precinct Masterplan aimed to create an accessible and walkable development where the community would have access to public transport, primarily the rail network, centred around the proposed Paerātā train station. Rail has always been identified as the primary transport mode for the Precinct, in order to reduce pressure and reliance on surrounding roading infrastructure. The original staging of the development proposed to commence development in the southern part of Precinct near the proposed train station. At the time of the commencing the first stages of subdivision, Auckland Transport and KiwiRail were unable to agree on the location and timing of the proposed train station. This lack of agreement resulted in GDL focusing their attention on the northern part of the Precinct accessed from Puhitahi Hill Road for the first stages of development.

In the intervening period there have been a number of pivotal decisions which have influenced GDL’s thinking on the approach to the development for the remainder of the Precinct.

These decisions relate to:

- the changes to the original staging plan that has resulted in the concentration of residential development at the northern end of the Precinct;
- the development and prioritisation of current and planned future transport improvements to the surrounding network;
- the recent decision of the Wesley College Trust Board to remain within the Precinct and retain the rugby fields, training grounds and gymnasium, and
- changes required by the National Policy Statement on Urban Development 2020 (“NPS-UD”) and the need to achieve an efficient scale of development that responds to investment in infrastructure.

This thinking has re-focused the strategic considerations for the Precinct including:

- the implications of Wesley College remaining on its existing site and retaining a number of its existing facilities such as the playing fields, gymnasium and other buildings which may have been suitable for wider community use.
- the need to relook at the how to provide for commercial and community activities in the Precinct to best meet and support the social and economic needs of those living at Paerātā Rise.
- the need to achieve a form and intensity of residential development in the southern part of the Precinct responding to the decision to the proceed with the Paerātā train station.

In response to these changes, GDL, with input from its technical specialists, have updated the Masterplan for the Precinct. Details of the revised Masterplan are outlined in Section 7.1 of this report. The updated Masterplan (refer **Appendix 9**) and specialist reports (refer **Appendices 10 – 15**) have informed and guided the development of this plan change.

The proposed plan change is seeking to rezone the existing Local Centre area located largely in the vicinity of Wesley College to Mixed Housing Urban zone. The Wesley College site will be identified as a sub-precinct which will retain the existing additional controls in the operative Precinct provisions to enable the ongoing operation and improvements to Wesley College.

The operative business zoning within the Precinct will be relocated, and reduced in extent, within the Precinct. This will involve the redistribution of the current Local Centre zone fronting Paerātā Road in part to the northern end of the Precinct adjacent to the Glenbrook Roundabout, and in part to the southern end of the Precinct adjacent to the new Paerātā train station. Provision has also been made for a small Business – Neighbourhood Centre (“Neighbourhood Centre”) zone (0.3ha) within the Precinct along Sim Road. Overall, GDL are proposing a reduction in the amount of business zoned within the Precinct from approximately 17.8ha as provided for by the Auckland Unitary Plan (Operative in Part) (“AUP”) to 6.8ha. The plan change also proposes to align with the requirements of the NPS-UD by providing for more intensive residential development within a 10 minute walkable catchment of the Paerātā train station. The area will be rezoned from Mixed Housing Urban zone to Residential – Terraced Housing and Apartment Buildings (“Terraced Housing and Apartment Buildings”) zone.

The operative Franklin 2 sub-precinct A and sub-precinct B rules will be removed, and future development will be managed by the standards in the underlying zone provisions. This will increase consistency with the underlying zone provisions and minimise the need for precinct-specific deviations. The Precinct specific standards in relation to Wesley College, vehicle access to SH22, the timing and upgrades of main roads, stormwater management and riparian margins are proposed to be retained.

The proposed plan change also corrects and clarifies the location of notable trees on the Wesley College site that are listed in Schedule 10 of the AUP.

It is therefore considered that the requested plan change can be accepted and approved by Auckland Council. In accordance with Clause 22(2) of Schedule 1 of the Resource Management Act 1991 (“RMA”), an assessment of environmental effects has been provided. It concludes that the anticipated actual and potential effects arising from development undertaken in accordance

with the proposed plan change provisions will be similar to those anticipated by the operative Precinct provisions introduced by Plan Variation 3 (“PPV3”). The revised zoning maintains the Precinct’s overall design approach and this, along with reliance on the AUP zone and Auckland-wide provisions and in conjunction with the Precinct specific provisions, will appropriately manage the effects on the surrounding environment. These AUP and Precinct provisions will continue to achieve high-quality environmental outcomes within the Precinct. Where additional building height is proposed within a walkable catchment of the Paerātā train station, this is a mandatory requirement under the NPS-UD, it is understood that through Plan Change 78 (PC78) to the AUP the Terraced Housing and Apartment Buildings zone includes provisions that will enable six-storey buildings in walkable catchments.

An evaluation in accordance with section 32 of the RMA has been undertaken (refer **Appendix 7**) that includes the necessary detail to correspond with the scale and significance of the environmental effects anticipated from the implementation of the plan change. The section 32 concludes that the proposed plan change will be an efficient and effective method for achieving the sustainable management purpose of the RMA and the AUP.

## 1.0 Applicant and Property Details

The summary details relating to the applicant and subject site are as follows:

Applicant's Name:	Grafton Downs Limited
Address for Service:	c/-Boffa Miskell Ltd PO Box 91250, Auckland 1142 Attn: Janine Bell Phone: +64 21 506592 Email: <a href="mailto:janine.bell@boffamiskell.co.nz">janine.bell@boffamiskell.co.nz</a>
Address for Fees:	Grafton Downs Limited Attn: Raycher Shyur 8a Sylvia Park Road, Mount Wellington PO Box 58 682 Botany, 2163 Phone: 09 272 3235 Email: <a href="mailto:accounts@graftondowns.co.nz">accounts@graftondowns.co.nz</a>
Site Address:	All sites subject to the Franklin 2 Precinct (refer to the Location Plan in <b>Appendix 1</b> )
Legal Description, Owner/Occupier Name and Address:	The legal description and ownership of the land subject to this application is set out in <b>Appendix 2</b> . The majority of the land is owned by Wesley College Trust Board and GDL. GDL is a charitable company within the Methodist Church of New Zealand.
Site Area:	294 ha
District Plan Zoning and Precincts:	Residential – Mixed Housing Urban Zone Business – Local Centre Zone Open Space – Informal Recreation Zone (refer Operative zoning map <b>Appendix 3a</b> )
Designations	6302 North Island Main Trunk Railway Line 6310 Paerātā Railway Station 6311 Paerātā Station Interchange and Accessway 6704 State Highway 22 - Karaka to Pukekohe 6705 State Highway 22 Road Widening – Karaka to Pukekohe 5061 Wesley Primary School (refer to Designations in <b>Appendix 3b</b> )
Overlays and Other Controls:	Natural Resources – High-Use Aquifer Management Areas Overlay Natural Heritage – Notable Trees Overlay Historic Heritage and Special Character – Historic Heritage Overlay Extent of Place Infrastructure – National Grid Corridor Overlay (refer to Overlays in <b>Appendix 3c</b> )  Macroinvertebrate Community Index Stormwater Management Area Control – WHANGAPOURI CREEK 1, Flow 1

	Stormwater Management Area Control – OIRA CREEK, Flow 1
	(refer to Controls in <b>Appendix 3d</b> )
Pre-Application Reference Number:	Meeting occurred with Craig Cairncross and Andrew An, Plans and Places Department, Auckland Council on 29 October 2024

## 2.0 Purpose of the Report

This report has been prepared in support of a request for a change to the AUP in relation to the properties subject to the Franklin 2 Precinct.

The request is made pursuant to clause 22 of Schedule 1 of the RMA which requires that the request must:

- explain the purpose of, and reasons for, the proposed plan change;
- contain an evaluation report prepared in accordance with section 32 of the RMA for the proposed plan;
- describe those effects, taking into account clauses 6 and 7 of Schedule 4 of the RMA, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan.

## 3.0 Site Context

### 3.1 Precinct Description

The Precinct is located approximately 6km north of the centre of Pukekohe and forms the northern edge of the rural urban boundary that surrounds Pukekohe, identified by Auckland Council as a rural satellite town. The precinct is applied to just under 300ha of land bounded by SH22 to the north and west (Karaka and Paerātā Roads respectively) and the North Island Main Trunk rail line to the east. The bulk of the Precinct has historically been owned by the Methodist Church of New Zealand which purchased the land for the relocation of Wesley College. The school and its associated dairy farm were established on the land in the early 1920's and remains on part of the site to the current day.

Most of the Precinct is zoned Mixed Housing Urban with the exception of a centrally located area of Local Centre zoning applied to the land currently occupied by Wesley College which fronts Paerātā Road and is located largely to the south of Puhitahi Hill Road.

Wesley College and its farming operations continue to operate within the Precinct. The College is New Zealand's oldest registered school and was the first private school to integrate into the State Education system. The school provides education for both boys and girls from year 9 to 13 including both boarders and day pupils. The main access to Wesley College and farm is from

Puhitahi Hill Road which provides access to the main school buildings, accommodation and associated facilities, gymnasium, playing fields and associated farm buildings.

In 2016, GDL commenced work on the initial enabling earthworks and development of bulk infrastructure to support the first stages of subdivision for its new residential community, now known as “Paerātā Rise”. Due to uncertainties surrounding the location and timing of construction of the Paerātā train station, the initial phases of residential development occurred in the northwestern area of the Precinct, north of the existing Wesley College and accessed from Puhitahi Hill Road. To date, resource consent has now been obtained for 947 residential lots, with approximately 648 individual titles having been issued and some 311 houses having been constructed. The remainder of the Precinct remains largely in the ownership of GDL and the Wesley College Trust Board (refer **Appendix 2**).

The area to the south of the College remains largely underdeveloped with the exception of the works currently underway by KiwiRail and Auckland Transport related to the electrification of the rail network from Papakura to Pukekohe which include the construction of the Paerātā train station and the new link road to SH22.

Initially, access to the Precinct from SH22 was provided through Puhitahi Hill Road. In June 2022, NZ Transport Agency Waka Kotahi (“NZTA”) completed the construction of the Glenbrook roundabout located at the Glenbrook Road, Karaka Road and Paerātā Road intersection. This now serves as the main access to the Precinct for residents and visitors travelling along SH22 or approaching from Glenbrook Road. The roundabout connects to Te Rātā Boulevard which provides the main access into the northern part of the Precinct. With the construction of Paerātā train station underway, construction has commenced on the third access/roundabout to SH22 at the southern end of the Precinct.

### 3.2 Surrounding Area

The surrounding area is largely rural in nature and used for agricultural purposes. A mixture of zoning is applied to these areas (refer **Appendix 3a**). The land immediately to the west of the Precinct, on the opposite side of Paerātā Road is zoned Future Urban, as is the land immediately to the south, on the opposite side of the North Island Main Truck railway line. To the north of the Precinct, on the opposite side of Karaka Road is the Pukekohe Golf Club which is zoned Rural – Mixed Use. Land to the north and east of the Precinct is largely zoned Rural – Mixed Rural and is used for agricultural purposes. The only exception is an area of land that adjoins the eastern boundary of the Precinct which is owned by GDL and is zoned Mixed Housing Urban.

The land zoned Future Urban is identified within the Pukekohe-Paerātā Structure Plan 2019 as Stage One which was scheduled for development between 2018 and 2022. The Structure Plan identifies that this land will be zoned a mix of Mixed Housing Urban and Terraced Housing and Apartment Buildings zone (refer to **Figure 1** below).

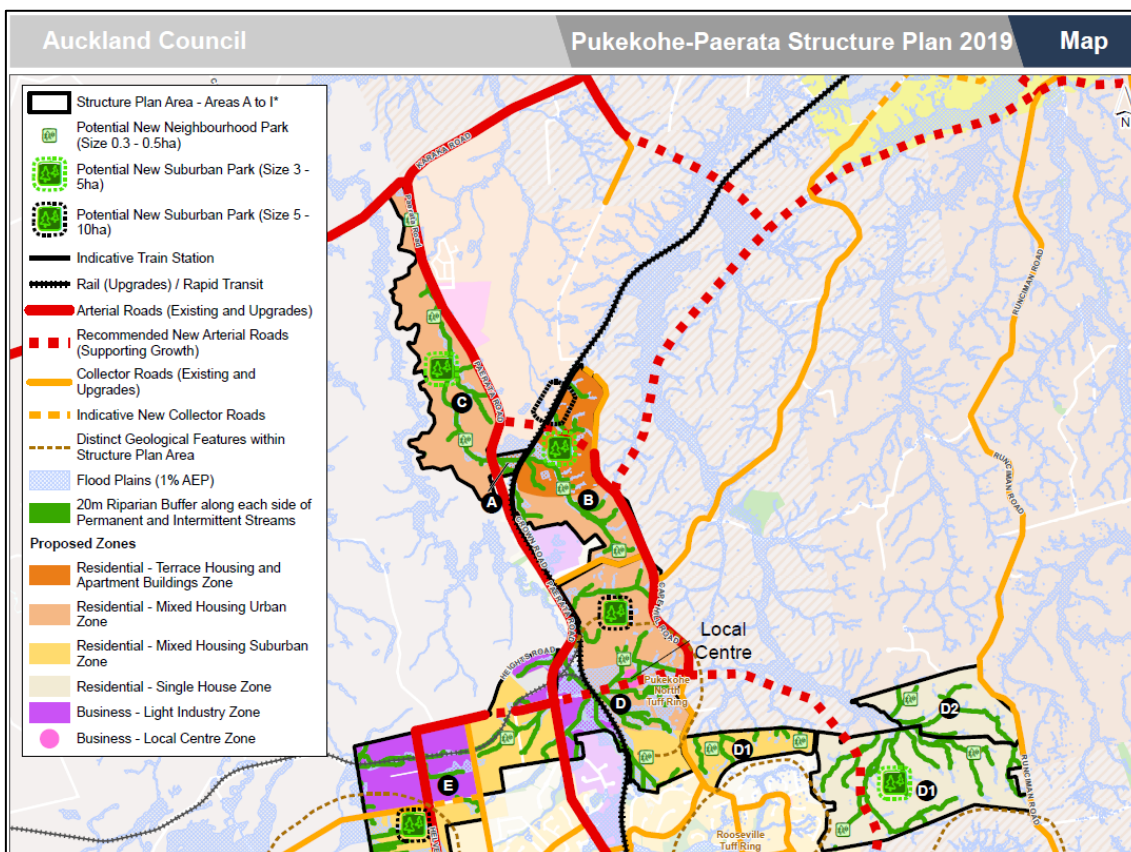


Figure 1: Excerpt from the Pukekohe-Paerātā Structure Plan 2019: Structure Plan Map. Source – Pukekohe-Paerātā Structure Plan 2019 by Auckland Council, Page 8.

Subsequently and in response to the NPS-UD, Council have produced the Future Development Strategy 2023-2053 (“FDS”). The FDS was adopted by Council in November 2023 and replaces the Auckland Plan 2050 Development Strategy 2018 and the Future Urban Land Supply Strategy 2017. The rest of the Auckland Plan 2050 remains in place, including the six Auckland Plan outcomes.

The Auckland Plan 2050 (“Auckland Plan”) and the FDS together set the high-level direction for Auckland over the long-term. The FDS re-evaluated all previously identified future urban areas that had not been live zoned (as at 2023). The proposed timeframes indicate when infrastructure required to service the development of these areas is likely to be implemented. Based on this re-evaluation, the FDS has extended the likely timeframes for infrastructure to be implemented in Paerātā south to 2030+ and Paerātā West to 2040+.

The FDS also provides strategic direction to remove previously identified future urban areas, or parts of future urban areas, which are the most constrained by natural hazards. The rationale for these recommendations is to ensure these areas are not developed in a manner that would otherwise place people and property at risk to natural hazards. The removed areas include Takaanini and Drury-Ōpaheke (Slippery Creek) in the Auckland South catchment. The impacts of this new strategic direction on future housing supply are discussed further in the Economic Assessment report (refer **Appendix 11**).

## 4.0 Planning Context

### 4.1 Background

#### 4.1.1 Wesley College Special Housing Area

Leading up to the notification of the Proposed Auckland Unitary Plan 2013 (“PAUP”), GDL worked actively with Council to advance its plans to develop a new residential community on the Wesley land at Paerātā. As a result of this and the wider Pukekohe Area Plan work, Council included the Wesley land and surrounding properties to the west and south, within the new Rural Urban Boundary and zoned the land Future Urban zone in the PAUP.

In October 2013 the Government and Auckland Council identified the Wesley College land as a Special Housing Area (“SHA”), enabling the development of the land for residential purposes and to add to the supply of housing in Auckland. The Wesley College SHA was approved as part of the first tranche of SHAs and formally established by an Order in Council in October 2013. A minor extension of this SHA arose as part of the identification of additional land around the boundary of Wesley College to be included in the SHA. These areas were included in the second tranche of SHAs and formalised by a further Order in Council dated 30 June 2014.

#### 4.1.2 Plan Variation 3 to the Proposed Auckland Unitary Plan

Following the issue of the Order in Council, GDL worked with Council's Housing Project Office (“HPO”) to prepare a plan variation to the PAUP and concurrent resource consent application to deliver the necessary planning provisions and consents to enable the commencement of development of the Wesley College SHA.

In November 2014, pursuant to section 61 and section 25 of the Housing Accords and Special Housing Areas Act 2013, GDL lodged a private plan variation application to the PAUP for the Wesley College land and a related subdivision consent “qualifying development. The Precinct was identified in the plan variation as the ‘Franklin 2 Precinct’. As required by the PAUP, the plan variation was accompanied by a structure plan report. The Franklin 2 Precinct Structure Plan Report (November 2014) was prepared in accordance with the requirements of the AUP and outlines how the Franklin 2 Precinct will be developed. It summarises the detailed work that was undertaken to identify the opportunities and constraints of the Wesley College SHA land to ensure the effects of its development were addressed in advance of development occurring.

Formally known as ‘Plan Variation 3’ (“PPV3”) to the PAUP. The variation requested the Wesley College SHA land be rezoned from Future Urban to urban zones, as well as identifying the land as the ‘Franklin 2 Precinct’, with its own objectives and policies. The Precinct is comprised of three sub-precincts – Residential A, Residential B and the Wesley local centre precinct. It was not intended that the Franklin 2 provisions would stand apart in the PAUP although some region-wide provisions that would otherwise apply to the land were amended to reflect site-specific circumstances. The activity status in the Precinct takes precedence over the activity status in the zone, whether more restrictive or enabling. It also included a number of precinct plans setting out the underlying concepts for the development of the Precinct, stormwater management areas, and provisions for the ongoing operation and development of Wesley College and the indicative transport network. Additions to the schedules of heritage buildings and protected trees in the PAUP were also sought in order to protect the historic W.H. Smith Memorial Chapel building at Wesley College and seven individual and one group of trees on the land respectively.

The plan variation application was accepted by the Council for processing in December 2014. PPV3 was notified in early 2015. A total of thirteen submissions were received to PPV3, including one late submission. The PPV3 and its accompanying qualifying development were considered by the Accord Territorial Authority Panel (“the Panel”) at a hearing held on 18 and 25 May 2015. Following the hearing of evidence, the Panel accepted with modifications, the application to vary the PAUP within the Wesley College SHA, with the plan provisions deemed operative (pursuant to section 73 HASHAA) in July 2015.

## 4.2 Existing Planning Context

### 4.2.1 Franklin 2 Precinct

The Precinct is zoned Mixed Housing Urban, except for the area identified as commercial fronting Paerātā Road (SH22) which is zoned Local Centre (refer map in **Appendix 3a**). The Precinct provides for the development of a sustainable community with a compatible mix of residential and supporting activities to meet the daily needs of the new, largely residential, community. The design philosophy of the Masterplan for the Precinct aimed to develop an accessible, multi-modal, walkable residential community, based on a passenger transport interchange, that achieved high quality environmental outcomes and offered its residents access to quality connected open space, water sensitive stormwater design, and a local commercial centre that would provide a heart for the community as well as meeting their local service needs. Rail was identified as the primary transport mode for the community, to reduce pressure and reliance on the surrounding roading infrastructure.

The Precinct provisions provide for the bulk of the land to be developed with a variety of residential activities and housing typologies including terraced, duplex and standalone dwellings, predominantly single and two storey houses, with a limited opportunity for additional height in the Local Centre zone. Provision is also made for more comprehensively planned and integrated residential developments including retirement villages.

Two distinct Franklin 2 residential sub-precincts were created (refer map in **Appendix 3a**). The intent of these is to provide a range of housing choice commensurate with their locality and proximity to amenity. The Franklin 2 Residential A sub-precinct is applied to the majority of the land in the Precinct. The provisions were based on the proposed Mixed Housing Urban zone to achieve the desired medium density outcomes.

The Franklin 2 Residential B sub-precinct is applied to the central part of the precinct, adjoining the Local Centre zone, central park and the higher ground where Sim Road intersects with the railway line. The Franklin 2 Residential B sub-precinct provides for a higher intensity of residential development to that provided for by Franklin 2 Residential A.

The Wesley sub-precinct was intended to provide the commercial and social hub of the new Paerātā Rise community. The provisions applying to this sub-precinct enable the redevelopment of this area to provide for the local convenience needs of the surrounding residential community including local retail, commercial services, offices, food and beverage and a small-scale supermarket. The Paerātā Rise community remains reliant on commercial facilities further afield for its bulk item retail and professional service needs. The provisions also enable the development of a wide range of residential activities.

The operative Precinct provisions anticipate Wesley College will be relocated to a new rural location outside of the Precinct. The Precinct provisions continue to recognise and make provision for the operation of the College and its associated activities.

The Precinct is also subject to a number of other overlay provisions in the AUP related to Natural Resources, Natural and Historic Heritage and Infrastructure (refer map in **Appendix 3c**).

The Precinct provisions recognise the area's historical links to Wesley College, with the W.H. Smith Memorial Chapel being scheduled as a Category B historic heritage place in Appendix 14.1 of the AUP. The historic heritage overlay rules apply to all land within the identified extent of place around the Chapel. The AUP also identifies a group of notable trees on the Wesley college site on the Natural Heritage – Notable Trees Overlay. These are described in Schedule 10 as:

ID	Botanical name	Common name	Number of Trees	Location/Street Address	Legal Description
2804	Araucaria bidwillii, Vitex lucens, Podocarpus totara, Liriodendron tulipifera, Quercus palustris, Quercus robur	Bunya Bunya Pine, Puriri, Totara, Tulip Tree, Pin Oak, Oak	Group	Paerātā Road 801	Lot 1 DP72819

The National Grid runs through the eastern side of the Precinct, consequently this part of the site is identified as being subject to Infrastructure – National Grid Corridor Overlays:

- National Grid Subdivision Corridor.
- National Grid Yard Uncompromised.

The purpose of the National Grid Corridor Overlay is to manage sensitive activities and potentially incompatible development (including land disturbance) within close proximity to the National Grid.

Other overlays that are applied to the Precinct are the Natural Resources – High-Use Aquifer Management Areas Overlay – Pukekohe Kaawa Aquifer, the Stormwater Management Area Control – Whangapouri Creek 1, Flow 1, the Stormwater Management Area Control – Oira Creek, Flow 1, and the Macroinvertebrate Community Index (refer map in **Appendix 3d**).

## 4.2.2 Designations and Notices of Requirement

### 4.2.2.1 Existing Designations

There are six designations relevant to the plan change that are identified in the AUP and outlined in Table 1 below (refer to **Appendix 3b** – Designations and Notices of Requirement).

**Table 1:** Designations in the AUP located within and adjacent to the Precinct.

Group	Number	Purpose	Location
Kiwi Rail Holdings	6302	The purpose of the designation is to develop, operate and maintain railways, railway lines, railway infrastructure, and railway premises as defined in the Railways Act 2005.	North Island Main Trunk Railway Line from Buckland to Britomart Station, Auckland Central

Group	Number	Purpose	Location
Kiwi Rail Holdings	6310	The purpose of the designation is to develop, operate and maintain railways, railway lines, railway infrastructure, and railway premises as defined in the Railways Act 2005.	412 Sim Road, 51 Puhitahi Hill Road, and Paerātā Road, Pukekohe
Kiwi Rail Holdings	6311	The construction, operation and maintenance of railway premises and transport interchange facilities including but not limited to: Park-and-ride and kiss-and-ride; transport interchange and layovers; accessways, paths and plazas; and bicycle facilities.	412 Sim Road, 913 and 933 Paerātā Road, Paerātā Road, Pukekohe
New Zealand Transport Agency	6704	State Highway - declared limited access road.	State Highway 22 (Karaka Road and Paerātā Road) from east of Woodlyn Drive, Karaka to Adams Drive, Pukekohe
New Zealand Transport Agency	6705	Land for road widening - 5m were indicated on Map 100, to a minimum width of 30m of road reserve	State Highway 22 (Karaka Road and Paerātā Road) from east of Woodlyn Drive, Karaka to Adams Drive, Pukekohe
Minister of Education	5061	Educational Purposes – primary school (years 0 to 8) and may include Early Childhood Education (preschool)	741 Paerātā Road, Paerātā

#### Kiwi Rail Holdings

Designation 6302 and 6310 provides for the development, operation and maintenance of railways, railway lines, railway infrastructure, and railway premises as defined in the Railways Act 2005. KiwiRail are in the process of electrifying the rail network from Papakura to Pukekohe. Designation 6310 provides designated land for the Paerātā train station which is currently in construction and expected to be complete in 2025.

Designation 6311 provides for the construction, operation and maintenance of railway premises and transport interchange facilities including the proposed interchange, park and ride and accessway to the Paerātā train station.

#### New Zealand Transport Agency

Designation 6704 provides for SH22 and Designation 6705 is provided for the widening of Paerātā and Karaka Road which is relevant to the future development aspirations of the site. This designation also signals NZTA's intention to widen this road in the future. The plan change will not hinder or obstruct the road widening designation from being given effect to.

Minister of Education

Designation 5061 provides for Paerātā School which is located in the northwestern area of the Precinct. Paerātā School is a primary school providing for years 0 to 8.

#### 4.2.2.2 Te Tupu Ngātahi Supporting Growth Alliance

Te Tupu Ngātahi Supporting Growth Alliance is a partnership between Auckland Transport and NZTA. The Alliance is responsible for investigating and planning for more than 70 transport projects to support urban growth in Auckland over the next 30 years. This involves protecting sites and routes required to accommodate transport projects that will connect new communities, help Aucklanders travel by safe, low-carbon transport modes, and deliver essential infrastructure to future-proof the economy.

By 2050 Auckland's population is expected to increase by one million people. Around 30 per cent of this new growth will be contained within the Future Urban zoned areas identified in the AUP<sup>1</sup>. To connect future communities, Auckland Transport and NZTA have developed a long-term strategic transport network. It contains well-designed transport connections that are safe, accessible and sustainable for Auckland's new growth areas in the north, northwest and southern parts of the region. This includes projects to support the planned growth in Pukekohe, Paerātā and south Drury.

The Pukekohe Business Case was approved by the Auckland Transport and NZTA Boards in September 2023, with nine Notices of Requirement ("NoRs") publicly notified in October 2023. The following NoRs in Table 2 are directly related to development of the Franklin 2 Precinct.

**Table 2:** NoRs located within and adjacent to the Precinct.

Group	Name and Number	Purpose	Location
Waka Kotahi NZ Transport Agency	Pukekohe: Drury – Pukekohe Link (NoR 2)	New state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.	Drury – Pukekohe
Waka Kotahi NZ Transport Agency	Pukekohe: Paerātā Connections (NoR 3)	Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerātā across the North Island Main Trunk Rail Line. The second between Paerātā train station and Sim Road, Paerātā.	Sim Road, Paerātā and Paerātā train station

Pukekohe: Drury – Pukekohe Link (NoR 2)

On 2 October 2023, NZTA lodged a NoR (NoR 2) for the Drury – Pukekohe Link project within the Pukekohe Transport Network. It is located along the eastern border of the Precinct (refer to **Appendix 3b**). This NoR aims to designate land for the construction, operation, maintenance,

<sup>1</sup> <https://supportinggrowth.govt.nz/about-us/>

and improvement of a new state highway running from Drury to Pukekohe, encompassing active transport facilities and associated infrastructure. The project includes the development of a state highway equipped with a shared path, along with intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems. Local road modifications are also planned where the new infrastructure intersects with existing roads. Spanning approximately 1587ha and involving 62 land parcels, the project aims to enhance connectivity between Great South Road in the northeast, SH22 in the west, and the Sim Road/Cape Hill Road area in the south. This will facilitate improved transport links to Drury West, Paerātā, and Pukekohe.

#### Pukekohe: Paerātā Connections (NoR 3)

On 2 October 2023, Auckland Transport lodged a NoR (NoR 3) for the Paerātā Connections project as part of the Pukekohe Transport Network expansion. This NoR aims to designate land for two new transport corridors equipped with active mode facilities. The first corridor spans between the two extents of Sim Road, Paerātā crossing the North Island Main Trunk Rail Line. The second corridor connects Paerātā train station and Sim Road, Paerātā. The proposed infrastructure includes the designation of transport corridors, active mode facilities, intersections, bridges, embankments, and stormwater management systems. These developments are pivotal in enhancing local transportation networks and supporting anticipated growth in the Paerātā area, covering approximately 109,399m<sup>2</sup> across 13 land parcels. These two connections are located at the southern end of the Precinct (refer to **Appendix 3b**).

#### Recommendations, Decisions and Appeals NoR 2 and NoR 3

Both NoR 2 and NoR 3 were notified on 13 October 2023 and the hearing for both matters commenced on 11 March 2024. On 22 August 2024, the Commissioners recommended that both NoRs should be confirmed subject to conditions.

On 24 October 2024, NZTA and Auckland Transport accepted the Commissioners' recommendations and accepted in part the recommendations on conditions for NoR 2 and NoR 3 respectively. Appeals on the decision closed on 15 November 2024. At the time of writing this report, it is unconfirmed whether any appeals on this decision have been lodged.

## 4.3 Changes Since 2015

### 4.3.1 Changing Context

Over the past 9 years, the development of Paerātā Rise has occurred in general accordance with the original Wesley College SHA Master Plan. The Precinct Masterplan aimed to create an accessible and walkable development where the community would have access to public transport, primarily the rail network, centred around the proposed Paerātā train station. Rail has always been identified as the primary transport mode for the Precinct, in order to reduce pressure and reliance on the surrounding roading infrastructure.

The original staging of development within the Precinct was proposed to commence in the southern part of Precinct near the proposed Paerātā train station. At the time of commencing the first stages of subdivision, Auckland Transport and KiwiRail were unable to agree on the location and timing of the proposed Paerātā train station. This lack of agreement meant that GDL focused

their attention for the first stages of development in the northern part of the Precinct accessed from Puhitahi Hill Road.

In the intervening period there has been a number of pivotal decisions which have influenced GDL's thinking on the approach to the development of the remainder of the Precinct.

These decisions relate to:

- the changes to the original staging plan that has resulted in the concentration of residential development at the northern end of the Precinct;
- the development and prioritisation of current and planned future transport improvements in the surrounding network;
- the recent decision of the Wesley College Trust Board to remain within the Precinct and retain the rugby fields, training grounds and gymnasium; and
- changes required by the NPS-UD and the need to achieve an efficient scale of development that is responds to investment in infrastructure.

This thinking has re-focused the strategic considerations for the Precinct including:

- the implications of Wesley College remaining on its existing site and retaining a number of its existing facilities such as the playing fields, gymnasium and other buildings which may have been suitable for wider community use.
- the need to look at how to provide for commercial and community activities in the Precinct to best meet and support the social and economic needs of those living at Paerātā Rise.
- the need to achieve a form and intensity of residential development in the southern part of the Precinct responding to the decision to the proceed with the Paerātā train station.

#### 4.3.2 Transport Investment

From the outset, Central and local government transport investment decisions have had a significant influence on the staging and development of Paerātā Rise, particularly the decisions on the Paerātā train station. This resulted in the initial stages of development at Paerātā Rise being focused on the northern end of the Precinct. This focus to the north is reinforced by recent Central government investment in the Precinct with the development of Paerātā primary school, and the works being undertaken by NZTA to upgrade the Glenbrook roundabout on SH22. The roundabout provides a purpose-built gateway to the northern end of Paerātā Rise.

Transport investment priorities and decisions will continue to influence the ongoing development of Paerātā Rise. These include upgrades to SH22, the electrification of rail between Papakura and Pukekohe, the location of train stations on the North Island Main Trunk Line between Papakura and Pukekohe, and the on/off approach to the Pukekohe Expressway (Mill Road extension).

The SH22 improvements, including the upgrade of the Glenbrook roundabout, have significantly improved access to the northern end of the Precinct and reinforce development in this part of the

Precinct. The confirmation of the electrification of the Papakura to Pukekohe rail line and the location of the Paerātā train station within the Precinct means that GDL can now proceed with greater certainty to plan the accompanying residential development in the southern part of the Precinct. This includes the areas of land around the proposed Paerātā train station.

#### 4.3.3 Wesley College Relocation

The original plans for the Precinct were predicated on the basis that Wesley College would relocate outside of the Precinct and build a new College in the general vicinity of Paerātā. GDL's original proposal for the College site was to repurpose and refurbish some of the existing College buildings including the marae, the gymnasium, the dining hall and tennis courts. There was also a desire to preserve a number of character buildings and structures and to protect the iconic W.H. Smith Memorial Chapel along with some of the significant trees on the College grounds.

With the existing College being centrally located within the Precinct, the decision was made to transform this area to be the new commercial and social hub for the community. This approach saw the College site and adjoining rugby fields being rezoned Local Centre zone and included in a separate Wesley sub-precinct. The Wesley sub-precinct provisions were drafted to enable the redevelopment of this area to provide for the local convenience needs of the surrounding residential community including local retail, commercial services, offices, food and beverage and a small-scale supermarket.

In the intervening period, the Wesley College Trust Board have revisited its decision to relocate the College. The Trust Board have since decided to remain on its current site within the Precinct and to retain the existing College facilities including the gymnasium and rugby fields. This decision has required GDL to re-examine the best option to meet the growing social and community demand for commercial and community services.

#### 4.3.4 Rethinking Approach to Commercial Activities

The retention of the College on its existing site has meant GDL have had to re-examine the location of the Local Centre zone within the Precinct and how to best provide for the commercial and community needs of the residents of Paerātā Rise.

GDL's preference is to redistribute the existing Local Centre zoned land to the northern and southern areas of the Precinct. This would result in the development of a small commercial centre at the northern end of the Precinct which would meet the convenience retail and local services needs of the growing residential community in this part of the Precinct. This approach would also enable a second complementary commercial area with accompanying higher intensity residential development in the southern area of the Precinct adjacent the Paerātā train station.

GDL considers this approach provides both the Council and the community with greater certainty of outcome particularly in relation to the transport investment being made in the area. It will also enable the orderly development of commercial activities in the Precinct, reduce the need for vehicle movements, and continue to protect the heritage and character buildings through the redevelopment of the College within the Precinct. It also provides opportunities for dual use by the College and community of the College's recreational facilities including the gymnasium, tennis courts and rugby fields.

#### 4.3.5 Higher Intensity Residential Development

GDL plans to co-locate more intensive development surrounding the Local Centre zone and in the vicinity of the Paerātā train station. This intention is reflected in the proposed rezoning of the land in the Franklin 2 Precinct as part of this proposed plan change. While GDL thought the Franklin 2 Precinct provisions were aspirational at the time of PPV3, in the intervening period, the AUP has become operative. This has enabled a surge of more intensive residential developments across the region, particularly in areas with good access to rapid transit options such as rail.

In addition, Central government has produced a number of policy directives that require local authorities to enable greater housing supply and ensure that planning is responsive to changes in demand. This involves ensuring that new development capacity enabled by councils is of a form and in locations that meet the diverse needs of communities while encouraging well-functioning, liveable urban environments. These policy directives also require councils to remove restrictive rules that affect urban development outcomes in our cities.

GDL considers there is an opportunity to review the zoning applied around the proposed Paerātā train station. While GDL are seeking provision for commercial activities in this part of the Precinct, they believe there should also be opportunities for more intensive residential activities and development, including terraced housing and apartment buildings. Such an approach would give effect to the government's national direction for urban development under the NPS-UD.

#### 4.3.6 Resource Consents

##### 4.3.6.1 Residential Development

GDL own the majority of the land within the Precinct. Phase 1 of development of Paerātā Rise was initiated in 2016. Several resource consents have been granted to date to facilitate development within the Precinct and are considered relevant in informing the plan change and seeking alignment with the AUP.

As detailed in the Subdivision and Consenting Assessment report prepared by Woods (refer **Appendix 14**), resource consents have been approved in relation to stormwater management, infrastructure, framework plans (Phases 1-4), bulk earthworks, staged subdivisions (Stages 1 – 12), and amenities (such as a café and a childcare centre) that have facilitated development within the Precinct. It is noted the more recent resource consents include land use consents addressing blanket approvals for infringements to Precinct standards such as new buildings, privacy, and show homes.

Implementation of these resource consents has occurred since 2016, with significant areas of earthworks now completed and subdivision Stages 1-9 being completed. To date, there are approximately 650 individual titles issued and a further 300 that are consented and ready to be constructed. This totals approximately 950 lots that have been granted consent. A summary of the relevant approved consents is set out in the Appendix 1 of the Subdivision and Consenting Assessment report (refer **Appendix 14**).

To date, development has occurred in accordance with the Franklin 2 Residential A and B sub-precinct provisions. The plan change proposes that future development in the Precinct will accord with the AUP zone provisions applied to the Precinct with some minor exceptions. These

exceptions relate to the retention of the minimum subdivision size of 200m<sup>2</sup> for sites in the Mixed Housing Urban zone and the inclusion of provisions for show homes.

#### 4.3.6.2 Northern Commercial Centre and Consent Order

Given the level of completed development in the northern end of the Precinct and at the time, uncertainty around the relocation of Wesley College, in April 2022, GDL lodged an application for resource consent with Council to enable the development of the northern commercial centre. This centre was intended to meet the convenience retail and local services needs of the growing residential community in this part of the Precinct. The application comprised of two parts:

- a proposed framework plan for the northern commercial centre; and
- resource consents for the proposed commercial development located within Stage A of the northern commercial centre in the framework plan. Stage A included the construction and operation of a 3,850m<sup>2</sup> supermarket (including a 250m<sup>2</sup> online order pick up area, servicing and loading areas, and a 200m<sup>2</sup> office and associated parking), a 250m<sup>2</sup> retail area within the supermarket building containing food and beverage activities, and a separate 450m<sup>2</sup> retail block containing standard retail activities. The supermarket and retail complex had a proposed gross floor area of 4,550m<sup>2</sup>.

The resource consent application was publicly notified on 17 October 2022 where nine submissions were received<sup>2</sup>. Submitters raised issues regarding stormwater, transport (including pedestrian safety), noise and vibration, and residential amenity effects. In response to submissions, the resource consent application was amended to resolve all issues raised by submitters.

On 17 August 2023, the Council issued its recommendation to decline the resource consent application. The decision was appealed by GDL. In a subsequent Environment Court mediation process, agreement was reached between GDL and Council regarding the development of the supermarket and agreed that GDL would lodge a private plan change request to update the zoning applied to the Franklin 2 Precinct in the AUP. On 27 May 2024, the Environment Court issued a consent order granting resource consents for the development of the supermarket building and associated carparking, loading, access, signage, landscaping areas subject to the conditions of the original consent application.

#### 4.3.6.3 Service Station

On 4 May 2023, a non-notified resource consent application was granted by Council to BP Oil New Zealand Limited to redevelop and expand the existing Caltex service station and commercial activities at 683 and 679 Karaka Road, Papakura. The site is zoned Mixed Housing Urban and located in the Franklin 2 Residential sub-precinct. Service stations are a discretionary activity in the precinct provisions.

The proposal includes the demolition of the existing Caltex Service Station and pet store at 683 Karaka Road and the residential house at 679 Karaka Road. The new service station will include a BP shop, car wash, 16 fuel pumps, signage and customer parking. At the time of writing this report, the buildings on the sites have been demolished, and construction has commenced.

<sup>2</sup> Ministry of Education, Auckland Transport, Waka Kotahi NZ Transport Agency, BP Oil New Zealand, Karaka Jixiang Development Ltd (the owner of the adjoining site at 3 Te Rata Boulevard), Bagia Brothers NZ Limited, Bruce and Diane Lovejoy, Dipak Hirani, and comments were received from the Franklin Local Board.

## 4.4 Masterplan Update

As outlined above, much has changed since the original Masterplan and Structure Plan report (2014) were prepared and the Franklin 2 Precinct provisions were made operative. In response to these changes, GDL, with input from its technical specialists, have updated the Masterplan for the Precinct. Details of the revised Masterplan are outlined in Section 7.1 of this report. The updated Masterplan (refer **Appendix 9**) and specialist reports (refer **Appendices 10 – 15**) have informed and guided the development of this plan change.

## 5.0 Plan Change Request

### 5.1 Scope of the Plan Change

The proposed plan change is seeking to relocate and reduce the overall extent of business zoned land in the Precinct. This will see the current Local Centre zoning fronting Paerātā Road being redistributed in part to the northern end of the Precinct adjacent to the Glenbrook Roundabout, and in part to the southern end of the Precinct adjacent to the new Paerātā train station. Provision has also been made for a small Neighbourhood Centre zone (0.3ha) within the Precinct along Sim Road. Overall, GDL are proposing a reduction in the amount of commercially zoned land within the Precinct from approximately 17.8ha as provided for by the AUP to 6.8ha. The plan change also proposes to provide for more intensive residential development within a walking catchment of the Paerātā train station.

The operative Franklin sub-precinct A and sub-precinct B rules will be removed and future development will be managed by the standards in the underlying zoning provisions. The Precinct specific standards in relation to Wesley College, vehicle access to SH22, the timing and upgrades of the main roads, stormwater management and riparian margins are proposed to be retained.

The changes to the AUP zone within the Precinct as shown on the planning maps and to the Franklin 2 Precinct provisions are attached as **Appendix 5**. A 'clean' version of the Franklin 2 Precinct plan change is attached in **Appendix 4**.

The scope of the plan change request is as follows:

Change the zoning as follows:

- Rezone the existing Local Centre area located largely in the vicinity of Wesley College to Mixed Housing Urban zone, with the retention of additional controls to enable the ongoing operation and improvements to Wesley College.
- Rezone the area adjacent to the Glenbrook roundabout from Mixed Housing Urban zone to Local Centre zone.
- Rezone the area adjacent to the Paerātā train station (currently under construction) to Local Centre zone and Business – Mixed Use (“Mixed Use”) zone.
- Rezone a small site (3,000m<sup>2</sup>) in the vicinity of Sim Road within the Precinct from Mixed Housing Urban zone to Neighbourhood Centre zone.
- Rezone the residential area within a 10 minute walkable catchment of the Paerātā train station from Mixed Housing Urban zone to Terrace Housing and Apartment Buildings zone to align with the requirements of the NPS-UD.

Align the Precinct with the operative AUP zone provisions, including:

- Updating the additional provisions applying to development in the Franklin 2 Precinct, including the transport triggers, affordable housing and the sub-precinct specific development standards.
- Clarification of the notable tree provisions within the Precinct, as these are largely identified in the Auckland-wide Notable Tree Overlay.

The scope of the plan change excludes:

- The boundaries of the Franklin 2 Precinct;
- The zoning of GDL owned land outside the Franklin 2 Precinct; and
- Any changes to the text of Overlays, Auckland-wide and Zone provisions of the AUP.

## 5.2 Purpose and Reasons for the Plan Change

The purpose and reasons for the plan change request are discussed in three themes below as follows:

THEME DESCRIPTIONS	PLAN CHANGE ELEMENTS
<p>Theme 1: Providing for the Wesley College</p> <p>The PPV3 and 2014 Masterplan assumed that Wesley College would be relocated to a new site outside of the Precinct, with the land occupied by the College anticipated to contain the commercial and social hub of the community. This change in use was provided for through the Local Centre zone. The Precinct did provide, in the meantime, for ongoing educational use of the land within the Wesley sub-precinct until such time as a new location was identified. Subsequently, it has been determined by the Wesley College Trust Board, that the College is to remain on its site and will be upgraded over time to meet the needs of students. As a consequence of this decision, analysis of commercial zoning within the precinct was undertaken and a commercial redistribution strategy developed to inform a revised Masterplan and location for two new Local Centres at the northern roundabout and adjacent to Paerātā train station. This redistribution results in the underlying zone within the former Wesley sub-precinct being reidentified as Mixed Housing Urban with the retention of the Precinct specific provisions providing for Special Purpose – School zone activities to be undertaken within this area.</p>	<ul style="list-style-type: none"> <li>• Changes to zoning.</li> <li>• Retain standard providing for education use.</li> <li>• Amendment to sub-precinct boundaries.</li> </ul>

THEME DESCRIPTIONS	PLAN CHANGE ELEMENTS
<p>Theme 2: Well-function Urban Environment</p> <p>Consistent with contributing to a well-functioning urban environment, the proposed changes will provide for higher densities of residential and commercial development and enable mixed-use areas within and around the proposed Local Centre zones. The proposal will enable an increase in the level of residential and commercial intensity around the Paerātā train station. Residential intensification will extend within a walkable catchment of the station and will enable a range of housing types. This will be achieved by zoning including the redistribution of the Local Centre zone, the establishment of a new area of Neighbourhood Centre zone and the application of the AUP’s Terrace Housing and Apartment Buildings zone within a walkable catchment of the Paerātā train station.</p> <p>The changes also include the deletion of precinct specific development controls and the adoption of AUP residential zone standards. Housing choice and affordability will be achieved through providing a wider range of housing types and land areas that can respond to market needs. Consequently, it is proposed to delete the precinct specific affordable housing standards. These changes increase the consistency with the underlying zone provisions as part of achieving a well-functioning urban environment. A table comparing the operative AUP residential zones to the operative Franklin 2 sub-precinct A and sub-precinct B provisions is included as <b>Appendix 6</b>. The table highlights where the provisions are similar alongside inconsistencies proposed to be addressed by the plan change.</p> <p>The changes also include clarification of trees identified in Wesley sub-precinct concept plan. These trees are already identified, subject to minor changes included in the plan change, in the Notable tree schedule at Schedule 10 of the AUP and the concept plan is considered unnecessary to include to achieve a well-functioning urban environment.</p>	<ul style="list-style-type: none"> <li>• Changes to zoning.</li> <li>• New standards.</li> <li>• Deletion of sub-precincts A and B</li> <li>• Amendment to Schedule 10 Notable Trees.</li> </ul>
<p>Theme 3: Aligning Development with Infrastructure Capacity</p> <p>In order to enable the establishment of development within the Precinct, considerable infrastructure planning and implementation was required. Whilst the provisions related to stormwater and future upgrade triggers continue to be satisfactory and meet the needs of the planned development, there are certain matters that have occurred that necessitate changes to the precinct provisions. This includes revision of the transport triggers recognising that the northern roundabout has been completed and the southernmost roundabout and Link Road to the Paerātā Station is under construction. The plan change does not amend the stormwater</p>	<ul style="list-style-type: none"> <li>• Retain standards related to stormwater management.</li> <li>• New standard to restrict impervious areas in the Terrace Housing and</li> </ul>

THEME DESCRIPTIONS	PLAN CHANGE ELEMENTS
<p>provisions that were developed to provide for urbanisation of the land however to address potential flooding effects, a new standard is proposed that will limit impervious surfaces to 60 per cent on land rezoned the Terrace Housing and Apartment Buildings zone. The plan change and accompanying masterplan concepts have considered the response to the nationally significant transmission lines that traverse the plan change site and provides development options to integrate development around these important assets.</p>	<p>Apartment Buildings zone to 60 per cent.</p> <ul style="list-style-type: none"> <li>• Amendment of transport standard to delete early triggers already surpassed.</li> <li>• Recognition of transmission line corridor.</li> </ul>

## 6.0 Statutory Analysis

The RMA requires territorial authorities to consider a number of statutory and policy matters when preparing proposed plan changes. This plan change seeks to make amendments to the District Plan provisions only and the plan change has been developed to comply with the relevant statutory matters.

The mandatory requirements for plan changes have been summarised by the Environment Court (refer Long Bay-Okura Great Park Society Incorporated and Others v North Shore City Council (A078/2008)<sup>3</sup>), where the Court set out the following measures for evaluating objectives, policies, rules and other methods. The key requirements are:

- a district plan change request should be designed to accord with and assist the territorial authority to carry out its functions so as to achieve, the purpose of the Act.
- when preparing a district plan change request it must give effect to any national policy statement or New Zealand Coastal Policy Statement.
- when preparing a district plan change request it shall:
  - have regard to any proposed regional policy statement; and
  - not be inconsistent with any operative regional policy statement.
- in relation to regional plans:
  - the district plan change request must not be inconsistent with an operative regional plan for any matter specified in section 30(1) (or a water conservation order); and
  - must have regard to any proposed regional plan on any matter of regional significance etc.

<sup>3</sup> Subsequent cases have updated the Long Bay summary, and includes Colonial Vineyard v Marlborough District Council [2014] NZEnvC 55.

- when preparing a district plan change request it must also:
  - have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations; and to consistency with plans and proposed plans of adjacent territorial authorities;
  - take into account any relevant planning document recognised by an iwi authority; and
  - not have regard to trade competition.
- a district plan change request must also state its objectives, policies and the rules, and may state other matters.

There are also mandatory requirements under Section 32 RMA, these requirements are summarised as follows and a Section 32 evaluation is provided at **Appendix 7**. This evaluation addresses the following requirements:

- each proposed objective in a district plan change request is evaluated by the extent to which it is the most appropriate way to achieve the purpose of the Act. (RMA section 32(1)(a))
- the policies are to implement the objectives, and the rules (if any) are to implement the policies (RMA sections 32(2)(b), 32(2), 32(6)(a) and (b)).
- each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:
  - the benefits and costs of the proposed policies and methods (including rules) (RMA section 32(2)(a)); and
  - the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods (RMA section 32(2)(c)).

Clause 22(2) of Schedule 1 of the RMA requires a plan change request to describe the anticipated environmental effects, and this is provided below in Section 7.0, in an assessment of environmental effects (“AEE”)<sup>4</sup>. The AEE which has been provided includes the necessary detail to correspond with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the plan change as has been assessed in the Section 32 Assessment (refer **Appendix 7**).

## 7.0 Assessment of Environmental Effects

This AEE is prepared in accordance with Clause 22(2) of Schedule 1 of the RMA. Clause 22(2) of Schedule 1 of the RMA requires a plan change request to describe the anticipated environmental effects, taking into account clauses 6 and 7 of Schedule 4 of the RMA, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the plan change.

<sup>4</sup> Clause 22(2) of Schedule 1 of the RMA requires the AEE to be prepared to the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, RMA.

This section details the actual and potential environmental effects that the plan change may have on the environment. This assessment is based on specialist reporting and analysis which are attached as appendices to this application.

## 7.1 Urban Form and a Quality Built Environment

This section addresses the matters in Clause 7(1)(a), (b) and (d) referenced in Section 22(2) of Schedule 4 of the RMA.

As outlined in Section 5.2, the plan change request has been prepared in response to a number of changes that have occurred since the Precinct provisions became operative in 2015. In response to these changes, Amy Zhu Grant Urban Design has updated the Masterplan for the Precinct (refer **Appendix 9**) and prepared a revised Urban Design Statement (2024) (refer **Appendix 10**).

The Urban Design Statement provides the rationale behind the proposed zoning changes, outlines the indicative design outcomes proposed, and assesses any urban design effects resulting from these changes. The statement also provides an analysis of the proposed design response in relation to the transport network, open space network, urban form, and use and activity.

At the heart of the revised masterplan is the decision of the Wesley College Trust Board for the school to remain in the Precinct. The original intention was that Wesley College would relocate to a new site outside the Precinct, with the land occupied by the College being identified as the commercial and social hub of the new community. This decision has required GDL to pursue an alternative strategy to provide for the commercial and social needs of the growing community at Paerātā Rise.

In 2023, a decision had not yet been made on whether the College would be relocating outside of the Precinct. As a result, this culminated in GDL lodging a resource consent application with Council to develop a commercial centre at the northern end of the Precinct adjacent to the new Glenbrook roundabout on land zoned Mixed Housing Urban. While Council declined consent to the full application, following an Environment Court appeal of the decision, agreement was reached between GDL and Council to part of the proposal enabling the development of a supermarket. As part of the Court mediation process, GDL and Council agreed that a private plan change request should be lodged to the AUP to amend the zoning applied in the Franklin 2 Precinct.

In addition to redistributing the provision for commercial activities within the Precinct, the revised Masterplan also provides for Wesley College and addresses the requirements of the NPS-UD for intensification within a walkable catchment of the Paerātā train station which is currently under construction.

The revised Masterplan maintains the Precinct's overall design approach as an accessible, multi-modal, walkable residential community. This is based on a passenger transport interchange, which will achieve high quality environmental outcomes and that offers its residents access to quality connected open space, water sensitive stormwater design, and access to local commercial, social and community services. The revised Masterplan will enable a mixture of residential, commercial, and other services and amenities within different areas of the Precinct.

The proposed residential zoning pattern will continue to provide for a mixture of site sizes which support a variety of building typologies and uses such as standalone dwellings, attached dwellings and higher-density apartments around Paerātā Train Station. This pattern addresses different market demands and promotes a more diverse housing stock within the Precinct and wider area

providing for a range of people and communities. The future urban form of the Precinct is consistent with the anticipated urban built character across Auckland as informed by the requirements of the NPS-UD. This includes provision for development of at least six storeys around train stations. Plan Change 120 ("PC 120") to the AUP includes provisions that will enable six-storey buildings in walkable catchments in the Terraced Housing and Apartment Buildings zone. Once determined the suite of provisions that enable six-storeys will be applicable to development in the precinct.

In terms of business zoning, the proposal will provide for commercial activities at the northern and southern end of the Precinct along with the provision for a future neighbourhood centre on Sim Road. The proposed Northern Local Centre covers approximately 5.3ha and is strategically positioned adjacent to the Glenbrook roundabout, which serves as a key gateway entry to the Precinct from the north and west. The area will be zoned Local Centre zone and will provide for the local convenience and retail needs of the existing and expanding residential community in the Precinct. This area is highly accessible and well-connected to the rest of the Precinct via dedicated cycle paths and public transport as well as neighbouring communities.

A second, but smaller (approximately 1.7ha), local centre is provided for at the southern end of the Precinct. Located adjacent to the Paerātā train station, it is aimed at creating a mixed-use node that will provide commuters and residents with easy access to commercial activities and community services. It will enable commuters and residents to shop, dine, and access services while also encouraging the use of public transportation. This area adjacent the train station will be zoned Local Centre and the area to the north Mixed Use zone. The Mixed Use area will provide a transition area, in terms of scale and activity, between the commercial hub and surrounding residential areas. The Mixed Use zone provides for a compatible mix of residential and employment activities.

The Sim Road neighbourhood centre in the northeastern part of the Precinct will provide for future establishment of a small set of shops within the residential neighbourhood to provide surrounding residents and passers-by with frequent retail and commercial service needs. Any development would be of a scale and intensity in keeping with the surrounding residential environment. This area along Sim Road will be zoned Neighbourhood Centre zone.

The revised movement network within the Precinct maintains the principles established in the Franklin 2 Precinct Structure Plan 2014. This includes creating a well-connected residential environment with a clear movement hierarchy that supports both passive and active modes of transport and provides access to the Paerātā train station. Despite slight variations to some road alignments, the masterplan retains the overall structure and movement hierarchy of the structure plan. This includes providing a connected road layout which follows the natural landform of the Precinct and supports open space and street activation. The masterplan also provides integration with the future Park and Ride Facility to the east of the Paerātā train station, alongside an internal pedestrian and cycle network. These elements of the proposed movement network ensure safe and efficient access is provided throughout the Precinct and its key nodes including to riparian reserves and open spaces, as well as the Paerātā train station.

Likewise, the plan change largely retains the open space principles and open space network established in the 2014 structure plan. This includes creating open spaces that are frequently used, well-loved and enjoyed and drawing on and enhancing the Precinct's natural assets and features. The proposed open space network retains the provision of a greenway network contiguous to the existing stream network which runs through the Precinct. A section of the greenway network in the northern area of the Precinct has been established and comprises of riparian reserves which provide for pedestrian and cycle pathways, ecological connections, and spaces for informal recreation. The plan change proposes to extend this network where future riparian reserves will maintain a similar character and function. Overall, the greenway network

supports the recreational and amenity values of the Precinct through providing safe and efficient access to high quality open spaces.

The Transmission Corridor is proposed to be integrated behind development blocks within riparian reserves, proposed parks, and landscaped corridors. This design response softens the prominence of the Transmission Corridor and ensures it is integrated into the surrounding urban fabric. Alongside mitigating potential amenity and safety effects on development within the Precinct, the design response ensures access to the Transmission Corridor is retained to allow for ongoing maintenance and operation.

The overall proposed zoning approach, in conjunction with the proposed precinct provisions, will enable a broader range of activities within different areas of the Precinct as anticipated within an urban environment by the AUP. This approach promotes a vibrant and sustainable community and enables the community within the Precinct to provide for their social, economic, and cultural wellbeing.

The proposed layout and design of the Precinct will continue to consider the natural topography of the area and support an integrated block structure with strategic lot placement to minimise rear lots and maximise sunlight access. To ensure a high quality design outcome is achieved within the Precinct, each block will continue to be designed so development fronts onto and has access to open space while providing for appropriate outlook and passive surveillance.

The underlying Mixed Housing Urban zone has a minimum vacant site size in the Auckland-wide urban subdivision chapter; however, it is proposed to provide for a smaller vacant site size of 200m<sup>2</sup> in the Precinct. This recognises the comprehensive and integrated masterplanning that has been developed to manage development within the Precinct and provides for lot sizes that are consistent with the high quality development anticipated in the Precinct.

Overall, the plan change facilitates the development of the Precinct in a way that contributes to a quality built urban environment in terms of accessibility, a level of amenity, a compact urban form and transport-orientated development. The plan change will result in positive effects and will achieve a quality, well-integrated urban form.

## 7.2 Economic Effects

This section addresses the matters in Clause 7(1)(a) referenced in Section 22(2) of Schedule 4 of the RMA.

An Economic Assessment has been prepared by Property Economics (refer **Appendix 11**). The Economic Assessment considers the potential economic effects of the proposed redistribution of business zoned land in the Precinct and residential intensification around the Paerātā train station. The assessment also considers the appropriateness and efficiency of the plan change in relation to the surrounding environment and centres network and hierarchy.

The Precinct currently provides for a centrally located local commercial centre that was intended to provide for the new residential community, including activities that would meet their local service needs. The local centre was planned for land fronting Paerātā Road, largely to the east of Puhitahi Hill Road, that forms part of the existing Wesley College. In the operative precinct provisions this area is identified as the Wesley sub-precinct. The sub-precinct provisions are drafted to provide for the redevelopment of the area to meet the local convenience needs of the surrounding residential community including local retail, commercial services, offices, food and beverage, a small scale supermarket as well as a range of residential activities. The sub-precinct provisions also provide for Special Purpose – School zone activities in this area to allow the school to operate in its current location for the transition.

With Wesley College now seeking to stay on its existing site, GDL has reassessed its approach to the provision of retail, commercial and community services and the business zoning applied in the Precinct. As a result of this reassessment, the plan change proposes to reduce the overall amount of business zoned land from 17.8ha (gross) to a total net area of approximately 6.8ha. Rather than create a single commercial centre, the plan change proposes to provide three distinct commercial areas being to the north adjacent to the Glenbrook roundabout, to the south adjoining the Paerātā train station and a small neighbourhood centre to the east fronting Sim Road. The proposed business zones applied to these areas are commensurate with the function of these areas being a mixture of Local Centre zone, Mixed Use zone and Neighbourhood Centre zone.

The economic assessment identifies the Precinct as being able to accommodate a net commercial developable land area of approximately 3ha to 3.4ha for convenience retail and commercial services. This total excludes land typically required for other non-commercial uses within a business zone such as infrastructure and community facilities. The assessment considers the proposed commercial land of 6.8ha<sup>5</sup> (net area) is sufficient to accommodate the local commercial needs of the existing and future population of the Precinct, including other non-commercial amenities required.

The economic assessment considers the spatial redistribution and proposed zoning applied to these areas as being more economically efficient than the current location. As the report sets out:

*“From an economic perspective, the existing [Local Centre zone] location, being an internalised focused area within the Precinct is not well located to achieve high economic performance. This zone also includes a school, church and will focus on delivering other community services and facilities to the community. There would be limited retail activity development potential in the existing [Local Centre zone] area, with any retail activity likely to be ancillary to supporting the community, recreational, cultural and educational activities”<sup>6</sup>.*

The assessment considers the operative area of Local Centre zone has limited land provision available for other commercial activities, effectively compromising the overall economic offerings and performance of the Precinct. The economic assessment concludes the proposed new locations will provide improved development potential, profile, visibility, and accessibility from the surrounding transport network. The proposed locations remain convenient for residents of the Precinct while also being highly accessible to passing traffic from SH22 and commuters utilising the Paerātā train station, enhancing the overall economic potential of the station. In addition, the provision of Local Centre zoning around the Paerātā train station is consistent with the AUP zoning strategy.

The proposed spatial redistribution of business zones is considered to be consistent with the centres' hierarchy of the AUP. The proposed Local Centre zones are intended to primarily service the local convenience needs of the Precinct, and do not significantly expand the core retail catchment of the internal centres network. In comparison, the existing and planned centres in the Auckland South market being Pukekohe Town Centre zone, Drury Metropolitan Centre zone and Drury Town Centre zone, are higher order centres that provide a range of commercial services and serve a larger catchment. The economic assessment concludes the proposed Local Centre zones are appropriately located and scaled to support the centres hierarchy and do not compromise the role, function and growth of other surrounding centres.

<sup>5</sup> Net area excludes area in roads and infrastructure (inc. reserves).

<sup>6</sup> Franklin 2 Precinct Private Plan Change Economic Assessment Report, Property Economic (October 2024), page 39, paragraph 8.3

In terms of the proposed Sim Road Neighbourhood Centre zone, the economic assessment considers the location is well suited to meet the day-to-day convenience needs of residents while also supporting a balanced distribution of business zoned land within the broader Precinct.

A second objective of the plan change is to enable residential intensification around the Paerātā train station in line with the requirements of Policy 3(c) of the NPS-UD. The plan change proposes to give effect to this national direction through the rezoning of Mixed Housing Urban zoned land within a walkable catchment of the station to the Terrace Housing and Apartment Buildings zone and Mixed Use zone.

The Precinct is located within the Paerātā – Pukekohe local residential market which forms part of the wider Auckland South catchment. In terms of residential capacity and demand, the Auckland South catchment is anticipated to require an additional 87,000 dwellings to accommodate projected medium-term population growth (2023 – 2048).

The economic assessment considers the plan change presents an opportunity to contribute to this anticipated demand through providing additional residential capacity within the Precinct. The rezoning of 50.7ha of land to the Terrace Housing and Apartment Buildings zone is estimated to provide approximately 760 new dwellings, where the wider Precinct is estimated to provide for approximately 5,140 dwellings. From an economic perspective, the assessment considers the proposed rezoning represents a more efficient use of rapid-transit oriented land which enables a variety of housing typologies and offers greater certainty around the available housing capacity of the wider catchment.

As part of determining the plan change's effect on residential capacity and demand, the economic assessment report provides an analysis of the FDS and surrounding land within the wider catchment zoned Future Urban zone. As noted above in Section 4.2, the assessment also highlights that approximately 640ha of previously identified Future Urban zoned land around Takaanini and Ōpaheke-Drury is recommended for removal due to natural hazard risk. The assessment estimates that the removal would result in a total residential capacity loss of approximately 7,500 dwellings in the Auckland South market. Taking into account both the requirements of the NPS-UD and the strategic direction of the FDS, the assessment concludes the plan change appropriately provides for greater residential yield in an existing and accessible urban environment while partially offsetting the removal of Future Urban zoned land within the surrounding catchment.

The economic assessment considers the removal of the 'Affordable Housing' provision from the Precinct is unlikely to have a negative impact on housing affordability both within the Precinct and wider Auckland region. The plan change residential zoning approach including a mixture of the Terrace Housing and Apartment Buildings zone and Mixed Housing Urban zone, enables a range of typologies which can be sold at various price points catered to different people and communities. As previously stated, the proposed Terrace Housing and Apartment Buildings zoning will provide for an additional 760 dwellings within the Precinct. The assessment considers the proposed provision for higher-intensity development is likely to have a larger impact on the overall housing market and housing prices in comparison to the affordable housing provision which only applies to approximately 350 dwellings. In addition, the assessment considers the removal of the provision will improve the overall consistency with the AUP and provide greater flexibility and certainty on development enabled within the Precinct.

Overall, the economic assessment supports the plan change and concludes the potential economic benefits of the plan change outweigh any potential economic costs.

## 7.3 Transport Effects

This section addresses the matters in Clause 7(1)(a) referenced in Section 22(2) of Schedule 4 of the RMA.

An Integrated Transport Assessment (“ITA”) has been prepared by Commute (refer **Appendix 12**). The ITA considers the compatibility of the plan change with surrounding land uses including the ability of the transport network to safely and efficiently accommodate development enabled by the plan change.

The ITA identifies the Precinct as well located with regards to transport connectivity to the wider Auckland region. The Precinct is accessed via four intersections directly from Paerātā Road and Karaka Road which form part of the arterial and SH22 networks. The Precinct is also serviced by public transport including a bus service connecting to the Pukekohe and Papakura train stations, and the southern train line which will connect Paerātā train station to Britomart from 2026. A frequent bus service is also planned which will connect the southern and northern ends of the Precinct<sup>7</sup>.

The Precinct is also well connected internally through a series of pedestrian and cycle pathways between local employment, schools, residential, commercial, and recreational facilities. The provision of an active transport network promotes walkability and ensures the safe and efficient movement of people throughout the Precinct.

The ITA considers development enabled by the plan change is compatible with the surrounding transport environment and continues to support the overall connectivity of the Precinct. As part of supporting connectivity, the ITA highlights that land use integration is improved through residential and commercial intensification around the Paerātā train station. This further promotes and enables active transport within the Precinct and a reduced reliance on private vehicles. In addition, the ITA considers the plan change improves the overall safety within the precinct through provision of new traffic calming, walking, and cycling infrastructure.

The ITA estimates development enabled by the plan change will result in approximately 3,166 external trips during the morning peak and 3,464 external trips during the afternoon peak. The plan change is anticipated to result in an additional 142 external trips during the morning peak, and a decrease of 540 external trips in the afternoon peak than what was previously assessed and approved under PPV3<sup>8</sup>. The increase can be attributed to the proposed minimal increase in residential yield, whereas the decrease reflects the proposed reduction in commercial yield.

The anticipated increase in trip generation during morning peak will have a minimal impact on the surrounding transport network, where the proposed Terrace Housing and Apartment Buildings zoning around the Paerātā train station will promote overall lower generation rates as residents are more likely to rely on public transport. In terms of commercial vehicle traffic volumes, the proposed redistribution of business zones will split the number of commercial trips across the Precinct as opposed to a single local centre as provided by the operative zoning. The ITA considers this will more equally distribute commercial trips across the Precinct and improve the overall operation of the accessways into the Precinct. The ITA anticipates the proposed Neighbourhood Centre zone will generate higher numbers of pedestrian traffic and therefore considers potential traffic effects from this centre are negligible.

The Precinct is accessed via four intersections directly from Paerātā Road and Karaka Road which form part of the arterial and SH22 network. The Precinct is also proposed to be accessed

<sup>7</sup> Auckland Regional Public Transport Plan 2023-2031

<sup>8</sup> 3,024 external trips during morning peak and 4,004 external trips during afternoon peak - Franklin 2 Structure Plan - Integrated Transport Assessment, 8 September 2014, Appendix C, Table 2-27.

via a new connection from Sim Road. The ITA identifies that these accessways will require upgrades to support development enabled by the plan change. At the time of writing this report, the northernmost access at the intersection of SH22 and Glenbrook Road has been upgraded to a roundabout. Construction has also commenced on Link Road, the southernmost access point of the Precinct, which is being constructed by KiwiRail in conjunction with the Paerātā train station phase. The upgrades to Puhitahi Hill Road and the access to the south of the Wesley College site have yet to be designed. NZTA have lodged a NoR to designate the land required to upgrade the Sim Road connection.

The plan change also proposes to update the 'Access upgrades and Timing of Development' standard in the precinct provisions to ensure that the rate of development is aligned with access upgrades. The standard requires a transport assessment is prepared once more than 1,200 residential lots or dwellings are completed across the Precinct, and again when more than 2,500 residential lots or dwellings are completed to determine whether an access upgrade(s) if any are required. The ITA confirms the Precinct's internal road network can accommodate appropriate access, circulation, parking, and loading and servicing to all sites.

The ITA includes recommendations to manage any potential effects on the safety and operation of the transport network as a result of the plan change which include:

- introduce traffic calming infrastructure on local roads within the Precinct to encourage safer speed limits.
- provide safe and accessible cycling and micromobility infrastructure including storage options.
- prepare a Construction Traffic Management Plan as part of future larger-scale resource consents to ensure the scale and effects of construction activities are appropriately managed.

The ITA concludes as the proposed overall yield of the Precinct is comparable to what has previously been assessed and approved under PPV3, the plan change will result in negligible traffic effects. In addition, any potential traffic effects arising from development within the Precinct can be appropriately managed by the identified recommendations. The ITA considers there are no transport planning or engineering reasons to preclude implementation of the plan change.

## 7.4 Infrastructure Effects

An Infrastructure Report has been prepared by Woods and Partners Consultants Limited ("Woods") (refer **Appendix 13**). The report considers there is sufficient existing and planned infrastructure to support the anticipated increase in residential yield and decrease in commercial yield resulting from the plan change request. The key conclusions of their assessment regarding services and utilities are summarised below.

### 7.4.1 Wastewater

The underlying wastewater assessment was based on 5,000 residential lots, 16.7Ha of commercial land and 1,000 school students. The current assessment is based on 5,143 residential lots, 10.65Ha of commercial and 1,000 school students. The net impact of the proposed changes in zoning within the Precinct has decreased the wastewater design flows and will therefore have no negative impact when compared to the operative zoning. The change in

flows can be seen in **Table 3** below. Detailed calculations of the dry weather and peak wet weather flows are included in Appendix D to the Woods Report<sup>9</sup>.

**Table 3:** Summary of the effects of the plan change on wastewater flows.

Items Description	Zoning Amendment (2024)				Plan Change (2014)			
	#DUE	Cum. DUE	ADWF (l/s)	PWWF (l/s)	#DUE	Cum. DUE	ADWF (l/f)*	PWWF (l/s)*
Residential Lots 3 stories or less	3824	3824	23.90	160.13	5000	5000	26.60	177.30
Residential Lots 4 stories or more	1319	5143	8.24	41.22		5000	12.50	83.10
Schools (500 students Boarding)	167	5310	0.81	5.44	666	5666	1.30	8.70
Schools (500 students day students)	167	5477	0.12	0.78		5666		
Commercial areas (7.25+3.4 = 10.65 Ha) (1l/s/ha) (Peaking factor PWWF = 6.7) ADWF Flow=1x10.65=10.65l/s~ 1700 DUE	1703	7180	10.64	71.31	1296	6962	8.10	11.70
Total			43.72	278.88			48.50	280.80

\* numbers taken directly from report

Development within the Precinct is currently serviced by a pump station supplied and constructed by GDL in a contractual agreement with Watercare. The pump station is located at 42 Te Paea Ave, to the north-east of Paerātā School and to the south of Arohaina Avenue and is owned by Watercare.

The pump station currently has capacity to service the 1,000 already consented residential lots in the northern area of the Precinct, where all flows are pumped and discharged into the Pukekohe network. The station has been designed with the intent to service the entire Precinct, where as part of their contract with GDL, Watercare are responsible with upgrading the station to provide capacity to the remaining 4,000 lots currently provided for by the Precinct provisions and the plan change. As part of this upgrade, Watercare are also proposing to install a new rising main to service future wastewater flows within the Precinct.

Watercare are currently finalising the upgrade design and have confirmed they are able to increase the capacity of the pump station to service an additional 2,000 lots as part of their ongoing southern developments work programme. The timing for this upgrade is anticipated to be after 2028. GDL will continue their ongoing communication with Watercare to ensure timing of development enabled by the plan change is appropriately aligned with future upgrades required to the pump station.

The Infrastructure Report confirms the plan change will result in a decrease in wastewater design flows in comparison to the assessment undertaken for PPV3 and therefore any wastewater effects are negligible in comparison to the operative provisions.

#### 7.4.2 Water Supply

As with wastewater, the net impact of the change in zoning has decreased the water peak design demand and will therefore have no negative impact when compared to the operative zoning. The change in flows is outlined in **Table 4** below.

<sup>9</sup> Franklin 2 Infrastructure Report, Woods, (October 2024) Appendix D,

**Table 4:** Summary of the effect of the plan change on peak water demand.

Items Description	Zoning Amendment (2024)			Plan Change (2014)		
	#DUE	Cum. DUE	Peak Demand (l/s)	#DUE	Cum. DUE	Peak Demand (l/s)
Residential Lots 3 stories or less	3824	3824	132.78	5000	5000	217.00
Residential Lots 4 stories or more	1319	5143	45.80		5000	
Schools (500 students Boarding)	167	5310	4.64	666	5666	7.20
Schools (500 students day students)	167	5477	0.72		5666	
Commercial areas (7.25+3.4 = 10.65 Ha)		5477	8.88		5666	45.20
Total			192.82			269.40

Water supply within the Precinct is currently sourced from Pukekohe into a local on ground reservoir located towards the eastern end of Puhitahi Hill Road.

The current water reticulation network in the Precinct was supplied and constructed by GDL in a contractual agreement with Watercare. The water network has capacity to service the 1,000 already consented residential lots and has been designed with the intent to service the entire Precinct. As part of their contract with GDL, Watercare are also responsible with upgrading the water network to provide capacity to the remaining 4,000 lots currently provided for by the Precinct provisions plan change.

Watercare have confirmed they are on schedule to complete a new water supply pipeline from Flanagan Road in Drury which will service the additional development enabled by the plan change.

The Infrastructure Report confirms the plan change results in a decrease in the water peak design demand as assessed as part of PPV3 and therefore any effects on water supply are negligible in comparison to the operative zoning.

#### 7.4.3 Stormwater

There is currently an approved Stormwater Management Plan ("SMP")<sup>10</sup>, prepared by Woods and referred to as the Paerātā North SMP. The Paerātā North SMP lays out the stormwater requirements for the development. The SMP clearly sets out the requirements for Stormwater Management within the Precinct, outlining the required attenuation, detention and treatment requirements for the development approved on site.

Woods has also undertaken a flood assessment<sup>11</sup> for the Precinct to determine the impact of the proposed zoning changes in the plan change on the flood level. The flood modelling undertaken for the Paerātā North SMP aligned with the 2014 concept land use plan, which proposed an impervious coverage increase from 5% to 50%. Following the adoption of the AUP, the flood modelling was revised as per the AUP zoning.

The plan change model builds on the 'base' model scenario and updates sub catchment imperviousness based on the proposed changes in zoning within the Precinct. It should, however, be noted that the plan change scenario models assume that areas proposed to be zoned Terrace Housing and Apartment Buildings zone in the plan change are modelled at 60 per cent impervious coverage to minimise any upstream effects resulting from the development. The model scenarios

<sup>10</sup> Wesley College Paerātā North Storm Water Management Plan, Version G dated 05-10-2016 (referred to as Paerātā North SMP)

<sup>11</sup> Franklin 2 plan Change Flooding Assessment dated 4 October 2024

were simulated for 2, 10 and 100 year ARI storm events with allowance for 2.1°C and 3.8°C future temperature increase.

Model results were extracted for each simulation and afflux plots were produced between the base model scenario and the Change model scenario. The 100 year afflux plots show that there are no major increases observed within the Precinct area for the 2.1°C and 3.8°C climate change scenarios.

It is concluded with the introduction of precinct provisions restricting impervious coverage to 60 per cent in the proposed Terrace Housing and Apartment Building zone, the plan change is not anticipated to have any adverse flood effects on areas upstream or downstream of the proposed plan change extent.

The current plan change does not intend to change the location of the streams, the upstream inflow points or the downstream points. The impervious and pervious percentages are approximately the same and the flow patterns have not changed since the SMP was implemented. As the changes are negligible in terms of the stormwater runoff, the current SMP is considered relevant and can remain as the underlying stormwater document for the development.

#### 7.4.4 Utilities

Development enabled by the plan change can be appropriately serviced through a proposed network of underground cables which provide each lot with a suitable connection for power and telecommunication reticulation. It is anticipated these cables will be located within the berm of the new roading network.

The Infrastructure Report considers the changes in residential and commercial yield enabled by the plan change will result in minimal differences in the capacity requirements of the power and telecommunications network.

It is noted Counties Power Ltd and Chorus Ltd confirmed as part of PPV3 there is sufficient capacity to supply power and telecommunication connections to development within the Precinct.

#### 7.4.5 Earthworks

Bulk earthworks of approximately 2,300,000m<sup>3</sup> are required to develop the remainder of the Precinct. This level of earthworks is necessary to establish appropriate building platforms, the roading network and infrastructure servicing, as well as achieving geotechnical stability and preservation of streams and gully systems across the Precinct. While any effects from the remaining earthworks stages will be assessed as part of future resource consent applications under Chapter E11 Land disturbance – Regional and Chapter E12 Land disturbance – District, a preliminary design which guides the overall earthworks strategy for the Precinct has been prepared as part of the plan change.

The preliminary design for the remaining bulk earthworks is shown on the Earthworks Plans provided in the Infrastructure Report prepared by Woods. The earthworks are anticipated to be completed in stages to minimise the area of exposed land and the number of construction vehicles entering and exiting the Precinct at one time. Each stage will be undertaken in accordance with Council's GD05 guidelines for erosion and sediment control and will be subject to geotechnical input to ensure the design is suitable for development. The Infrastructure Report considers the plan change has no impact on the earthworks and erosion and sediment controls required in the Precinct.

Relying on the 'Geotechnical Interpretive Report (GIS), dated 4 July 2014' prepared by Beca in support of PPV3, the Infrastructure Report confirms the land within the Precinct is suitable for residential development provided an appropriate geotechnical remediation and design is prepared which includes sufficient setbacks from existing streams and banks. The preliminary earthworks design accounts for these matters where a detailed geotechnical design will be conducted as part of the future resource consent applications.

#### 7.4.6 Infrastructure and Earthwork Conclusions

In terms of stormwater, Woods have undertaken a flood assessment to evaluate any adverse flood effects that may be caused by the proposed plan change on areas upstream and downstream of the Precinct. This assessment has concluded that with the inclusion of a 60 per cent impervious coverage standard in the Terrace Housing and Apartment Buildings zone in the Precinct, the plan change will not have any adverse flood effects on areas upstream or downstream of the proposed plan change extent.

With regards to wastewater and water infrastructure, the plan change will result in a decrease in wastewater design flows and water demand in comparison to the assessment undertaken for PPV3. Any effects on wastewater and water demand are negligible in comparison to the operative provisions and can be adequately serviced by the existing and planned wastewater and water supply infrastructure.

In the case of other utilities, it is considered the changes in residential and commercial yield enabled by the plan change will result in only minimal differences in capacity requirements of the power and telecommunications network and can be adequately serviced by the existing and planned networks.

Bulk earthworks of approximately 2,300,000m<sup>3</sup> are required to develop the remainder of the Precinct. This level of earthworks is necessary to establish appropriate building platforms, the roading network and infrastructure servicing, as well as achieving geotechnical stability. A preliminary design for the remaining bulk earthworks has been prepared by Woods. The Precinct is suitable for residential development provided appropriate geotechnical remediation and design work is undertaken. Detailed geotechnical design will be conducted as part of the future resource consent applications.

Overall, it is considered that with the inclusion of the additional impervious coverage standard for the Terrace Housing and Apartment Buildings zone within the Precinct, the plan change will not generate any potential infrastructure servicing effects that are beyond what is already enabled within the Precinct under the AUP.

## 7.5 Natural Hazards

This section addresses the matters in Clause 7(1)(f) referenced in Section 22(2) of Schedule 4 of the RMA.

The Precinct is subject to a series of floodplains and flood prone areas associated with the existing networks of streams which flow through the area. A Flooding Assessment has been prepared by Woods and is included as Appendix C to the Infrastructure Report (refer **Appendix 13**). The assessment considers potential adverse flooding effects from the plan change on areas upstream and downstream of the Precinct. As noted above, the assessment builds on existing flood modelling undertaken as part of the development of the approved SMP.

Given the proposed decrease in commercial yield, the Flood Assessment confirms the plan change will result in a 11 per cent decrease in the net impervious area within the Precinct. While a decrease in impervious areas is anticipated, taking into account climate change, the Flood Assessment models there will be a slight increase in flood depths within the Precinct. The increase depth is confined to the existing streams and does not adversely affect the future lots as shown on the indicative masterplan.

To ensure natural hazard risk is not exacerbated from the increase in flood depth, a range of mitigation measures are proposed. This includes the retention and expansion of the greenway network which acts as critical green infrastructure within the Precinct to manage stormwater and protect natural floodplains. The proposed Precinct provisions also include a series of stormwater management standards which require subdivision and development to manage the quantity of stormwater runoff through retention and detention methods. In addition, the precinct provisions also contain policies and standards which seek to avoid development within the 1% AEP floodplain in order to appropriately manage flood risk.

With regards to downstream effects, the Flooding Assessment confirms the plan change is unlikely to exacerbate natural hazard risk outside of the Precinct. As part of the proposed intensification around the Paerātā train station, the plan change proposes to include a standard in the precinct provisions which restricts the permitted impervious area to 60 per cent for Terrace Housing and Apartment Buildings zoned land. The Flood Assessment considers this standard is appropriate to ensure potential flooding effects on sites downstream are avoided. It is also noted as part of the approved Fast Track application for the Paerātā train station, KiwiRail are proposing to upgrade an existing culvert located to the south of the station. This will further ensure potential flooding effects from the plan change are appropriately managed.

Overall, based on the flooding assessment, it is considered the plan change is unlikely to exacerbate natural hazard risk both within the Precinct and on the surrounding environment. The provision of the greenway network, stormwater infrastructure and restriction of impervious area on Terrace Housing and Apartment Buildings zoned land ensures any potential flood risks are appropriately managed.

## 7.6 Ecological Effects

This section addresses the matters in Clause 7(1)(c) referenced in Section 22(2) of Schedule 4 of the RMA.

The plan change proposes to retain and expand on the provision of a greenway network along the existing streams which flow through the Precinct. While the network serves a key role in achieving the open space principles and objectives for the Precinct, the network also serves as critical green infrastructure for managing stormwater and protecting ecological values.

The continued development of the greenway network will involve the restoration and enhancement of the existing stream corridors, inclusive of constructed and natural wetlands, through re-vegetation of indigenous species. Once completed, the greenway network will include approximately 37ha of riparian margins and wetland open space with vegetation extending approximately 4.5km along a number of existing streams (refer to the Open Space Network Plan included in **Appendix 9**). The vegetated network will act as a biological filter and buffer between the streams and surrounding land within the Precinct. This will support improved water quality, increase habitat opportunities, enable greater biodiversity, and manage potential stormwater effects from urban development including the protection of natural floodplains.

In addition, the proposed precinct provisions direct that subdivision and development is sensitive to the Precinct's natural ecological values which are identified as a significant feature. This policy direction further ensures the ecological values of the Precinct's streams and wetlands features are protected.

It is considered that the effects of future development enabled by the plan change on the ecological values of the Precinct can be appropriately managed through the development of a greenway network, the proposed precinct provisions and the Auckland-wide AUP provisions.

## 7.7 Cultural Values

In undertaking the development of Paerātā Rise, GDL have maintained an ongoing relationship with iwi groups who have mana whenua over land within the Precinct, in particular Ngāti Tamaoho who consider the Precinct as the 'heartland' of the Ngāti Tamaoho rohe.

Ngāti Tamaoho were actively involved in the preparation of PPV3 to rezone the Wesley SHA land from future urban to urban. As part of this involvement, Ngāti Tamaoho prepared a Cultural Impact Assessment that set out details of the iwi's cultural associations with the area. Te Ākitai Waiohū and Ngāti Te Ata Waiohū were also involved in PPV3 and provided their own Cultural Impact Assessment. Ngāti Paoa and Ngāti Tai Ki Tamaki were also contacted in the preparation of PPV3. Having had an initial discussion with GDL advised they did not want to be involved in the process.

There has been ongoing involvement with mana whenua as the development at Paerātā Rise has been undertaken with Ngāti Tamaoho taking a lead role supported by Te Ākitai Waiohū and Ngāti Te Ata Waiohū. This included engagement in the resource consent process for the Northern Commercial Centre.

GDL have engaged Ngāti Tamaoho, Te Ākitai Waiohū and Ngāti Te Ata Waiohū with regards to the plan change. This engagement involved a formal letter being sent outlining the intent and content of the plan change including the background, purpose, proposed zoning plans and intended lodgement timeframe of the plan change. The letter also provides an opportunity to give feedback or for a meeting to further discuss the plan change. A response has been received from Ngāti Te Ata Waiohū advising that Te Ata iwi have mana whenua customary interests over the application area Paerātā / Pukekohe / Drury and surrounds and indicating a willingness to engage with GDL. At the time of lodging the Plan Change, no response has been received from Ngāti Tamaoho and Te Ākitai Waiohū.

Based on this ongoing engagement, the Precinct has been developed in a manner that recognises and protects the cultural values from subdivision, use and development. The plan change proposes to retain key provisions and design elements of the precinct plans which seek to protect the natural and landscape features of the Precinct and have been developed with input from mana whenua. These include the provision of a greenway network along the Precinct's waterways and wetlands, and precinct provisions which manage stormwater runoff. These provisions support the protection of cultural values associated with the natural landscape through managing water quality, retention of natural floodplains and promoting native revegetation.

It is anticipated engagement with iwi will continue throughout the plan change process and as part of future works and development within Paerātā Rise.

## 7.8 Natural Heritage

The proposed plan change includes two key amendments regarding notable trees:

- amending Schedule 10 of the operative AUP and removing Precinct Plan 2, the Wesley Sub-Precinct Concept Plan (“WSPCP”), to clarify the locations of the notable trees.
- removal of the operative plan change subdivision provisions relating to notable trees.

Peers Brown Miller Ltd has undertaken an arboricultural assessment of the notable trees listed in Schedule 10 Notable Trees of the AUP in the Precinct. Schedule 10 records there is group of trees, identified as group 2804, at 801 Paerātā Road, Paerātā (LOT 1001 DP 566172). The Council’s GIS notes the position of the trees listed is unverified. The operative WSPCP also identifies scheduled notable tree and trees to be retained which differ from those in Schedule 10.

The resulting Arboricultural Report (refer **Appendix 15**) outlines in detail the inconsistencies between the notable trees listed in Schedule 10 and those listed and mapped on the operative WSPCP. In particular, the WSPCP includes an isolated totara tree that is not included in Schedule 10 and excludes a pin oak windrow in the north-west corner of Wesley College that is listed in Schedule 10. Schedule 10 does not specifically map the locations of the notable trees but rather relies on a ‘bubble map’ held in the Council’s records indicating the general locations. In comparison, the WSPCP includes a more specific map as well as a list of trees which differs slightly from the list provided in Schedule 10.

On 16 October 2024 a site visit was undertaken with West Fynn, Heritage Arborist, Auckland Council Heritage Division to discuss the inconsistencies within the operative provisions and to reach agreement of the trees that are protected, their actual location and any amendments required to Schedule 10.

To clarify the matter, a tree assessment was undertaken using the Standard Tree Evaluation Method (“STEM”) survey. The assessment identified 9 trees which met or exceed the required STEM score (and therefore qualify to be scheduled notable trees) and align with the trees identified in Schedule 10. However, two trees (an English Oak and the Pin Oak at 801 Paerātā Road) did not meet the STEM threshold, contrary to the operative Schedule 10.

It is therefore proposed to amend the Schedule 10 listing to reflect the STEM findings. An updated location map (**Figure 2** below) has been prepared to verify the location of the scheduled notable trees on the Wesley College site. While the WSPCP will be deleted, it is considered there will be no adverse effects arising, as the notable trees will continue to be protected through the application of the Schedule 10 provisions.



**Figure 2:** Locations for revised Notable tree group 2804. Source – Arboricultural Report by Peers Brown Miller Ltd (refer Appendix 15)

The operative precinct provisions also contain a Size Shape Standard 3.2(3)(c) which requires vacant sites to contain a rectangle that shall be located outside the protected root zone of a notable tree. This duplicates the Site Shape Factor standards for both residential and business zones in the operative AUP (E38.8.1.1(1)(e) and E38.9.1.1(1)(f) respectively. Accordingly, removal of the relevant operative plan change provisions will have no adverse effect on notable trees, as the operative AUP provisions will continue to apply.

## 7.9 Effects Summary

Based on the analysis undertaken by a range of technical experts, the anticipated actual and potential effects arising from development enabled by the plan change will be generally consistent with those anticipated by the operative precinct provisions introduced by PPV3. The Wesley College Trust Board's decision to remain on its current site has necessitated a reassessment on how to provide for the commercial and service requirements of the growing community at Paerātā Rise. The proposed plan change seeks to redistribute the operative business zoned area within the Precinct. The other changes to zoning reflect the requirements of the NPS-UD and align the precinct with the operative AUP residential zones.

While the proposal will result in an overall reduction of business zoned land within the Precinct, the economic analysis has concluded that the areas of Local and Neighbourhood Centres and the Mixed Use zone are sufficient to meet the needs of the existing and future population of the Precinct. The economic analysis provided concludes that the zoning is appropriately located and scaled to support the community, the AUP's centre hierarchy and will not compromise the role, function and growth of other surrounding centres.

The existing and planned infrastructure has been assessed and been determined to meet the needs of the existing and future population of the Precinct. Regarding transport, the Precinct is well-connected with pedestrian and cycle paths linking employment, schools, homes, shops, and recreation areas. This active transport network promotes walking and ensures safe, efficient movement within the Precinct and the changes proposed will not detract from this. The improvements proposed to the Paerātā train station, and corresponding zoning response will further promote use of the public transport network, active transport within the Precinct and a reduced reliance on private vehicles. The Precinct provisions as amended will ensure that access upgrades are aligned with the rate of development in the Precinct and given the proposal does not result in significant changes to anticipated yield of development, the traffic effects enabled by the Precinct provisions will not detract from the safety and efficiency of the transport network.

As part of implementing PPV3, the Paerātā North SMP was approved for the purpose of managing stormwater runoff within the Precinct. A further flooding assessment has been undertaken as part of the plan change to determine the impact of the proposed zoning changes. This assessment concludes that, subject to a restriction on impervious areas in the proposed Terrace Housing and Apartment Buildings zone, the effects on stormwater runoff is negligible. The Paerātā North SMP is considered appropriate to remain as the underlying stormwater document for the development, and along with the Precinct specific stormwater provisions, can manage the potential effects of urban development on stormwater generation to acceptable levels.

Ngāti Tamaoho, Te Ākitai Waiohua and Ngāti Te Ata Waiohua have been involved in development of the land within the Precinct providing Cultural Impact Assessments that informed earlier assessments on cultural values and provisions in the operative Precinct. Those relationships are enduring and it is anticipated that ongoing engagement with iwi will continue throughout the plan change process and as part of future works within Paerātā Rise. It is unlikely that the proposed changes will result in any new or additional cultural effects.

The revised zoning maintains the Precinct's overall design approach and this along with the reliance on the AUP zone and Auckland-wide provisions in conjunction with the Precinct specific provisions, will appropriately manage the effects on the surrounding environment. These AUP and precinct provisions will also achieve high quality environmental outcomes within the Precinct. Where additional building height is proposed within the walkable catchment of the train station, this is a mandatory requirement under the NPS-UD.

## 8.0 Higher Order RMA Documents

This section analyses the relevant strategic planning documents that apply to the plan change. It addresses the relevant national planning documents as well as the regional and district planning documents that apply to the Auckland region. The AUP provisions from the Auckland-wide section, the Overlays section and the various zone rules will continue to apply to the Franklin 2 Precinct and are considered to be complementary to the plan change provisions.

### 8.1 National Policy Direction

The following National Policy Statements are in effect as of 30 July 2024:

- National Policy Statement on Urban Development 2020
- National Policy Statement for Freshwater Management 2020

- National Policy Statement on Electricity Transmission 2008

#### 8.1.1 National Policy Statement on Urban Development 2020

The NPS-UD came into force on 20 August 2020, replacing the National Policy Statement on Urban Development Capacity 2016.

The NPS-UD provides direction for decision makers on planning for urban development under the RMA. The document directs councils in their resource management decisions to support and provide for particular urban development outcomes.

Auckland Council have notified a series of plan changes, including Plan Change 78 (“PC78”), to the AUP in order to give effect to the objectives and high-level policies of the NPS-UD.

The provisions of the NPS-UD that are considered relevant to the requested changes are assessed in **Appendix 8**.

#### 8.1.2 National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management 2020 (“NPS-FM”) came into force on 3 September 2020. It was amended in December 2022.

There is a network of freshwater streams which flow across the precinct. As part of the ongoing development of the Precinct, approximately 37ha of riparian corridors and wetland open space will be established to service the Precinct as green infrastructure. As the first stages of subdivision have been undertaken, the development of the riparian corridors and wetland protection has been implemented. These corridors serve a range of functions including managing stormwater, providing for ecological habitats and enhancing water quality. The plan change supports the ongoing extension of these networks through retained precinct provisions which facilitate the restoration of riparian margins through subdivision.

There will be no effect on freshwater from this plan change request. Therefore, assessing the plan change against the objectives and policies of the NPS-FM is not required.

#### 8.1.3 National Policy Statement on Electricity Transmission 2008

The National Policy Statement on Electricity Transmission 2008 (“NPS-ET”) came into force on 13 March 2008. The NPS-ET sets out the objectives and policies to manage the effects of the electricity transmission network. The NPS-ET recognises the importance of the National Grid network by enabling its operation, maintenance and upgrade, while establishing new transmission resources for future needs.

The AUP gives effect to the NPS-ET through the National Grid Corridor overlay by controlling the location of activities, and the extent of subdivision and development near the National Grid Line.

The southern area of the plan change area is traversed by the National Grid Corridor Overlay. New development within this area of the Precinct will be subject to the provisions in Chapter D26 – National Grid Corridor Overlay which ensures reverse sensitivity effects on the National Grid Corridor are avoided.

## 8.2 The Auckland Unitary Plan (Operative in Part)

The AUP is the primary statutory planning document in Auckland. The AUP comprises the Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan. The AUP guides the use of Auckland's natural and physical resources including land development. It is considered to be the only regional or district planning document relevant to the area subject to this plan change request.

### 8.2.1 Regional Policy Statement

The plan change has been assessed against the relevant chapters of the RPS in **Appendix 8**. Overall, it is considered that the plan change is consistent with the objectives and policies of the relevant chapters of the RPS, as summarised below:

- B2 Urban Growth and Form

The plan change seeks to contribute to a quality compact urban form locating higher levels of residential intensification within the walkable catchment of Paerātā train station. Across the wider Precinct, the plan change provides for a walkable, compact and high quality urban development with residential areas that enables higher residential intensification within a walkable catchment of the Paerātā train station and medium residential intensification in other locations within the Precinct. The plan change also provides for nodes of commercial development to meet the needs of the community. Necessary infrastructure including roads, stormwater management, and transport options are integrated, supporting a sustainable urban design while protecting natural resources. The proposal enables a range of housing types, and can accommodate approximately 6,000 dwellings which contributes to meeting housing need in the Auckland South catchment. The new Local Centres and Neighbourhood Centres have been designed and are of a scale to provide for the needs of residents and leverage off the improvements to road and rail networks. The plan change includes provision for accessible open spaces, including enhanced riparian margins and other public open space areas with high levels accessibility and connectivity through pedestrian and cycle networks. The plan change is consistent with the objectives for quality-built environments, residential growth, commercial growth, and open space provisions, as outlined at Chapter B2 of the RPS.

- B3 Infrastructure

The existing and planned infrastructure has been designed to provide for appropriate servicing levels to meet the needs of the developing community. The analysis undertaken demonstrates that sufficient capacity is available to support the infrastructural needs of the development that is established and enabled under the plan change. The plan change does not compromise the National Grid lines that traverse the Precinct and options are available to allow for continued National Grid operations and maintenance whilst urbanising around the corridor. The transport strategy, including the precinct plans and as provided for in the precinct provisions, ensures a well-connected and accessible internal street network. The strategy also supports various transport options, maintaining safety and efficiency, and ensuring integration with urban form to minimise environmental impact. The provisions provide for key development thresholds that will ensure upgrades are implemented at critical phases of development. The plan change is consistent with the objectives for infrastructure including transport and energy, as outlined at Chapter B3 of the RPS.

- B4 Natural Heritage

The site includes trees identified as notable trees in Schedule 10 of the AUP where Chapter B4 seeks to ensure that notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained. Chapter B4 also includes other matters that the Precinct does not contain which include outstanding natural features and landscapes, volcanic viewshafts and the Waitākere Ranges Heritage Area. The operative precinct identifies the notable trees on Precinct Plan 2 the Wesley Sub-Precinct Concept Plan, where it is proposed to delete this concept plan in the proposed plan change given the change in zoning. The operative D13 Notable Tree overlay provisions will ensure the values of the identified trees are not affected. Similarly, the removal of the subdivision standards in the precinct provisions that relate to notable trees are managed via the Auckland-wide subdivision standards listed in the shape factor standards. The deletion of Precinct Plan 2 and amendments to the precinct subdivision standards by the plan change will not diminish the provisions that protect the identified notable trees which are provided for in other parts of the AUP.

- B5 Historic Heritage

The site includes a historic heritage extent of place (identified as ID 2733 W.H. Smith Memorial Chapel in Schedule 14.1 of the AUP) that includes the Chapel and its surrounds. Chapter B5 of the RPS sets out the objectives and policies for significant historic heritage places with the objectives being to identify and protect them from inappropriate subdivision, use and development, and to ensure they are used appropriately encouraging protection, management and conservation. The operative precinct provisions identify the historic heritage extent of place on Precinct Plan 2 the Wesley Sub-Precinct Concept Plan, where it is proposed to delete this concept plan in the proposed plan change given the change in zoning. The deletion of Precinct Plan 2 will not affect the historic heritage extent of place which is recorded on the AUP's planning maps and in Schedule 14.1. These provisions will ensure the Chapel is appropriately managed, in a manner that is consistent with the provisions in Chapter B5.

- B6 Mana Whenua

Chapter B6 identifies the objectives for the recognition of Treaty of Waitangi / Te Tiriti o Waitangi partnerships and participation, and to recognise Mana Whenua values.

Mana Whenua were consulted as part of the PPV3 process and input received. Whilst the plan change includes a range of changes to the Precinct, in general terms the outcomes remain unchanged where ongoing development with the Precinct has integrated practices to recognise tikanga with cultural induction, and adherence with discovery protocols. A low impact stormwater management approach relying on a treatment train for stormwater with riparian margin planting and a network of green corridors to manage stormwater flow and quality.

Engagement with Mana Whenua is ongoing and where appropriate, input is sought and integrated to ensure that these values and the relationship is maintained. The plan change would not introduce an element that is inconsistent with the outcomes preceding cultural engagement and is consistent with the provisions in Chapter B6.

- B7 Natural Resources

Chapter B7 identifies the objectives for indigenous biodiversity, water (freshwater and coastal water), minerals and air. Extensive assessments were undertaken as part of the establishment of the operative precinct provisions where the plan change retains the matters developed to support the urbanisation of the site and to manage the effects on natural resources as identified in Chapter B7. This includes the requirements associated with stormwater management, and riparian margins that have been retained by the plan change. Overall, the plan change does not present

any departure from the methods developed to manage the effects on natural resources and is consistent with the provisions in Chapter B7.

- B10 Environmental Risk

Chapter B10 identifies the objectives for responding to natural hazards, climate change, hazardous substances and contaminated land. The operative precinct provisions do not directly respond to these matters and rely on the AUP's Auckland-wide and overlay provisions to manage these matters. No specific provisions have been included that would affect these and the plan change is consistent with the provisions in Chapter B10.

### 8.2.2 Plan Changes 78 and 120: Intensification

PC 78 was Auckland Council's Intensification Planning Instrument ("IPI") to the AUP which was notified on 18 August 2022. The plan change responds to Policy 3 and Policy 4 of the NPS-UD and amendments to the RMA that require Tier 1 Council's to incorporate the Medium Density residential Standards ("MDRS") into relevant residential zones.

PC 78 proposed to give effect to Policy 3 of NPS-UD through amendments to residential and business zone provisions to enable building heights of at least six storeys within a Metropolitan Centre zone and within an 800m walkable catchment around existing and planned rapid transit stops, the City Centre zone and Metropolitan Centre zones. In addition, PC78 proposed to intensify through zoning areas of land adjacent to Local Centre zones and Town Centre zones to a modified Terrace Housing and Apartment Buildings zone to enable building heights and densities of urban form commensurate with the level of activity and services within these centres.

To give effect to Policy 4, PC 78 proposed consequential amendments to provisions in response to qualifying matters.

Since the private plan change request was lodged with the Council there have been further changes to the Resource Management Act (August 2025). These changes resulted in Auckland Council's partial withdrawal of PC 78 on 9 October 2025 and the public notification of the replacement PC 120. The partial withdrawal of PC 78 effectively withdrew the blanket application of the MDRS across most of the residential zones in the AUP(OP).

On 3 November 2025 the Council publicly notified PC120 which aims to increase housing supply by enabling more intensification near transport hubs and centres, while simultaneously improving resilience by strengthening natural hazard rules, especially for flooding, to better protect people and property, balancing central government housing directives with hazard management. It focuses new homes in well-connected areas, potentially allowing taller buildings and more apartments near train/bus routes, but introduces more restrictive rules for areas identified as high-risk zones.

Within the Franklin 2 Precinct, PC120 proposes to rezone the Residential – Mixed Housing Urban zone within walking distance of the Paerātā Station to Residential – Terraced Housing and Apartment Buildings zone (with six storeys). PC 120 also proposes changes to the Operative Franklin 2 precinct provisions (Chapter I6.30 Franklin 2). These proposed changes amend the precinct description to address proposed zoning changes; increases the proposed height rules to allow 22m within the walkable catchment; and identifies the yard and access upgrade rules as qualifying matters.

While GDL is generally supportive of enabling residential intensification within the walkable catchment of the Paerātā train station and the proposal to rezone parts of this area Residential – Terraced Housing and Apartment Buildings zone, there is also a need to provide for the commercial and community service needs of the growing residential community within the

Franklin 2 Precinct. GDL has lodged a submission to PC 120 seeking the zoning in the Franklin 2 Precinct be amended to reflect the pattern included in this private plan change request.

### 8.2.3 Plan Change 80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters

Plan Change 80 (“PC80”) proposes amendments to the RPS to integrate concepts and terms under the NPS-UD in relation to well-functioning urban environments, climate change, resilience to the effects of climate change and qualifying matters.

The plan change contributes to a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. The plan change supports a quality compact urban form which incorporates improved resilience to the effects of climate change through providing good accessibility to active and public modes of transport. Plan Change 80 became operative on 13 December 2024

## 8.3 Auckland Plan 2050

The Auckland Plan is Auckland’s long-term spatial plan designed to ensure Auckland grows in a manner that will meet the opportunities and challenges of the future. The Auckland Plan is required by legislation to contribute to the social, economic, environmental and cultural well-being of the city. It is a high-level document that does not include a detailed set of actions but instead includes focus areas. The development strategy is outlined through six outcomes, being Belonging and Participation, Māori Identity and Wellbeing, Homes and Places, Transport and Access, Environmental and Cultural Heritage, and Opportunity and Prosperity.

The Auckland Plan identifies existing Auckland urban areas, including the Precinct, as suitable for growth and intensification. The plan change responds to the direction set in the Auckland Plan through the provision of additional housing in an area of identified need.

Within the Auckland Plan, Pukekohe is identified as the satellite town and rural node at the southern extent of Auckland. Pukekohe serves a wide, mostly rural catchment which contains some of New Zealand’s most elite soils and prime agricultural land. Paerātā is included in the Pukekohe wider catchment.

The Auckland Plan identifies the potential of Pukekohe to function semi independently from the main urban area of Auckland, reducing the need for travel to access services, facilities and employment. The Auckland Plan notes an increase in business land will help achieve this aim. The plan change supports this long-term vision by providing a significant opportunity for a large-scale, comprehensive development of a mostly greenfield site with high accessibility to public transport (planned Paerātā rain station), employment opportunities (Paerātā, Pukekohe, Drury, Papakura), education areas (Wesley College and Paerātā School) and recreation and community facilities. The plan change proposed residential zoning pattern provides for quality, compact neighbourhoods which encourage a wider range of housing choice with the more intensive housing development surrounding the Paerātā train station. The proposed Terrace Housing and Apartment Buildings zone and the operative Mixed Housing Urban zoning, along with the proposed precinct provisions, will make efficient use of greenfield land while ensuring appropriate transitions to the surrounding land uses.

The Auckland Plan anticipates significant growth in Pukekohe over the next 30 years with the potential for the satellite town to accommodate up to 14,000 additional dwellings. The AUP has

zoned 1,262ha (gross) of land as Future Urban zone around Pukekohe and Paerātā. This includes the land along the length of Paerātā Road to the west, on the opposite side of the road from the Precinct and the land to the south of the Precinct, on the opposite side of the North Island Main Trunk line adjacent to the Paerātā train station.

The plan change proposes to amend the location of business zoned land within the Precinct which will continue to provide for a range of business activities and community facilities to support the community at Paerātā Rise and reduce the need for travel to access services, facilities and employment outside of the Pukekohe catchment.

## 8.4 Tāmaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053 (2023)

The FDS is the Council's 30-year plan to make sure homes, jobs and infrastructure are built in the right places, at the right time, and to accommodate an expected half a million more people. The FDS has been prepared to meet the requirements of the NPS UD. The purpose of the FDS is to promote integrated, long-term strategic planning to help the Council set the high-level vision for accommodating urban growth over the long term and identify strategic priorities to inform other development-related decisions. The FDS aims to:

- achieve well-functioning urban environments;
- ensure there is sufficient development capacity; and
- integrate planning and infrastructure planning and funding.

The FDS seeks to address this significant uncertainty and level of change in a land use sense. It replaces the existing Auckland Plan 2050 Development Strategy 2018 and the Future Urban Land Supply Strategy 2017. The rest of the Auckland Plan 2050 remains in place, including the six Auckland Plan outcomes. The Auckland Plan 2050 and the FDS work together to set the high-level direction for Auckland over the long-term.

In terms of its spatial response, the FDS retains the quality compact, multi-nodal model direction established in previous strategies, with further refinement of concepts and approaches.

The FDS does however, have two significant changes from previous strategies including:

1. A much stronger focus on adaptation, particularly in relation to flooding hazards and the protection of life and property.
2. A greater recognition of the financial challenges facing Auckland Council and ratepayers. This includes giving the development sector clear signals regarding these constraints and when Council is likely able to invest in infrastructure and services in respective areas, in particular greenfield sites. The aim is to give the development sector as much certainty as possible for their own planning and outline the meaningful role it can play in the development of Tāmaki Makaurau.

The FDS does not impact on the Precinct, recognising the area is already zoned urban. The FDS does however have implications for the timing of the surrounding Future Urban zoned land to the south and the west of the Precinct. The area to the south of the Paerātā train station has been extended to 2035+ and the area to the west to 2040+. The FDS indicates the key infrastructure prerequisites to support the land as being development ready are as follows:

- SH22 - Paerātā Station Connection

- Drury-Paerātā Link
- Paerātā Arterial
- Paerātā Railway Station
- Paerātā Transmission Wastewater Pumpstation
- Wesley-Paerātā Watermain

Noting the FDS advises this list of key bulk infrastructure is not exhaustive and is based on current information.

## 9.0 Consultation

Section 6 of Schedule 4 of the RMA (which is included by cross reference from Section 22(2) of Schedule 1 of the RMA) states that, where consultation has been undertaken, details are to be provided. The summary below outlines the consultation that has been undertaken to date in relation to the plan change.

GDL have made contact with the following parties with regard to the plan change and are currently in the process of consulting:

- Franklin Local Board and Councillor Andy Baker (Franklin Ward)
- Auckland Council and Council Controlled Organisations including Plans and Places, Parks, Watercare and Auckland Transport.
- Infrastructure entities including NZTA, KiwiRail and Transpower.
- Mana Whenua that were engaged in the PPV3 application process.
- Landowners within the Franklin 2 Precinct.

A report summarising the consultation undertaken to date is provided as **Appendix 16**.

In summary, GDL have engaged in a series of meetings with Auckland Council including Plans and Places, Parks, Watercare and Auckland Transport. Each Council Controlled Organisation was provided with an introduction to the plan change, including background context and the purpose of the plan change. Discussions covered the proposed precinct provisions, the approach to the water supply and wastewater network in the precinct and the proposed internal transport network. Feedback received from these Council Controlled Organisations has been considered in the development of the plan change.

In terms of community engagement, at the time of lodging the plan change, GDL have received two items of feedback in support and two items opposing elements of the plan change from Paerātā Rise landowners. Engagement with the community is ongoing.

It is anticipated consultation with the other above listed parties will be ongoing and will extend past the lodgement of the plan change.

## 10.0 Clause 25 Assessment

Clause 25 of Schedule 1 of the RMA sets out the options available to Auckland Council to decide how the plan change is to be processed. Those options are:

- *adopt the request as if it were a proposed plan change made by the council, or*
- *accept the private plan change request in whole or in part, or*
- *reject the private plan change request in whole or in part, if one of the limited grounds for rejection is satisfied, or*
- *deal with the request as if it were an application for a resource consent.*

The Council can only reject the request in whole or in part, on the grounds set out Clause 4.

### *Clause 25(4)(a) – Frivolous or Vexatious Requests*

In terms of clause 25(4)(a), the request is not considered to be frivolous or vexatious as it addresses valid resource management issues. A comprehensive application has been prepared supported by technical reports prepared by independent experts. As such, there are no grounds for rejecting the request under clause 25(4)(a).

### *Clause 25(4)(b) – Requests Considered in Last Two Years*

The request has not been considered and given effect to or rejected by the local authority or Environment Court within the last 2 years.

### *Clause 25(4)(c) – The extent to which the Request is in Accordance with Sound Resource Management Practice*

Clause 25(4)(c) provides that a private plan change request may be rejected on the grounds that the request is not in accordance with sound resource management practice. As detailed in this application, over the last decade there have been a series of key changes that have occurred as the Precinct has developed which has necessitated the revision of the current zoning pattern and precinct provisions. The request to reduce the quantum and location of business zoned land within the Precinct and to increase the intensity of residential development within a 10 minute walkable catchment of the Paerātā train station are supported by technical expert assessments appended to this report.

### *Clause 25(4)(d) – Consistency with Part 5 of the Act*

Part 5 of the Act sets out the role and purpose of planning documents created under the RMA, including that they must assist a local authority to give effect to the sustainable management purpose of the Act. The plan change request will not make the AUP inconsistent with Part 5 of the RMA. The plan change request will rather assist to achieve the purpose of regional and district plans under sections 63 and 72, and the functions of the Council under sections 30 and 31.

*Clause 25(4)(e) – Operative Plan for less than 2 years*

Clause 25(4)(e) of Part 2 of Schedule 1 may apply where a District Plan has been operative for less than two years. The Franklin 2 Precinct provisions have been operative for more than two years having been made operative in July 2015.

*Conclusions on Clause 25(4) and (4A)*

Based on the above assessment the Council should accept the plan change for processing and notify it for public submissions as soon as is practical. The plan change is neither frivolous nor vexatious, has not been previously considered in the last 2 years. The changes sought are consistent with sound resource management practice and would not make the AUP inconsistent with the RMA, Part 5 – Standards, policy statements, and plans. It would not be appropriate to deal with the plan change as a resource consent given the scale and complexity of the land and the proposal, recognising that development timeframe would extend well beyond the typical timeframes associated with a resource consent.

## 11.0 Conclusion

Overall, it is considered that the requested changes the AUP to the zoning and precinct specific provisions applied to Franklin 2 Precinct provisions will:

- enable increased development capacity within the Franklin 2 Precinct by rezoning the residential area within a 10 minute walkable catchment of the Paerātā train station in a manner which is consistent with the Regional Policy Statement and the National Policy Statement for Urban Development 2020;
- re-distributes the Local Centre zoned land within the Precinct to the northern and southern ends of the Precinct to better meet the commercial and community needs of the community at Paerātā Rise;
- retains additional controls to enable the ongoing operation and improvements to Wesley College on its existing site;
- aligns the Precinct's approach to affordable housing provision with the AUP's Auckland-wide approach and higher order planning documents;
- increases consistency with the underlying zone provisions and minimises the need for precinct-specific deviations;
- corrects and clarifies the location of the notable trees on the Wesley College site; and
- proposes provisions that are the most effective and efficient way to achieve the Franklin 2 Precinct objectives and the purpose for the plan change.

It is therefore considered that the requested change can be accepted and approved by Auckland Council.



## Appendix 1: Location Plan



## Appendix 2: List of Properties Subject to the Plan Change Request and Certificates of Title



## Appendix 3: Auckland Unitary Plan Maps



## Appendix 4: Proposed Provisions (clean)



## Appendix 5: Proposed Provisions (marked up)



## Appendix 6: Comparison of AUP Zones to Franklin 2 Sub-Precinct



## Appendix 7: Section 32 Assessment



## Appendix 8: Assessment against Relevant Policy Framework



## Appendix 9: Urban Design Plan Set (Updated Masterplan Drawings)



## Appendix 10: Urban Design Assessment Report



## Appendix 11: Economic Report



# Appendix 12: Integrated Transport Assessment Report



## Appendix 13: Infrastructure Report



## Appendix 14: Subdivision and Consenting Report



## Appendix 15: Arboricultural Report

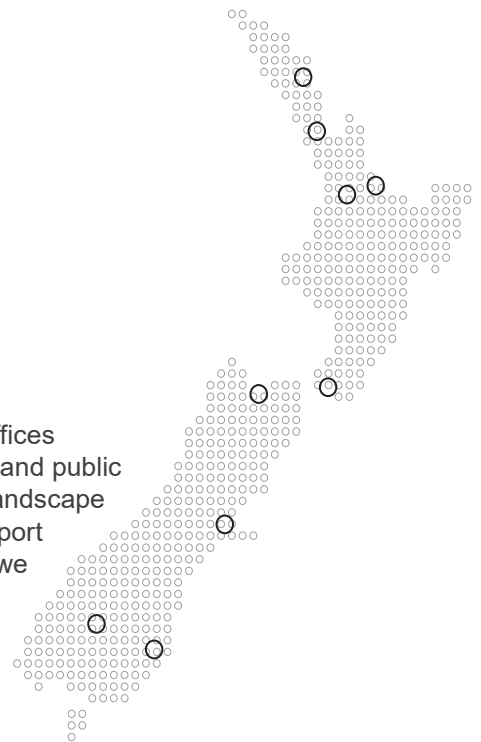


## Appendix 16: Consultation



**Together. Shaping Better Places.**

Boffa Miskell is a leading New Zealand environmental consultancy with nine offices throughout Aotearoa. We work with a wide range of local, international private and public sector clients in the areas of planning, urban design, landscape architecture, landscape planning, ecology, biosecurity, Te Hīhiri (cultural advisory), engagement, transport advisory, climate change, graphics, and mapping. Over the past five decades we have built a reputation for creativity, professionalism, innovation, and excellence by understanding each project's interconnections with the wider environmental, social, cultural, and economic context.



# Memorandum

To: Veer Khar, 595 Karaka Road Development

From: Kerryn Swanepoel, Watercare

Subject: Servicing Paerata

Date: 20<sup>th</sup> December 2022

---

There have been a number of developments proceeding ahead of public plan change in the Paerata and Pukekohe area. As a result, Watercare have been reviewing the proposed servicing strategy for the Paerata-Pukekohe Scheme. There are a number of key infrastructure projects and dates that will need to be noted when seeking viability of developable land within the live zoned or future live zoned areas.

## Wastewater

The Franklin Road Pump Station servicing the area presently, is at capacity. Our plan is as follows;

- The Te Paea pumpstation (PS) and rising main is allocated, at present, to the growth at Grafton Downs. It allows for flows to be managed as to not overload the Franklin Road PS.
- In the future, Te Paea PS will pump to a secondary pumpstation in Paerata Road (PS1). This will not be built until the proposed Isabella PS is commissioned and in service.
- Watercare is in the process of planning and designing Isabella PS to relieve Franklin Road PS, located in Isabella Ave. This is forecasted for completion in February 2025.
- On completion, the Paerata scheme will feed to either Te Paea PS or Paerata PS (PS1), which will pump to Isabella PS and out to the Pukekohe Treatment Plant.

## Water

Given the high level of growth interest, we have completed the refresh of the servicing strategy for the area. The zoning that services your site is the northern part of the Kitchener supply zone.

- Water supply in Paerata currently services the Grafton Downs development until resilience supply is completed in FY2026. This is supplied from the Kitchener Zone via a DN250 PE watermain along Paerata Road. This watermain does not have capacity to service any further developments. A new zone to service Wesley, Paerata and Drury South-west areas will be created, once substantial development is reached.
- A proposed new BSP, located near Quarry Road, along the existing Waikato 1 Watermain will supply the developments in Paerata and Karaka Road areas. A proposed watermain, approximately 8 km long along Karaka Road, from this proposed BSP, will connect to the existing Paerata Road DN250 PE watermain.

Ngā mihi,

Kerryn Swanepoel

Major Development Programme Lead  
Watercare Services Limited



## Submission on Proposed Plan Change PC123

**Submitter:** AV2023 Ltd

**Affected Property:** 595 Karaka Road, Auckland

**Position:** Oppose

---

### 1. Introduction

AV2023 Ltd opposes Proposed Plan Change **PC123** because it seeks to enable further development intensification in an area where we are given to believe that the infrastructure servicing is already constrained for surrounding landowners, including our property.

Our development consent application has been held since 2021 due to confirmed wastewater capacity limitations. In this context, enabling further development capacity in the same locality is premature and inconsistent with infrastructure-led planning principles.

---

### 2. Evidence of Existing Infrastructure Constraints

Our resource consent application has remained on hold since 2021 due to servicing constraints identified by **Auckland Council** and **Watercare Services Limited**.

This demonstrates that infrastructure limitations are real, ongoing, and materially affecting development outcomes in the area.

Approving additional zoning capacity while existing developments cannot proceed due to servicing constraints would represent inconsistent and inequitable planning. Correspondence with Watercare and Auckland Council is attached.

---

### 3. Applicant's Own Evidence Confirms Available Wastewater Capacity

However the plan change documentation itself states:

- the existing wastewater pump station has capacity to service **1,000 residential lots**; and
- approximately **311 houses have been constructed** to date.

This means that **substantial unused wastewater capacity currently exists**. This raises a question about information being provided by Council/Watercare.

---

### 4. Preferential Allocation Concern

If available infrastructure capacity exists but is effectively reserved for a single development, this raises serious planning concerns including:

- inequitable allocation of public infrastructure.
- distortion of development opportunities.
- inefficient use of existing network capacity.
- inconsistent treatment of neighbouring landowners.

Infrastructure funded, consented, or constructed to serve a growth area should be allocated transparently and fairly across that area.

---

## **5. Failure to Demonstrate Infrastructure Justification for Intensification**

Before approving additional density under PC123, decision-makers must be satisfied that infrastructure capacity is genuinely available.

However:

- neighbouring landowners cannot currently connect.
- yet the applicant's report confirms capacity exists.

This inconsistency creates uncertainty regarding:

- how capacity is allocated.
- whether capacity is reserved.
- whether allocation criteria are equitable.

Without clarification, the infrastructure evidence supporting PC123 is incomplete.

---

## **6. Access Constraints Created by Deferred Infrastructure Delivery**

The approved consent framework for the neighbouring development provided for access to our site via an internal road connection.

That road:

- has largely been constructed.
- has services installed.
- was intended to serve multiple neighbouring properties.

However, a Section 127 consent change reportedly allows deferment of vesting of the final link. As a result, affected landowners including AV2023 Ltd are left without effective access despite infrastructure being substantially delivered.

This creates:

- stranded land parcels.
  - fragmented infrastructure delivery.
  - inefficient urban form.
  - inequitable planning outcomes.
- 

## **7. Inconsistent Planning Outcomes**

PC123 would enable intensified development within the Precinct while neighbouring landowners:

- cannot obtain infrastructure connections; and
- cannot secure effective access.

Planning decisions should operate consistently across similarly situated land. PC123 risks producing the opposite result.

---

## 8. Information Requested

Before any decision is made, AV2023 Ltd requests disclosure of:

- actual wastewater network capacity.
  - current allocation commitments.
  - remaining available capacity.
  - criteria used to allocate capacity.
  - whether any capacity has been contractually reserved.
  - status and reasoning for deferred road vesting.
- 

## 9. Risk of Adverse Effects if Plan Change Proceeds

Approving additional development rights without resolving these issues risks:

- inefficient infrastructure utilisation.
  - inequitable development outcomes.
  - reduced public confidence in planning processes.
  - constrained future growth options.
- 

## 10. Relief Sought

AV2023 Ltd respectfully requests that Proposed Plan Change PC123 be:

**Declined**

or alternatively

**Deferred** until infrastructure capacity and access availability are independently verified.

If neither occurs, then:

**Approved only with provisions stating that additional development rights cannot be exercised until infrastructure capacity and access connections are demonstrably available to all affected landowners.**

---

## **11. Further Relief**

Such further or consequential relief as is necessary to ensure infrastructure allocation, access provision, and development sequencing occur in a fair, efficient, and integrated manner.

---

**Submitted by:**

**AV2023 Ltd**

Owner — 595 Karaka Road

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

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



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

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

For office use only
Submission No:
Receipt Date: 09/07/2023 10:36:19

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Ms/Ms (Full Name) VEER KHAR  
AV2023 LTD

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

Address for service of Submitter

89 GRACECHURCH DRIVE AUCKLAND 2016

Telephone: 022 197 1916 Email: Khara@xtra.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 123 (Private)

Plan Change/Variation Name Franklin 2 Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s) [Redacted]

Or Property Address 595 KARAKA ROAD

Or Map [Redacted]

Or Other (specify)

[Redacted]

**Submission**

I seek the following decision by Council:

Accept the proposed plan change / variation

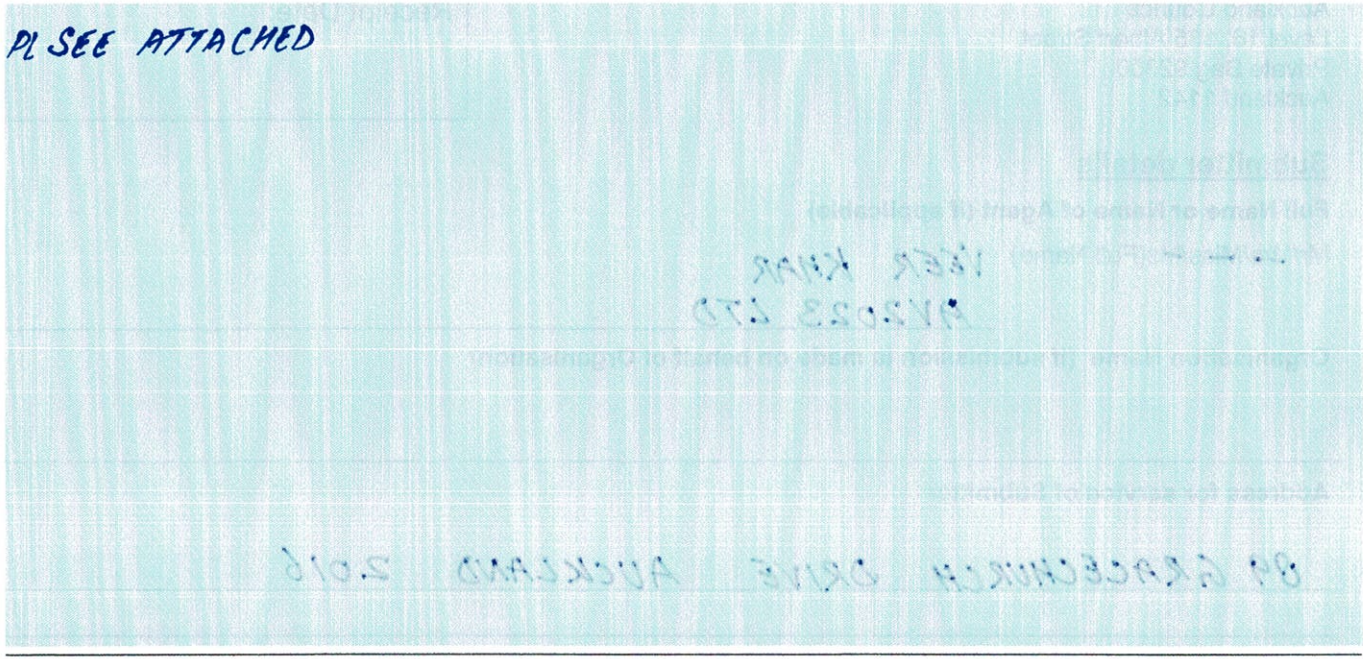
Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

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

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

PLEASE 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

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

*[Handwritten Signature]*

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

22/02/26

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 Proposed Plan Change PC123

**Submitter:** AV2023 Ltd

**Affected Property:** 595 Karaka Road, Auckland

**Position:** Oppose

---

### 1. Introduction

AV2023 Ltd opposes Proposed Plan Change **PC123** because it seeks to enable further development intensification in an area where we are given to believe that the infrastructure servicing is already constrained for surrounding landowners, including our property.

Our development consent application has been held since 2021 due to confirmed wastewater capacity limitations. In this context, enabling further development capacity in the same locality is premature and inconsistent with infrastructure-led planning principles.

---

### 2. Evidence of Existing Infrastructure Constraints

Our resource consent application has remained on hold since 2021 due to servicing constraints identified by **Auckland Council** and **Watercare Services Limited**.

This demonstrates that infrastructure limitations are real, ongoing, and materially affecting development outcomes in the area.

Approving additional zoning capacity while existing developments cannot proceed due to servicing constraints would represent inconsistent and inequitable planning. Correspondence with Watercare and Auckland Council is attached.

---

### 3. Applicant's Own Evidence Confirms Available Wastewater Capacity

However the plan change documentation itself states:

- the existing wastewater pump station has capacity to service **1,000 residential lots**; and
- approximately **311 houses have been constructed** to date.

This means that **substantial unused wastewater capacity currently exists**. This raises a question about information being provided by Council/Watercare.

---

### 4. Preferential Allocation Concern

If available infrastructure capacity exists but is effectively reserved for a single development, this raises serious planning concerns including:

- inequitable allocation of public infrastructure.
- distortion of development opportunities.
- inefficient use of existing network capacity.
- inconsistent treatment of neighbouring landowners.

Infrastructure funded, consented, or constructed to serve a growth area should be allocated transparently and fairly across that area.

---

### **5. Failure to Demonstrate Infrastructure Justification for Intensification**

Before approving additional density under PC123, decision-makers must be satisfied that infrastructure capacity is genuinely available.

However:

- neighbouring landowners cannot currently connect.
- yet the applicant's report confirms capacity exists.

This inconsistency creates uncertainty regarding:

- how capacity is allocated.
- whether capacity is reserved.
- whether allocation criteria are equitable.

Without clarification, the infrastructure evidence supporting PC123 is incomplete.

---

### **6. Access Constraints Created by Deferred Infrastructure Delivery**

The approved consent framework for the neighbouring development provided for access to our site via an internal road connection.

That road:

- has largely been constructed.
- has services installed.
- was intended to serve multiple neighbouring properties.

However, a Section 127 consent change reportedly allows deferment of vesting of the final link. As a result, affected landowners including AV2023 Ltd are left without effective access despite infrastructure being substantially delivered.

This creates:

- stranded land parcels.
  - fragmented infrastructure delivery.
  - inefficient urban form.
  - inequitable planning outcomes.
- 

### **7. Inconsistent Planning Outcomes**

PC123 would enable intensified development within the Precinct while neighbouring landowners:

- cannot obtain infrastructure connections; and
- cannot secure effective access.

Planning decisions should operate consistently across similarly situated land. PC123 risks producing the opposite result.

---

## 8. Information Requested

Before any decision is made, AV2023 Ltd requests disclosure of:

- actual wastewater network capacity.
  - current allocation commitments.
  - remaining available capacity.
  - criteria used to allocate capacity.
  - whether any capacity has been contractually reserved.
  - status and reasoning for deferred road vesting.
- 

## 9. Risk of Adverse Effects if Plan Change Proceeds

Approving additional development rights without resolving these issues risks:

- inefficient infrastructure utilisation.
  - inequitable development outcomes.
  - reduced public confidence in planning processes.
  - constrained future growth options.
- 

## 10. Relief Sought

AV2023 Ltd respectfully requests that Proposed Plan Change PC123 be:

**Declined**

or alternatively

**Deferred** until infrastructure capacity and access availability are independently verified.

If neither occurs, then:

**Approved only with provisions stating that additional development rights cannot be exercised until infrastructure capacity and access connections are demonstrably available to all affected landowners.**

---

**11. Further Relief**

Such further or consequential relief as is necessary to ensure infrastructure allocation, access provision, and development sequencing occur in a fair, efficient, and integrated manner.

---

**Submitted by:**

**AV2023 Ltd**

Owner — 595 Karaka Road

## **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.

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](mailto: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)

Mr Peter Fa'afiu

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

Navigator Limited

### Address for service of Submitter

7 Cape Vista Crescent, Pukekohe 2120

Telephone: 027 452 2012

Email: peter.faafiu@navigator.kiwi.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:

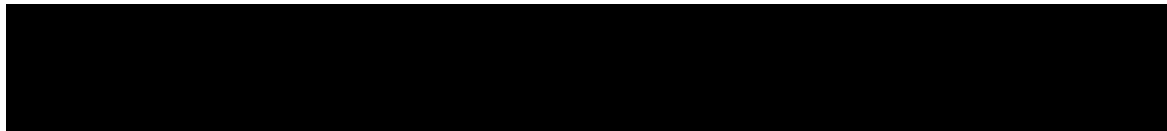
Plan Change/Variation Number PC 123 (Private)

Plan Change/Variation Name Franklin 2 Precinct

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

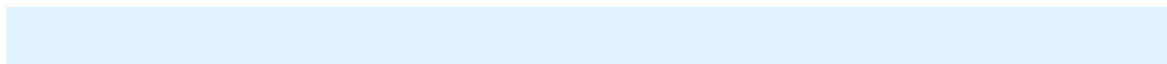
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)



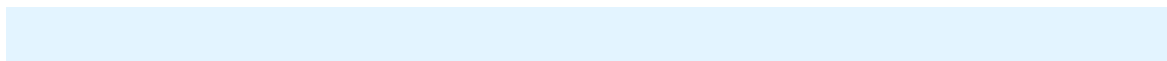
Or

Property Address



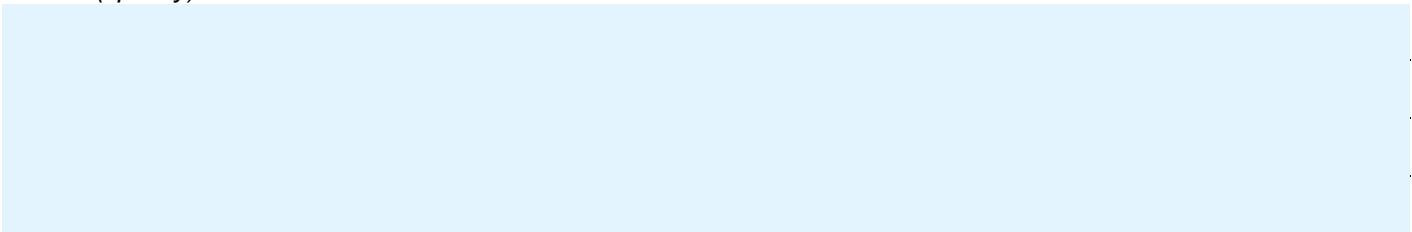
Or

Map



Or

Other (specify)



**Submission**

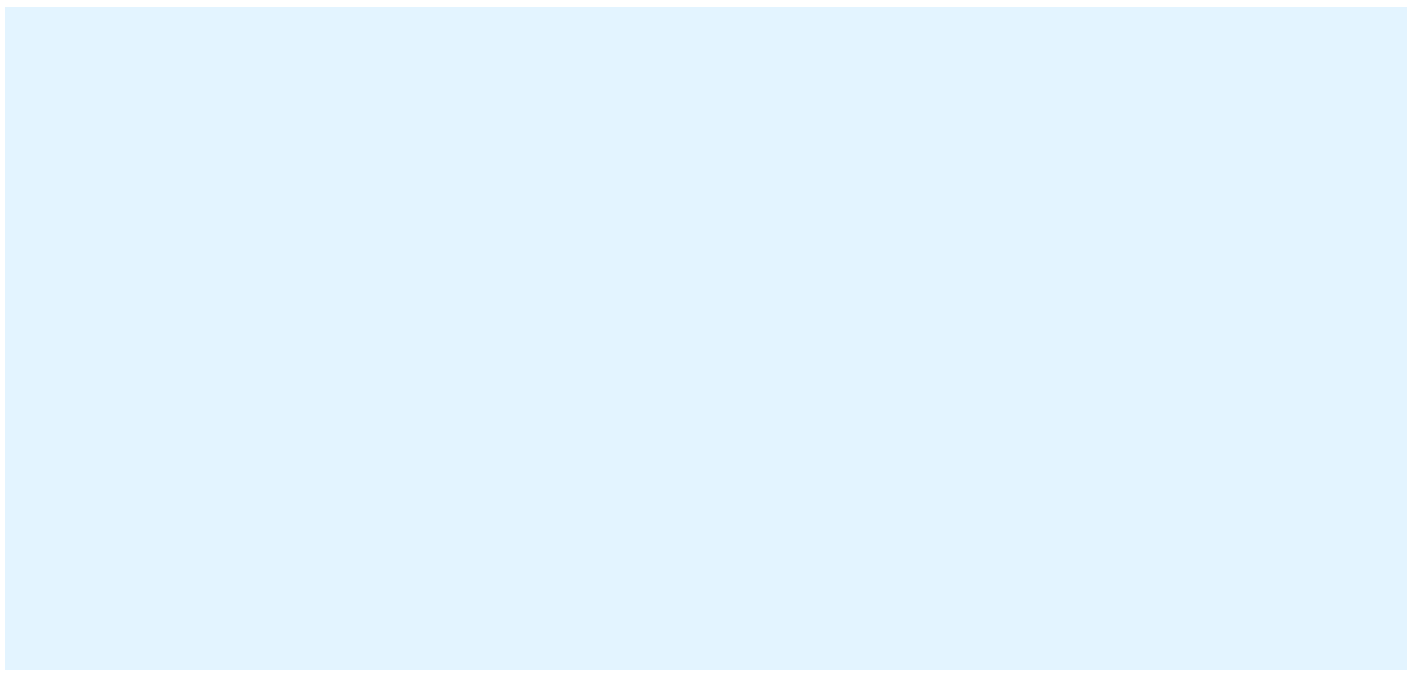
I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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



I wish to be heard in support of my submission

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

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

Peter Fa'afiu

Signature of Submitter

*(or person authorised to sign on behalf of submitter)*

22 Feb 2026

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 raising concerns with the PC 123 application from Grafton Downs Limited.**

**Date: 22 February 2026**

### **1. Introduction**

My name is Tiumalu Peter Fa'afiu. I'm a resident of Pukekohe. My management consultancy, Navigator Limited, has clients in the Franklin and wider Southern Auckland region but not at Paerata Rise. I'm an Independent Commissioner for fast-track consents although none of my four decisions relate to projects in the Franklin region.

The PC proposes six planning changes, for clarity this submission (and content) is in relation to the following:

- rezone the area adjacent to the Paerātā Railway Station from Residential – Mixed Housing Urban Zone to Business – Local Centre Zone, and Business – Mixed Use zone;
- rezoning the residential area within a 10-minute walkable catchment of the Paerātā Railway Station from Residential – Mixed Housing Urban Zone to Residential -Terrace Housing and Apartment Building Zone.

Whilst we support the overall objectives of PC 123, I do have **concerns** in relation to the above two proposed plan change elements.

Given the significant number of technical documents attached by the Applicant and Council and the limited timeframe for feedback, my comments are thematic in nature and in some respects reaffirm those concerns provided by Council officers through the Section 32 process.

### **2. Failure to acknowledge that THAB designation will be maximised**

The PC is positioned on high level directions provided by the NPS-UD and Plan Change 78. That positioning is reasonable from the Applicant's perspective considering the significant decisions made by others such as Wesley College Board, entities of the Council 'family' and Government agencies in relation to above and below ground infrastructure. However, it's important to be publicly consistent on that point when outlining the intensification that will occur on the site.

The case studies provided by the consultants around THAB intensity saw those developers maximise the six-storey and three-storey designations. Given the infrastructure investment from KiwiRail and NZTA, it's commercially appropriate to also maximise that density on the

SUBMISSION FROM NAVIGATOR LIMITED, PETER FA'AFIU - Plan Change 123 – Franklin 2 Precinct

48 HA land area proposed. So that acknowledgement to maximise once a plan change is successful is the starting point for looking at this proposed plan change. It's inauthentic that GDL gives the impression that those limits would not be maximised. The remainder of my comments therefore use that as a starting point.

10.1

**3. Inadequate Assessment of Effects (Section 32 and Section 104)**

The Section 32 evaluation report **does not** adequately demonstrate that:

- The proposed zoning and precinct provisions are the most appropriate way to achieve AUP objectives.
- Adverse effects (particularly cumulative traffic and infrastructure effects) are appropriately avoided, remedied, or mitigated.
- Geotechnical risks are appropriately remedied or mitigated. Leaving further analysis of "High" risk geotechnical matters to resource consent stage is not appropriate.

10.2

10.3

10.4

The absence of confirmed infrastructure funding and delivery also undermines the efficiency and effectiveness tests required under Section 32.

We offer specific comments using the Applicant's Section 32 Analysis (scale and significance of effects) notes:

*Who and how many will be affected? Low.*

We disagree with the assessment of Low. It should be Medium. Four comments (with two for and two against the PC) from an already established community of 300+ households does not represent a position of Low in responding to this question. That consultation process with its own residents was via email by the Paerata Rise Body Corporate on 12 November 2024. There is no evidence that there has been further engagement with current residents since then.

10.5

The two residents who were opposed had significant comments to make. Both sets of comments were premised on the view that as homeowners they had been "sold" a different master planned community than what they now will see with the proposed plan changes. The cost to them would be significant in terms of financial and landscape character. We don't know the impact of those current residents because we are not aware of any further consultation apart from November 2024. The lack of authentic engagement with landowners within the site itself would mean this is Medium, not Low effect.

*Degree of impact on, or interest from iwi/Māori. Low.*

For a significant master planned community and now one seeking THAB across 48HA, there is no outward expression of transformative Māori outcomes for local iwi and Māori. Under Auckland Plan 2050, the Māori Outcomes Framework provides clear opportunities for how these can be achieved. Apart from the name of the development and some street names, there is no other outcomes for Māori. In the decade that Paerata Rise has been constructing residential housing, have there been specific employment opportunities for

SUBMISSION FROM NAVIGATOR LIMITED, PETER FA'AFIU - Plan Change 123 – Franklin 2 Precinct

Māori or local Iwi? How is the developer contributing to an economic eco-system for Māori that the Auckland Plan seeks such as procurement of local Māori owned businesses? Has the developer in putting forward this plan change utilised Te Ao Māori expertise whether it be urban design, architecture, landscape design? Has there been an opportunity for community housing entities to provide housing options for Māori via first home buyer programmes? Therefore, that pattern of non-delivery towards the Plan’s Māori Outcomes Framework will remain the same with the proposed plan change. Therefore, the evaluation on this point is a medium effect. As an aside, the CIA from Ngaati Te Ata was not attached to the set of documents put out for public submission.

10.6

*Geographic scale of impacts. Low.*

THAB designation sits over an area which has stream / waterway through it. Several maps within the technical reports from 20014 show this stream. We believe this is a Medium. Further reasons for that designation is noted below in Points 4, 5 and 6.

10.7

**3. Not a well-functioning urban environment / affordable housing provision**

GDL makes two related arguments – to remove the Affordable Housing provision and that Paerata Rise is a well-functioning urban environment (Part 2 of the RMA) and will continue to be so with the intensification.

We agree with the *Property Economics*’ view that the removal of the ‘Affordable Housing’ provision has no propensity to adversely impact the affordability of housing in the local market or the broader region. Moreover, the removal can be expected to provide greater certainty for local growth and offer increased flexibility in developing the area to meet evolving community needs.

However, this point is premised on the masterplan developer – GDL – seeking to achieve its well-functioning urban environment objective by building their neighbourhoods with different housing products even tenures for different cohorts of New Zealanders; this is particularly important for a charitable company of the Methodist Church.

For the last decade, 16 residential builders have been in Paerata Rise building the same typology in accordance with planning and resource consent requirements. Those same requirements can allow for a “variety of housing types” in accordance with “housing needs and demand”. There is no **community housing provider** (CHP) builder within Paerata Rise therefore no community housing to match the actual need and demand.

For example: Housing Foundation is a CHP and builds for first home buyers as does Habitat for Humanity. Accessible Homes (and similar ilk) are one of the largest builders in the country, building accessible universal standards homes for those with disabilities. There is no housing for the elderly; no retirement village but also none like Haumaru Housing or an Abbeyfield model or other private developers who build Lifemark designated housing for retirees particularly given the demographics shifts within New Zealand which is acute in Auckland.

SUBMISSION FROM NAVIGATOR LIMITED, PETER FA'AFIU - Plan Change 123 – Franklin 2 Precinct

GDL has shown little interest in developing in accordance with *actual* housing need (economic deprivation 5 -6 score for Paerata, 8 – 9 for parts of Pukekohe); that's a commercial decision on their part which is fine but they should be transparent about this – again authentic communication for GDL is an issue raised by those two current households who opposed.

GDL do not wish for community housing, and it's proven by its decade of legacy. This is unlikely to change with intensification of 48 HA and a projected population of 13,900 to 16,400 for the whole Paerata Rise suburb. The Applicant uses the Hingaia Plan Change as an example of removal for the 'affordable housing' – again its appropriate but to also note in that example Hugh Green Group through their procurement processes intentionally sought out specific community housing providers who can provide a different typology (and cohort) than private residential builders. Moreover, security of tenure has an impact on Auckland's housing challenges, would the TOD (Transit Oriented Development) opportunity provide an opportunity for the likes of Simplicity Living in the Precinct; again it will be up to GDL and based on its 10-year legacy.

10.8

#### 4. THAB economic assessment

The THAB economic assessment is based on FDS loss of future urban land however further analysis, particularly in relation to yield, should be undertaken considering:

10.9

- Fisher and Paykel Healthcare's Plan Change 121 Karaka Road Precinct
- Sunfield development which is about to receive fast-track approval (Expert Panel released draft decision to approve on 11 February 2026)
- Plan Change 124 - Pukekohekohe Gateway Precinct, which is also out for public submission.
- Updated yield plans for Hingaia / Park Green, Drury South, and Auranga.

We understand that Council is also engaging with landowners on Jesmond Road, Drury West, about their proposed plan changes and likely yield.

#### 5. Urban development without adequate certainty

Council responses already cover areas where they see inconsistency with the AUP. That inconsistency leads on to inadequate certainty regarding:

- Infrastructure servicing capacity (water, wastewater, stormwater)
- Transport network upgrades
- Funding and delivery sequencing

Enabling urban intensification without confirmed infrastructure capacity risks adverse environmental effects and does not represent sustainable management under various policies.

10.10

SUBMISSION FROM NAVIGATOR LIMITED, PETER FA'AFIU - Plan Change 123 – Franklin 2 Precinct

This lack of certainty also impacts on information that is shared with the current 300+ households within the suburb who had bought into the area based on a 2014 master plan and subsequent marketing by GDL.

## 6. Geotechnical Concerns

The Applicant's Geotechnical report by ENGEO is clear on the risks. As the Report notes whilst there are differing levels of risk of liquefaction across the whole Precinct, the high-risk areas remain that Southern end where the GDL is seeking further intensification via THAB.

To recap, Engeo noted that the following is regarded as "High" risk in that THAB area:

- Liquefaction and lateral spreading
- Consolidation settlement
- Expansive soil
- Slope instability
- Groundwater intersect
- Multiple flood plain and overland flow paths

10.11

The above is reaffirmed in various other reports and maps from 2014 noting the stream / waterway coming down the centre of the Precinct to the Southern area specifically where THAB will allow 3 – 6 storey blocks.

The proposal does not adequately address the above matters. Precinct provisions might resolve these matters and some of those practical solutions will be developer lead (60% impervious coverage in THAB) however the technical reports provided in this PPC application is insufficient especially as the risks are high across several areas that cannot be further analysed until at resource consent stage. That further analysis should be undertaken at the plan change stage.

## 7. Transport Effects and Network Resilience

Related to point 5 above, Auckland Transport's *Appendix 2: Additional comments from Auckland Transport* captures my overall concern around the applicant's transport infrastructure requirements being non-compliant. Therefore closer scrutiny is required to ensure sub-division does not occur ahead of necessary transport infrastructure.

10.12

## 8. Adverse Effects on Local Character and current local community

The scale and density enabled by PC 123 would significantly alter:

- Rural/low-density character
- Landscape values
- Residential amenity
- Privacy and noise environment

10.13

The proposal does not demonstrate that such effects are avoided or appropriately mitigated as required under AUP amenity and character provisions. This is reaffirmed by GDL’s lack of consultation with its own residents of 300+ households. GDL funds some nice “movie nights” for its existing residents but with such a significant plan change impacting the character of what those residents had bought into, it would have been useful for this plan change process to have more views / feedback from current residents. Note, given some of the reports date back to late 2024, there is a sense that from reading the consultation report, that engagement with current residents is inauthentic. As one of the two households who opposed said in their feedback, they were “disgusted” by GDL’s lack of engagement and proposed intensification plans.

**9. Relief Sought**

We seek that Council officers take into consideration our submission. If a plan change was approved then further clarity is required by the Applicant.

That the development be strictly staged and conditional upon:

- Confirmed funding and physical delivery of water, wastewater, stormwater and transport infrastructure. | 10.14
- Updated and independently reviewed traffic modelling. | 10.15
- Updated and independently reviewed housing yield in Franklin / Papakura area given other plan changes / fast track applications in progress. | 10.16
- Updated and independently reviewed economic assessment since mid-2024 (date of report in the application) | 10.17
- Engeo report on solutions / mitigation to the high risks they identified in their report. | 10.18
- Reduced density and/or scale to align with infrastructure capacity. | 10.19
- Confirmation that community housing providers or builders that build specifically to actual housing need is part of the future procurement process for GDL e.g. elderly, disability peoples, Māori housing, first home buyer models. | 10.20
- Evidence provided of an authentic engagement plan, its implementation, and outcomes with its current residents / households. | 10.21
- Progressive procurement approaches are taken by GDL that align with the values and housing and economic outcomes of their parent entity, the Methodist Church of Aotearoa New Zealand. | 10.22

Nгаа mihi, nui

Tiumalu Lauvale **PETER FA'AFIU**



NZ Transport Agency Waka Kotahi Reference: 2026-0081

23<sup>rd</sup> February 2026

Auckland Council  
C/- John Duguid, General Manager  
Level 16 Planning and Resources Consents  
Auckland Council  
Private Bag 92300  
Auckland 1142

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

Dear Mr Duguid,

**Submission on Proposed Plan Change 123 (Private) – Franklin 2 Precinct – Area bounded by State Highway 22 (Paerāta Road), Karaka Road, Paerātā Train Station and the North Island Main Truck Line**

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the Plan Change 123 (Private) – Franklin 2 Precinct.

We welcome the opportunity to discuss the contents of our submission with Council Officers or the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Elliott Thornton  
Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services

Phone: 021 678 399

Email: [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz)

**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**

---

**Submission on Proposed Plan Change 123 (Private) – Franklin 2 Precinct– Area bounded by State Highway 22 (Paerāta Road), Karaka Road, Paerāta Train Station and the North Island Main Truck Line – Grafton Downs Limited**

**To:** Auckland Council  
C/- John Duguid, General Manager  
Level 16 Planning and Resources Consents  
Auckland Council  
Private Bag 92300  
Auckland 1142  
  
Via email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**CC:** Grafton Downs Limited  
C/- Boffa Miskell Ltd  
PO Box 91250,  
Auckland 1142  
  
Via email: [janine.bell@boffamiskell.co.nz](mailto:janine.bell@boffamiskell.co.nz)

**From:** NZ Transport Agency Waka Kotahi  
44 Bowen Street,  
Private Bay 6995  
Wellington 6141

---

**1. This is a submission on an application from Grafton Downs Limited for:**

A Private Plan Change 123 to Franklin 2 Precinct (**PC123**) for rezoning as a result of decisions to retain the Wesley College at its current location and the construction of the Paerāta Train Station by KiwiRail.

The areas of interest to the NZTA that the plan change is seeking is to:

- Rezone Wesley College from Local Centre to Mixed Housing Urban;
- Rezone the area adjacent to the Glenbrook roundabout from Mixed Housing Urban to Local Centre;
- Rezone the area adjacent to the Paerāta Train Station from Mixed Housing Urban to Local Centre and Mixed Use;
- Rezone the area within 10 minutes walkable catchment to the Paerāta Train Station from Mixed Housing Urban to Terrace Housing and Apartment Buildings;
- Rezone a 3,000m<sup>2</sup> site near Sim Road from Mixed Housing Urban to Neighbourhood Centre;
- Update the plan provisions including the transport triggers, namely timing of intersection upgrades to State Highway 22.

This submission relates to the extent the provisions have the potential to compromise the New Zealand Transport Agency Waka Kotahi (**NZTA**) statutory obligations.

**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 Rooding 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.

Within the 2024-27 National Land Transport Programme, NZTA has allocated investment in the Auckland Region to the improvement, operation and maintenance of State Highway network, including public transport investment, walking and cycling and transport planning. In addition, NZTA is the co-funder of the local roading network. NZTA is therefore a significant investor in the infrastructure required to achieve land use change and growth.

**4. State highway environment and context**

The Franklin 2 Precinct is bounded to the north and west by State Highway 22 (**SH22**) (Karakā Road and Paerātā Road), connecting Franklin to the Auckland Southern Motorway (**SH1**) at Drury. PC123 is located to the immediate south and west of SH22 where the site is bounded between SH22 and the KiwiRail Main North Trunk Line. It provides an important connection to the high-growing suburbs in southern Auckland. This plan change is predominately reliant on SH22 for vehicle access to and from the site.

South Auckland is growing fast, with an additional 120,000 people expected to make it their home during the next 30 years. NZTA are working to plan and deliver transport improvements in South Auckland to support future growth.

NZTA is currently constructing stage 1B of the Papakura to Drury project, which includes an upgrade of the Drury Interchange (which connects with SH22) and a widening of SH1. Projects beyond these are currently awaiting confirmation of funding and are not currently programmed.

**5. The specific parts of the application that this submission relates to are:**

- The proposed changes to the timing and nature of transport access triggers.
- The information and assumptions used to rely on travel demand modelling, which feeds into timing of SH22 access and upgrades.

**6. The submission of NZTA is:**

- (i) NZTA supports in part PC123 to the extent outlined in this submission.
- (ii) NZTA supports the principle of rezoning of land around the Paerātā Train Station to Local Centre and Mixed use, and the upzoning of the Residential Zone for greater intensity land within 10 minutes walking distance.

NZTA considers that the rezoning supports transit-orientated development (TOD) with a focus on the Paerātā Train Station, reducing reliance on private vehicles, leading to less congestion, fewer emissions and lower road, accident-related, and environmental impacts.

Enabling higher intensity of development near the Paerātā Train Station also aligns with the Government Policy Statement on Land Transport 2024 by:

- Supporting economic growth and productivity by enabling greater intensification near public transport to ultimately improve housing supply, choice and affordability; and
- Value for money by maximising growth opportunities by focussing growth and intensification adjacent to a newly constructed train station, optimising the utility of the public investment.

- (iii) NZTA oppose the changes to the proposed transport threshold triggers in Table IXXX.4.1 (A7) – (A9) and Table IXXX.6.5.1 that rely on a Transport Assessment to be carried out by the applicant to determine the activity status of a resource consent and confirm the need for access upgrades to SH22.

The use of a subjective report such as a Transport Assessment is neither an effective nor efficient method to confirm activity status, timing, or need for intersection upgrades to ensure the safe and effective function of the roading networking including SH22. It is not good practice for District Plan rules to rely on subjective or qualitative assessment to determine an activity status as this provides a high degree of ambiguity, particularly as the default activity status (A7) is a controlled activity (i.e. generally an activity that can't be declined).

The proposed transport threshold triggers leave the determination of activity status solely at the discretion of the applicant's traffic consultant, without peer review or input from Auckland Council or NZTA. This is particularly concerning given that Council has only 10 working days from lodgement to return the application as being incomplete under section 88 of the Resource Management Act 1991 (RMA), or it is deemed to be accepted as complete. It is generally not appropriate for the completeness check to confirm the merits of an application, and this should be subject to decision making under sections 95 / 104 of the RMA.

A more effective approach would be to maintain triggers based on a quantitative and easily identified objective trigger, such as dwellings and / or allotments (see item iv below). Where a total number of specified dwellings or lots are reached, the need for access upgrades can be fully considered through the resource consent process as a Restricted Discretionary Activity.

It would be entirely appropriate that this be supported by a Transport Assessment where the Council can consider the merits and need for access upgrades, but retains full discretion to approve, approve with conditions, or decline the consent.

- (iv) NZTA support in part the addition of allotments as a transport threshold trigger, as dwellings alone are no longer an efficient and effective tool to measure transport threshold triggers in Table IXXX.4.1 (A7) – (A9) and Table IXXX.6.5.1 as:

- The use of dwellings as the only transport threshold trigger could in theory add significant cost to obtaining consent for a single dwelling house as the cost of a Transport Assessment and carrying out the access upgrade could potentially fall to the consent holder for a single dwelling house who often does not have the resources or expertise in such matters.
- It is neither practical or feasible for consent holders to easily access information on the number of building consents issued in the Franklin Precinct 2 to identify transport threshold triggers, as

the information is not readily available and it is unclear if Auckland Council is keeping a tally to easily identify when transport trigger points are met; and

- Recent changes to the Building Act 2016 to allow for standalone units of no more than 70m<sup>2</sup> without either building consent, means such records may not be available.

For the above reasons, the addition of allotments is a more cost effective and efficient trigger for access upgrades, although in practice, neither mechanism is ideal nor necessarily fit for purpose any longer.

It may be worth exploring alternatives such Development / Financial Agreement, or the use of consent notices on balance lot of each stage of development to check compliance against as stages of development progress.

- (v) NZTA oppose in part the specific allotment numbers proposed to determine transport triggers in Table IXXX.4.1 (A7) – (A9) and Table IXXX.6.5.1. The intent of the current transport threshold triggers based on dwellings does not translate to the same traffic demand if allotments are used instead. Under the H5 Residential – Mixed Housing Urban Zone, up to 3 dwellings per site are permitted (Table H5.4.1 – A3). This means that in theory, if the trigger point is now 1,200 vacant lots, as opposed to 1,200 dwellings, the transport trigger would potentially enable 3,600 dwellings, and in practice it might not be viable for the checks carried out during a building consent application to capture the dwelling triggers in every instance.

As noted in item iv above, NZTA consider the retention of dwellings only as a trigger point is problematic, and support in part the use of allotments as suggested in the plan change, however NZTA oppose the specific allotment number triggers.

To ensure that the originally intended dwelling demand is captured with the use of allotments, the specific allotments will need to be reduced by 2/3. For example, 1,200 dwellings = 400 lots to capture the same transport demand enabled by the subdivision of vacant allotments.

We note that the above scenario is unlikely the applicant's intent, however there is a need for the use of lower vacant allotment triggers to appropriate threshold triggers to consider the effects on SH22 and ensure adequate, safe and efficient access is provided.

- (vi) NZTA have concerns with the assumptions made in the Integrated Transport Assessment (ITA). It relies heavily on assumptions and high-level analysis with a focus on providing a direct comparison to the 2014 ITA, and would benefit from remodelling to understand the effects of the proposed changes to zoning and changes to the environment that have occurred since 2014. In particular:

- The assumed rate of 0.58 trips per dwelling is less than the current observed rate of 0.85 trips per dwelling (7.1.1 of the ITA).
- If the assumed rate is based on a low occupancy rate, the actual trip generation rate could be understated.
- The assumed rate appears to rely on rail, centres, amenities, walking, cycling and pricing / parking measures and other public transport enhancements to be immediately in place to enable mode shift. This is highly unlikely to be the case at the opening of the Paerātā Train Station, as mode shift is not immediate, and the other enhancements assumed upon won't form part of the environment for quite some time. Given the site's location, car-based trip generation would likely sit at the higher end of the range when compared with developments in more urban locations, and a more conservative assessment of 1.2 trips per dwellings may be more appropriate to consider the impacts on the network.

- The commercial trip rates are based on outdated 2002 Guide from New South Wales (NSW) and is now more than 20 years old. The draft Auckland Transport's 2025 ITA Guidelines reference more contemporary sources, including a 2025 update to the NSW guide.
- It is unclear whether the change in the location and the size of the Local Centre Zones will alter the function of the commercial activities and associated travel demand. For example, has it been assumed that they will function as high-trip or conservative attractor and what rationale is applied.
- It is unclear whether the assumed m<sup>2</sup> of commercial GFA has also accounted for some commercial in the Mixed Use Zone, and if so, what assumptions have been used for commercial / residential mix in the Mixed Use Zone.
- It would be useful to understand the likely job creation within the development precinct, and anticipated uptake by residents, and what impact would there be on the network if the assumed internal capture rates are not realised as a trip reduction for internal capture and multi-purpose trips has been applied which may be optimistic.
- The ITA is based on traffic surveys and assumptions that are now nearly 2 years out of date. Policy or market changes may have impacted on assumed growth and demand, such as unconsented dwellings permitted by changes to the Building Act or National Environment Standard for Detached Minor Residential Units.
- The ITA has made assumptions about upgrades to SH22 including 4 lanes, which are unfunded. Additional mitigation works may be required if they remain unfunded. It remains unclear whether this scenario has been fully considered in the ITA.
- Traffic modelling has not been run since the 2014 ITA to verify the adequacy of the access points and take into account any changes in travel behaviour and future forecasts to ensure they remain appropriate and account for the proposed increase in intensity and scale of residential development in and around the Paerātā Train Station, and redistribution of commercially zoned land.

**7. NZTA seeks the following decision from the consent authority:**

- (i) NZTA seeks the following relief, summarised below and outlined in Appendix 1:
- Removal of and simplification of all transport triggers that rely on an applicant's Transport Assessment to confirm activity status.
  - Amendments to the number of lots triggering intersection access upgrades to account for the permitted dwellings enabled in the Residential Mixed Housing Urban Zone.
  - The addition of a higher dwelling / lot trigger based on a 75% build out of the precinct to enable consideration of any additional mitigation works that may be required resulting from the increased dwelling yield anticipated.
  - Potential changes to the transport threshold triggers and review of access upgrades, based on rerun of modelling and findings of the below additional information outlined in item (ii) to ensure they are current and fit for purpose.

- (ii) To better understand the potential effects of the plan change on the immediate and wider State Highway network, along with the appropriateness of the transport threshold triggers, NZTA seeks the following additional information and updated traffic modelling:
- Confirmation of the occupancy / vacancy rates of the 311 approximately dwellings assumed to form the basis of the 0.58 trips per dwelling. Low occupancy could mean that the actual trip generation rate is understated. | 11.1
  - Further assessment on the adequacy of the trip rates applied specific to the likely transport behaviour and use to the precinct, or further justification that the rates previously applied for the Golding Meadows Private Plan Change are still current and have similar characteristics as to the likely travel behaviour within the precinct. | 11.2
  - Provide further rationale for the car vs public or active transport assumptions. While the ITA states the assumed modal split is possible, it doesn't confirm whether it's likely or probable and state why. It also appears reliant on: | 11.3
    - o Assumed, aspirational increased public transport modal share targets with limited evidence to support the claims that the targets will be realised;
    - o Amenities provided at the train station;
    - o Speculation that smaller dwelling sizes increase public transport usage; and
    - o Completion of the train station and development of the commercial area.
  - Provide details on the anticipated job creation within the development and uptake by residents, to aid in understanding the internal capture. | 11.4
  - Carry out an analysis of development changes including policies, zoning and market shifts, since 2014 that could impact on the assumptions on residential and commercial dwellings and cumulative effects on the wider network, including but not limited to the National Environmental Standards for Detached Minor Residential Units and changes to the Building Act 2016. | 11.5
  - Update the commercial trip rates based on more up to date guidance, including the updated TS00085 V1.1 NSW Guide to Transport Impact Assessment and the draft Auckland Transport's 2025 ITA Guidelines. | 11.6
  - Provide further details on the assumed mix of commercial and confirm whether it is purely based on the changes to the Local Centre Zone, or whether it has accounted for the Mixed Use Zone, and if so, confirm the assumed commercial uptake in the Mixed Use Zone. | 11.7
  - Confirm whether the ITA has assumed high trip-attractor or conservative trip-attractor rates for retail and commercial scenarios. | 11.8
  - Carry out a sensitivity test for a more conservative scenario that does not apply trip reductions for internal capture and multi-purpose trips to assessment potential impacts on the transport network. | 11.9
  - Clarify the impact of increased commercial trip movements on the Drury Interchange and the required staging of SH22 access improvements. | 11.10
  - Run a SATURN model with conservative trip generation rates for residential (1.2 trips per dwelling) to understand whether this changes the timing and scale of SH22 access improvements. | 11.11

- Run a SIDRA analysis using revised future forecasts to ensure the access arrangements remain appropriate under PC123. | 11.12
- Confirm whether the assessment has considered upgrades to SH22 not being carried out, and need for alternative transport threshold triggers or consideration of effects. | 11.13
- Confirm how a single, once off owner or developer, will determine compliance with the transport threshold triggers, and pay for reporting or upgrades necessary (i.e. if they are dwelling no. 1,200, etc.). | 11.14

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:



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

Date 10 February 2026

Address for service: NZ Transport Agency Waka Kotahi  
44 Bowen Street  
Private Bag 6995  
Wellington 6141

Contact Person: Elliott Thornton  
Telephone Number: 021 678 399  
Email: EnvironmentalPlanning@nzta.govt.nz

Table 1 – Relief Sought (omissions ~~strike through~~, addition underlined)

Chapter	PLAN PROVISION	POSITION	REASONS	RELIEF SOUGHT	
IXXX.4 Activity Table	Table IXXX.4.1 (A7)	Oppose	Reliance on an applicant's Transport Assessment to confirm an Activity Status is inefficient and ineffective, particularly as a controlled activity. The merits of the Transport Assessment and need for an upgrade should be determined through the consideration of a resource consent, not in determining the activity status.	Remove entirely.	11.15
IXXX.4 Activity Table	Table IXXX.4.1 (A8)	Oppose		<i>Replace with the following:</i>  <u>Subdivision and development that triggers the thresholds set out in standard IXXX.6.5.1.</u>	11.16
IXXX.6.5	Purpose (1)	Oppose		<i>Amend with the following omissions and additions:</i>  <i>The number of dwellings or residential lots in the Franklin 2 precinct must not exceed the numbers in the table below until the relevant access <del>measure</del> <u>upgrade assessment has been undertaken to determine whether any of the specified access upgrade(s) is required. is constructed and operational.</u></i>	11.17
IXXX.6.5	Purpose (2)	Oppose		<i>Amend with the following omissions and additions:</i>  <i><del>If the A transport assessment may identify determines</del> that an access measure upgrade(s) is <u>not required or propose alternative timing and threshold for construction and operation, for consideration. it shall be constructed and be made operational prior to the number of dwellings or</u></i>	11.18

				<i>residential lots in the Franklin 2 precinct exceeding the threshold specified in Table IXXX6.5.1</i>			
IXXX.6.5	Purpose (3)	Support with amendments	To ensure that building works that do not require building consent are also captured in the dwelling triggers.	<i>For the purposes of this rule “dwelling” is a dwelling that has been granted building consent under the Building Act 2004 or <u>has notified Council that a dwelling is proposed that is exempt from building consent</u>, and residential lots where a section 224(c) certificate has been issued that creates additional vacant lots.</i>	11.19		
IXXX.6.5	Table IXXX.6.5.1	Support with amendments	Require as a restricted discretionary activity consideration of transport effects based on existing triggers, rather than relying on the merits of a Transport Assessment.	<i>Table IXXX.6.5.1 Access Measures and Timing of Subdivision and Development: Rate of subdivision and development and alignment with access upgrades</i>			
				<table border="1"> <thead> <tr> <th><i>Threshold</i></th> <th colspan="2"><i>Access Measure</i></th> </tr> </thead> <tbody> <tr> <td><i>Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed <u>400</u></i></td> <td>(a)</td> <td><i>A transport assessment that assesses the <del>potential additional effects and whether:</del></i>  <i>(i) Upgrades to the existing accesses (Te Rata Boulevard, Puhitathi Hill Road, and Link Road) and/or</i>  <i>(ii) the final access between Puhitahi Hill</i></td> </tr> </tbody> </table>	<i>Threshold</i>	<i>Access Measure</i>	
<i>Threshold</i>	<i>Access Measure</i>						
<i>Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed <u>400</u></i>	(a)	<i>A transport assessment that assesses the <del>potential additional effects and whether:</del></i>  <i>(i) Upgrades to the existing accesses (Te Rata Boulevard, Puhitathi Hill Road, and Link Road) and/or</i>  <i>(ii) the final access between Puhitahi Hill</i>					

				<u>lots or 1,200 dwellings.</u>		Road and Link Road is required.	
				Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed <u>850 lots or 2,500 dwellings</u>	(b)	<p><del>A transport assessment that assesses the potential additional effects and whether there is a need for:</del></p> <p><del>(i) The upgrade(s) in Table IXXX.6.5.1(a) above; and</del></p> <p><del>(ii)</del></p> <p><u>An upgrade of the SH22 Karaka Road / Sim Road intersection and associated Sim Road Upgrade.</u></p> <p><del>An upgrade of the SH22 Karaka Road / Sim Road intersection and associated Sim Road upgrade; and</del></p> <p><del>(iii) the timing and implementation of such upgrade(s) if assessed to be necessary.</del></p>	<p>11.22</p> <p>11.23</p>
				Subdivision or development	(c)	<u>Upgrade measure to be confirmed once more information on</u>	11.24

				<p><i>that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 1,300 lots or 3,900 dwellings</i></p>	<p><i>assumptions and updated traffic modelling carried out.</i></p>
				<p><i>Any new development on land zoned Business Local Centre Zone adjacent to the SH22 / Glenbrook roundabout</i></p>	<p><i>(d) A transport assessment that assesses the potential additional effects on SH22 / Glenbrook roundabout and whether the existing Te Rata Boulevard access is adequate or required upgrading to accommodate the effects.</i></p> <p><i>Note: A transport assessment is not required if the potential additional effects have already been taken into account in a previous transport assessment.</i></p> <p><i>Upgrade measure to be confirmed once more</i></p>

11.25

						<u>information on assumptions and updated traffic modelling carried out.</u>
IXXX8.1	Matters of Discretion (1)	Oppose	The matters of discretion only relate to the upgrades that are proposed, rather than impacts on the wider network.	<p>The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary resource consent application: (1)</p> <p>For subdivision and development that trigger the transport thresholds, <u>the need for</u> <del>and require</del> the access measure upgrade(s) specified in Table IXXX.6.5.1 <del>to be undertaken:</del> (a) <del>and the effects of the upgrade and improvements</del> on the safety and efficiency of the transport network.</p>		

11.26

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of a submission to the **AUCKLAND COUNCIL** by **SCOTT RD JIXIANG GARDEN LTD** in respect of **PLAN CHANGE 123** to the partly operative Auckland Unitary Plan

**SUBMISSION OF SCOTT RD JIXIANG GARDEN LTD  
ON PLAN CHANGE 123 (PRIVATE): FRANKLIN 2 PRECINCT  
TO THE PARTLY OPERATIVE AUCKLAND UNITARY PLAN**

DATE: 23 FEBRUARY 2026

**To:** Planning Technicians  
Planning and Resource Consents Department  
Auckland Council  
Private Bag 92300  
Auckland 1142

**1. INTRODUCTION**

- 1.1 This submission is made by Scott Rd Jixiang Garden Limited (“Submitter”). The submission relates to Plan Change 123 (Private): Franklin 2 Precinct (“PC123”) to the partly operative Auckland Unitary Plan (“AUP”). PC123 area is bound by State Highway 22 (“SH22”) to the north and west (Karaka and Paerātā Roads respectively). Grafton Downs Limited (“GDL”) is the applicant and owns the majority of the land in the Plan Change area.
- 1.2 This submission relates to land at 663 and 671 Karaka Road, Papakura, Auckland 2580 (“Site”). The Site is located immediately adjacent to SH22 and is shown on the aerial photo **attached** as **Annexure A**. The Site is zoned (in both the AUP and PC123) for residential use. A close up of the proposed Precinct Plan’s treatment of the Site is included in **Annexure B**.
- 1.3 This Submission seeks to decline the proposed changes to the Franklin 2 Precinct contained in PC123 in their entirety and retain the current Franklin 2 Precinct objectives, policies and rules, and make the amendments to the existing Precinct plans to require 3-waters infrastructure connectivity, and road formation and vesting, for the properties along Karaka Road that would otherwise be isolated from the rest of the Precinct. This will require updating the master plan and precinct plans to provide for the Connectivity Points and to highlight the area along Karaka Road where additional vehicle crossing(s) may be needed.

- 1.4 Should PC123 be approved, this submission requests that the provisions be amended as set out in **Annexure C**.
- 1.5 The submitter is not a trade competitor for the purposes of PC123 and could not gain an advantage in trade competition through this submission.

## 2. REASONS FOR THE SUBMISSION

- 2.1 Overall, the submitter does not support PC123. It considers that the existing rules are generally appropriate for development within the Precinct.
- 2.2 However, the Submitter also considers that the Precinct, or PC123 if granted, must be amended in order to provide integrated infrastructure and connectivity for the Site. This is on the basis that, without such amendments (and again with respect to the Site) the existing Precinct and PC123 will not:
- (a) Be consistent with all relevant legislation or appropriately give effect to applicable higher order policy instruments, including the Resource Management Act 1991 (“RMA”), National Policy Statement on Urban Development 2020 (“NPSUD”), the Auckland Regional Policy Statement (“RPS”, Chapter B of the AUP) and Tāmaki-Whenua Taurikura 2023-2053 (“FDS”).<sup>1</sup> In particular (without limiting the generality of the foregoing), PC123 will not:
- (i) Result in a well-functioning urban environment, including one that:
- (A) Enables all people and communities to provide for their social, economic and cultural well-being and for their health and safety, now and into the future;
  - (B) Supports, and limits as much as possible adverse impacts on, the competitive operation of land and development markets;
  - (C) Responds to the intrinsic qualities and physical characteristics of the area;
  - (D) Adapts to changing needs;
  - (E) Develops street networks that provide good access, better linkages and enable a range of travel options;
  - (F) Meets the functional, and operational needs of the intended use;
  - (G) Achieves a high level of amenity and safety for pedestrians and cyclists;
  - (H) Efficiently provides new infrastructure; or
  - (I) Provides good accessibility for all people;

---

<sup>1</sup> Being Auckland’s current Future Development Strategy.

- (ii) Promote a quality, compact urban form, by enabling more people to live in areas of urban environments that have many employment opportunities, are well serviced by existing/planned public transport and where there is high demand for housing;
  - (iii) Appropriately provide for a variety of housing types and sizes that respond to housing need and demand, while also avoiding development in areas subject to natural hazard risk or any other spatially identified qualifying matter, or that would give rise to reverse sensitivity effects;
  - (iv) Meet the future commercial and employment needs for the Precinct; or
  - (v) Sufficiently enable housing to be designed to meet the day-to-day needs of residents.
- (b) Promote the sustainable management of natural and physical resources or be consistent with Part 2 of the RMA, to the extent that it would not:
- (i) Enable the social, economic and cultural well-being of the community in the Precinct;
  - (ii) Meet the reasonably foreseeable needs of future generations; or
  - (iii) Ensure the efficient use and development of land, which itself is a physical resource which must be sustainably managed.
- (c) Enable quality planning outcomes to be achieved for the Precinct.
- 2.3 Without limiting the generality of the foregoing, the specific reasons for the submission are set out in Sections 3 – 5 below.

### **3. LOGICAL INTEGRATION OF INFRASTRUCTURE AND CONNECTIVITY**

- 3.1 Both the Precinct and PC123 propose illogical and absurd transport outcomes for residentially zoned land within the Precinct adjacent to SH22/Karaka Rd that do not have frontage onto Te Rāta Boulevard – including the Site. The precinct plans effectively cut these properties off from the rest of the Precinct.
- 3.2 Isolating these properties has implications not only for providing access, efficient use of the land, reducing trip generation, amenity and overall integration with the rest of the Precinct, but also creates difficulties for efficient water and wastewater servicing for those properties.
- 3.3 In relation to the Site specifically:
- (a) The PC123 - including the Precinct Plans, updated master plan, Staging Plan and visuals in Appendix 9 to the Application - do not include any proposed roading connections between the Site and the rest of the Precinct to the south to accommodate growth. The surrounding roading network is seemingly proposed to come to an abrupt halt at the Site's boundary. This appears not to have been done with other privately owned land within the Precinct. See Figures 1 below.

Figure 2 PC123 Updated Masterplan



- (b) The Plan Change area is intended to be accessed by only 4 intersections along SH22, which is likely to cause difficulties for the Site in future when it is developed. Access to the Site may face challenges if they are characterised as “extra” access points to SH22, contrary to the proposed provisions. As the Site is developed, and if connected to the remainder of the Precinct, it may be beneficial, desirable or appropriate to include an extra road crossing or two along Karaka Road before the Glenbrook Roundabout.
- (c) Regardless of whether access to SH22 is retained when the Site is developed, the Site will eventually need to provide a roading connection to the roundabouts to the south at Manatika Road and to the east at Arohanui Road. As noted above, PC123 has failed to provide for these connections.
- (d) On the ground, the roading connection at the roundabouts have stopped short of the boundary creating a “spite strip” that preclude connections and future development, requiring considerable cost and complexity to link the Site to the Precinct in future. In all instances, the “spite strips” are owned by the Applicant, GDL. Aerials of these intersections from Auckland Council’s GeoMaps are included below as Figures 2 and 3 with the strips preventing connectivity highlighted in red. An additional spite strip appears to be present to the east of Meteoriti Crescent. It is noted that a similar spite strip is not present at the Roundabout at Te Rātā Boulevard and Jonah Lomu Drive where the adjacent land is owned by the Applicant.



Figure 2 Arohanui Rd Roundabout

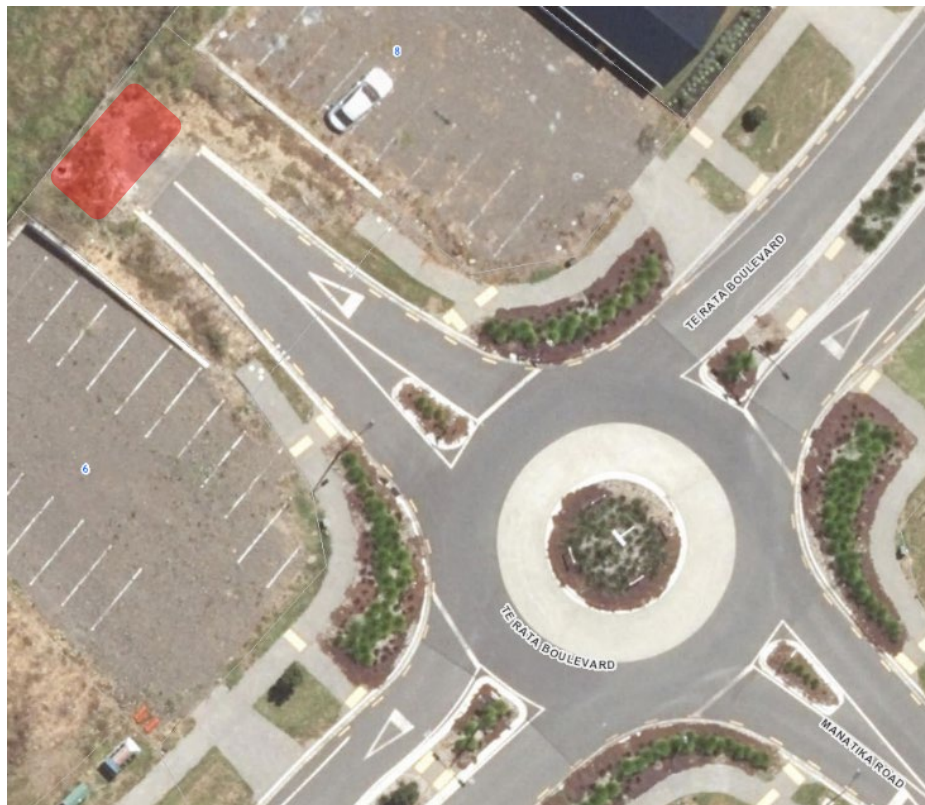
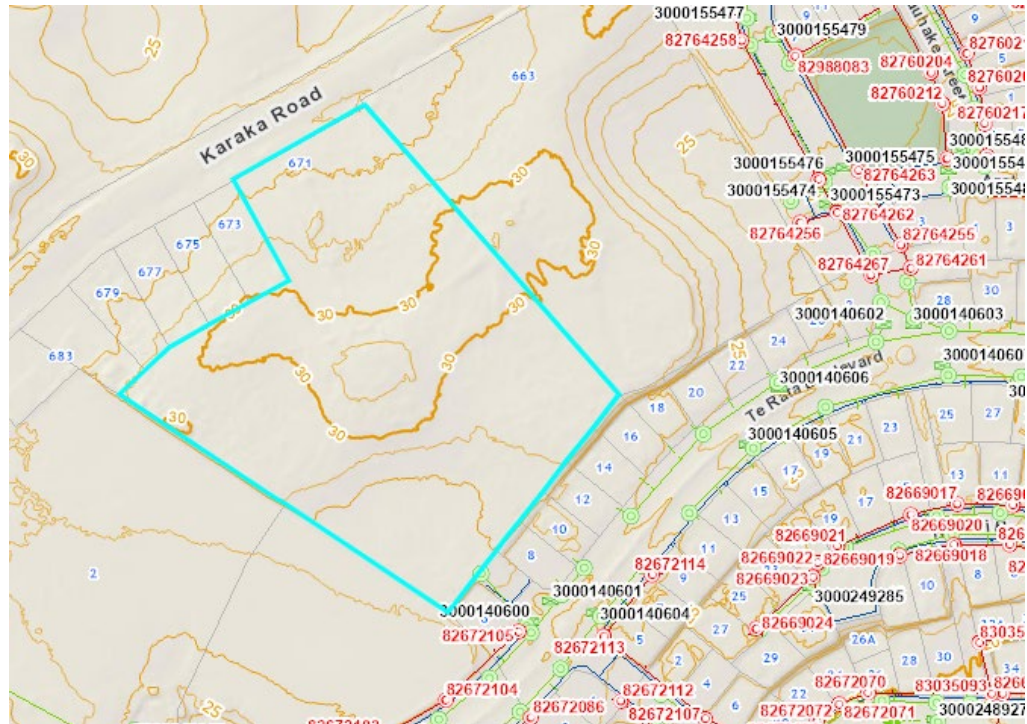


Figure 3 Manatika Rd Roundabout

- (e) Existing public drinking water, wastewater and stormwater is located in the Te Rāta Boulevard road corridor to the south and the Meteoriti Crescent road corridor to the east. The failure of the Precinct to provide sufficient connection for the Site is shortsighted and will result in inefficient servicing. The public assets depicted on Auckland Council's GeoMaps are shown in Figure 5 below.

Figure 5 Public Assets



- (f) Wastewater servicing for the entire Precinct is to be provided by a pump station on Te Paea Ave (which is currently operational) to the south.<sup>2</sup> Accordingly, these roading connections will be necessary to provide that servicing to occur when the Site is developed.

3.4 The Submitter considers that the existence of these spite strips has effectively locked it out of efficient and integrated development of the Site with the broader Precinct. This is contrary to:

- (a) The NPSUD in that it creates impediments to well-functioning urban environments by creating barriers to connectivity with and accessibility to the rest of the Precinct, creating inefficiencies in servicing provision.

<sup>2</sup> See AEE Appendix 13, Infrastructure Report at 4.3.2.

- (b) The anticipated built form of the Precinct, and its proposed objectives and policies, which seek to achieve comprehensive and integrated development, walkable neighbourhoods and well-connected internal street networks.<sup>3</sup>
- (c) The RPS, which aims to achieve efficiency and integration in infrastructure provision, connectivity for transport infrastructure.
- (d) The FDS which seeks to achieve a quality compact built form that is sustainable with linkages for people to move around.<sup>4</sup>
- (e) The Commerce Act and the NPSUD in that it creates impediments to development by other landowners and to connectivity with the wider Precinct, affecting operation of the market.

3.5 For the above reasons, the Submitter asks that the relevant precinct provisions and plans be updated to provide for:

- (a) Connectivity Points that can provide connectivity with the rest of the Precinct to the south; and
- (b) additional roading connections along Karaka Road before the Glenbrook Roundabout

#### **4. RESTORING BALANCE BETWEEN BUSINESS AND RESIDENTIAL ZONED LAND**

4.1 PC123 seeks to reduce the amount of business zoned land within the Precinct from approximately 17.8ha as provided for by the AUP to 6.8ha. The plan change also proposes more intensive residential development within a 10-minute walkable catchment of the Paerātā train station, rezoning the walkable catchment from MHU to THAB.

4.2 The Submitter acknowledges the directions in policy 3(c)(1) of the NPSUD, recent amendments to the RMA regarding residential intensification and Plan Change 120 requiring increased heights and densities within walkable catchments of rapid transit stops such as Paerātā train station. The NPSUD, however, also requires:

- (a) Plans to enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one the area is in or near a centre zone or other area with many employment opportunities.
- (b) Good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;

4.3 The Precinct plans for approximately 5,900 new dwellings.<sup>5</sup> The residents of these new dwellings will need access to social and community services, and employment to meet their day-to-day needs and help create a community that is truly walkable, where alternatives to private vehicles are a practical alternative. Retaining the Franklin 2 Residential A sub-precinct

---

<sup>3</sup> See for proposed objectives (1), (2), and policies (1)(a), (1)(b), (1)(c), and (13).

<sup>4</sup> At page 7.

<sup>5</sup> AEE Page 27.

provisions would provide a better balance between different uses, as well as provide an appropriate interface between the Precinct and adjacent rural land.

- 4.4 The Submitter does not generally oppose the dispersion of business land proposed by PC123, which will create more amenities closer to the Site and to the train station. However, the Submitter considers that such a significant reduction in business zoned land will mean additional residents in the Precinct and fewer amenities to provide for their social and cultural well-being and health, and that they must travel further these amenities. The proposed reduction in business land of almost two-thirds will fail to meet the commercial and employment needs of the Precinct and provide a well-functioning urban environment for residents.

## **5. RETENTION OF FRAMEWORK PLANS**

- 5.1 In the AUP, Franklin 2 sub-precinct A (where the Site is located) requires any application to comply with the requirements for a framework plan and may seek consent for the following land uses:

- (a) mix and location of housing types
- (b) public open spaces, community or social infrastructure
- (c) blocks, roads and pedestrian connections
- (d) stormwater, water and wastewater infrastructure
- (e) earthworks associated with development
- (f) vehicle accessways
- (g) pedestrian, cycle and other transport connections

- 5.2 PC123 proposes to delete this requirement.

- 5.3 The use of framework plans in the Precinct serves to ensure comprehensive and integrated development. PC123, as outlined above in section 3 however, does not provide any guidance or vision for comprehensive, integrated development for the Site. Consequently, it is important that such a requirement remains for the Site and surrounding properties to ensure that they are properly connected as part of the Precinct and that the planned outcomes for the Precinct are achieved.

## **6. RELIEF SOUGHT**

- 6.1 For the foregoing reasons, the Submitter seeks the following relief and outcomes in relation to PC123:

- (a) PC123 be declined, and the AUP Precinct maps be updated to provide for Connectivity Points to link the Site with the remainder of the Precinct and additional road crossings on Karaka Road east of the Glenbrook Roundabout.

- (b) Amendment of PC123 as outlined in **Annexure C** to enable and support a well-planned and unimpeded future residential outcome at the Site that is integrated and connected with the rest of the Precinct. Please note, for clarity, Annexure C shows changes to PC123 as if it was approved in its present form. However, the submitter seeks the changes set out in Annexure C even if PC123 is not approved in its present form; or
  - (c) 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.
- 6.2 The Submitter wishes to be heard in support of its submission and would consider presenting a joint case at a hearing if others have made a similar submission.

**DATED at AUCKLAND** this 23<sup>rd</sup> day of February 2026



---

**Andrew Braggins**  
Counsel for Scott Rd Jixiang Garden Ltd

**Address for service of the Submitter:**

**Andrew Braggins**  
The Environmental Lawyers  
Level 4, B:HIVE  
72 Taharoto Road  
Takapuna  
Auckland 0622

**Phone:** 021 662 249

**Email:** [andrew@telawyers.co.nz](mailto:andrew@telawyers.co.nz) / [heather@telawyers.co.nz](mailto:heather@telawyers.co.nz)

**ANNEXURE A**

**Aerial Photo**



ANNEXURE B

PC123 Proposed Precinct Plan 1



**ANNEXURE C**

**Submitter's proposed amendments to  
PC123 provisions (if granted)**

[NB: master plan and precinct plans 1-3 must be updated to show Connectivity Points with a cross reference to the relevant standard, and to highlight the area along Karaka Road where additional crossing\(s\) may be needed.](#)

12.1

## **IXXX. Franklin 2**

### **IXXX.1 Precinct Description**

The Franklin 2 precinct is located approximately 6km north of the centre of Pukekohe and forms the northern edge of the rural urban boundary that surrounds Pukekohe, an identified rural satellite town. The precinct is applied to just under 300 hectares of land that has been principally owned by the Wesley College Trust Board for much of the past century. From 1922 up until the current day Wesley College and its associated agricultural operation has been located on the land.

The precinct provides for the development of a sustainable community with a compatible mix of residential and supporting activities to meet the daily needs of the new, largely residential, community. The precinct is designed as an accessible, multi-modal, walkable residential community, based on a passenger transport interchange at the Paerātā train station, that achieves high quality environmental outcomes and that offers its residents access to quality connected open space, water sensitive stormwater design, and access to commercial and retail activities to meet the needs of the community. Within the mapped walkable catchment of the Paerātā train station, as shown on the planning maps, development of at least six storeys is enabled.

[However, as development has unfolded within the Franklin 2 precinct a number of spite strips have been established, which prevent the Precinct from achieving the outcomes intended. The Franklin 2 precinct now contains provisions that require the removal of such spite strips and the establishment of new Connectivity Points shown in the Franklin 2 precinct plan 4, before any further development or subdivision may take place. New provisions seeking to prevent spite strips being established in the future are also included. These provisions are intended to ensure that the intended outcomes of the Precinct are delivered promptly.](#)

12.2

Development of this precinct is defined by the zoning maps and other overlay controls and the Franklin 2 precinct plans, and . The College sub-precinct provisions recognise and continue to make provision for the operation and future development of the existing college and its associated activities.

### **IXXX.2 Objectives [\(DP / RP\)](#)**

12.3

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to the following:

- (1) Subdivision and development occur in a comprehensive and integrated way that provides for a compatible mix of residential living, housing typologies and locations designed to increase housing supply and to support passenger rail.

- (2) Development makes efficient use of land based on a series of walkable neighbourhoods and mixed-use areas in close proximity to passenger transport, local centres and open space.

...

- (5) Subdivision and development are integrated with transport networks and provides a well connected internal street network supporting pedestrian, cycle and public transport use along with facilities to promote use of public transport, including rail.

...

(10) Commercial and retail activities are enabled at a scale and intensity which complements and serves the precinct. | 12.4

(11) Ensure that the Connectivity Points shown in Precinct Plan 4 are established with roading and 3 waters services (water, wastewater and stormwater) as defined in the relevant standard, before: | 12.5

(a) land development or land disturbance takes place;

(b) activities requiring consent under sections 13, 14 or 15 of the Resource Management Act 1991 or the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 including any replacement legislation or regulations are undertaken (defined as “River, Wetland, Water and Discharge Activities” in this Precinct); and

(c) land is subdivided.

**IXXX.3 Policies [DP/RP]**

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to the following:

(x) Require the development of framework plans prior to subdivision, the establishment of land use activities or development to ensure that the precinct is developed in a co-ordinated, integrated and comprehensive manner. | 12.6

(xx) Require the framework plan to demonstrate the interrelationship and future integration with other land and features in the precinct, including the National Grid Corridor. | 12.7

(xxx) Avoid further subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct until 3 waters and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that any adjacent property has a direct connection to the 3 waters services and roading network. | 12.8

(xxxx) Ensure that any further resource consents for subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct require 3 waters (water, wastewater and stormwater) and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that adjacent property has a direct connection to the 3 waters infrastructure and roading network, prior to: | 12.9

- (a) [in the case of a subdivision consent, prior to a certificate pursuant to s224\(c\) of the RMA being issued for the first stage of any subdivision;](#)
- (b) [in the case of a land use consent \(including earthworks\) prior to the commencement of construction of works \(land disturbance or construction of buildings or structures\); and](#)
- (c) [in the case of River, Wetland, Water and Discharge Activities, prior to the commencement of works.](#)

(1) Require all subdivision and development to incorporate the structural elements of the Franklin 2 precinct plans to achieve:

- a) an integrated block pattern which provides for a range of site sizes, minimises rear lots and promotes street activation;
- b) a network of connected pedestrian and cycleways which follow the internal road network, riparian reserves and open spaces;
- c) a logical north-south local road network which ~~provides~~ [include](#) the following connections:
  - (i) Glenbrook Road roundabout to Paerātā train station;
  - (ii) links to Sim Road to the east;
  - (iii) links to the identified access points to State Highway 22 to the west; and
- d) an open space network which provides for the ecological and recreational needs of the precinct inclusive of neighbourhood parks and riparian reserves.

12.10

...

[\(xxxx\) Enable activities for the local convenience needs of the surrounding residential area, including local retail, commercial services, office, food and beverage and supermarkets.](#)

12.11

[\(xxxxxx\) Require subdivision to give effect to an approved framework plan.](#)

12.12

...

**Transport Infrastructure**

(12) Require the construction of new roads and access upgrades to State Highway 22 to achieve a highly interconnected pedestrian and road system that provides for all modes of transport, particularly cycling ~~as shown in precinct plan 2~~ [comprehensively throughout the Precinct.](#)

12.13

(13) Require pedestrian and cycle links to allow for safe and efficient movements within the precinct and where practicable the surrounding network, ~~as shown in precinct plan 2.~~

12.14

~~(14) Limit the number and location of vehicle access and egress points from the precinct to State Highway 22 as shown in precinct plan 1.~~

12.15

...

**IXXX.4 Activity Table**

...

**[Add the following activities into the activity table]**

12.16

	<u>Activity Status</u>
<b><u>Development</u></b>	
<u>Development prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>Development prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>
<u>Development following the Connectivity Points being established</u>	
<b><u>Subdivision</u></b>	
<u>Subdivision prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>Subdivision prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>
<u>Subdivision following to the Connectivity Points being established</u>	
<b><u>Resource consent River, Wetland, Water and Discharge Activities [rp]</u></b>	
<u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which application which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>

<a href="#">River, Wetland, Water and Discharge Activities following to the Connectivity Points being established</a>	
---	--

#### IXXX.5 Notification

(1) Any application for a resource consent which is listed above which also requires resource consent under other standards in the Plan will be subject to the normal tests for notification under the relevant sections of the RMA, [subject to \(3\) below if applicable](#).

12.17

(2) When deciding who is an affected person in relation to any activity for the purpose of section 95E of the Resource Management Act 1991, the Council will give specific consideration to those persons listed in Rule C1.13(4) [and also notify those in \(3\) below if applicable](#).

[\(3\) Restricted Discretionary activities for Connectivity Points must be limited notified to adjacent landowners, including.](#)

- I. [Part Lot 1 Deposited Plan 49602 in relation to the Connectivity Point at the end of Manatika Road.](#)
- II. [Lot 1 Deposited Plan 211133 in relation to the Connectivity Point at the end of Arohanui Road.](#)
- III. [Lot 10 Deposited Plan 148431 in relation to the Connectivity Point off of Meteoriti Crescent.](#)

#### IXXX.6 Standards

(1) All relevant overlay, Auckland-wide and zone standards apply to all activities in the IXXX Franklin 2 precinct.

(2) All activities listed in Activity Table IXXX.4.1 must comply with standards IXXX.6.1 – IXXX.6.6 [and an approved framework plan](#).

12.18

...

#### IXXX.6.4 Vehicle Access to State Highway 22

(1) Paerātā Road and Karaka Road form part of State Highway 22 (SH 22) and are Limited Access Roads. The maximum number of direct vehicle access/egress points from the precinct to SH 22 is limited to ~~four~~ [six](#) and these will be located generally at the points shown on precinct plan 1, [with an additional two of which may be included along Karaka Road before the Gleenbrook Roundabout](#), with the final location and design of each intersection to be approved by the New Zealand Transport Agency.

12.19

...

### IXXX.6.5 Access Measure Upgrades and Timing of Subdivision and Development

Purpose:

- To ensure that the rate of subdivision and development is aligned with access upgrades.
- To ensure a connected transport network that is safe and efficient for all modes and provides for development in the Franklin 2 precinct.
  - (1) The number of dwellings or residential lots in the Franklin 2 precinct must not exceed the threshold numbers in the table below until the relevant access measure upgrade assessment has been undertaken to determine whether any of the specified access upgrade(s) is required.
  - (2) If the transport assessment determines that an access measure upgrade(s) is required, it must be constructed and be made operational prior to the number of dwellings or residential lots in the Franklin 2 precinct exceeding the threshold specified in Table IXXX.6.5.1.
  - (3) For the purposes of this rule “dwelling” is a dwelling that has been granted building consent under the Building Act 2004 and residential lots where a section 224(c) certificate has been issued that creates additional vacant lots.

**Table IXXX.6.5.1 Access Measures and Timing of Subdivision and Development: Rate of subdivision and development and alignment with access upgrades**

Threshold	Access Measure
Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 1,200.	(a) A transport assessment that assesses the potential additional effects and whether: <ol style="list-style-type: none"> <li>(i) the existing accesses (Te Rata Boulevard, Puhitahi Hill Road, and Link Road) are adequate or require upgrading to accommodate the effects; and/or</li> <li>(ii) the final access between Puhitahi Hill Road and Link Road is required.</li> </ol>
Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 2,500.	(b) A transport assessment that assesses the potential additional effects and whether there is a need for: <ol style="list-style-type: none"> <li>(i) the upgrade(s) in Table IXXX.6.5.1(a) above; and</li> <li>(ii) an upgrade of the SH22 Karaka Road/ Sim Road intersection and associated Sim Road upgrade; and</li> <li>(iii) the timing and implementation of such upgrade(s) if assessed to be necessary</li> </ol>
Any new development on land zoned Business Local Centre zone adjacent to the SH 22 / Glenbrook roundabout,	(c) A transport assessment that assesses the potential additional effects on SH 22 / Glenbrook roundabout and whether the existing Te Rata Boulevard access is adequate or requires upgrading to accommodate the effects.  <b>Note:</b> A transport assessment is not required if the potential additional effects have already been taken into account in a previous transport assessment.

...

**IXXX.6.7 Subdivision***Framework Plan*

12.20

A resource consent application for a framework plan, amendment(s) to a framework plan or for a replacement framework plan:

1. Must comply with the rules, assessment criteria and special information requirements for framework plans specified for the Franklin 2 precinct;

2. May seek consent for the following land uses:

a. mix and location of housing types; and/or

b. the design and location of public open spaces, community or social infrastructure; and/or

c. the design and location of blocks, roads and pedestrian connections; and/or

d. stormwater, water and wastewater infrastructure; and/or

e. earthworks associated with the development; and/or

f. vehicle accessways.

3. Identify the location of pedestrian, cycle and other transport connections in the precinct and to the surrounding neighbourhood.

*Precinct Plans*

(1) Vacant site subdivision shall provide for the following structural elements ~~shown on Figure IXXX.10 Franklin 2 precinct plans~~, unless they are shown on the precinct plans to be within any proposed allotment 4 ha or greater in area or identified as a balance lot:

12.21

(a) boulevard and collector roads;

(b) riparian reserve separated cycleway, pedestrian/cycleway, and pedestrian walkway;

(c) indicative Neighbourhood Parks and Open Space Informal Recreation areas in the locations indicated on the precinct plans; and

(d) riparian margins and wetlands in the locations indicated on the precinct plans.

(e) National Grid Corridor

*Road Design and Design Elements*

(2) Subdivision that includes the construction of new roads, or the upgrade of existing roads, must comply with Appendix 1: Road Function and Design Elements Table.

*Vacant Sites Subdivision in Residential Zones*

(3) All vacant sites within the Residential – Mixed Housing Urban Zone shall have a minimum net site area of 200m<sup>2</sup>.

(4) All vacant sites within the Residential – Terrace Housing and Apartment Buildings Zone shall have a minimum net site area of 1200m<sup>2</sup>.

....

**IXXX.6.X Connectivity Points [DP / RP]**

12.22

Purpose, to ensure that Connectivity Points shown in Precinct Plan 4 are provided as a priority within the precinct.

- (1) A Resource consent for subdivision must include the establishment of all Connectivity Points shown in Precinct Plan 4 for construction prior to a certificate pursuant to s224(c) of the RMA being issued for the first stage of any subdivision.
- (2) A Resource consent for land use (including earthworks) must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to land disturbance or construction of buildings or structures commencing.
- (3) A resource consent for River, Wetland, Water and Discharge Activities must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to prior to the commencement of works.

For the purpose of this Precinct and any Connectivity Point provisions, establishing a Connectivity Point is defined as requiring:

- (1) Constructing and vesting in Auckland Council or Watercare as the case may be, water, wastewater, stormwater and roads, such that the land adjacent to the Connectivity Point can connect into those services without the further permission of any person other than Auckland Council or Watercare as relevant.
- (2) Designing and constructing Water, Wastewater, Stormwater and Roads in accordance with the applicable Auckland Council Code of Practice and sized for the maximum probable yield of the relevant land being connected.

...

## **IXXX.8 Assessment – Restricted Discretionary Activities**

### **IXXX.8.1 Matters of Discretion**

#### Connectivity Points [DP / RP]

12.23

The Council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the precinct activity table in relation to Connectivity Points:

- (1) A Resource consent for subdivision, compliance with the standard and the establishment of infrastructure and services.
- (2) A Resource consent for land use (including earthworks), compliance with the standard and the establishment of infrastructure and services.
- (3) A resource consent for River, Wetland, Water and Discharge Activities, compliance with the standard and the establishment of infrastructure and services.

### **IXXX.8.2 Assessment Criteria**

The Council will consider the relevant assessment criteria below for restricted discretionary activities:

(7) Whether the standard and policies related to Connectivity Points are achieved. [DP / RP]

12.24

...

**Appendix 1 – Road Function and Design Elements Table**

Road / Road Class	Minimum Road Reserve (refer Note 1)	Total Number of Lanes	Speed Limit (Design Km/hr)	Access Restrictions	Bus Provision (refer Note 2)	Cycle provision
Te Rata Boulevard and Sim Road	28	2	50	Yes (where protected cycle lane and due to median)	Yes	As per IXXX.10 Precinct Plan 2
Link Road	Link Road is being constructed by a third party					
Collector Road	24	2	50	Yes (where protected cycle lane is provided)	Yes	Yes on both sides
Local Roads - General	15.9	2	30	No	No	No
Local Roads – Reserve Edge	16.2	2	30	Yes (where protected cycle lane is provided)	No	Yes on one side

**Note 1**

Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints, or other localised design requirements.

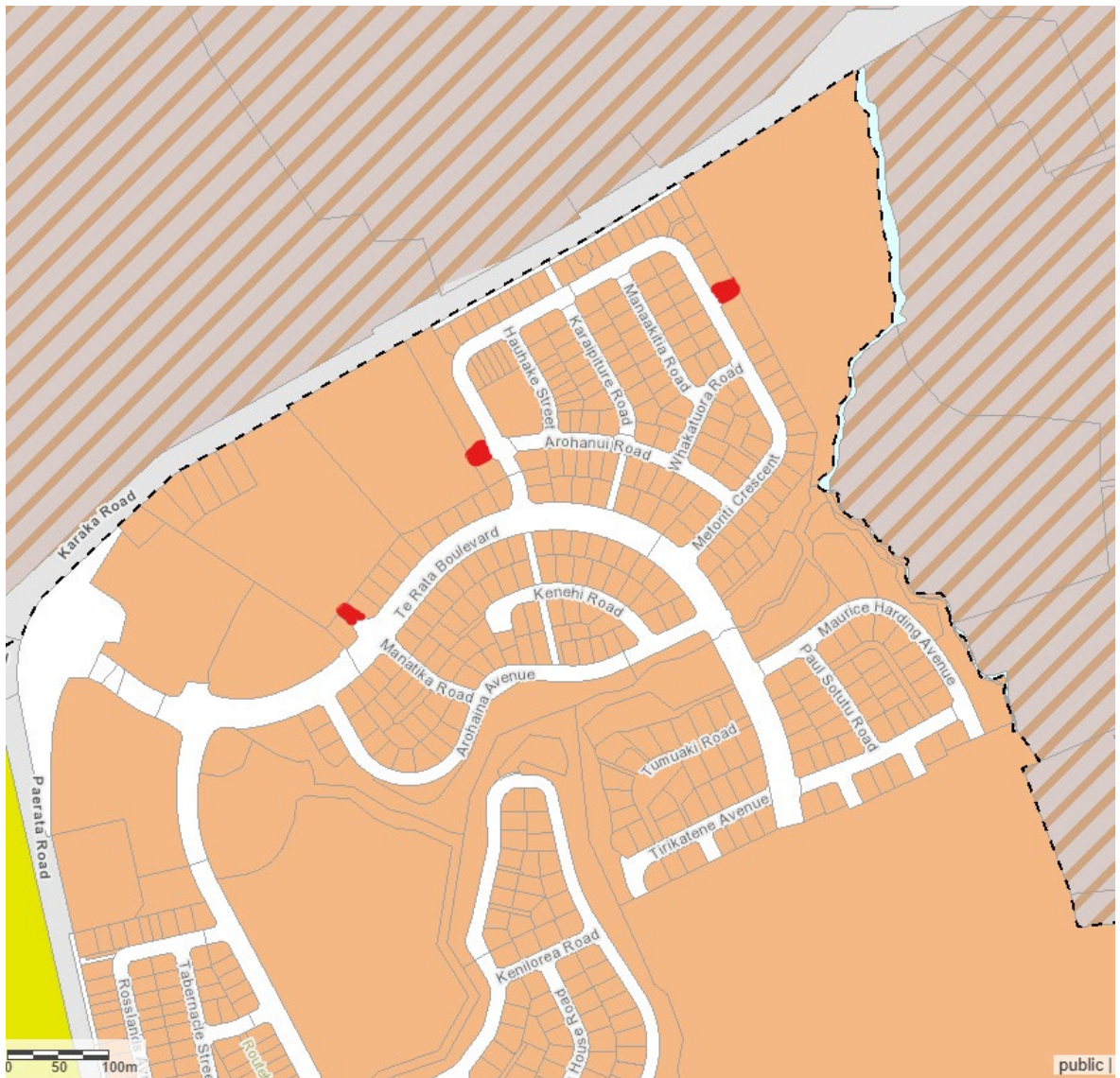
**Note 2**

Carriageway and intersection geometry capable of accommodating buses.

### Add New Precinct Plan 4

Areas marked in red are new connectivity points.

12.25



**ANNEXURE C**

**Submitter's proposed amendments to  
PC123 provisions (if granted)**

[NB: master plan and precinct plans 1-3 must be updated to show Connectivity Points with a cross reference to the relevant standard, and to highlight the area along Karaka Road where additional crossing\(s\) may be needed.](#)

## **IXXX. Franklin 2**

### **IXXX.1 Precinct Description**

The Franklin 2 precinct is located approximately 6km north of the centre of Pukekohe and forms the northern edge of the rural urban boundary that surrounds Pukekohe, an identified rural satellite town. The precinct is applied to just under 300 hectares of land that has been principally owned by the Wesley College Trust Board for much of the past century. From 1922 up until the current day Wesley College and its associated agricultural operation has been located on the land.

The precinct provides for the development of a sustainable community with a compatible mix of residential and supporting activities to meet the daily needs of the new, largely residential, community. The precinct is designed as an accessible, multi-modal, walkable residential community, based on a passenger transport interchange at the Paerātā train station, that achieves high quality environmental outcomes and that offers its residents access to quality connected open space, water sensitive stormwater design, and access to commercial and retail activities to meet the needs of the community. Within the mapped walkable catchment of the Paerātā train station, as shown on the planning maps, development of at least six storeys is enabled.

[However, as development has unfolded within the Franklin 2 precinct a number of spite strips have been established, which prevent the Precinct from achieving the outcomes intended. The Franklin 2 precinct now contains provisions that require the removal of such spite strips and the establishment of new Connectivity Points shown in the Franklin 2 precinct plan 4, before any further development or subdivision may take place. New provisions seeking to prevent spite strips being established in the future are also included. These provisions are intended to ensure that the intended outcomes of the Precinct are delivered promptly.](#)

Development of this precinct is defined by the zoning maps and other overlay controls and the Franklin 2 precinct plans, and . The College sub-precinct provisions recognise and continue to make provision for the operation and future development of the existing college and its associated activities.

### **IXXX.2 Objectives [\(DP / RP\)](#)**

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to the following:

- (1) Subdivision and development occur in a comprehensive and integrated way that provides for a compatible mix of residential living, housing typologies and locations designed to increase housing supply and to support passenger rail.

- (2) Development makes efficient use of land based on a series of walkable neighbourhoods and mixed-use areas in close proximity to passenger transport, local centres and open space.

...

- (5) Subdivision and development are integrated with transport networks and provides a well connected internal street network supporting pedestrian, cycle and public transport use along with facilities to promote use of public transport, including rail.

...

(10) Commercial and retail activities are enabled at a scale and intensity which complements and serves the precinct.

(11) Ensure that the Connectivity Points shown in Precinct Plan 4 are established with roading and 3 waters services (water, wastewater and stormwater) as defined in the relevant standard, before:

(a) land development or land disturbance takes place;

(b) activities requiring consent under sections 13, 14 or 15 of the Resource Management Act 1991 or the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 including any replacement legislation or regulations are undertaken (defined as “River, Wetland, Water and Discharge Activities” in this Precinct); and

(c) land is subdivided.

### **IXXX.3 Policies [DP/RP]**

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to the following:

(x) Require the development of framework plans prior to subdivision, the establishment of land use activities or development to ensure that the precinct is developed in a co-ordinated, integrated and comprehensive manner.

(xx) Require the framework plan to demonstrate the interrelationship and future integration with other land and features in the precinct, including the National Grid Corridor.

(xxx) Avoid further subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct until 3 waters and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that any adjacent property has a direct connection to the 3 waters services and roading network.

(xxxx) Ensure that any further resource consents for subdivision, development or River, Wetland, Water and Discharge Activities within the Precinct require 3 waters (water, wastewater and stormwater) and roading are established (as defined in the relevant standard) at all of the Connectivity Points shown in Precinct Plan 4, so that adjacent property has a direct connection to the 3 waters infrastructure and roading network, prior to:

- (a) [in the case of a subdivision consent, prior to a certificate pursuant to s224\(c\) of the RMA being issued for the first stage of any subdivision;](#)
- (b) [in the case of a land use consent \(including earthworks\) prior to the commencement of construction of works \(land disturbance or construction of buildings or structures\); and](#)
- (c) [in the case of River, Wetland, Water and Discharge Activities, prior to the commencement of works.](#)

(1) Require all subdivision and development to incorporate the structural elements of the Franklin 2 precinct plans to achieve:

- a) an integrated block pattern which provides for a range of site sizes, minimises rear lots and promotes street activation;
- b) a network of connected pedestrian and cycleways which follow the internal road network, riparian reserves and open spaces;
- c) a logical north-south local road network which ~~provides~~ [include](#) the following connections:
  - (i) Glenbrook Road roundabout to Paerātā train station;
  - (ii) links to Sim Road to the east;
  - (iii) links to the identified access points to State Highway 22 to the west; and
- d) an open space network which provides for the ecological and recreational needs of the precinct inclusive of neighbourhood parks and riparian reserves.

...

[\(xxxx\) Enable activities for the local convenience needs of the surrounding residential area, including local retail, commercial services, office, food and beverage and supermarkets.](#)

[\(xxxxxx\) Require subdivision to give effect to an approved framework plan.](#)

...

### **Transport Infrastructure**

(12) Require the construction of new roads and access upgrades to State Highway 22 to achieve a highly interconnected pedestrian and road system that provides for all modes of transport, particularly cycling ~~as shown in precinct plan 2~~ [comprehensively throughout the Precinct.](#)

(13) Require pedestrian and cycle links to allow for safe and efficient movements within the precinct and where practicable the surrounding network, ~~as shown in precinct plan 2.~~

~~(14) Limit the number and location of vehicle access and egress points from the precinct to State Highway 22 as shown in precinct plan 1.~~

...

**IXXX.4 Activity Table**

...

**[Add the following activities into the activity table]**

	<u>Activity Status</u>
<b><u>Development</u></b>	
<u>Development prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>Development prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>
<u>Development following the Connectivity Points being established</u>	
<b><u>Subdivision</u></b>	
<u>Subdivision prior to the Connectivity Points being established and which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>Subdivision prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>
<u>Subdivision following to the Connectivity Points being established</u>	
<b><u>Resource consent River, Wetland, Water and Discharge Activities [rp]</u></b>	
<u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which application which complies with Standard IXXX.6.X Connectivity Points</u>	<u>RD</u>
<u>River, Wetland, Water and Discharge Activities prior to the Connectivity Points being established and which does not comply with Standard IXXX.6.X Connectivity Points</u>	<u>Pr (Prohibited)</u>

<a href="#">River, Wetland, Water and Discharge Activities following to the Connectivity Points being established</a>	
---	--

#### **IXXX.5 Notification**

(1) Any application for a resource consent which is listed above which also requires resource consent under other standards in the Plan will be subject to the normal tests for notification under the relevant sections of the RMA, [subject to \(3\) below if applicable](#).

(2) When deciding who is an affected person in relation to any activity for the purpose of section 95E of the Resource Management Act 1991, the Council will give specific consideration to those persons listed in Rule C1.13(4) [and also notify those in \(3\) below if applicable](#).

[\(3\) Restricted Discretionary activities for Connectivity Points must be limited notified to adjacent landowners, including.](#)

- I. [Part Lot 1 Deposited Plan 49602 in relation to the Connectivity Point at the end of Manatika Road.](#)
- II. [Lot 1 Deposited Plan 211133 in relation to the Connectivity Point at the end of Arohanui Road.](#)
- III. [Lot 10 Deposited Plan 148431 in relation to the Connectivity Point off of Meteoriti Crescent.](#)

#### **IXXX.6 Standards**

(1) All relevant overlay, Auckland-wide and zone standards apply to all activities in the IXXX Franklin 2 precinct.

(2) All activities listed in Activity Table IXXX.4.1 must comply with standards IXXX.6.1 – IXXX.6.6 [and an approved framework plan](#).

...

#### **IXXX.6.4 Vehicle Access to State Highway 22**

(1) Paerātā Road and Karaka Road form part of State Highway 22 (SH 22) and are Limited Access Roads. The maximum number of direct vehicle access/egress points from the precinct to SH 22 is limited to ~~four~~ [six](#) and these will be located generally at the points shown on precinct plan 1, [with an additional two of which may be included along Karaka Road before the Gleenbrook Roundabout](#), with the final location and design of each intersection to be approved by the New Zealand Transport Agency.

...

### IXXX.6.5 Access Measure Upgrades and Timing of Subdivision and Development

Purpose:

- To ensure that the rate of subdivision and development is aligned with access upgrades.
- To ensure a connected transport network that is safe and efficient for all modes and provides for development in the Franklin 2 precinct.
  - (1) The number of dwellings or residential lots in the Franklin 2 precinct must not exceed the threshold numbers in the table below until the relevant access measure upgrade assessment has been undertaken to determine whether any of the specified access upgrade(s) is required.
  - (2) If the transport assessment determines that an access measure upgrade(s) is required, it must be constructed and be made operational prior to the number of dwellings or residential lots in the Franklin 2 precinct exceeding the threshold specified in Table IXXX.6.5.1.
  - (3) For the purposes of this rule “dwelling” is a dwelling that has been granted building consent under the Building Act 2004 and residential lots where a section 224(c) certificate has been issued that creates additional vacant lots.

**Table IXXX.6.5.1 Access Measures and Timing of Subdivision and Development: Rate of subdivision and development and alignment with access upgrades**

Threshold	Access Measure
Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 1,200.	(a) A transport assessment that assesses the potential additional effects and whether: <ol style="list-style-type: none"> <li>(i) the existing accesses (Te Rata Boulevard, Puhitahi Hill Road, and Link Road) are adequate or require upgrading to accommodate the effects; and/or</li> <li>(ii) the final access between Puhitahi Hill Road and Link Road is required.</li> </ol>
Subdivision or development that would enable the total number of residential lots or dwellings in the Franklin 2 precinct to exceed 2,500.	(b) A transport assessment that assesses the potential additional effects and whether there is a need for: <ol style="list-style-type: none"> <li>(i) the upgrade(s) in Table IXXX.6.5.1(a) above; and</li> <li>(ii) an upgrade of the SH22 Karaka Road/ Sim Road intersection and associated Sim Road upgrade; and</li> <li>(iii) the timing and implementation of such upgrade(s) if assessed to be necessary</li> </ol>
Any new development on land zoned Business Local Centre zone adjacent to the SH 22 / Glenbrook roundabout,	(c) A transport assessment that assesses the potential additional effects on SH 22 / Glenbrook roundabout and whether the existing Te Rata Boulevard access is adequate or requires upgrading to accommodate the effects.  <b>Note:</b> A transport assessment is not required if the potential additional effects have already been taken into account in a previous transport assessment.

...

### **IXXX.6.7 Subdivision**

#### *Framework Plan*

A resource consent application for a framework plan, amendment(s) to a framework plan or for a replacement framework plan:

1. Must comply with the rules, assessment criteria and special information requirements for framework plans specified for the Franklin 2 precinct;

2. May seek consent for the following land uses:

a. mix and location of housing types; and/or

b. the design and location of public open spaces, community or social infrastructure; and/or

c. the design and location of blocks, roads and pedestrian connections; and/or

d. stormwater, water and wastewater infrastructure; and/or

e. earthworks associated with the development; and/or

f. vehicle accessways.

3. Identify the location of pedestrian, cycle and other transport connections in the precinct and to the surrounding neighbourhood.

#### *Precinct Plans*

(1) Vacant site subdivision shall provide for the following structural elements ~~shown on Figure IXXX.10 Franklin 2 precinct plans~~, unless they are shown on the precinct plans to be within any proposed allotment 4 ha or greater in area or identified as a balance lot:

- (a) boulevard and collector roads;
- (b) riparian reserve separated cycleway, pedestrian/cycleway, and pedestrian walkway;
- (c) indicative Neighbourhood Parks and Open Space Informal Recreation areas in the locations indicated on the precinct plans; and
- (d) riparian margins and wetlands in the locations indicated on the precinct plans.
- (e) National Grid Corridor

#### *Road Design and Design Elements*

(2) Subdivision that includes the construction of new roads, or the upgrade of existing roads, must comply with Appendix 1: Road Function and Design Elements Table.

*Vacant Sites Subdivision in Residential Zones*

(3) All vacant sites within the Residential – Mixed Housing Urban Zone shall have a minimum net site area of 200m<sup>2</sup>.

(4) All vacant sites within the Residential – Terrace Housing and Apartment Buildings Zone shall have a minimum net site area of 1200m<sup>2</sup>.

....

**IXXX.6.X Connectivity Points [DP / RP]**

Purpose, to ensure that Connectivity Points shown in Precinct Plan 4 are provided as a priority within the precinct.

- (1) A Resource consent for subdivision must include the establishment of all Connectivity Points shown in Precinct Plan 4 for construction prior to a certificate pursuant to s224(c) of the RMA being issued for the first stage of any subdivision.
- (2) A Resource consent for land use (including earthworks) must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to land disturbance or construction of buildings or structures commencing.
- (3) A resource consent for River, Wetland, Water and Discharge Activities must include the establishment of all Connectivity Points shown in Precinct Plan 4 prior to prior to the commencement of works.

For the purpose of this Precinct and any Connectivity Point provisions, establishing a Connectivity Point is defined as requiring:

- (1) Constructing and vesting in Auckland Council or Watercare as the case may be, water, wastewater, stormwater and roads, such that the land adjacent to the Connectivity Point can connect into those services without the further permission of any person other than Auckland Council or Watercare as relevant.
- (2) Designing and constructing Water, Wastewater, Stormwater and Roads in accordance with the applicable Auckland Council Code of Practice and sized for the maximum probable yield of the relevant land being connected.

...

## **IXXX.8 Assessment – Restricted Discretionary Activities**

### **IXXX.8.1 Matters of Discretion**

#### Connectivity Points [DP / RP]

The Council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the precinct activity table in relation to Connectivity Points:

- (1) A Resource consent for subdivision, compliance with the standard and the establishment of infrastructure and services.
- (2) A Resource consent for land use (including earthworks), compliance with the standard and the establishment of infrastructure and services.
- (3) A resource consent for River, Wetland, Water and Discharge Activities, compliance with the standard and the establishment of infrastructure and services.

### **IXXX.8.2 Assessment Criteria**

The Council will consider the relevant assessment criteria below for restricted discretionary activities:

- (7) Whether the standard and policies related to Connectivity Points are achieved. [DP / RP]

...

**Appendix 1 – Road Function and Design Elements Table**

Road / Road Class	Minimum Road Reserve (refer Note 1)	Total Number of Lanes	Speed Limit (Design Km/hr)	Access Restrictions	Bus Provision (refer Note 2)	Cycle provision
Te Rata Boulevard and Sim Road	28	2	50	Yes (where protected cycle lane and due to median)	Yes	As per IXXX.10 Precinct Plan 2
Link Road	Link Road is being constructed by a third party					
Collector Road	24	2	50	Yes (where protected cycle lane is provided)	Yes	Yes on both sides
Local Roads - General	15.9	2	30	No	No	No
Local Roads – Reserve Edge	16.2	2	30	Yes (where protected cycle lane is provided)	No	Yes on one side

**Note 1**

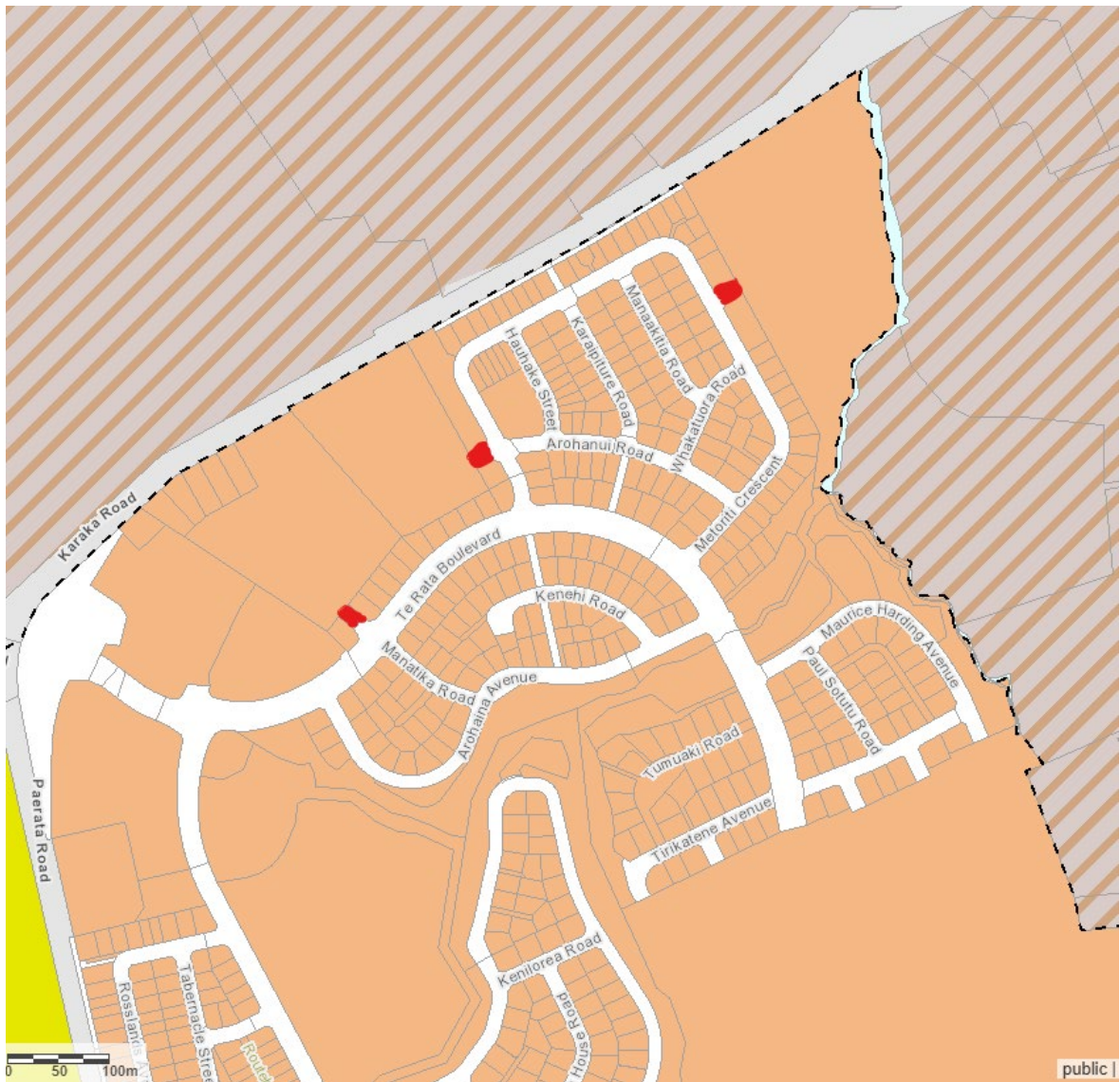
Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints, or other localised design requirements.

**Note 2**

Carriageway and intersection geometry capable of accommodating buses.

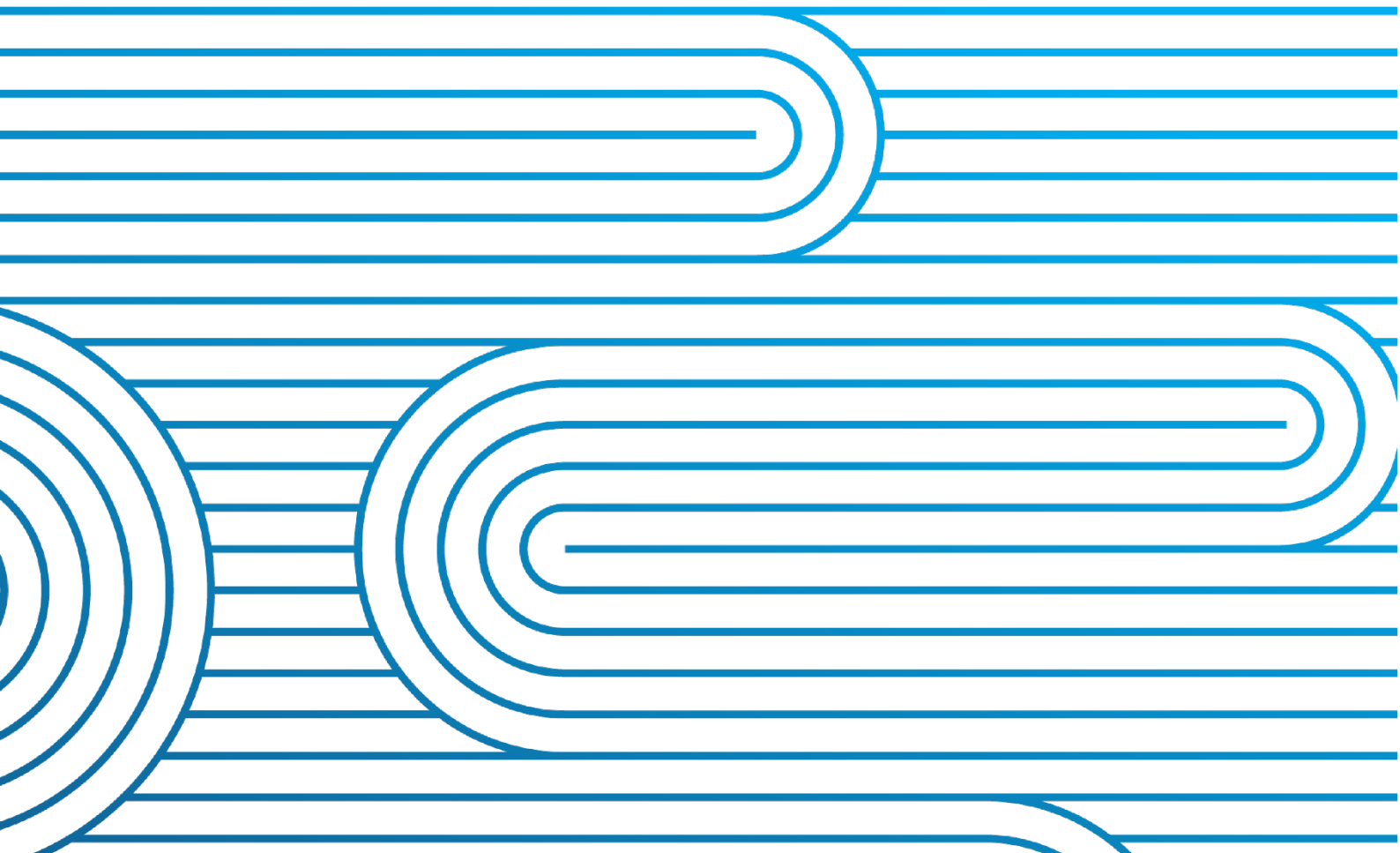
### Add New Precinct Plan 4

Areas marked in red are new connectivity points.



# Submission by Transpower New Zealand Limited on PC 123 (Private) Franklin 2 Precinct, to the Auckland Unitary Plan

23 February 2026



For office use only Submission No:
Receipt Date:

## Form 5

### Submission by Transpower New Zealand Limited on PC 123 (Private) Franklin 2 Precinct, to the Auckland Unitary Plan:

Clause 6 of Schedule 1, Resource Management Act 1991

**To: Plan Change 123 to the Auckland Unitary Plan: Franklin 2 Precinct**

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

Attn: Planning Technician

Auckland Council

Level 16, 135 Albert Street

Private Bag 92300

Auckland 1142

**Name of submitter:** Transpower New Zealand Limited (“Transpower”)

This is a submission on Plan Change 123 (Private) Franklin 2 Precinct, to the Auckland Unitary Plan

**Transpower could not gain an advantage in trade competition through this submission.**

**The specific provisions of the Proposed Plan Change that my submission relates to are:**

Refer attached.

**Transpower’s submission is:**

Attached. Included is background information and relevance of the Plan Change to Transpower.

Transpower’s specific submission points are included in **Appendix A**

A copy of the National Policy Statement for Electricity Networks 2008 (“**NPS-EN**”) (previously named National Policy Statement on Electricity Transmission 2008) is attached as **Appendix B**.

**Transpower seeks the following decision from the local authority:**

Retain or amend the provisions of Proposed Plan Change 123 to give effect to the NPS-EN (and any updated/revised Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NES-ETA)) and the relief sought in this submission as set out in Appendix A including such further alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Transpower wishes to be heard in support of its submission.**

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.



**Signature of person authorised to sign  
on behalf of Transpower New Zealand Limited**

**Date:** 23 February 2026

**Electronic address for service:** environment.policy@transpower.co.nz

**Telephone:** +64 3 590 6926

**Postal address:** PO Box 21154, Edgware, Christchurch 8143

**Contact person:** Daniel Hamilton

# Submission by Transpower New Zealand Limited on Proposed Plan Change 123 (Private) Franklin 2 Precinct, to the Auckland Unitary Plan

## 1.1 Background to Transpower and Relevance of PC123

The following provides specific submission points from Transpower New Zealand Limited (“**Transpower**”) on Proposed Plan Change 123 (Private) Franklin 2 Precinct, to the Auckland Unitary Plan (“**PC123**”).

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand’s National Grid, the high voltage transmission network for the country. The National Grid links generators directly to distribution companies and major industrial users, feeding electricity to the local networks that distribute electricity to homes and businesses (refer Figure 1).

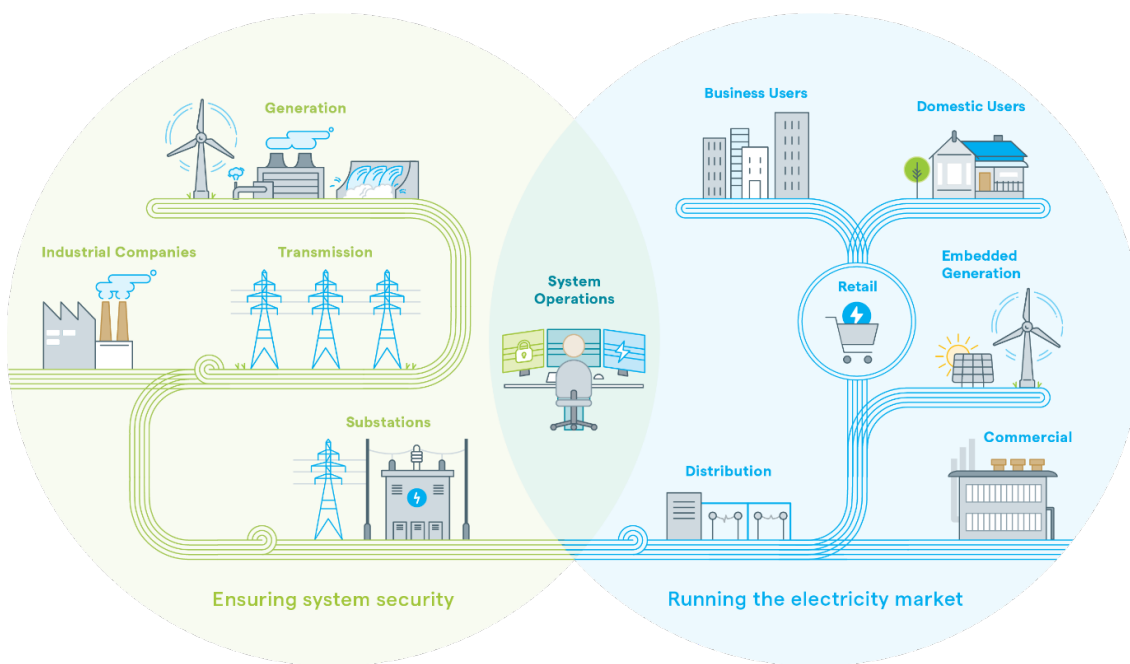


Figure 1. Electricity Industry in New Zealand.

Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand’s economic and social aspirations. Specific to PC123, Transpower needs to protect its existing assets to ensure their ongoing operation, maintenance and upgrade is not compromised.

## 1.2 Statutory Framework

### National Policy Statement for Electricity Networks, and National Environmental Standards

The National Policy Statement for Electricity Networks (“NPS-EN”) 2008 came into effect on 15 January 2026 and replaced the National Policy Statement on Electricity Transmission (“NPSET”).

As with the NPSET, the NPS-EN recognises the national significance of the National Grid (and that this significance be ‘protected’), with specific policies to manage the effects of third party activities on the electricity network. Of particular relevance are Policies 11 and 12, as follows:

#### *Policy 11*

*(1) Decision-makers and local authorities must manage adverse effects of activities undertaken by third parties on the EN, including by:*

*(a) avoiding direct effects on the EN;*

*(b) avoiding reverse sensitivity effects on the EN, to the extent reasonably possible; and*

*(c) ensuring that the effective operation, maintenance, upgrading and development of the EN is not compromised.*

#### *Policy 12*

*(1) To manage adverse effects of activities undertaken by third parties on the EN:*

*(a) local authorities must identify and map the ETN and other EN assets of national or regional significance within their district, whether or not these are designated;*

*(b) decision-makers, as relevant, must engage with the operator of the ETN to implement the buffer corridors, provided in any national environmental standards for electricity networks or similar standards, within which it can be expected that sensitive activities, buildings, earthworks, subdivision and other activities that have the potential to compromise the ETN are to be generally avoided;*

*(c) decision-makers, as relevant, must engage with EDN providers to implement the provisions of any national environmental standards for electricity networks or similar standards that protect the EDN from adverse effects of third parties;*

*(d) decision-makers must ensure that buildings, structures, earthworks, subdivision and land use activities are designed and located to maintain safe distances from, and allow sufficient space for access to, and maintenance, construction, development and upgrading of EN assets; and*

*(e) decision-makers must ensure the nature and location of any proposed trees or vegetation to be planted around the EN do not compromise its function and operation.*

Policy 11 is very directive in requiring that adverse effects on the National Grid must be managed and that adverse effects on the National Grid must be avoided (including reverse sensitivity (to the extent reasonably possible)) and that the National Grid is not compromised. Policy 12 then outlines how Policy 11 will be achieved, including through buffer corridors. Policy 12(1)(b) makes specific reference to buffer corridors provided in any national standards. This reflects the intent to introduce buffer corridors in a revised electricity network national environment standard (to

replace the NES-ETA. Transpower understands the release of the revised NES (being the National Environmental Standards for Electricity Network Activities (“NES-ENA”) is imminent.

The inclusion of buffer corridor provisions (including any Auckland bespoke provisions) within the NES will prevail over any district plan provisions). However, until such time the revised NES is gazetted, it is appropriate the National Grid Corridor overlay provisions in the AUP continue to apply.

### 1.3 Relevance of PC123 to Transpower

PC123 requests to change the Auckland Unitary Plan to amend the Franklin 2 Precinct text, precinct plans, the underlying zoning and amend the AUP Schedule 10 of Notable Trees to correct and clarify the location of notable trees in the request area.

The existing 220 kV Glenbrook – Deviation A (GLN-DEV-A) transmission line on towers traverses the southern portion of the site, and is identified as *National Grid Corridor overlay* within the AUP. There are five tower support structures on the plan changes site. Refer Figure 2 below.

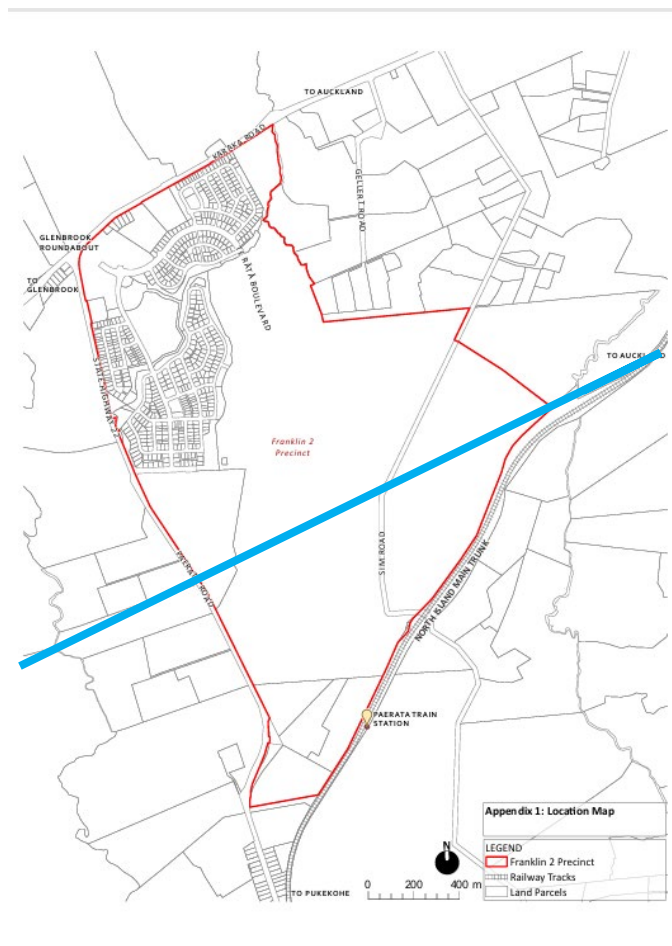


Figure 2. Site subject to PC123 is outlined in red. The GLN-DEV-A line is shown in blue.

The applicant has met with Transpower to discuss the proposal, including Transpower’s long-term plan for the transmission corridor and the potential options for realignment in the future. An agreement has been reached in principle with Transpower to the applicants’ preferred

transmission line realignment' shown on the Updated Masterplan (2025) (see Attachment 1, Drawing SK005). A copy of Drawing SK005 is provided below in Figure 3.

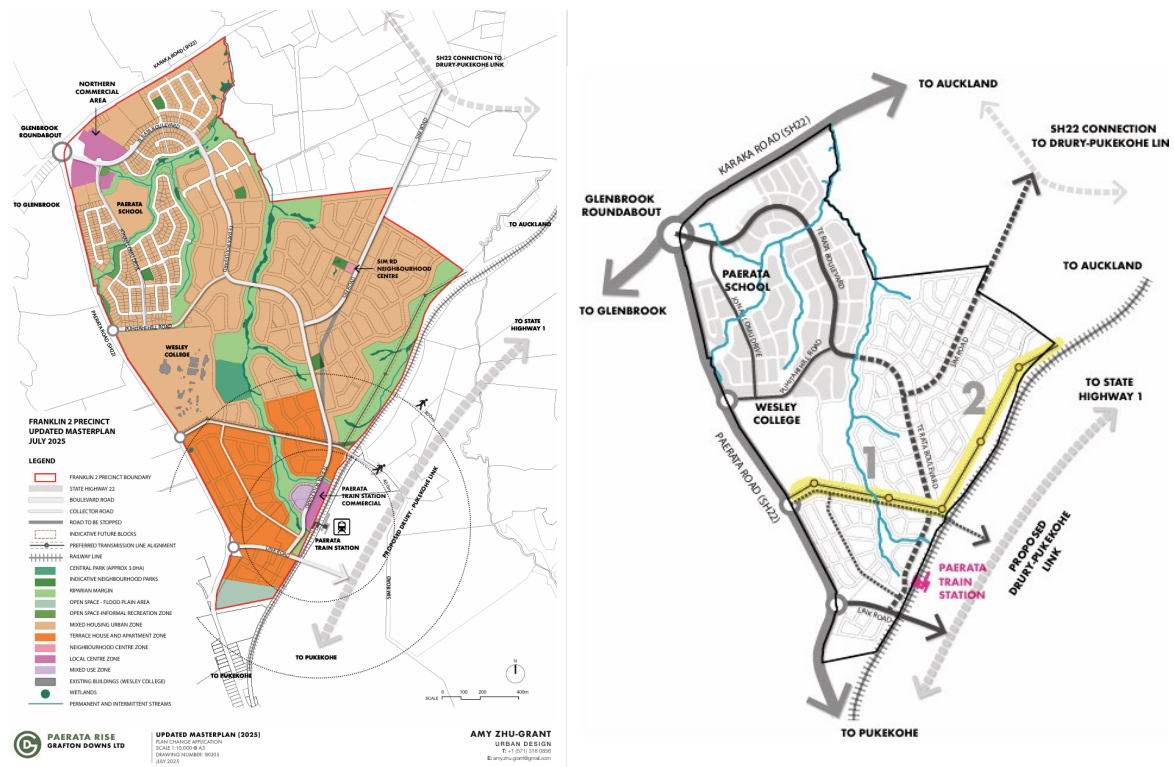


Figure 3. Masterplan drawing SK005, with the image on the right showing the proposed transmission line realignment in yellow.

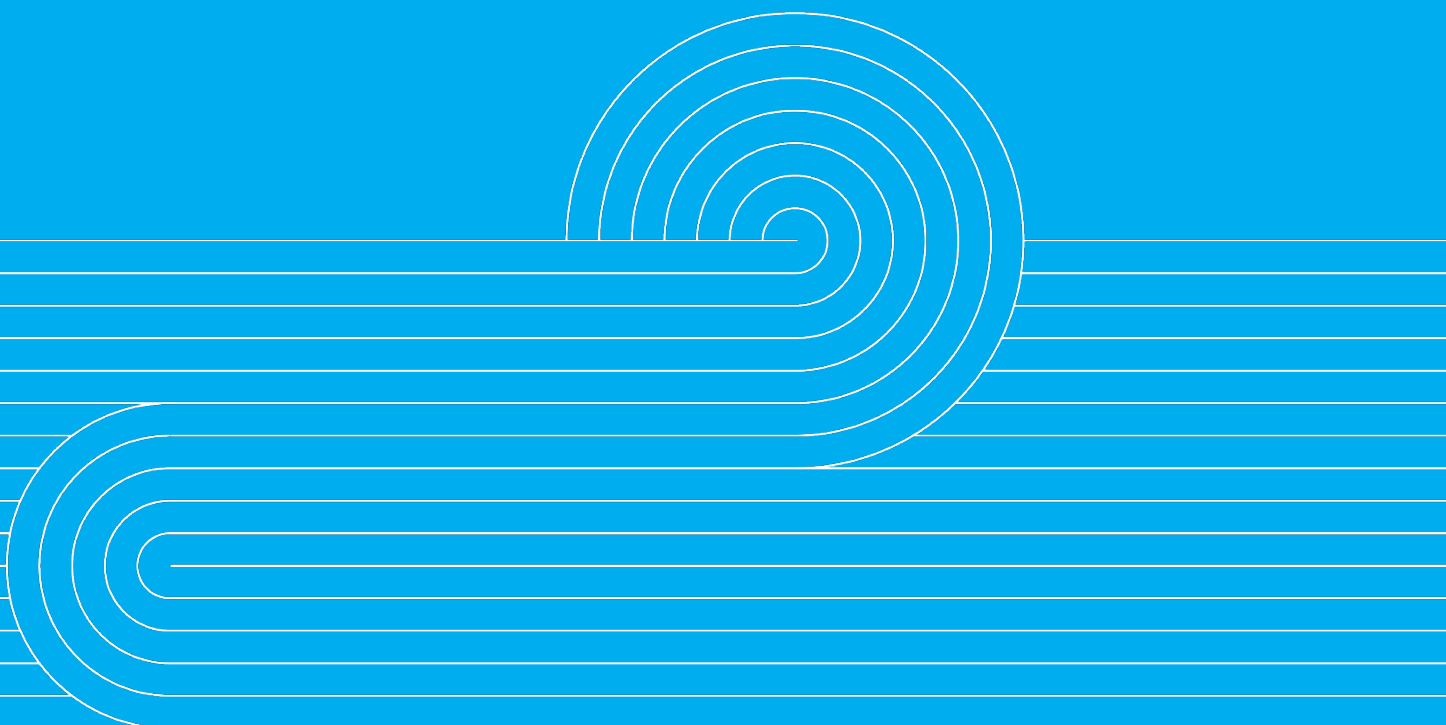
Transpower understands any potential realignment of the transmission line is an issue separate to the plan change request and this submission. The key matter for Transpower for this submission is ensuring the planning framework manages any development within proximity of the National Grid, regardless of whether the transmission line is realigned or not. Such management requires an appropriate policy and rule framework, and it is this which is the focus of this submission.

Confined amendments are requested through this submission to give effect to the NPS-EN and ensure the continued application of Chapter D26 (until such time as the proposed NES-ENA (which Transpower understands will contain corridor provisions) comes into effect).

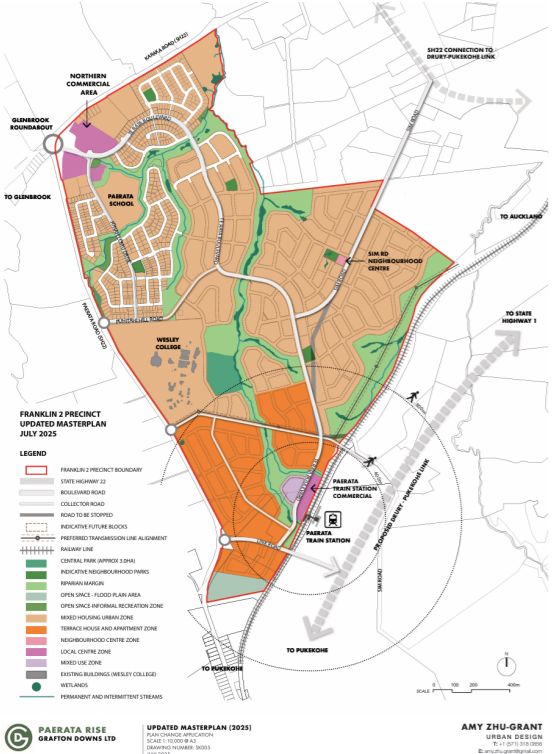
## 1.4 Specific Submission Points

Specific submission points are included in the below table as Appendix A, and for the avoidance of doubt, include any consequential relief to the specific relief sought, and to give effect to the commentary above. PC123 proposed amendments are shown in red underlined and ~~red strikethrough~~ text and Transpower’s proposed amendments are shown in blue underlined and ~~blue strikethrough~~.

# Appendix A: Specific Submission Points



The following table sets out the decisions sought by Transpower, including specific amendments to the provisions of PC123 and the reasons for Transpower’s support for, or opposition to, the notified provisions. PC123 proposed amendments are shown in red underlined and ~~red strikethrough~~ text and Transpower’s proposed amendments are shown in blue underlined and ~~blue strikethrough~~

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought	
<b>Plan Change 123 – General submission point</b>				
<p><b>General submission point – Giving effect to National Instruments</b></p>	Amend	Transpower seeks the planning provisions within PC123 give effect to the NPS-EN, and any replacement to the NES-ETA (anticipated to be renamed the NES-ENA). As outlined in this submission, the national significance of the National Grid is recognised in the NPS-EN.	Amend the plan change accordingly to give effect to national instruments, specifically the NPS-EN and any revised NES-ETA.	13.1
<b>Plan Change 123 – Updated Masterplan SK005</b>				
<p>Update the Masterplan as follows</p>  <p>The map shows the Franklin 2 Precinct boundary and various zones including Northern Commercial Area, Sunnyside Residential, Wesley College, and Franklin 2 Train Station. It also shows roads like Sunnyside Road, Franklin Road, and the proposed transmission line alignment.</p>	Amend	Transpower is neutral on the updated Masterplan drawing SK005. However, Transpower would support identification of the existing GLN-DEV-A line on the Masterplan, as well as the ‘preferred transmission line realignment’. This would ensure any development of the site takes into account the existing transmission line location, should it not be realigned.	Show the existing GLN-DEV-A transmission line on the Masterplan.	13.2
<b>Plan Change 123 – Objectives, Polices and Rules</b>				
<p><u><del>IXXX. Franklin 2</del></u>  <u><del>IXXX.1 Precinct Description</del></u>          ...  <u><del>Development of this precinct is defined by the zoning maps and other overlay controls and the Franklin 2 precinct plans. The College sub-precinct provisions recognise and continue to make provision for the operation and future development of the existing college and its associated activities.</del></u>          ...</p>	Support	The reference to AUP wide overlays is supported in that it provides clarity/certainty that Chapter D26 (which contain provisions relevant to the National Grid) applies.	Retain the reference to ‘other overlay controls’.	13.3

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought	
<p><u>IXXX.2 Objectives</u>  <del>In addition to the objectives specified above, all relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to the following:</del>  .....  (6) Subdivision and development in the precinct will not adversely impact on the safe and efficient operation of the adjoining state highway network or the National Grid <del>Corridor #ne</del> (GLN-DEV A).</p>	Support	<p>Transpower supports the reference to ‘corridor’ on the basis this reflects terminology used in the AUP.  The reference to AUP wide overlays is also supported in that it provides clarity/certainty that Chapter D26 applies.</p>	Retain proposed objective (6).	13.4
<p><u>IXXX.3 Policies</u>  <del>In addition to the policies specified above, all relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to the following:</del>  ....  (6) <del>17. Managing subdivision and development to minimise adverse effects on the efficient and safe operation, maintenance and development of incorporating the Electricity National Transmission Grid eCorridor as part of the east west, informal recreation open space corridor traversing the precinct.</del></p>	Amend	<p>Transpower supports the proposed wording that overlays apply in addition to the precinct specific policies.  Transpower supports the provision of a specific National Grid policy given the national significance of the National Grid and need to give effect to the NPS-EN. However, an amendment is sought to replace the word ‘minimise’ with ‘avoid’, thereby reflecting and giving effect to the strong directive wording within Policy 11 of the NPS-EN.</p>	<p>Amend policy (6) as follows:  (6) <del>17. Managing subdivision and development to minimise avoid adverse effects on the efficient and safe operation, maintenance and development of incorporating the Electricity National Transmission Grid eCorridor as part of the east west, informal recreation open space corridor traversing the precinct.</del></p>	13.5
<p><u>IXXX.3 Policies</u>  <del>28. Require subdivision to be consistent with the Electricity Transmission overlay provisions.</del></p>	Support	<p>On the basis of proposed changes to include reference to ‘other relevant overlays’ within the chapter, the deletion of policy 28 is supported.</p>	On the basis overlay Chapter D26 applies, retain the deletion.	13.6
<p>Deletion of:  <del>5. Assessment: Matters of Discretion 5.1.1  .1. Framework Plans  The council will restrict the exercise of its discretion to the matters listed below for creation of a framework plan, including any amendments to an approved framework plan or replacement framework plan, in the Franklin 2 precinct:</del>  ...  <del>h. the location and design of public transport and active mode infrastructure including walking and cycling;  i. design, layout and proposed use in relation to the GLN-DEV A National Grid Line, including  -i. impacts on the operation, maintenance, upgrade and development of the National Grid line;  ii. compliance with NZCEP34: 2001;  -iii. the risk of electrical hazards affecting public or individual safety;  iv. the nature and location of any vegetation to be planted in the vicinity of the National Grid line.</del></p>	Support	<p>Transpower supports the deletion of the matters listed (which contain provisions relevant to the National Grid) on the basis the matters are addressed within Chapter D26 (and E38 and E39), which will apply to any development or subdivision of the site.</p>	On the basis overlay Chapter D26 applies, retain the deletions.	13.7
<p>Deletion of:  <del>5. Assessment: Assessment criteria 5.1  1 Framework Plans  When considering a restricted discretionary application for a framework plan, amendments to an approved framework plan or replacement framework plan, the council will consider the proposal against the following criteria:</del>  ...  <del>h. the location and design of public transport and active mode infrastructure including walking and cycling:</del></p>				

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
<p><i>The framework plan should provide details on the design and location of all public transport and active mode infrastructure to be provided to demonstrate how these will deliver a highly interconnected, safe and efficient network that provides for all modes of transport, particularly walking and cycling.</i></p> <p><i>i. design, layout and proposed use in relation to the GLN_DEV A National Grid Line:</i></p> <p><i>Where the framework plan includes land that is identified in the Electricity Transmission Overlay the council will consider:</i></p> <ul style="list-style-type: none"> <li><i>i. the effects on the ability of Transpower to operate, maintain, upgrade and develop the National Grid line, including access to the line;</i></li> <li><i>ii. the extent to which the design and layout will enable earthworks, buildings and structures to comply with NZECP34: 2001;</i></li> <li><i>iii. the extent to which the design and layout, including the location of roads and reserves, landscaping and building platforms, allows for activities to be set back from the National Grid line to ensure adverse effects on, and from, the National Grid and on public safety are appropriately avoided;</i></li> <li><i>iv. the extent to which the design and layout will minimise the potential for reverse sensitivity effects.</i></li> </ul>			
<p>Deletion of:</p> <p><del>6. Sub Precinct: Wesley:</del></p> <p><del>Matters of Discretion 4.1.1</del></p> <p><del>1 Framework Plans</del></p> <p><del>The council will restrict the exercise of its discretion to the matters listed below for the creation of a framework plan, including any amendments to an approved framework plan or replacement framework plan, in the Wesley sub-precinct:</del></p> <p><del>...</del></p> <p><del>h. the location and design of public transport and active mode infrastructure including walking and cycling;</del></p> <p><del>i. design, layout and proposed use in relation to the GLN_DEV A National Grid Line, including:</del></p> <ul style="list-style-type: none"> <li><del>i. impacts on the operation, maintenance, upgrade and development of the National Grid line.</del></li> <li><del>ii. compliance with NZECP34: 2001.</del></li> <li><del>iii. the risk of electrical hazards affecting public or individual safety.</del></li> <li><del>iv. the nature and location of any vegetation to be planted in the vicinity of the National Grid line.</del></li> </ul>			
<p>Deletion of:</p> <p><del>6. Sub Precinct: Wesley:</del></p> <p><del>Assessment Criteria 4.1.2.</del></p> <p><del>For development that is a restricted discretionary activity in the Wesley sub-precinct, the following assessment criteria apply in addition to the criteria specified for the relevant restricted discretionary activities in the underlying Local Centre zone, or where applicable the Mixed Housing Urban zone. 1. Framework Plans</del></p> <p><del>When considering a restricted discretionary application for a framework plan, amendments to an approved framework plan or replacement framework plan, the council will consider the proposal against the following criteria:</del></p> <p><del>...</del></p> <p><del>h. the location and design of public transport and active mode infrastructure including walking and cycling.</del></p> <p><del>The framework plan should provide details of the design and location of all public transport and active mode infrastructure to be provided to demonstrate how these will deliver a highly interconnected, safe and efficient network that provides for all modes of transport, particularly walking and cycling.</del></p> <p><del>i. design, layout and proposed use in relation to the GLN_DEV A National Grid Line.</del></p> <p><del>i. where the framework plan includes land that is identified in the Electricity Transmission Overlay the council will consider:</del></p>			

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought									
<p><i>ii. the effects on the ability of Transpower to operate, maintain, upgrade and develop the National Grid line, including access to the line.</i></p> <p><i>iii. the extent to which the design and layout will enable earthworks, buildings and structures to comply with NZECP34: 2001.</i></p> <p><i>i.v. the extent to which the design and layout, including the location of roads and reserves, landscaping and building platforms, allows for activities to be set back from the National Grid line to ensure adverse effects on, and from the National Grid and on public safety are appropriately avoided.</i></p> <p><i>v. the extent to which the design and layout will minimise the potential for reverse sensitivity effects.</i></p>												
<p>Deletion of:</p> <p><del>8. Special Information Requirements</del></p> <p><del>1. Framework Plans.</del></p> <p><del>An application for a framework plan, amendment(s) to an approved framework plan or a replacement framework plan must be accompanied by the following information:</del></p> <p><del>1. The overall context of the land area relative to existing buildings, including any public open space, transport connections, the electricity transmission corridor, any approved buildings and approved framework plans;</del></p>												
<p>Deletion of:</p> <p><del>10. Subdivision Controls</del></p> <p><del>3.2 Size Shape</del></p> <p><del>All proposed vacant sites shall contain the following:</del></p> <p><del>...</del></p> <p><del>All proposed vacant sites shall contain the following:</del></p> <p><del>...</del></p> <p><del>j. separation distance from national grid transmission lines.</del></p>												
<p>Deletion of:</p> <p><del>IXXX.6.4 Yards</del></p> <p><del>Table IXXX.6.4.1 Yards</del></p> <table border="1" data-bbox="121 1413 1219 1654"> <thead> <tr> <th data-bbox="121 1413 320 1528">Qualifying matter as per s77(a) of the RMA</th> <th data-bbox="320 1413 709 1528">Yard</th> <th data-bbox="709 1413 1219 1528">Minimum depth</th> </tr> </thead> <tbody> <tr> <td data-bbox="121 1528 320 1654">Qualifying matter as per s77(e) of the RMA</td> <td data-bbox="320 1528 709 1654">Riparian</td> <td data-bbox="709 1528 1219 1654">10m from the edge of all other permanent and intermittent streams</td> </tr> <tr> <td data-bbox="121 1654 320 1890"></td> <td data-bbox="320 1654 709 1890">Buildings, structures, accessory buildings within the National Grid Corridor Overlay</td> <td data-bbox="709 1654 1219 1890">12m from a National Grid support structure</td> </tr> </tbody> </table>	Qualifying matter as per s77(a) of the RMA	Yard	Minimum depth	Qualifying matter as per s77(e) of the RMA	Riparian	10m from the edge of all other permanent and intermittent streams		Buildings, structures, accessory buildings within the National Grid Corridor Overlay	12m from a National Grid support structure			
Qualifying matter as per s77(a) of the RMA	Yard	Minimum depth										
Qualifying matter as per s77(e) of the RMA	Riparian	10m from the edge of all other permanent and intermittent streams										
	Buildings, structures, accessory buildings within the National Grid Corridor Overlay	12m from a National Grid support structure										
<p><del>IXXX.4 Activity Table</del></p> <p><del>All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IXXX.4.1 below.</del></p> <p><del>A blank in the activity status column means that the activity status in the relevant Auckland-wide or zone provision applies in addition to any standards listed.</del></p> <p><del>In addition to the provisions of IXXX.X Franklin 2 precinct, reference should also be had to the planning maps (GIS Viewer) which shows the extent of all designations, overlays and controls applying to land within the Franklin 2 precinct. These may apply additional restrictions.</del></p>	Support	The National Grid Corridor Overlay provisions are provided within Chapter D26 of the AUP. Chapter D26 provides provisions relating to subdivision use and development within the spatially defined/identified National Grid Corridor Overlay. The relationship to the subdivision provisions within Chapters E38 and E39 is clarified with the statement in those chapters that:	On the basis overlay Chapter D26 applies, retain the proposed provisions.									

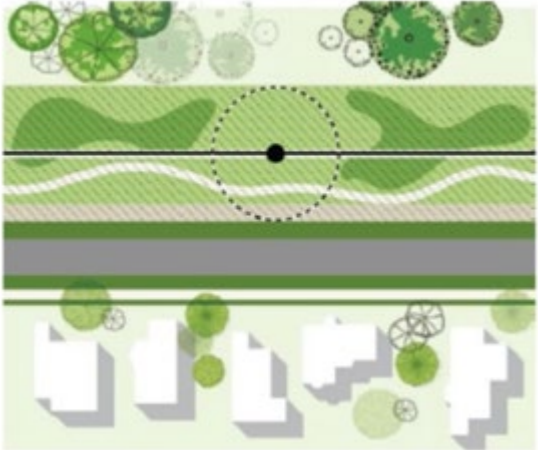
13.8

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
<p><i>The rules in Activity Table IXXX.4.1 in IXXX.X Franklin 2 precinct as they relate to the construction and use of up to three dwellings per site replace the rules in the underlying Residential – Mixed Housing Urban zone and Residential – Terrace Housing and Apartment Buildings zone for the construction and use of up to three dwellings per site.</i></p> <p><i>Table IXXX.4.1 specifies the activity status of land use and subdivision activities in the Franklin 2 Precinct pursuant to sections 9(3) and section 11 of the Resource Management Act 1991.</i></p> <p><i>The Auckland-wide Chapter E38 Subdivision rules apply in the Franklin 2 precinct unless otherwise specified below:</i></p> <p><i>(1) E38 Subdivision – Rule (A16) Vacant sites subdivision involving parent sites of less than 1ha complying with Standard E38.8.2.3</i></p> <p><i>(2) E38 Subdivision – Rule (A17) Vacant sites subdivision involving parent sites of less than 1ha not complying with Standard E38.8.2.3.</i></p> <p><i>(3) E38 Subdivision – Rule (A18) Vacant sites subdivision involving parent sites of 1ha or greater complying with Standard E38.8.3.1</i></p> <p><i>(4) E38 Subdivision – Rule (A19) Vacant sites subdivision involving parent sites of 1ha or greater not complying with Standard E38.8.3.1</i></p> <p><i>Table IXXX.4.1 specifies the activity status of land use and subdivision activities in the Franklin 2 precinct pursuant to section 9(3) and section 11 of the Resource Management Act 1991.</i></p> <p><i>A blank table cell with no activity status specified means that the zone, Auckland-wide and overlay provisions apply.</i></p> <p><i>....</i></p>		<p><i>For subdivision within the D26 National Grid Corridor Overlay, the activity status for subdivision in the urban/rural zones as listed in Tables E38/39.4.1 to E38/39.4.5 below will apply unless there are different provisions in D26 National Grid Corridor Overlay in which case the overlay provisions will take precedence.</i></p> <p>Transpower supports the clarification within PC123 that all relevant overlays apply unless otherwise specified.</p> <p>Transpower notes that it is anticipated the NES-ETA will shortly be updated to include National Grid corridor provisions, and these will prevail over the corridor rules in Chapter D26. However, in the interim, it is appropriate Chapter D26 applies.</p>	
<p><i>IXXX.6 Standards 7. Additional Provisions</i></p> <p><i>(1) Unless specified in Standard IXXX.6(2) below, all relevant overlay, Auckland-wide and zone standards apply to all activities in the IXXX.X Franklin 2 precinct.</i></p>	Support	Transpower supports the requirement that all activities provided for in the zone must comply with all relevant overlays (which will include D26). The reference to overlays is important as it clearly sets out the National Grid corridor provisions in Chapter D26 apply. Such recognition is required to give effect to the NPS-EN.	Retain the reference to all relevant overlays applying.
<p><i>IXXX.6.17 10. Subdivision controls</i></p> <p><i>Precinct Plans</i></p> <p><i>(1) Vacant site subdivision shall provide for the following structural elements shown on the Franklin 2 precinct plans, unless they are shown on the precinct plans to be within any proposed allotment 4 ha or greater in area or identified as a balance lot:</i></p> <p><i>(a) boulevard and collector roads;</i></p> <p><i>(b) riparian reserve separated cycleway, pedestrian/cycleway, and pedestrian walkway;</i></p> <p><i>(c) indicative Neighbourhood Parks and Open Space Informal Recreation areas in the locations indicated on the precinct plans;</i></p> <p><i>(d) riparian margins and wetlands in the locations indicated on the precinct plans; and</i></p> <p><i>(e) National Grid Corridor.</i></p>	Support	The recognition of the National Grid is supported.	Retain the reference to the National Grid within the proposed provision.
<p><i>IXXX.8. 4. Assessment - Restricted Discretionary Activities</i></p> <p><i>IXXX.8.1 4.1 Matters of Discretion</i></p> <p><i>The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary resource consent application: The council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the Activity Table:</i></p> <p><i>(3) For subdivision listed as a restricted discretionary activity in Activity Table IXXX.4.1: in accordance with an approved framework plan, including around existing buildings and development:</i></p> <p><i>(a) consistency with the Franklin 2 precinct plans and Appendix 1 Road Function Design and Design Elements Table approved framework plan;</i></p> <p><i>(b) effects on the transport network;</i></p> <p><i>b. site sizes and dimensions;</i></p> <p><i>c. location and design of roads, lanes and reserves;</i></p> <p><i>d. location and design of reserves;</i></p>	Support	On the basis Chapter D26 (and specific to subdivision, assessment criteria D26.8.2 (1A)) will apply, Transpower supports the broad nature of the reference to the National Grid within clause (3)(f).	On the basis overlay Chapter D26 applies, retain the proposed provisions.

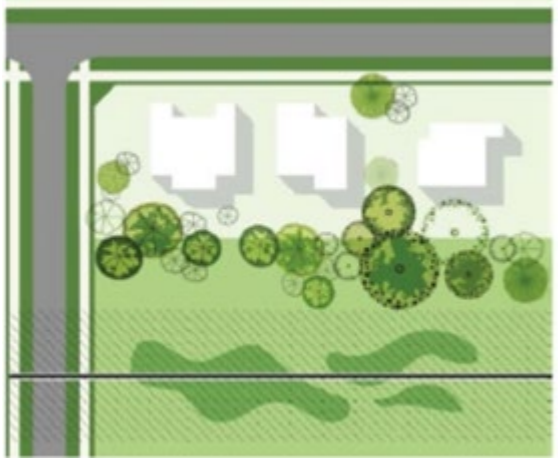
13.9

13.10

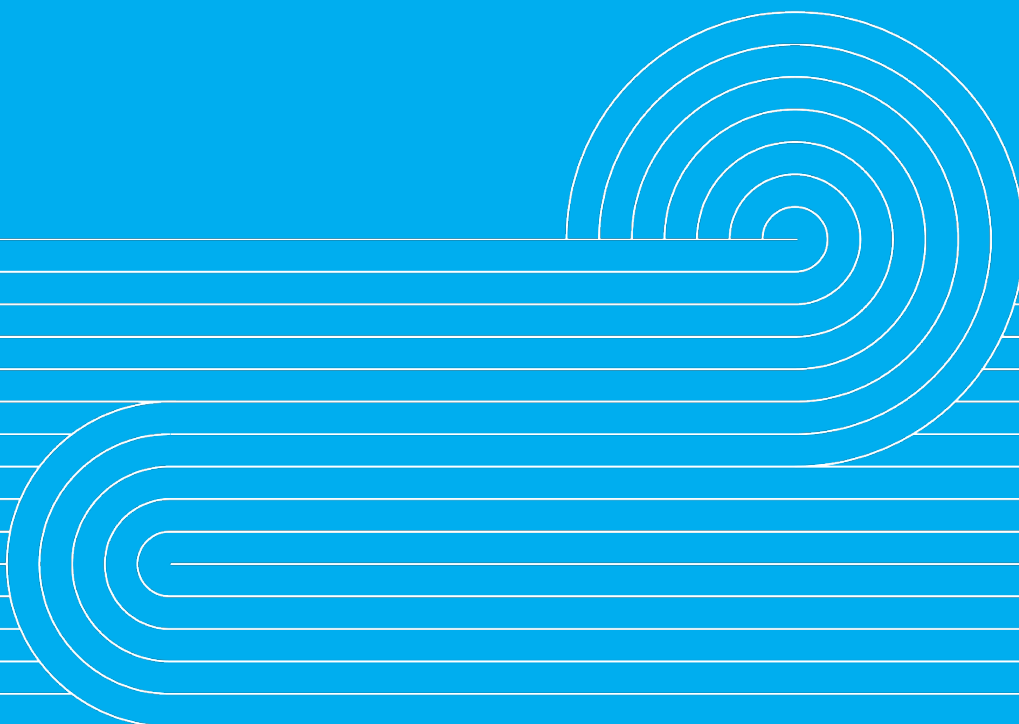
13.11

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
<p><del>(c) e.location and capacity of infrastructure and servicing;</del>  <del>(d) f. stormwater management;</del>  <del>(e) the provision and maintenance of riparian planting for streams and natural wetlands;</del>  <del>(f) the design and layout of subdivision within the National Grid Corridor.</del></p>			
<p><u>IXXX.8.2. 4.2 Assessment Criteria</u>  <u>The Council will consider the relevant assessment criteria below for restricted discretionary activities: <del>listed above.</del></u>  <u>(3) For subdivision listed as a restricted discretionary activity in Activity Table IXXX.4.1:</u>  <u>(a) the extent to which any subdivision is consistent with and gives effect to the key elements in the Franklin 2 precinct plans and Appendix 1 Road Function Design and Design Elements Table including roads, walkways and cycleways, and stream corridors;</u>  <u>(b) the extent to which any subdivision is consistent with and achieves the Franklin 2 precinct.</u>  <u>(c) on-going compliance with the on-site stormwater management requirements contained in any relevant Stormwater Management Plan will be achieved.</u>  <u>(d) The extent to which the ecological values and water quality of existing watercourses and wetlands are maintained or enhanced by the proposed subdivision.</u>  <u>(e) The extent to which the design and layout of subdivision within the National Grid Corridor considers:</u>  <u>(i) the amenity of future residents;</u>  <u>(ii) the safe and efficient operation of the National Grid Corridor; and</u>  <u>(iii) where practicable, the National Grid Corridor is located within the road or open space networks.</u>  <u>Possible design options for subdivision layouts are illustrated in Figure IXXX.8.2.1 below.</u>  <u>Figure IXXX.8.2.1 Possible design options for subdivision layouts within the National Grid Corridor</u>  <u>(a) National Grid Corridor along road corridor</u>    <u>(b) National Grid Corridor adjacent to public open space</u></p>	<p>Amend</p>	<p>On the basis Chapter D26 will apply to subdivision within the defined National Grid Corridor Overlay, Transpower is not opposed to the provisions within 8.2.(3)(e). However, Transpower would support reference to Chapter D26 to provide clarity that the assessment criteria are not confined to only those listed in the proposed provision. While the matters (i) to (iii) are not in themselves opposed, they are not sufficiently comprehensive or directive to address all the matters of relevance to the National Grid.</p>	<p>Amend IXXX.8.2. Assessment Criteria as follows:          ....  <u>(e) The extent to which the design and layout of subdivision within the National Grid Corridor considers:</u>  <u>(i) the assessment criteria within D26.8.2(1A);</u>  <u>(i) the amenity of future residents;</u>  <u>(ii) the safe and efficient operation of the National Grid Corridor; and</u>  <u>(iii) where practicable, the National Grid Corridor is located within the road or open space networks.</u></p>

13.12

Notified PC123 Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
 <p><i>Note: The illustrations represent possible design outcomes and are not intended to represent the only design options available. The illustrations are not to scale. Where any options in Figure IXXX.8.2.1 conflicts with a requirement of the National Grid Corridor Overlay and/or NZECP 34:2001, the National Grid Corridor Overlay and/or NZECP 34:2001 provisions prevail.</i></p>			

**Appendix B: National Policy  
Statement for Electricity Networks  
2008 (previously named National  
Policy Statement on Electricity  
Transmission 2008)**



# National Policy Statement for Electricity Networks 2008

Amended December 2025

[Previously National Policy Statement on Electricity Transmission 2008]



Ministry for the  
**Environment**  
*Manatū Mō Te Taiao*



**MINISTRY OF BUSINESS,  
INNOVATION & EMPLOYMENT**  
HĪKINA WHAKATUTUKI



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

**Authority**

This National Policy Statement was approved by the Governor-General under section 52(2) of the Resource Management Act 1991 on 10 March 2008, and is published by the Minister for the Environment under section 52(3) of that Act.

This version of the National Policy Statement incorporates the following amendments:

1. amendments made by the Minister for the Environment under section 53(1) of the Resource Management Act 1991 regarding the title, objective and policies.

# Contents

<b>Part 1: Preliminary provisions</b>	<b>4</b>
1.1 Title	4
1.2 Commencement	4
1.3 Application	4
1.4 Interpretation	4
1.5 Incorporation by reference	6
<b>Part 2: Objectives and policies</b>	<b>7</b>
2.1 Objective	7
2.2 Policies	7
<b>Part 3: Timing</b>	<b>11</b>
3.1 Timing	11

# Part 1: Preliminary provisions

## 1.1 Title

- (1) This is the National Policy Statement for Electricity Networks 2008 (previously named National Policy Statement on Electricity Transmission 2008).

## 1.2 Commencement

- (1) This National Policy Statement came into force on 10 April 2008.
- (2) See [Part 3](#) for timeframes for giving effect to this National Policy Statement.

## 1.3 Application

- (1) This National Policy Statement applies to electricity network activities, including all electricity transmission and distribution networks and ancillary electricity network activities.
- (2) This National Policy Statement applies across the whole of New Zealand.

## 1.4 Interpretation

- (1) In this National Policy Statement:

**Act** means the Resource Management Act 1991

**ancillary electricity network activities (ancillary EN activities)** mean all supporting and subsidiary activities necessary to provide for the EN and EN assets, including, but not limited to:

- (a) vegetation clearance and tree trimming;
- (b) earthworks and land disturbance;
- (c) construction, maintenance, repair and upgrading of access tracks, accessways, bridges and culverts; and
- (d) construction, maintenance, repair and upgrading of power supply, telecommunication cables and devices

**decision-maker** means any person exercising functions or powers under the Act

**electricity distribution network (EDN)** means all assets and activities that provide electricity distribution and that:

- (a) is owned or used by a person or body who is both an electricity distributor and an electricity operator;
- (b) comprise the network of distribution lines, cables (overhead, underground or submarine), switching stations, support structures, substations, transformers, kiosks, cabinets, connections to grid exit points, customer connections, and works used to distribute electricity from the electricity transmission network or generation activities; and
- (c) includes ancillary EN activities

The EDN does not include the electricity transmission network (ETN).

**electricity distribution network provider (EDN provider)** means an electricity distributor and/or electricity operator

**electricity distributor** as defined in section 2 of the Electricity Act 1992

**electricity network (EN)** means the electricity transmission network (ETN) and the electricity distribution network (EDN)

**electricity network activities (EN activities)** means the construction, operation, maintenance, development, upgrading, replacement, decommissioning or removal of electricity network assets, and includes ancillary EN activities

**electricity network assets (EN assets)** means the physical components of the EN and any physical components of ancillary EN activities that support operation of the EN

**electricity network line (EN line)** means EN assets in the form of lines or cables that are used for, or associated with, the overhead, underground or submarine transmission or distribution of electricity, including where attached to a structure or bridge, but does not include an EN substation

**electricity network resilience (EN resilience)** means the capacity of the EN to absorb and recover from a shock or disruption, or adapt to changing conditions, while retaining an appropriate level of service as determined by the EN provider

**electricity operator** as defined in section 2 of the Electricity Act 1992

**electricity transmission network (ETN)** means all assets and activities that provide electricity transmission and that:

- (a) comprise the network of transmission lines, and cables (overhead, underground and submarine, including the high-voltage direct current link), stations and substations, support structures, facilities and works;
- (b) includes ancillary EN activities;
- (c) includes other works necessary to connect grid injection points and grid exit points to convey electricity;
- (d) is owned or used by Transpower New Zealand Limited; and
- (e) is commonly known as the National Grid

The ETN does not include the electricity distribution network (EDN).

**functional need** has the meaning set out in the National Planning Standards 2019

**local authority** has the meaning set out in the Act

**national environmental standard** means a standard prescribed by regulations made under the Act

**non-routine electricity network activities (non-routine EN activities)** means:

- (a) the upgrading, rebuilding or replacement of, or changes to, EN assets or EN activities that are not defined as routine EN activities; or

- (b) the construction of new EN assets not carried out on or related to EN lines, or at an EN substation, that exist at the time of construction; or
- (c) new connections to electricity generation or demand activities upon request of a third party (other than Transpower New Zealand Limited or an electricity distributor); or
- (d) relocation or undergrounding of assets to enable urban or infrastructure development upon request of a third party (other than Transpower New Zealand Limited or an electricity distributor)

**operational need** has the meaning set out in the National Planning Standards 2019

**routine electricity network activities (routine EN activities)** mean:

- (a) activities required for, or associated with, the operation of existing EN assets; or
- (b) activities that replace an existing EN asset with a modern equivalent or substitute, where the replacement will not result in an increase in the nature, scale or intensity of the activity; or
- (c) maintenance, repair and upgrading of existing EN assets necessary to continue to deliver the same or a similar level of service; or
- (d) upgrading of existing EN assets necessary to improve resilience, where the upgrade will not result in an increase in the nature, scale or intensity of the activity; or
- (e) the removal, decommissioning or dismantling of EN assets; or
- (f) all activities identified as a permitted or controlled activity in any national environmental standards for electricity networks or similar standards; and
- (g) related ancillary EN activities to (a)–(f)

**sensitive activities** mean activities that are susceptible to actual or potential adverse effects (such as noise, vibration, odour, glare or emissions) generated by adjacent or nearby activities. In relation to the EN, this means residential units (including visitor accommodation and retirement accommodation), care facilities, childcare facilities, schools, hospitals, custodial or supervised accommodation where residents are detained on site, papakāinga, marae or place of worship

**upgrading** means improving the capacity, level of service, efficiency, safety, security, resilience, effectiveness or longevity of existing EN assets and includes the replacement, renewal, addition, expansion and intensification of existing EN assets.

## 1.5 Incorporation by reference

- (1) Clause 2(1) of Schedule 1AA of the Act does not apply to any material incorporated by reference in this National Policy Statement.

## Part 2: Objectives and policies

### 2.1 Objective

- (1) The national significance of the electricity network is recognised, protected and provided for, so that the network:
  - (a) is upgraded, improved and resilient to provide for the social, economic and cultural wellbeing of present and future generations and their health and safety;
  - (b) is developed and operated in a timely, efficient and ongoing manner while managing adverse effects from or on the EN; and
  - (c) supports achievement of New Zealand’s climate change mitigation and renewable energy targets.

### 2.2 Policies

#### *National significance and benefits of the EN*

##### **Policy 1**

- (1) Decision-makers on EN activities must:
  - (a) recognise and provide for the national significance of the EN; and
  - (b) provide for the ongoing benefits of the EN to be realised at national, regional and local scales, relative to any localised adverse effects.

##### **Policy 2**

- (1) Decision-makers must recognise that the benefits of the EN include:
  - (a) providing for the social, economic and cultural wellbeing of people and communities to meet the needs of present and future generations and their health and safety;
  - (b) providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;
  - (c) providing safe, secure, reliable and resilient electricity supply that is responsive to demand from homes, communities and businesses at a local, regional and national scale;
  - (d) efficient storage and transfer of electricity;
  - (e) supporting climate change mitigation and the electrification of the economy, including by:
    - (i) supporting new, expanded or increased renewable electricity generation;
    - (ii) increasing and improving network capacity; and
    - (iii) providing direct connections for industry and commercial development; and
  - (f) enhancing supply of electricity through the ETN by removing points of congestion.

*Māori interests***Policy 3**

- (1) Decision-makers must recognise and provide for Māori interests in relation to EN activities, including by:
  - (a) taking into account the outcomes of any engagement with tangata whenua on any relevant resource consent, notice of requirement or private plan change;
  - (b) recognising the opportunities tangata whenua may have in developing and operating their own EDN assets at any scale or in partnership;
  - (c) avoiding, where practicable, or otherwise mitigating, the adverse effects of EN activities on sites of significance to Māori; and
  - (d) local authorities:
    - (i) providing opportunities for tangata whenua involvement where EN activities may affect a site of significance or issue of cultural significance to Māori; and
    - (ii) operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.

*Site, route and method selection for EN activities***Policy 4**

- (1) Decision-makers must recognise that it is the role of Transpower New Zealand Limited or the EDN provider to:
  - (a) determine the purpose, scope, required capacity and technical solution for proposed EN activities; and
  - (b) consider sites, routes and methods, where appropriate, and identify the preferred site, route and method for EN activities, ancillary EN activities and EN assets.

*Providing for EN activities and managing the effects of proposed EN activities on the environment***Policy 5**

- (1) Decision-makers must provide for routine EN activities to occur in all locations and environments, provided adverse effects on the environment are, where practicable, avoided, remedied or mitigated, while acknowledging the existing nature of the assets.

**Policy 6**

- (1) In rural environments, decision-makers should ensure that non-routine EN activities seek to avoid adverse effects on outstanding natural features and landscapes, areas of high natural character, and areas of high recreation value and amenity.

**Policy 7**

- (1) Decision-makers must recognise and provide for the operational need or functional need of the EN to operate in, be located in, or traverse environments, including:
  - (a) the need for EN assets to convey electricity over long distances and in all locations and environments, including:

- (i) within and across urban and rural environments;
  - (ii) within the coastal environment, including the coastal marine area; and
  - (iii) across jurisdictional boundaries within and across districts and regions; and
- (b) the need for the EN to operate effectively and efficiently as an interconnected system across New Zealand;
  - (c) recognition that the ETN and EDN are separate networks that have differing functional needs and operational needs;
  - (d) the requirement for regular maintenance and upgrading of the EN due to its age, the need to improve EN resilience, and the need to increase and improve capacity to meet changing demand and supply;
  - (e) the need for the EN to connect to electricity generation, and to respond to demand, wherever located; and
  - (f) the functional need for the EN to locate in areas at risk from natural hazards, where Transpower New Zealand Limited or the EDN provider have considered and managed potential natural hazard risks.

### **Policy 8**

- (1) When considering the environmental effects of EN activities and ancillary EN activities, including measures to avoid, remedy or mitigate any adverse effects on the environment, decision-makers must:
  - (a) have regard to the extent to which any adverse effects have been avoided, remedied or mitigated through the selection of route, site or method of undertaking the work;
  - (b) recognise that there may be unavoidable adverse effects, regardless of the route, site and method chosen, with adverse effects reduced as far as practicable;
  - (c) provide for EN activities that have an operational need or functional need to be in particular locations and environments, including in areas where section 6 matters apply, even where there may be unavoidable adverse effects on those environments;
  - (d) consider the constraints imposed on achieving those measures by any operational need of the EN;
  - (e) recognise that development, upgrading and improvement of the EN will be necessary to maintain and improve the capacity and delivery of the EN over time;
  - (f) recognise that EN activities may result in changes in amenity that are unavoidable and necessary to achieve an effective, efficient, safe, secure, reliable and resilient EN, and that such changes may not constitute adverse effects under the Act;
  - (g) adopt relevant international standards (that have been adopted for use in New Zealand), national standards, and recognised best practice standards and methodologies to assess and manage adverse effects; and
  - (h) consider the financial and timing implications of mitigation measures and any consent conditions to ensure these are proportionate to the adverse effects of the EN or particular EN activities.

**Policy 9**

- (1) In urban environments:
  - (a) decision-makers must recognise that the EN forms an essential part of well-functioning urban environments that must be provided for;
  - (b) decision-makers must recognise that the effective and efficient development, operation, maintenance and upgrading of the EN may be appropriate use and development when protecting historic heritage;
  - (c) decision-makers must ensure, wherever practicable, that new EDN lines are placed underground, particularly within new subdivisions, while recognising the financial and technical constraints of undergrounding;
  - (d) decision-makers must ensure that, where development will result in an increase in demand for electricity, sufficient on-site space is provided for EDN assets to meet demand; and
  - (e) local authorities must consult with EDN providers to determine an appropriate method or means for identifying when EDN assets are required to meet increasing demand.

**Policy 10**

- (1) Transpower or the EDN provider must consider practicable opportunities and measures to reduce the existing adverse effects of EN assets when considering non-routine EN activities, taking into account the functional need, operational need and the financial implications of any measures to reduce adverse effects.

*Managing the effects of third parties on the EN***Policy 11**

- (1) Decision-makers and local authorities must manage adverse effects of activities undertaken by third parties on the EN, including by:
  - (a) avoiding direct effects on the EN;
  - (b) avoiding reverse sensitivity effects on the EN, to the extent reasonably possible; and
  - (c) ensuring that the effective operation, maintenance, upgrading and development of the EN is not compromised.

**Policy 12**

- (1) To manage adverse effects of activities undertaken by third parties on the EN:
  - (a) local authorities must identify and map the ETN and other EN assets of national or regional significance within their district, whether or not these are designated;
  - (b) decision-makers, as relevant, must engage with the operator of the ETN to implement the buffer corridors, provided in any national environmental standards for electricity networks or similar standards, within which it can be expected that sensitive activities, buildings, earthworks, subdivision and other activities that have the potential to compromise the ETN are to be generally avoided;
  - (c) decision-makers, as relevant, must engage with EDN providers to implement the provisions of any national environmental standards for electricity networks or similar standards that protect the EDN from adverse effects of third parties;

- (d) decision-makers must ensure that buildings, structures, earthworks, subdivision and land use activities are designed and located to maintain safe distances from, and allow sufficient space for access to, and maintenance, construction, development and upgrading of EN assets; and
- (e) decision-makers must ensure the nature and location of any proposed trees or vegetation to be planted around the EN do not compromise its function and operation.

### *Long-term spatial and strategic planning for the EN*

#### **Policy 13**

- (1) When undertaking long-term spatial and strategic planning:
  - (a) local authorities must engage with EN operators to facilitate the medium- to long-term strategic planning for the construction, operation, maintenance and upgrading of the EN;
  - (b) local authorities should utilise regional and district spatial plans and future development strategies as tools to identify existing and future EN asset needs and to make provision for sufficient space for EN assets to be developed as far as practicable;
  - (c) local authorities and decision-makers, as relevant, must recognise that the designation process can facilitate long-term planning for construction, operation, maintenance, upgrading and development of the EN; and
  - (d) local authorities must recognise that not all EN activities and EN assets can be spatially identified in advance.

### *Electric and magnetic fields*

#### **Policy 14**

- (1) Local authorities must manage electric or magnetic fields associated with the EN based on recommendations from the World Health Organization monograph Environmental Health Criteria (No 238, Extremely low frequency fields) and International Commission on Non-Ionizing Radiation Protection 'Guidelines for limiting exposure to time-varying electric and magnetic fields (1 Hz to 100 kHz)' (*Health Physics* 99(6): 818–836; 2010) (ICNIRP Guidelines) or their revisions, or any other applicable New Zealand standards.

## **Part 3: Timing**

### **3.1 Timing**

- (1) Decision-makers must give effect to this National Policy Statement on and from the commencement date.

Made at Wellington on 15 December 2025.

Hon Chris Bishop  
For the Minister for the Environment

### **Explanatory note**

*This note is not part of the National Policy Statement for Electricity Networks but is intended to indicate its general effect.*

This National Policy Statement amends the National Policy Statement on Electricity Transmission 2008.

This National Policy Statement recognises the electricity network as a matter of national significance under the Resource Management Act 1991 (the Act).

New Zealand needs to invest in electricity networks to support growth of the economy, support new housing development, provide for the wellbeing of people and communities, improve resilience and achieve better environmental outcomes, including support for achievement of climate change and renewable energy targets.

This National Policy Statement applies to all decisions made under the Act affecting the development of new electricity networks and the operation, maintenance, renewal and upgrade of existing electricity networks, including all electricity transmission and distribution networks.

This National Policy Statement acts in parallel with the National Policy Statement for Infrastructure 2025 and the National Policy Statement for Renewable Electricity Generation 2011, which have interfaces with, but do not overlap with, this statement.

The National Policy Statement for Indigenous Biodiversity 2023 does not apply to the development, operation, maintenance or upgrade of electricity transmission network assets and activities.

No national policy statement overrides another. Each national policy statement must be applied to the relevant decision-making process.

In relation to managing the effects of EN activities, this national policy statement must be read alongside other national direction and local authority planning documents that govern RMA section 6 matters. The protection of section 6 RMA matters is achieved through Policy 6 'seek to avoid' and Policy 7(1) 'functional and operational need' which set a high bar for EN activities to be located in section 6 environments. However, this NPS acknowledges that for linear network infrastructure required to connect to demand and supply, avoidance of all section 6 values along the length of a route is not always possible.

This National Policy Statement is to be applied by all persons exercising powers and functions under the Act. The objective and policies are intended to guide decision-makers in making decisions on the determination of resource consent applications, in considering a requirement for a designation or a heritage order, in considering an application for a water conservation

order and when exercising other relevant powers as required by the Act. The objective and policies will also provide guidance for local authorities in relation to plan making.

In applying this National Policy Statement, local authorities should be aware of their obligations with regard to other legislation, including Te Ture Whenua Māori Act 1993, the Local Government Act 2002, Treaty settlement legislation, iwi participation legislation and the Treaty of Waitangi. Local authorities should also be aware of their obligations in any Mana Whakahono ā Rohe agreement they may have with relevant hapū and iwi.

In August 2025, the Government passed an amendment to the Act that introduced a requirement to stop most plan making under the Act, unless it was subject to an exemption. This 'plan stop' amendment suspends the requirement to review plans and policy statements and prevents notification of new plan or policy statement changes or variations until the end of 2027, when the new resource management system will be in effect.

Due to the plan stop amendment, plans and policy statements will not be updated to give effect to this amendment (unless a relevant exemption applies).

For the avoidance of doubt, plan and policy statement content that implements the original National Policy Statement on Electricity Transmission does not require amendment.

This is secondary legislation issued under the authority of the [Legislation Act 2019](#).

Title	National Policy Statement for Electricity Networks 2008
Principal or amendment	N/A
Consolidated version	Yes
Empowering Act and provisions	Resource Management Act 1991, section 52(2)
Replacement empowering Act and provisions	N/A
Maker name	Minister for the Environment
Administering agency	Ministry for the Environment
Date made	10 March 2008
Publication date	13 March 2008
Notification date	13 March 2008
Commencement date	10 April 2008
End date (when applicable)	N/A
Consolidation as at date	15 January 2026
Related instruments	<a href="#">National Policy Statement on Electricity Transmission 2008 [as made]</a> <a href="#">National Policy Statement for Electricity Networks Amendment 2025</a>



## **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.

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](mailto: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)

Vivek Kumar

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

### Address for service of Submitter

43 Te Paea Ave, Papakura, 2124

Telephone:

Email: [vivek@fourwords.co.nz](mailto:vivek@fourwords.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 123 (Private)

Plan Change/Variation Name Franklin 2 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)

I agree with all the submissions. I believe greater intensification around rail; and providing supporting amenities is required for the flourishing of the neighbourhood. Furthermore, even greater intensification within 10-15 minutes of the train station is a necessary step to get the greatest return of the City Rail Link. I believe the greater the intensification the better. Great examples include New Lynn and Newmarket train stations.

**Submission**

I seek the following decision by Council:

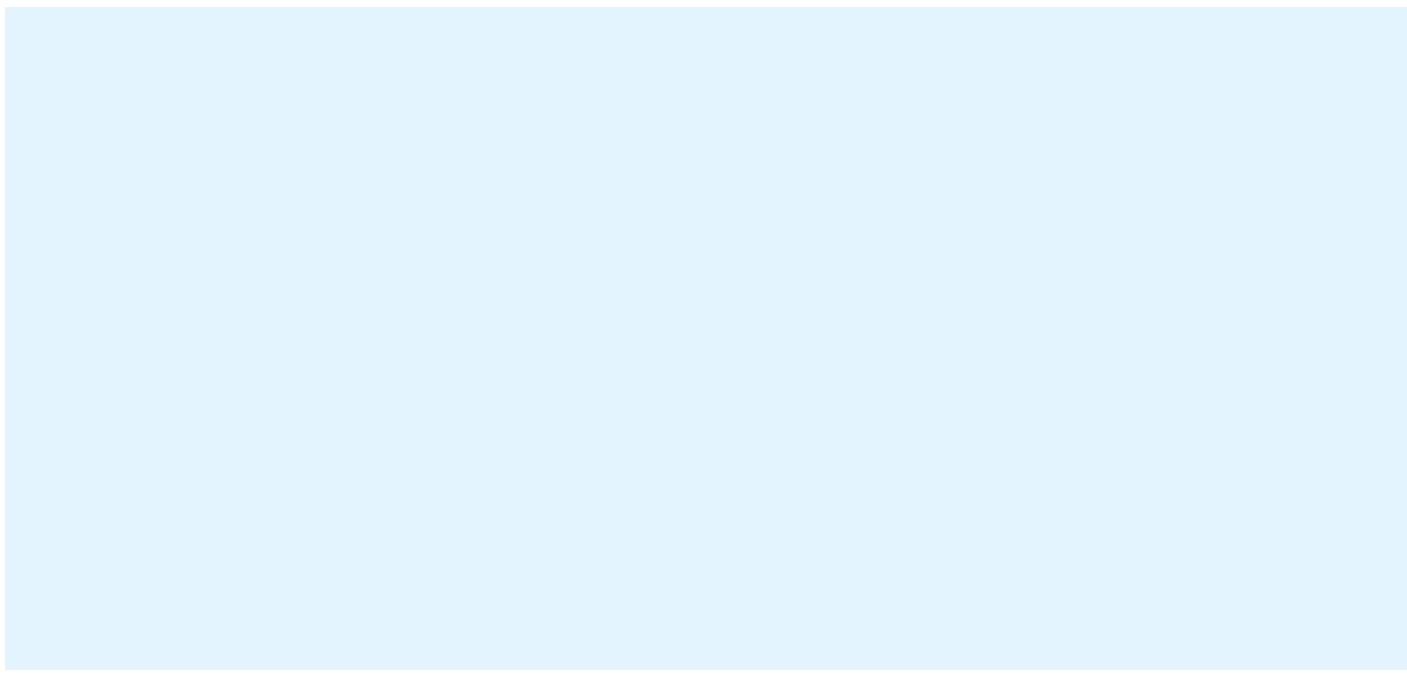
Accept the proposed plan change / variation

14.1

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

Decline the proposed plan change / variation

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



I wish to be heard in support of my submission

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

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

vivek kumar

23 Feb 2026

Signature of Submitter

Date

*(or person authorised to sign on behalf of submitter)*

**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 Proposed Plan Change 123 (Private) – Franklin 2 Precinct

### Submitter:

Paerātā Rise Residents Society

---

### 1. Introduction

This submission is made by the Paerātā Rise Residents Society on **Proposed Plan Change 123 (Private) – Franklin 2 Precinct (PC123)** to the Auckland Unitary Plan (Operative in Part). The Society represents residents currently living within the Paerātā Rise development and the broader Franklin 2 Precinct.

The Society strongly supports PC123, subject to the delivery of appropriate infrastructure, transport enhancements, and clear staging controls that align with development growth.

---

### 2. Overall Position

The Paerātā Rise Residents Society fully supports **PC123**, as it presents a significant opportunity to develop a **more complete, connected, and walkable community**. Key factors include:

- **Maximizing the potential of Paerātā Train Station** and creating a true transit-oriented development.
- Addressing current housing demands and future needs.
- Aligning with **national and regional policy goals**, ensuring the development contributes positively to wider urban planning objectives.

We firmly believe this plan supports a modern, sustainable community in a growing area.

---

### 3. Transit-Oriented Development

Residents are enthusiastic about the **increased residential density** within the **walkable catchment of Paerātā Train Station**. This is crucial to:

- Improving **access to public transportation**, which will reduce long-term car dependence and promote sustainable transport options.
  - Providing diverse **housing choices** that cater to a variety of needs, including affordable options for future residents.  
The location of this development will also help reduce congestion on the wider transport network, which is a significant benefit for both existing and future residents.
- 

#### 4. Business Land and Local Services

The **redistribution of business land** within the precinct, particularly near the Paerātā Train Station and the northern precinct, is a positive step toward ensuring the development is fully integrated. This change:

- Improves **access to jobs**, services, and amenities for residents, making the area more self-sufficient and reducing the need to commute long distances.
  - Creates an environment where local businesses can thrive and contribute to the vibrancy of the community.
- 

#### 5. Integrated Development

The Society strongly supports the **coordinated precinct-wide planning** to ensure that the necessary infrastructure, streets, and services are developed in tandem with housing growth. This ensures that:

- Development is **delivered sustainably**, without putting undue pressure on existing infrastructure.
  - The community will have access to key amenities (such as parks, schools, and public spaces) at the same time as residential growth.
- 

#### 6. Transport and Safety

The **safe and efficient management** of SH22 access is critical, and we support the alignment of development with the necessary transport upgrades. Proper planning here will help:

- Minimize congestion and improve **traffic flow** for both residents and commuters.
- Enhance **pedestrian safety**, ensuring that local streets remain safe and accessible for all.

We also encourage further consideration of **cycling infrastructure** and **pedestrian-friendly pathways** to make the community even more walkable and sustainable.

---

## 7. Policy Alignment

PC123 aligns with several national and regional planning policies, including:

- **National Policy Statement on Urban Development (NPS-UD)**
- **Auckland Regional Policy Statement**
- **Future Development Strategy**
- **Resource Management Act**

By giving effect to these policies, PC123 ensures that the development is part of a broader, coordinated strategy for Auckland's future growth and development.

---

## 8. Relief Sought

The Paerātā Rise Residents Society respectfully requests that Auckland Council **approve** PC123, with minor amendments, if necessary, to ensure that:

- **Infrastructure upgrades**, particularly transport improvements, are delivered alongside development to meet the needs of the growing population.
- The appropriate **staging and timing controls** are put in place to avoid any infrastructure bottlenecks.

15.1

---

## 9. Conclusion

PC123 represents a **positive step forward** for Paerātā Rise and the wider Franklin 2 Precinct. It offers a clear pathway toward a **connected, sustainable, and vibrant community** that will benefit current and future residents alike. The Society urges Auckland Council to accept the plan change, ensuring that the necessary infrastructure and transport systems are in place to support this exciting development.

---

**Signed:**

Paerātā Rise Residents Society

**Date:** 23 February 2026

## **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.

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](mailto: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)

Edith Tuhimata

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

Ngati Tamaoho

### Address for service of Submitter

[Redacted address]

Telephone: 0220445074

Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number PC 123 (Private)

Plan Change/Variation Name Franklin 2 Precinct

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

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

Plan provision(s) Overarching

Or  
Property Address

Or  
Map

Or  
Other (specify)

Filling of wetlands, lack of engagement, better layout of the proposed town centre and the smaller proposed retail area.

16.1  
16.2  
16.3

**Submission**

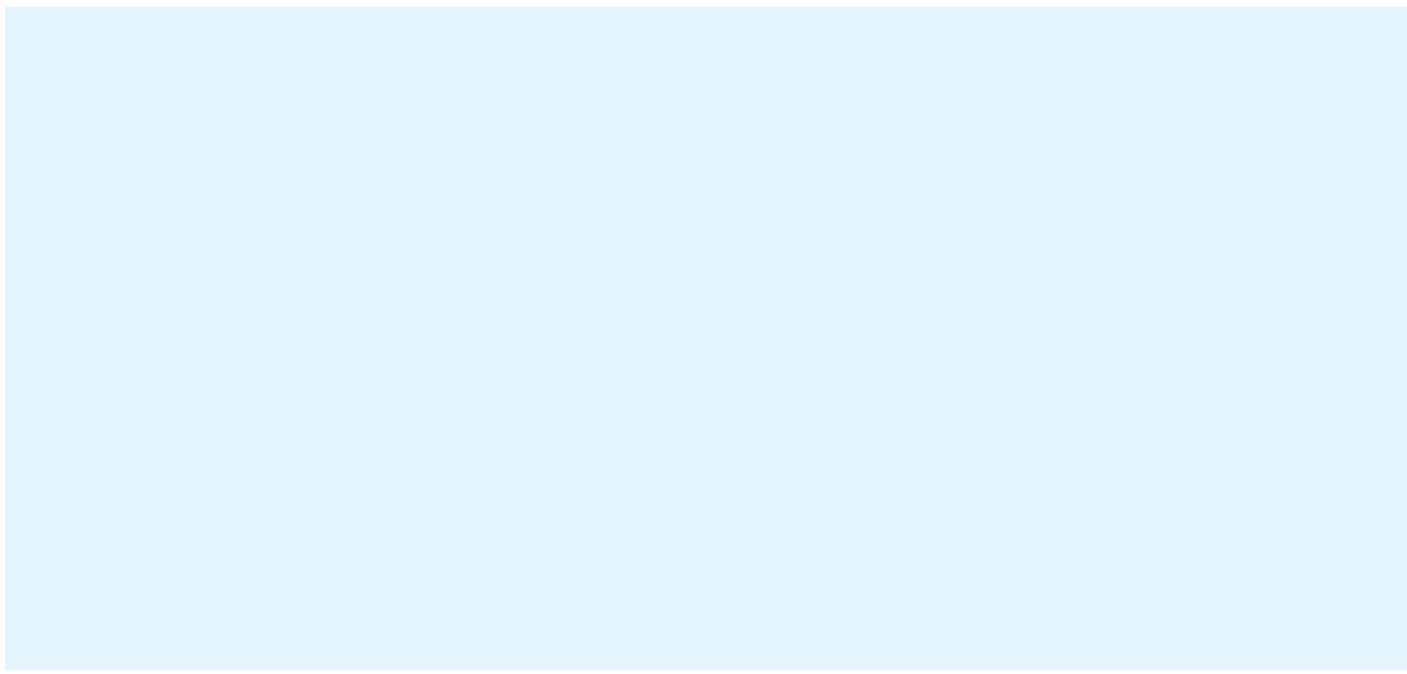
I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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



I wish to be heard in support of my submission

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

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

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

23/02/2026  
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.



# NGAATI TE ATA WAIOHUA

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

---

23<sup>rd</sup> February 2026

**SUBMISSION REGARDING:  
Proposed Plan Change 123 (Private) – Franklin 2 Precinct  
Grafton Downs Limited (GDL)**

AUCKLAND COUNCIL  
Unitary Plan Department  
Submissions  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Teena Koe

## **Application Details**

GDL's Private Plan Change (PPC 123) request to change the Auckland Unitary Plan to amend the Franklin 2 Precinct text, precinct plans, the underlying zoning and amend the AUP Schedule 10 of Notable Trees to correct and clarify the location of notable trees in the request area.

The PPC proposes:

- rezoning the existing business – Local Centre Zone (Wesley College) to Residential – Mixed Housing Urban Zone and retain controls to enable the ongoing operation and improvement of Wesley College, redistributing and reducing (from approximately 17.8ha to 6.8ha) the extent of the Business – Local Centre Zone;
- rezoning the area adjacent to the Glenbrook Roundabout from Residential – Mixed Housing Urban Zone to Business – Local Centre Zone;
- rezone the area adjacent to the Paeraataa Railway Station from Residential – Mixed Housing Urban Zone to Business – Local Centre Zone, and Business – Mixed Use zone;
- rezoning the residential area within a 10-minute walkable catchment of the Paeraataa Railway Station from Residential – Mixed Housing Urban Zone to Residential -Terrace Housing and Apartment Building Zone;
- rezoning a small area (approximately 0.3 ha) in the vicinity of Sim Road within the precinct from Residential – Mixed Housing Urban Zone to Business - Neighbourhood Centre Zone.
- removing the Franklin 2 sub-precinct A and sub-precinct B.

Paerata is an area of traditional interest to Ngaati Te Ata. Ngaati Te Ata have a long association with development that has occurred in Paerata and Pukekohe. We

participated in the SHA process. Our ultimate goal has always been to achieve best cultural, environmental and social outcomes, and to provide for community.

**Concerns**

Adverse impacts as a result of scale and density enabled by PC 123. Ngaati Te Ata are concerned that, with the plan change, large areas of Paerata are no longer within an easy walking or cycling distance of a local centre. There are significant issues with relocating the local centre to the north in terms of easy and convenient access to convenience retail and services. There also seems to be no plans to provide for a town square of other recreation space with the centres.

17.1

17.2

Ngaati Te Ata are not convinced that a small neighbourhood centre on Sim Road and a Local centre next to the train station adequately address this issue of convenient access. The Mixed Use Zone is not located adjoining a principal road, has an awkward shape and its opportunity to provide local employment and services is not clear. The neighbourhood centre may not thrive because it is not associated with a high level of passing trade, and therefore it is a poor substitute for the current local centre.

Ngaati Te Ata have also been made aware that third party land in Paerata has been effectively landlocked by spite strips and roads/infrastructure not connecting/vesting to boundaries. This does not create sustainable or well-functioning communities, nor a competitive housing market. Ngaati Te Ata would seek that a plan change includes rules to remedy this.

17.3

One of the reasons for our involvement with the previous SHA process was that Grafton Downs Limited was a wholly owned subsidiary of the Methodist Church. We understand that the shareholding of the development entity is still across three Methodist Church owned entities including the Wesley College Trust Board. Ngaati Te Ata has a long-standing relationship with the Methodist Church of Aotearoa New Zealand as we have had with all traditional religions within our rohe. For example, the “Catholic Precinct” of Pukekohe was established when the Church bought land – on what is now Edinburgh and Seddon Streets - from the iwi in 1843.

It was that cultural, social, community, ethical, and spiritual connection with the Methodist Church that lead to the establishment of the relationship with Grafton Downs Limited. We are unsure of the how much of those development returns are making its way back to the core social, educational and poverty alleviation objectives of the Methodist Church in line with the teachings of John Wesley.

An intensification of a significant area of the already established Paerata Rise Masterplan would not lead to better social, community, and cultural outcomes than if the designation in that Southern area remained as it is. Given that profits from the development is going back to the Methodist Church (and as articulated on your website), is the Church therefore seeking more profits than it currently is receiving for its philanthropic purposes? If so, why?

17.4

Ngaati Te Ata does not wish for negative impacts on social and community cohesion which intensification under the current draft plans is likely to occur.

**Position**

Ngaati Te Ata Waiohua **oppose** the proposed Plan Change 123 (Private) Franklin 2 Precinct in its current form – until further discussions take place and the issues we have raised are adequately addressed to our satisfaction.

- |   |      |
|---|------|
| 1. That the recommendations in our CIA Report are provided for.   | 17.5 |
| 2. That the proposed precinct provisions incorporate and integrate Iwi (manawhenua) interests and values, cultural, economic and social wellbeing in the development. | 17.6 |
| 3. That Grafton Downs Limited continue to engage and consult with us as the plan change develops, particularly what eventuates from the hearing process.              | 17.7 |

This submission represents only a starting point for initial engagement and will require further consultation and dialogue between Ngaati Te Ata and GDL. Further discussion will be needed around the matters raised in this submission, implications of the future development of the proposed plan change and the issues that will be raised as a result of the hearing.

It is intended that this submission will assist with ongoing decision making from all relevant parties involved and ensure that Ngaati Te Ata Waiohua issues, concerns, interests and values are provided for, including resource consent requirements.

We wish to be heard in support of our submission.

  
**Karl Flavell**  
Te Taiao (Manager Environment)  
Ngaati Te Ata Waiohua  
Ph: 027 932 8998  
[karl\\_flavell@hotmail.com](mailto:karl_flavell@hotmail.com)





## FORM 5

### Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

**Name of submitter:** Te Tāhuhu o te Mātauranga | Ministry of Education

Address for service: C/- Beca Ltd  
PO Box 6345  
Victoria Street West  
Auckland 1142

Attention: Eden Rima

Phone: +64 9 300 9000

Email: Eden.Rima@beca.com

#### This is a submission on the Plan Change 123: Franklin 2 Precinct

This is a submission on Private Plan Change 123 (PC123) which seeks to amend the Franklin 2 Precinct text, precinct plans, the underlying zoning and the AUP: OP Schedule 10 of Notable Trees. The change includes rezoning the residential area within a 10-minute walkable catchment of the Paerātā Railway Station to Residential – Terrace Housing and Apartment Building Zone (THAB), enabling development of up to six storeys which aligns with the requirements of the National Policy Statement on Urban Development (NPS-UD).

#### Background

Te Tāhuhu o te Mātauranga | Ministry of Education ('the Ministry') is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State-Integrated schools. For the Crown-owned State school, this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.



**The specific parts of the proposal that the Ministry's submission relates to are:**

*Engagement with the Ministry*

The Ministry highlights that Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (which includes schools) to achieve integrated land use and infrastructure planning.

The PC123 amendment gives effect to the NPS-UD as it will provide for more intensive residential development within a 10-minute walkable catchment of the Paerātā train station.

With regard to subpart 3.5 of the NPS, the intensification proposed will increase demand on the local school network in the Paerātā area once development occurs at this greater scale.

The Ministry is aware that residential development has been occurring within the plan change area (PCA) since Grafton Downs Limited ('the Applicant') first applied to rezone the land in 2014. The Ministry also acknowledge Council's intentions to urbanise this area as per the Pukekohe-Paerata Structure Plan. However, the proposed change in zoning to enable greater intensification has not been anticipated within the Ministry's catchment planning. The increase in dwellings enabled by PC123 may trigger the need, or change the timing, for additional infrastructure to support current school(s) in the area. As a result, the Ministry will need to explore options for new school sites to address the future capacity that will be required in the schooling network.

***Transport provisions***

The Ministry supports the proposed multi-modal provisions through the PPC area, as they require safe, efficient links within the PCA. Quality pedestrian and cycle connections to schools and through neighbourhoods provide health and safety benefits for children and a reduction in traffic generation at pick up and drop off (PUDO) times. The provision for public transport will also connect future growth with the existing Paerātā School and Wesley College until further schools are established within the surrounding area.

18.1

Notwithstanding the above, the intensification of this land will give rise to increases in traffic generation in the local area. The Ministry requests that the transport and traffic effects on existing schools within the PCA be considered should the plan change amendment be approved. In particular, the Ministry is concerned about increased traffic movements along Jonah Lomu Drive outside Paerātā School and Puhitahi Hill Road outside Wesley College.

18.2

The particular concern relates to the safety of the road environment for students entering and leaving the school grounds during the school start and finish times, especially as a result of increased heavy traffic movements during development of early infrastructure. Larger trucks also reduce visibility of students to other road users.

The Applicant's Integrated Transport Assessment recommends that, as part of any future resource consents, a Construction Traffic Management Plan (CTMP) be required as a condition. Given Paerātā School and Wesley College are both located within the precinct and will be directly affected, the Ministry supports this recommendation. The Ministry acknowledges this is still at the plan change stage and there



may be further opportunities to comment on specific construction-related effects at a later date should the plan change amendment be approved.

As there is no certainty subdivision and land use consents will be notified, the Ministry consider it important to include reference to CTMPs within the objectives as outlined within Appendix 1 of this submission.

18.3

#### *Wesley College sub-precinct*

The Ministry supports the retention of Wesley College as a sub-precinct and its provisions that recognise and continue to make provision for the operation and future development of the existing college and its associated activities within the precinct.

#### **Decision sought**

The Ministry is neutral on the plan change variation in its current form if the relief outlined in Appendix 1 and any consequential amendments required to give effect to this submission is accepted.

Given the level of increase in housing provision in Paerātā as a result of this plan change, the Ministry requests regular engagement with the Applicant and Auckland Council, including prior to the hearing to keep up to date with the housing typologies being proposed, staging and timing of this development so that potential impact of the plan change on the local school network can be planned for.

18.4

The key Ministry contact email is [Resource.Management@education.govt.nz](mailto:Resource.Management@education.govt.nz).

**The Ministry wishes to be heard in support of its submission.**

*Eden Rima*

**Eden Rima  
Planner – Beca Ltd  
(Consultant to the Ministry of Education)**

**Date:** 23 February 2026



## Appendix 1

- Deletions have been shown as a strikethrough (~~deletion~~); and
- Additions have been shown as an underline (addition).

### IXXX.2 Objectives

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to the following:

- (1) Subdivision and development occur in a comprehensive and integrated way that provides for a compatible mix of residential living, housing typologies and locations designed to increase housing supply and to support passenger rail.
- (2) Development makes efficient use of land based on a series of walkable neighbourhoods and mixed-use areas in close proximity to passenger transport, local centres and open space.
- (3) Development of at least six storeys is enabled within the mapped walkable catchment, while also achieving a high-quality built environment.
- (4) Subdivision and development are sensitive to the precinct's natural ecological values are a significant feature of the precinct's development.
- (5) Subdivision and development are integrated with transport networks and provides a well-connected internal street network supporting pedestrian, cycle and public transport use along with facilities to promote use of public transport, including rail.
- (6) Subdivision and development in the precinct will not adversely impact on the safe and efficient operation of the adjoining state highway network or the National Grid Corridor (GLN-DEV A).
- (6a) Adverse effects of subdivision and development construction are avoided or mitigated through incorporating the use of Construction Traffic Management Plans, including specific measures to manage traffic during school pick-up and drop-off times.
- (7) Adverse effects of stormwater runoff are avoided or mitigated through incorporating the use of water sensitive design principles and restrictions on impervious areas for high density residential areas.
- (8) Subdivision of the precinct will facilitate restoration of riparian margins.
- (9) Provision is made for the continued operation and development of the existing college and its associated activities within the precinct.

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

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

# 19



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

**Address for service of Submitter**

Telephone:

Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

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

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

Plan provision(s)

Or

Property Address

Or

Map

Or

**Other (specify)**

**Submission**

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.

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

1) This addresses the proposal to rezone the area adjacent to the Glenbrook Roundabout from Residential – Mixed Housing Urban Zone to Business – Local Centre Zone. Reasons why this proposal should be declined:

- The change to the zoning was proposed well after residents in the immediate area of the newly proposed site had built their homes.
- I would not have chosen to purchase a home and land package at my address if I had known of the proposed change.
- I moved from Pakuranga to Paerata Rise because the plan presented at the time included a country vibe and peaceful surroundings. There was no indication my home would end up one street away from a business district.
- Traffic will increase significantly into what has been a safe and peaceful area with the addition of retail and local centre facilities, contrary to what we thought when we bought our section in the area. This can make walking and cycling more dangerous, and potentially endanger children at the nearby Paerata School.
- It will create visual pollution, and a likely increase in pests with the extra rubbish and food waste in the area.
- Potential for extra noise, inebriated people, and greater crime risk if bars, restaurants, vape stores, or even the supermarket is opened.
- There is a strong chance property values will be negatively impacted by the close proximity of retail areas.
- Auckland Council has regularly stated that intensification and business areas are best placed around public transport hubs. Therefore, the new area around Paerata Railway Station would be a much better place for this retail. More to the point, considering the railway station area is undeveloped at this time, if it becomes zoned for retail and commercial businesses now, people who build there in the future will know this from the start - unlike the area around Glenbrook Roundabout, where people built homes under the presumption it would remain a residential area.

19.1

2) My other submission is regarding the plan to rezone the residential area within a 10-minute walkable catchment of the Paerātā Railway Station from Residential – Mixed Housing Urban Zone to Residential -TerraceHousing and ApartmentBuilding Zone;

Though I support changing the immediate area adjacent to the railway station from Residential – Mixed Housing Urban Zone to Business – Local Centre Zone, and Business – Mixed Use zone (as indicated above), it goes against the character of the development that residents bought into to have the whole area shown in the map to become terraced housing and apartments. I would suggest it should only be about half that area - within a 5-minute walkable catchment of the railway station.

19.2

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

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

*Alastair Bull*

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

*23/02/2026*

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.

Auckland Council  
Unitary Plan Team  
Level 16,  
135 Albert Street,  
Auckland 1011

27<sup>th</sup> February 2026

### Re: Plan Change 123 – Submission

To whom this concerns,

This is a submission on Plan Change 123 by Paerata 5 Farms Limited, referred to as the "Submitter".

The Submitter owns land at 412 Sim Road, directly opposite the plan change area, south east of the railway, and also represents a related party who owns 328 Sim Road.

Part of the original Submitter's land holding has been acquired by Kiwirail, where the Paerata Railway Station is being constructed.

The Submitter acknowledges that this submission is made after the closing date of the 23<sup>rd</sup> February 2026, and seeks permission that it is accepted for consideration, and enables the opportunity to present at a hearing.

The Submitter is interested in the outcome due to the relationship between the Plan Change area and the Submitter's land and how these changes will contribute to a well-functioning urban environment. The Submitter is concerned that the precinct may create a precedent that could be applied to the Submitter's land in the future. This is potentially beneficial as the precinct could apply to the wider area currently zoned Future Urban if it is suitable. This would be an efficient planning method saving time and costs in the future.

### Zoning:

The Submitter generally supports the concept of the proposed change to the zoning, particularly as it relates to the area around the train station where a Local Centre and Mixed Use zone, and the Residential Terrace House and Apartment zone are proposed to replace the Residential Mixed Housing Urban zone. This generally follows good urban design principles and responds to the government direction to intensify around transport nodes such as this. This support is qualified due to the questions posed below around the location and extent of the business zones and whether a mix of business zones are needed.

This zoning should be considered in the context of the Submitter's land where a similar zoning outcome could apply in the future. However, the Pukekohe-Paerata Structure

Plan illustrates an intended zone for the Submitter's land close to the station being Residential Terrace House and Apartment zone, and no business zone is indicated. It is noted that there is provision for business activities within the THAB zone also.

The Submitter is concerned that the centre zone is proposed to be split with the largest area proposed at the northern end of the plan change area at the intersection of Karaka Road and Glenbrook Road. This is less accessible for future residents in the wider structure plan area due to it being at the edge of the urban area, and is designed more as a typical vehicle based centre. The Submitter understands that there are potential economic benefits of this location due to passing vehicles, however the majority of this benefit would exist for any site along State Highway 22. The question then is where is the best location for the centre or centres?

20.1

The proposed centre adjacent to the train station could be an excellent outcome if the vision in the urban design statement (figure 23) is realised, assuming the height and density of those buildings are consistent with the objectives for this area.

The Submitter questions the need for the Mixed-Use zone in addition to the Local Centre zone at the railway station. The precinct provisions do not restrict activities such as light manufacturing and servicing, or warehousing and storage for example which are potentially at odds with the intended outcome.

20.2

If these activities are enabled, a better location may be along the railway, in which case the Mixed Use zone maybe a better zone adjacent to the railway as it enables a higher number of commercial activities than the THAB zone. This may also address potential interface issue that the application seems necessary to mitigate, although it is not clear what these are.

20.3

The Submitter also questions the size of the business zone and its location as discussed below.

#### **Pukekohe-Paerata Structure Plan:**

The Pukekohe-Paerata Structure Plan was prepared in the context of the existing zoning pattern that currently applies to the Plan Change area.

The Submitter is concerned that the Structure Plan has not been reconsidered as part of this plan change process and that the Structure Plan may not be appropriate going forward given the proposed changes in this plan change application. This is particularly around the issue of the location of the local centre relative to the wider catchment area.

20.4

The urban design drawings are clear and cover the normal aspects, except they are missing the important context of the existing zoning and the future outcomes planned for by the Pukekohe-Paerata Structure Plan.

It is unclear whether the structure plan has been considered, and why this plan has not been readdressed.

The Submitter is of the view that the Plan Change application should be made within the context of a structure plan, and that the Pukekohe – Paerata Structure Plan revised if

necessary. This is because the plan change seeks the rezoning of existing urban areas for more intensive uses or for comprehensive redevelopment and changing the location of fundamental zones that impact the future development of the Structure Plan area.

The Submitter acknowledges that this is not legally required, however this is in line with good planning practice and supported by the regional policy statement<sup>1</sup>.

The Submitter is concerned that the s32 analysis is inadequate as it hasn't appropriately demonstrated the proposed zoning is the most appropriate method for managing the land resource or assisting with the development of a well-functioning urban environment. There is no structure plan that addresses the plan change area, other than the area is shown as part of the context within the above mentioned structure plan.

20.5

As this context is proposed to change through PC123, it is submitted that the Structure Plan also needs to be updated.

The Submitter has had no consultation request from the applicant and assumes no revised structure plan is proposed.

The Submitter requests that the structure plan be revised such that it includes the plan change area and reflects the proposed changes. The Structure Plan may need to be changed in areas outside the plan change area particularly due to the fundamental change in the location of the centre(s). This process should include the options for the location of the centre or centres within the structure plan area, rather than just within the Plan Change area.

20.6

The Pukekohe – Paerata Structure Plan includes "Recommended New Arterial Roads", one of which links State Highway 22 across the railway, through the Submitter's land and to Sim Road. There is another recommended new arterial road further east linking Sim Road to Drury, known as the Drury – Pukekohe Link or expressway.

The urban design drawings conceptually illustrate the proposed Drury – Pukekohe Link as a think dashed line through the Submitter's land as copied below. It is unclear where this alignment has originated and is clearly not consistent with the structure plan as copied in Image 2 below.

20.7

---

<sup>1</sup> B2.5.2 (4) "Enable new metropolitan, town and local centres which contribute to a well-functioning urban environment following a structure planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following:..."

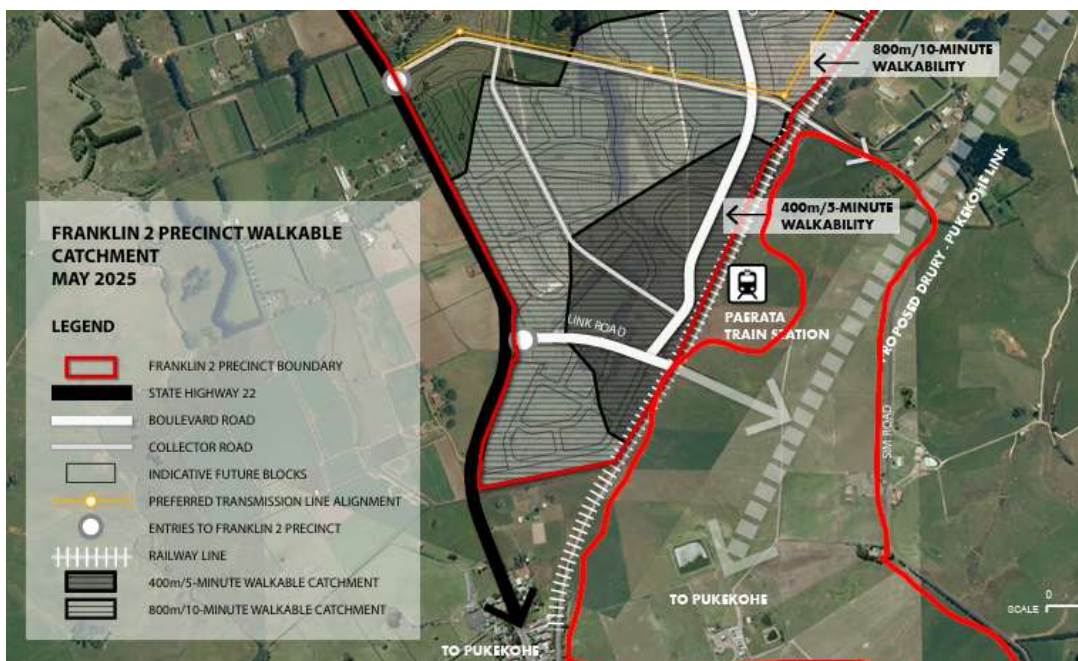


Image 1 – Drawing Sk002 by Amy Zhu-Grant, with the submitters land roughly identified in red.

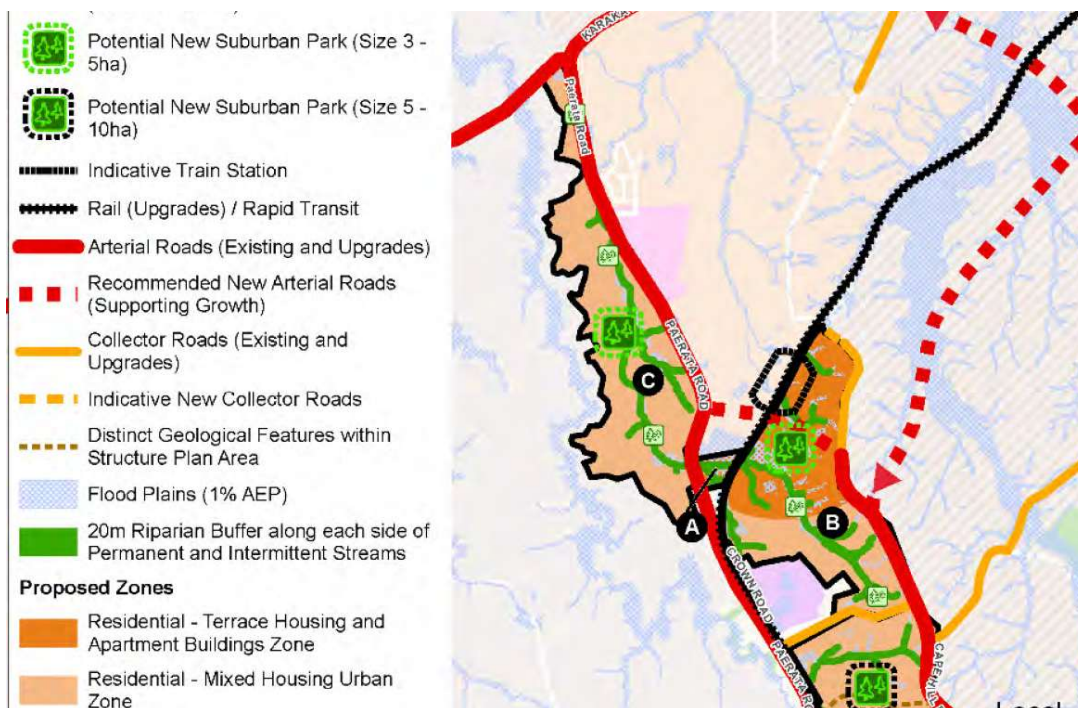


Image 2 – Current plan from the Pukekohe – Paerata Structure Plan.

The proposed Drury-Pukekohe Link is not planned through the Submitter’s land as illustrated, and the Submitter requests that these drawings are adjusted to show the correct alignment.

Further, there has been a process recently to designate land for this link and the designation exists along the Sim Road alignment. There are other designations applying

to the Submitter's land around the train station location. These are important proposed infrastructure elements that will inform the urban fabric and should be illustrated correctly such that the plan change request and structure plan can be considered within the context of these designations.

However, having said that, the urban design drawings roughly illustrate this intended roading network at a high level with a main access across the rail to the south of the station and another connection north of the station. This may be an issue of timing, however the planning for this area has moved on from a loose concept. The urban design statement includes reference to the NZTA designation, and states that "that future design plans will need to accommodate this requirement" (para 2.3). Why then has this not been included in the Plan Change assessment? These roads potentially have an impact on the consideration of where the centre should be located also taking a long term view.

20.8

#### **Local Centre location / function:**

In light of the above, the question needs to be asked, where should the centre be located. Should there be more than one centre? If the centre at the railway station is appropriate, should the zone extend to the link road across the railway? Should the centre exist both sides of the railway and what function and ultimate size should this be. Or should the centre extend to the SH22 intersection such that there is a main intersection at one end of the centre that responds to the passing vehicles, and a rail station at the other end? This needs to be considered in the context of the potentially high volume of traffic that would be delivered to Paerata via the Link Road over the railway from the future Drury to Pukekohe arterial road. This analysis is missing in order to confirm the proposed zoning. The s32 analysis does not include options for changing the location of the centres and zones outside the plan change area.

20.9

#### **Precinct Provisions**

The Submitter is concerned that the proposed provisions enable outcomes that are different to the concept design illustrated for the centre adjacent to the train station. It is understood that the concept within the urban design statement is one idea and the outcomes could be different to this.

20.10

#### **Railway buffer**

The s23 response states that the buffer along the railway corridor will consist of trees and shrubs to create a visual screen. This buffer between the residential area and the railway line is in the range from 50 to over 100m wide (paraphrased).

The Submitter is concerned that a buffer is required at all as this may have the potential to sterilise the landuse, particularly near the station where intensification is required.

20.11

Precinct Plan 1 Franklin 2 Precinct within the precinct provisions or the provisions themselves do not require a buffer for managing these effects. The effects are not easily understood and the methods to mitigate these don't appear to exist.

There is a riparian margin to the north of Sim Road along the north western side of the railway within this plan, is it this area being referred to as the buffer? If so, there are provision requiring a restorative planting for the riparian margins, but in comparison to the 50-100m stated above, these requirements are for only 10m either side of the stream.

20.12

This response does not support the design intent close to the station where the commercial abuts the railway and where there is no stream. The centre zone enables residential use and therefore effects discussed above could occur. There appear to be no provisions for a buffer along the railway at the THAB or business zones, and therefore are these effects managed appropriately?

20.13

The Submitter questions whether the proposed THAB zone along the railway corridor is the best method for the development and use of this land, particularly if noise and visual effects need to be managed. It maybe better to utilise this land for commercial development, or creating a buffer, and manage the impact of the railway in a different way. The submitter suggests the management of this should be in the form of an urban use, rather than a wide vegetative buffer in order to maximise the opportunity provide by the railway station.

20.14

The precinct plan does not suggest a buffer is required near the station. The Submitter supports this intent.

### Precinct Acitivity table

Activity table IXXX.4.1 (A1) has no activity status in the right column so it is unclear what this provision is for. See below as it appears this is an error.

20.15

### Standards

It appears that IXXX.6.2 limits height in the THAB zone to 11m for buildings containing up to three dwellings. Given the intent of the zone where 6 stories are envisaged, why is this limit imposed? The purpose states, the planned urban built character is predominantly three storeys. This is contrary to the intent of the THAB zone. It is more consistent with the MHUZ.

20.16

Building height is typically controlled via the height overlay in the AUP. The precinct includes this provision which is unusual. It is unclear how the 21m height standard IXXX.6.10 will be used as it appears that development more than three dwellings is controlled by the zones and this has a 16m height limit. The Submitter is concerned that the intended outcome is not enabled, or the precinct is not inline with the AUP standards.

20.17

Likewise, IXXX.6.11 HIRB appears to only apply to developments with three storey's, three dwellings as the standard is linked to the activity table IXXX.4.1, and does not override the zone provisions. The Submitter supports the intent of these standards, but is concerned that they do not work. This may be corrected by inserting an activity status in IXXX.4.1. (A1)?

20.18

### Infrastructure

The Submitter understands that Watercare have a planned budget for the installation and supply of water and wastewater services to Paerata circa 2030.

20.19

The plan change documents appear to be contradicting with some stating the density will be about the same (paraphrase) and some saying there will be an increase. While a total of around 5,000 dwellings is listed in the s23 response, it is unclear how this relates to the original zone. The consultation document summary with Watercare (s2.4) states that the applicant confirmed the plan change does not change the overall scale anticipated for Paerata Rise and therefore the current and planned water supply and wastewater infrastructure provision is satisfactory.

The Submitter does not understand how this can be the case when the plan change seeks to increase the density opportunity via the THAB zone and the increase height standards for the centre zones.

The Submitter is concerned that the structure plan area and the plan change area will be serviced as planned, and seeks confirmation that the planned capacity for servicing the Submitters land is not impacted by this plan change.

20.20

Consultation with Watercare with reference to the entire Paerata area is required. This infrastructure provision should have been implemented already and is one of the reasons other parts currently zone Future Urban have not progressed to a live urban zone.

20.21

The Submitter would like the opportunity to address the panel at a hearing in due course.

Yours sincerely



Nick Rae  
Registered Urban Designer  
Director Transurban Limited

Authorised by Paerata 5 Farms Limited.