



Pukekohekohe Gateway Plan Change

Private Plan Change Request

222-250 Manukau Road, 358, 360 and 372

Buckland Road, Pukekohe

Section 32 Assessment Report

23 April 2025

B&A

Urban & Environmental

Prepared for:

Auckland Thoroughbred Racing Inc (ATR)

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1.0 Applicant and Property Details

To:	Auckland Council
Site Location:	222-250 Manukau Road and 358, 360, 372 Buckland Road, Pukekohe
Applicant Name:	Auckland Thoroughbred Racing Inc ('ATR')
Address for Service:	Barker & Associates Ltd PO Box 1986, Shortland Street, Auckland 1140 Attention: Nick Roberts
Plan Change Area:	Approximately 66.5 hectares
Unitary Plan:	Auckland Unitary Plan (Operative in Part) ('AUP')
AUP Zoning:	Special Purpose – Major Recreation Facility and Business – General Business Zone
AUP Precinct:	Pukekohe Park Precinct
AUP Overlays & Controls:	<p>Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe Kaawa Aquifer</p> <p>Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe Central Volcanic</p> <p>Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe South volcanic</p> <p>Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay - Franklin Volcanic Aquifer</p> <p>Controls: Stormwater Management Area Control – Pukekohe Park, Flow 1</p> <p>Natural Heritage: Notable Trees Overlay - 2684, Elm, Plane, Puriri, English Oak, Common Beech, Unverified position of tree</p> <p>Controls: Macroinvertebrate Community Index - Rural</p> <p>Controls: Macroinvertebrate Community Index - Urban</p>
Designations:	<p>Designations: Designations - 6302, North Island Main Trunk Railway Line, Designations, KiwiRail</p> <p>Designations: Designations - 9569, Wastewater Purposes - Pump Station, Designations, Watercare Services Ltd</p>
Locality Diagram:	Refer to Figure 1 .

Brief Description of Proposal:

Private plan change request to:

Rezone approximately 22.96 hectares of land at Manukau Road and Buckland Road from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban, Open Space – Information Recreation and Business – Light Industry zones.

Apply the proposed Pukekohekohe Gateway Precinct to the proposed Residential – Mixed Housing Urban and Open Space – Information Recreation Zones and the existing Business – General Business zoned land at 222-250 Manukau Road, Pukekohe.

Amendments to I434 Pukekohe Park Precinct to delete references to motorsport activities, consequential amendments to the provisions which manage noise, and to increase the permitted duration of temporary buildings from 90 to 120 days.

Amendments to Schedule 10 Notable Tree Schedule to delete ID 2684 and include seven new trees.

2.0 Executive Summary

Auckland Thoroughbred Racing Inc ('**ATR**') is applying to Auckland Council for a plan change ('**Plan Change**') to the Auckland Unitary Plan – Operative in Part ('**AUP**') to:

- Rezone approximately 23.5 hectares of land within Pukekohe Park Precinct from Special Purpose – Major Recreation Facility Zone to:
 - Residential – Mixed Housing Urban ('**MHU**') zone (20.82 hectares);
 - Open Space – Information Recreation ('**OS-IR**') zone (2.14 hectares); and
 - Business – Light Industry ('**B-LI**') zone (0.47 hectares).
- Introduce transport infrastructure upgrade requirements for any future development on the existing Business – General Business ('**B-GB**') at 222-250 Manukau Road. This addition seeks to include existing transport infrastructure upgrade requirements that are identified within a private covenant for the benefit of Auckland Transport into the AUP;
- Apply the Pukekohekohe Gateway Precinct to the proposed MHU and OS-IR zones (Sub-Precincts A and B) and the existing B-GB zone (Sub-Precinct C);
- Amend the Pukekohe Park Precinct to remove references to motorsport activities, make consequential amendments to the provisions which manage noise, increase the permitted duration of temporary buildings from 90 to 120 days, and amend the precinct boundaries to exclude land within the proposed Pukekohekohe Gateway Precinct; and
- Amend Schedule 10 Notable Tree Schedule to delete ID 2684 and the associated 'group' of notable trees and to include seven new notable trees.

The Plan Change is in keeping with the outcomes sought in relevant national direction, the Auckland Plan, and the Regional Policy Statement. In particular, it will enable the use of land within the existing Pukekohe Rural Urban Boundary ('**RUB**') utilising existing water supply and wastewater infrastructure. In addition, the provision of greenfield land for residential development in this location will also contribute to downward pressure on house prices and achieving a competitive greenfield land market in Pukekohe.

Specialist assessment reports that have been prepared for the Plan Change application confirm that the proposed plan change is appropriate in this location and that potential adverse environmental effects can be appropriately managed. The proposed precinct provisions, and existing zone and Auckland-wide provisions of the AUP, will ensure that future development of the Pukekohekohe Gateway Precinct will achieve the higher-level objectives and policies of the Regional Policy Statement.

An evaluation in accordance with section 32 of the Resource Management Act 1991 ('**RMA**') has been undertaken and concludes that the proposed Plan Change will be an efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

On this basis, it is considered that the proposed zoning, building heights, and precinct provisions will provide for the most appropriate uses for the land.

3.0 Introduction

3.1 Auckland Thoroughbred Racing Inc

Auckland Thoroughbred Racing Inc ('ATR') was formed in 2021 following the amalgamation of the Auckland Racing Club (established 1874) and the Counties Racing Club (established 1919), with the goal of ensuring a more vibrant and sustainable future for thoroughbred racing across the Auckland Region. The amalgamation was made in direct response to the 2018 Messara Report, an independent review of the New Zealand thoroughbred racing industry commissioned by the Minister for Racing and prepared by John Messara, an experienced Australian racing administrator. Of significance, the Report calls to consolidate venues across racing clubs that had overlapping catchments or served similar communities in order to rationalise existing resources and improve the efficiency and long-term sustainability of the thoroughbred racing industry.

ATR manages two premier thoroughbred horse racing venues, being Ellerslie Racecourse and Pukekohe Park, and annually hosts a number of major racing events such as the Auckland Cup, Counties Cup, Karaka Millions and Champions Day.

ATR own the sites located at 222-250 Manukau Road and 358 and 372 Buckland Road, in Pukekohe. Thoroughbred horses have been raced at Pukekohe Park for over 100 years, and after 60 years of motorsport racing, motorsport activities effectively ceased in April 2023.

ATR intend to continue to race, trial, train and stable thoroughbred racehorses at Pukekohe Park and to enable its ongoing use as a venue and facility to host special events within Pukekohe and the wider Auckland Region.

3.2 The Proposed Plan Change Request

The Plan Change seeks to enable the use of the identified land for residential purposes, while continuing to support the ongoing use of the remainder of Pukekohe Park for thoroughbred racing, associated events, and other activities that are anticipated and provided for in the Special Purpose – Major Recreation Facility ('MRF') zone. The Plan Change reflects the next stage in ATR delivering its wider strategy for the racing industry, with economic benefits flowing down to trainers, breeders and the wider Pukekohe community, supporting local businesses and the racing industry's long-term sustainability.

In summary, the proposed Plan Change seeks to rezone approximately 23.5 hectares of land within the Pukekohe Park Precinct, no longer required for ATR operations, from MRF zone to Residential – Mixed Housing Urban ('MHU'), Open Space – Informal Recreation ('OS-IR') and Business – Light Industry ('B-LI') zones. The proposed provisions of the Pukekohekohe Gateway Precinct will apply to the new MHU and OS-IR zones to provide for and manage future residential development.

The proposal also seeks to include transport infrastructure upgrade requirements for the development of the existing Business – General Business ('B-GB') land at 222-250 Manukau Road. This land, referred to herein as the "PC30 land," was rezoned from 'Special Purpose – Major Recreation Facility Zone' to 'B-GB' under Plan Change 30 to the AUP. The PC30 land is subject to a private covenant for the benefit of Auckland Transport, which requires a series of transport infrastructure upgrades to be completed as development within the PC30 land progresses. The Plan Change proposal is to incorporate the key transport upgrades required by the covenant into

the AUP, to enable the required transport upgrades to be managed cohesively with those upgrades that are required to support future residential development.

Accordingly, the Pukekohekohe Gateway Precinct and three sub-precincts are proposed to apply to the new MHU and OS-IR zones and the PC land as follows:

- Sub-Precinct A and Sub-Precinct B to the MHU and OS-IR zones to provide for and manage future development in accordance with these zones; and
- Sub-Precinct C to the PC30 land manage the provision of key transport upgrades that are currently required by way of an existing private covenant.

As no further changes are proposed to the zoning or land use framework applicable to the PC30 land, a number of appended technical reports have focussed their assessments to the proposed MHU and OS-IR zones, and refer to land within Sub-Precinct A and Sub-Precinct B as the Plan Change area.

In addition to the above, amendments are also proposed to the Auckland Unitary Plan Operative in Part ('AUP') to amend Schedule 10 Notable Tree Schedule to delete ID 2684 and include seven new trees, and to the Pukekohe Park Precinct to reflect existing operations by deleting references to motorsport activities.

The Plan Change also includes the removal of motorsport activities within the Pukekohe Park Precinct to recognise that motorsport activities have effectively ceased from the site since April 2023. The proposal includes consequential amendments to the provisions that manage noise, specifically the deletion of I434.6.1 Motorsport activities noise and the inclusion of new Standard I434.6.2 Special noise events to enable the ongoing operation of horse racing and special events at Pukekohe Park. In addition, it is also proposed to increase the permitted duration of temporary buildings from 90 to 120 days

The proposed Plan Change is set out in **Appendix 2**.

3.3 Site Location and Description

3.3.1 Site Description

The land subject to the proposed Plan Change is located at 222-250 Manukau Road and 358, 360, 372 Buckland Road, and comprises a total area of approximately 66.5 hectares, as shown in **Figure 1** and **Figure 2** below. The plan change area is bound by the railway network of the North Island Main Trunk ('NIMT') and Station Road to the east Buckland Road to the west and commercial and light industrial buildings on the periphery of the Pukekohe Township to the north. The Tutaenui Stream is also adjacent to the southernmost boundary.



Figure 1: Map showing the location of the Plan Change area and the surrounding locality. Source: EMaps.

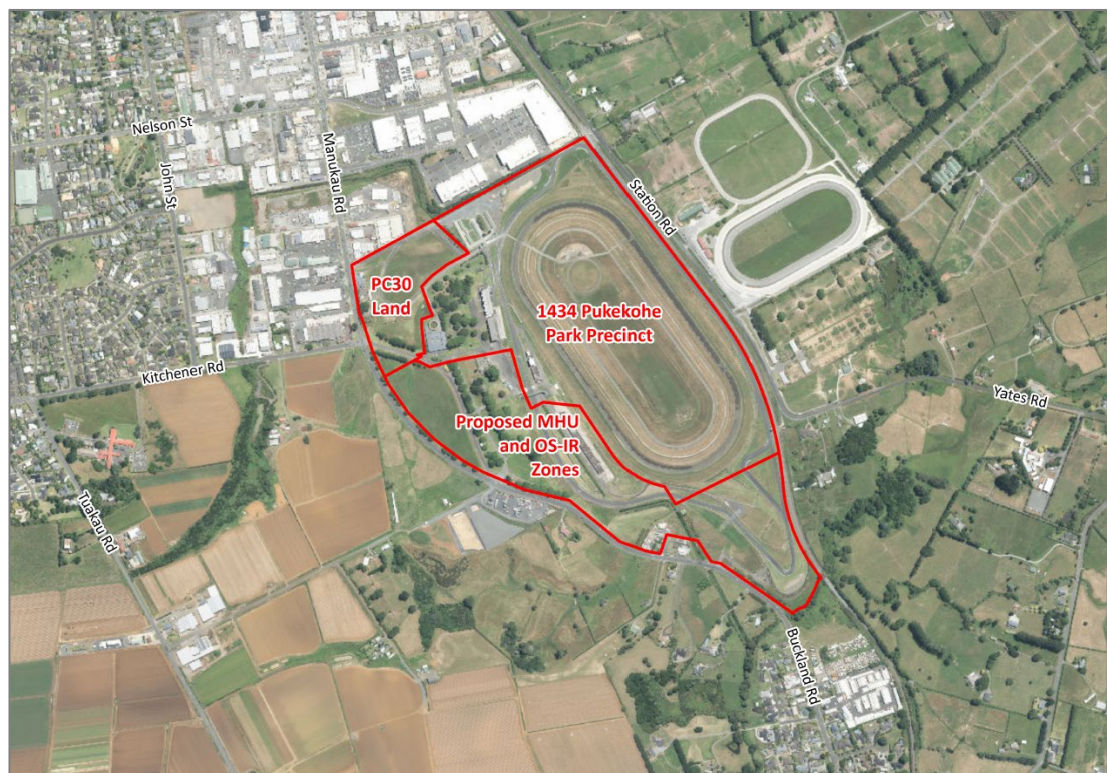


Figure 2: Map showing the boundaries of the proposed new MHU and OS-IR zones, the PC30 land, and the amended Pukekohe Park Precinct.

The Plan Change area is zoned MRF and located within the Pukekohe Park Precinct under the AUP. The Plan Change area is also subject to the Notable Tree Overlay (2684), relevant to Elm, Plane,

Puriri, English Oak, and Common Beech species, however the positions of these trees is unverified under the AUP.

The Plan Change area forms part of the Pukekohe Park Racecourse and is currently used for thoroughbred horse racing and training (including stables, ATR clubrooms and grandstands, as well as other ancillary buildings and structures). The racecourse includes a motor racing track, however motorsport activities effectively ceased on the site in April 2023, and all other ancillary motorsport structures (such as pit lanes, garages and barriers) have been removed from the site.

Watercare Service Limited's ('WSL') Pukekohe Pump Station at 360 Buckland Road also forms part of the Plan Change area.

The topography of the Plan Change area is flat near the horse racing track, and gently rises westward towards Buckland Road.

There are four existing vehicle crossings from along the frontage of the Plan Change area from the Buckland Bridge to Kitchener Road.

Vegetation within the Plan Change area is highly modified and largely pasture surrounding the horse and motor racing tracks, parking/vehicle manoeuvring areas and buildings. There are no identified Significant Ecological Areas ('SEAs') within the Plan Change area itself or its vicinity. The pasture within the Plan Change area is interspersed with amenity vegetation (including a number of mature trees) and riparian vegetation.

The Plan Change area includes piped, modified/artificial and natural permanent and intermittent streams (refer to **Figure 3**). Four artificial watercourses are located within the Plan Change area, with these features being constructed for drainage purposes. The Plan Change area includes a large, permanently flowing reach of the Tutaenui Stream along the south-eastern boundary, and its margins are densely vegetated by weedy vegetation with some deciduous exotic trees on the bank opposite to the site. The tributaries of the Tutaenui Stream which flow through the Plan Change area have been extensively modified through straightening and installation of culverts.

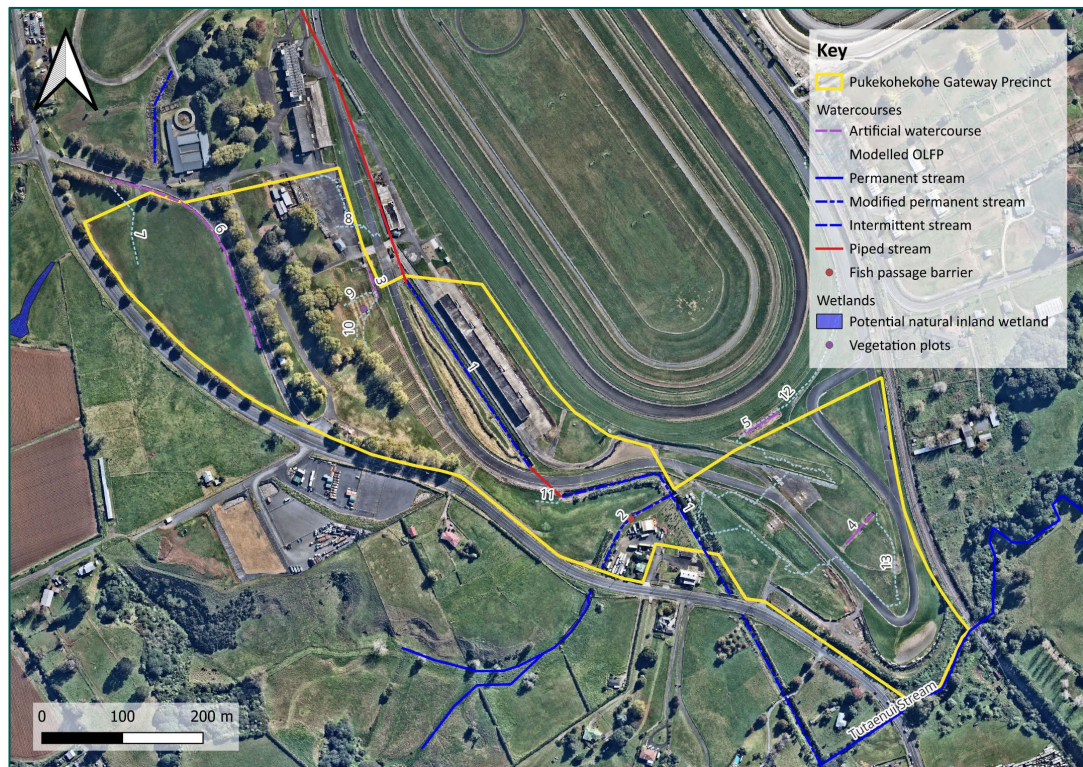


Figure 3: Overview of watercourses and wetlands in relation to the proposed MHU and OS-IR zones. Source: Viridis.

3.3.2 Surrounding Area and Local Context

Adjacent to the north of the Plan Change area is large format retail (such as Harvey Norman, Briscoes), and beyond this is a range of commercial and light industrial buildings and activities, including car dealerships, auto repair shops and concrete suppliers. Approximately 1 kilometre to the north of the Plan Change area is the Pukekohe Town Centre and Pukekohe Train Station. Existing amenities within and close to the town centre include the Pukekohe Library, primary and secondary schools and a range of retail services, including food and beverage, supermarkets and a shopping mall.

The NIMT and Station Road are located to the east of the Plan Change area, and beyond this is the Franklin Trotting Club. The Tutaenui Stream, and beyond this, Buckland Village, are located to the south of the Plan Change Area. Land to the west of the Plan Change area, beyond Buckland Road, generally comprises rural land held in pasture or horticulture, with the exception of 303 Buckland Road which is sealed and currently accommodates the Versatile Homes site office.

The zoning pattern surrounding the Plan Change area is shown in **Figure 4**, and includes B-G Zone to the north, Business – Light Industry Zone ('B-LIZ') immediately adjoining to the east (on the opposite side of Station Road), Future Urban to the south and a mix of Future Urban and General Business to the west on the opposite side of Buckland Road.

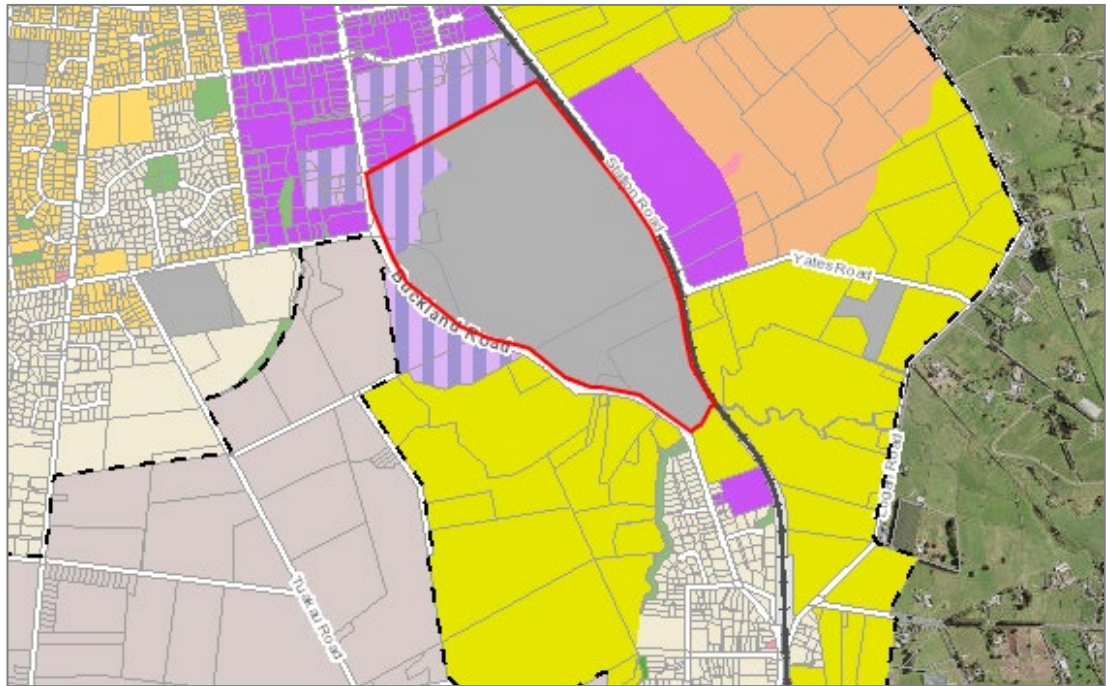


Figure 4: AUP zoning with the Plan Change area outlined in red. Source: Auckland Council.

The land immediately adjacent to the Plan Change area has been subject to a number of Private Plan Change Requests as follows:

- 240-242 Station Road, 27 and 49 Yates Road, 17, 25, 27A-27D Royal Doulton Road and 152-214 Golding Road located to the east of the site were rezoned under Private Plan Change 74 from Future Urban and MRF zone to a mix of B-LIZ, Business – Neighbourhood Centre, and MHU zones;
- 301-303 Buckland Road located to the west of the site was rezoned under Private Plan Change 87 from Future Urban to Business – General Business zone; and
- The north-eastern corner of 222-250 Manukau Road was rezoned under Private Plan Change 30 from MRF zone to Business – General Business zone.

4.0 Description of the Plan Change Request

4.1 Description of the Proposal

4.1.1 Approach to the Planning Framework and Zoning

The Plan Change seeks to rezone approximately 23.5 hectares of MRF zone to MHU, OS-IR and B-LI zones, as shown at **Appendix 2**. The Plan Change area and proposed zoning is also shown at **Figure 5** below.

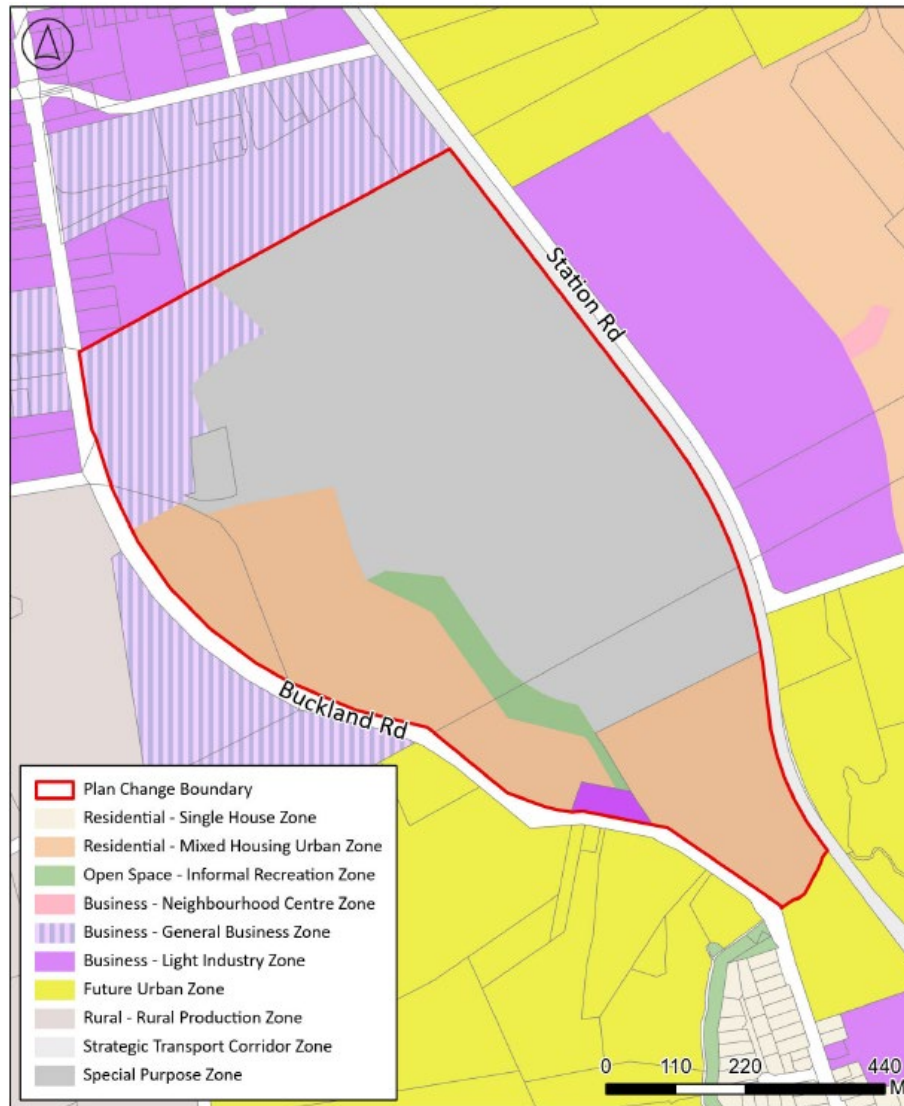


Figure 5: The Plan Change area and proposed zoning.

The proposed MHU and OS-IR zones will rely largely on the underlying zone and Auckland-wide provisions under the AUP to manage the development of the Plan Change area, however the Pukekohekohe Gateway Precinct is also proposed to include place-based provisions to recognise the specific characteristics of the site.

The precinct provisions, included as **Appendix 2**, are appropriately focussed to the layout and form of development necessary to achieve the objectives of the AUP, including in relation to:

- Protecting and respecting Mana Whenua values;
- Providing access to the Plan Change area that is integrated with the existing and planned transport network, including active mode connections;
- Enhancing the riparian margins of streams;
- Managing stormwater quality; and
- Protecting people’s health and residential amenity adjacent to the railway corridor.

The Precinct provisions enable the Plan Change area to develop to a scale and intensity which is broadly consistent with MHU zoned areas within the region. The precinct will, however, include some variation to the standard Auckland-wide and zone provisions to introduce more tailored standards, matters of discretion and assessment criteria. This will support the development of a sustainable and comprehensively planned residential environment within this locality that contributes to a well-functioning urban environment and a quality compact urban form.

4.1.1.1 Overview of the Proposed Zoning

The intention of the proposed zoning is to provide for the development of a sustainable and comprehensively planned residential community, that supports a well-functioning urban environment and a quality compact built form, adjacent to the Pukekohe Park. To enable this, approximately 23.5 hectares of MRF zone is proposed to be rezoned as follows:

- MHU zone: 20.82 hectares; and
- OS-IR zone: 2.14 hectares.

In addition, the proposed Plan Change also seeks to rezone approximately 0.47 hectares of land, being the existing wastewater pump station lot, to B-LI zone, as shown in **Figure 6** below.



Figure 6: Existing wastewater pump station located at 360 Buckland Road, proposed to be rezoned to B-LI. The site is subject to WSL Designation 9569 under the AUP.

The MHU zone will enable the development of a variety of housing types at higher densities, and contains other provisions that manage the height, bulk, form and appearance of development to achieve an urban built character in a variety of forms and minimise visual dominance effects to adjoining sites. The provision of medium density housing will provide for housing choice and in particular smaller more affordable housing.

The OS-IR zone has been applied between the proposed MHU zone and the existing Pukekohe Park Precinct. The OS-IR zone will provide for a variety of informal recreation activities while maintaining and enhancing the natural character values. In this case, the OS-IRZ will provide a degree of separation between the proposed MHU zone and any future residential development and the existing racetrack. The OS-IRZ will also provide opportunity for the naturalisation and

enhancement of the existing stormwater channel, with native riparian planting providing a recreational space for future residents and an enhanced stormwater channel.

The B-LI zone has been applied to the WSL wastewater pump station site at 360 Buckland Road, Buckland, to reflect WSL's position on zoning of designated pumpstation sites across the region.

4.1.1.2 Other Auckland Unitary Plan Controls

In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the entire Pukekohekohe Gateway Precinct area (as shown in **Figure 7** below) to manage the increase in stormwater discharge associated with development to sensitive stream environments. The SMAF 1 overlay is not proposed to apply to Sub-Precinct C as this is an existing overlay applied to this part of the site under the AUP.

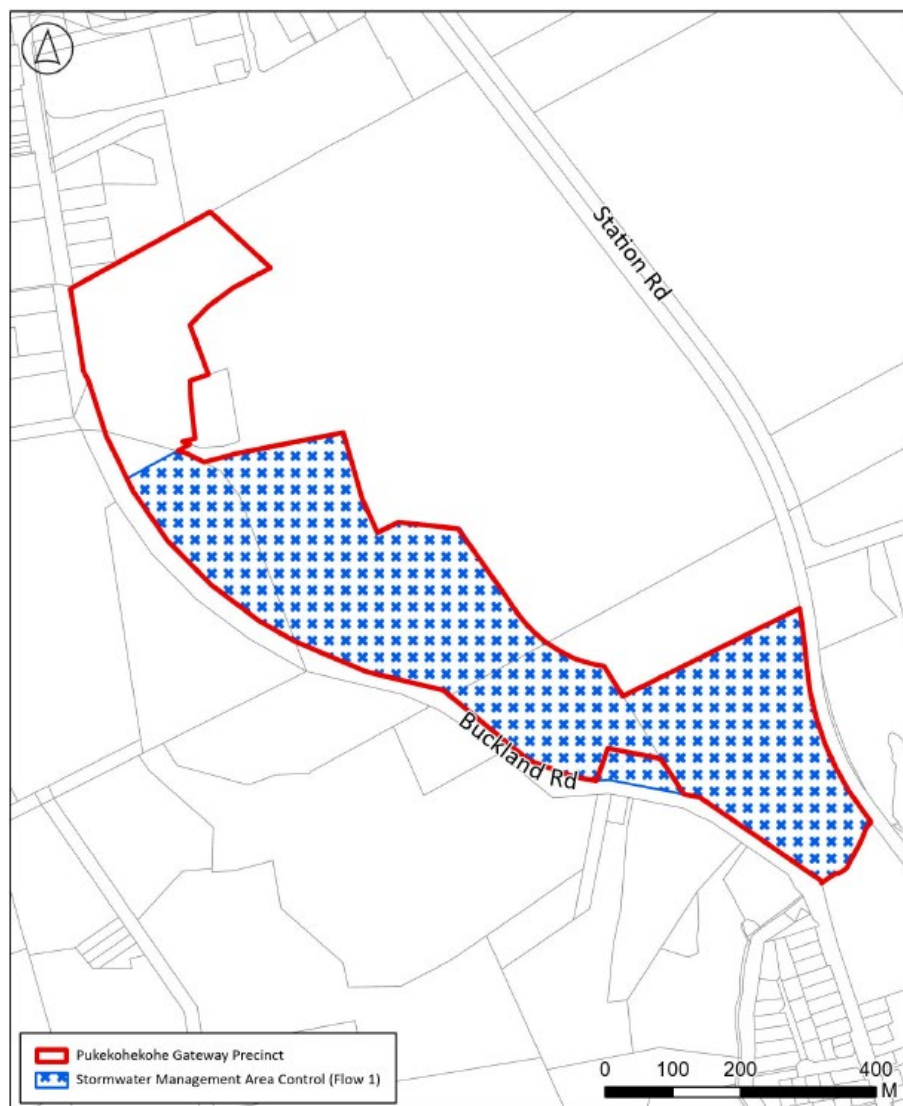


Figure 7: Proposed SMAF 1 control.

All other existing controls and overlays will continue to apply to the Plan Change area, including:

- Overlays: Natural Resources: High-Use Aquifer Management Areas Overlay – Pukekohe Kaawa Aquifer;

- Overlays: Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe Central Volcanic;
- Overlays: Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe South Volcanic;
- Overlays: Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay - Franklin Volcanic Aquifer;
- Controls: Stormwater Management Area Control – Pukekohe Park, Flow 1 (PC30 land only);
- Controls: Macroinvertebrate Community Index – Urban; and
- Controls: Macroinvertebrate Community Index – Rural.

All relevant Auckland-wide and zone rules would apply to future development in the Plan Change area, in addition to those applying under the overlays and controls noted above.

4.1.2 Pukekohekohe Gateway Precinct

The Pukekohekohe Gateway Precinct includes the proposed MHU and OS-IR zones to manage the effects of urbanisation on the local environment, and to ensure that a quality-built environment can be achieved by responding to the specific characteristics of the site (as shown in the Pukekohekohe Gateway Precinct Plan: Indicative Road and Open Space Network at **Figure 8**).

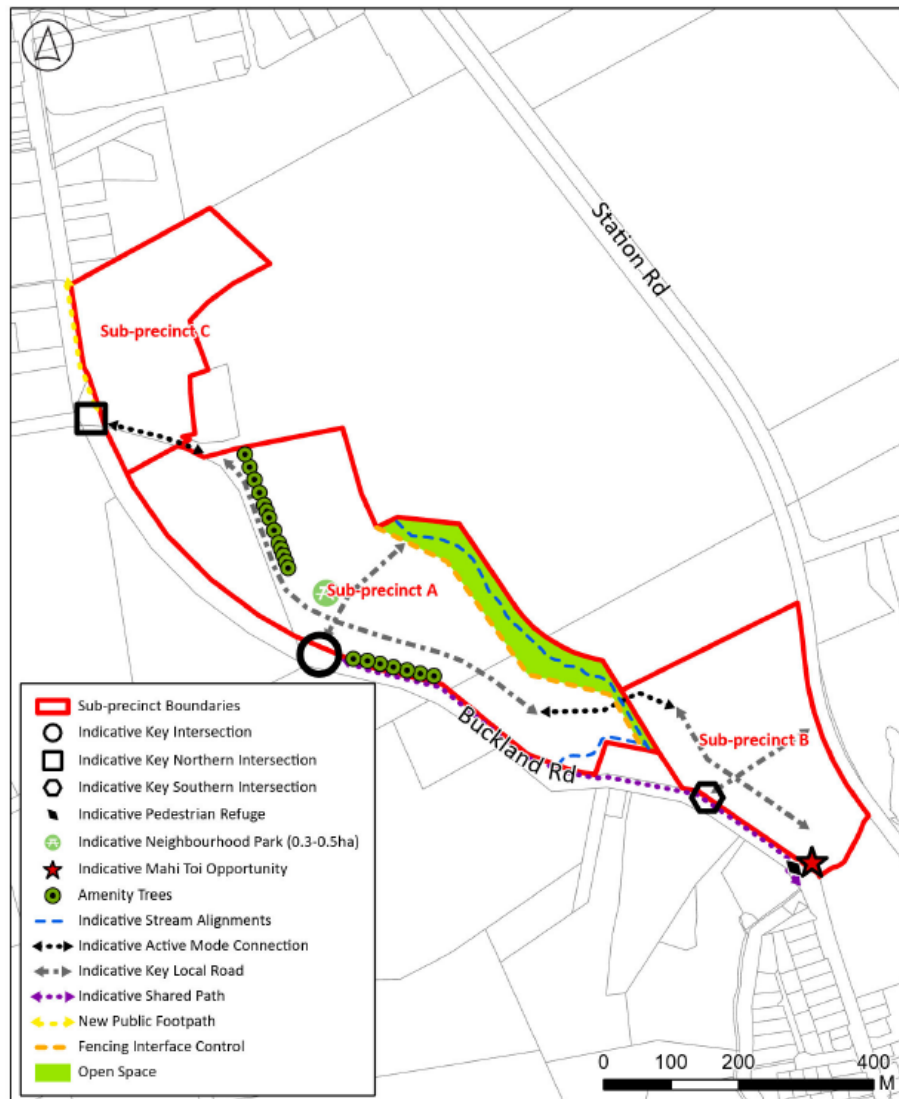


Figure 8: Pukekohekohe Gateway Precinct Plan 1: Indicative Road and Open Space Network.

A package of provisions, including objectives, policies, activity rules, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives of the precinct and the AUP. The full set of provisions is set out within **Appendix 2** and summarised below.

4.1.2.1 Objectives and Policies

The proposed Pukekohekohe Gateway Precinct objectives and policies address the specific outcomes for the Precinct and the methods by which these outcomes will be achieved. These are summarised below:

- A high-quality, comprehensively developed urban environment that integrates with the surrounding urban area, the Pukekohe Park Precinct and the natural environment.
- Acknowledgement and provision for Mana Whenua values to be recognised and provided for.
- Access to and from the precinct occurs in a safe and effective manner that mitigates adverse effects of traffic generation on the surrounding road network and encourages mode shift to active modes of transport.

- Development is coordinated with transport infrastructure upgrades through the use of triggers and standards.
- Stormwater quality and quantity is managed to avoid adverse effects on the receiving environment.
- Ecological values are recognised and protected and enhanced.
- Activities sensitive to noise adjacent to the rail corridor are designed to protect people's health and residential amenity, in a way which does not unduly constrain the operation of the railway corridor.

Overall, the objectives and policies result in a comprehensive framework of provisions that provide direction for the precinct standards, matters of discretion and assessment criteria. The following sections summarise how the Plan Change achieves these specific outcomes.

4.1.2.2 Transport Infrastructure

The Precinct includes a number of provisions relating to the provision of infrastructure. These include the following:

- Transport infrastructure staging rules to coordinate occupation of dwellings and buildings with the delivery of required transport infrastructure, generally in the locations identified in Precinct Plan 1 (refer **Figure 8** above);
- A road design rule requiring the design and function of indicative key local roads to be in accordance with requirements specified at IX.11.1 Appendix 1 of the Precinct; and
- Special Information Requirements in relation to development within Sub-Precinct C and the provision of a Transport Design Report for new key intersections and local roads.

4.1.2.3 Ecology

A key objective of the Precinct is that ecological values within the stream habitats are protected, restored, maintained or enhanced. This is achieved by:

- Identifying permanent and intermittent streams in Precinct Plan 1 (refer **Figure 8** above) and requiring a minimum 10m vegetation riparian buffer planted each side of any permanent or intermittent streams to mitigate the effects of urbanisation on freshwater quality;
- A Special Information Requirement for a riparian planting plan, requiring plant species to be predominantly native and resilient to the potential adverse effects of flood risk;
- A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff, which is additional to the requirements imposed by the SMAF 1 control; and
- Identifying 20 trees within the Precinct that are to be protected and retained, where possible, for amenity reasons (refer Precinct Plan 3 at **Figure 9** below).

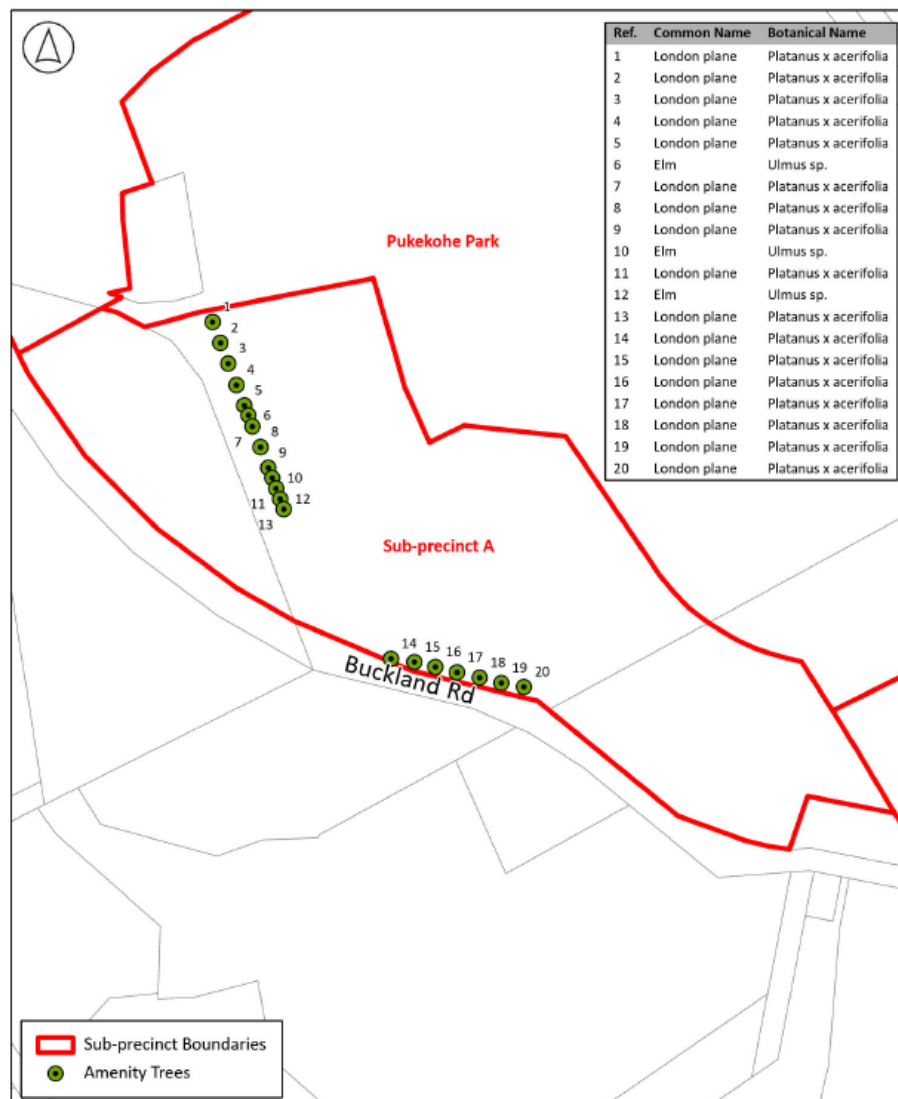


Figure 9: Pukekohekohe Gateway Precinct Plan 3: Protected Trees.

4.1.2.4 Activities sensitive to noise adjacent to the rail corridor

The Precinct includes a number of provisions to ensure activities sensitive to noise adjacent to the railway corridor are designed to protect healthy and amenity and manage reverse sensitivity effects. These include the following:

- An acoustic treatment and mechanical ventilation rule to ensure activities sensitive to noise adjacent to the railway corridor are designed to protect healthy and amenity;
- A building setback rule, requiring buildings to be setback at least 5 metres from any boundary that adjoins the North Auckland Line to ensure the safe operation of the North Auckland Line; and
- A Vibration Alert area identifying areas within 60m of the North Auckland Line which may experience vibration levels higher than would normally be experienced (refer Precinct Plan 2 at **Figure 10** below).



Figure 10 Pukekohekohe Gateway Precinct Plan 2: Rail Vibration Plan

4.1.3 Proposed Amendments to the Pukekohe Park Precinct

The Plan Change seeks to amend the existing Pukekohe Park Precinct (Chapter I434 of the AUP) to reflect that motorsport activities have effectively ceased on the Pukekohe Park site.

The proposed amendments include the following:

- Remove I434.4.1 (A2) which provides for motorsport activities as a permitted activity;
- Remove standard I434.6.1 Motorsport activities noise and standard I434.6.2 Public address system noise as both standards directly relate to motorsport activities;
- Update standard I434.6.3 General noise and include new standard I434.6.2 Special noise events to provide noise standards for the ongoing operation of Pukekohe Park, generally consistent with Chapter I313 Ellerslie Racecourse Precinct and other MRF zones across the region. In particular, the new standard will provide for up to 8 special noise events with a noise limit of 75dB LAeq(5min) and up to 15 special noise events with a noise limit of 65dB LAeq(5min);

- Update standard I434.6.11 (now standard I434.6.9) Helicopter flights to remove reference to motorsport category days, while still providing for 60 helicopter movements within any 12 month period as had already been provided for under I434.6.11;
- Amend standard I434.6.12 (now standard I434.6.9) to enable temporary buildings for a duration of 120 days (previously 90 days); and
- Update the Pukekohe Park Precinct boundary to reflect the new Precinct area (refer **Figure 11** below) and delete Precinct Plan 1 – Interface Control Area.

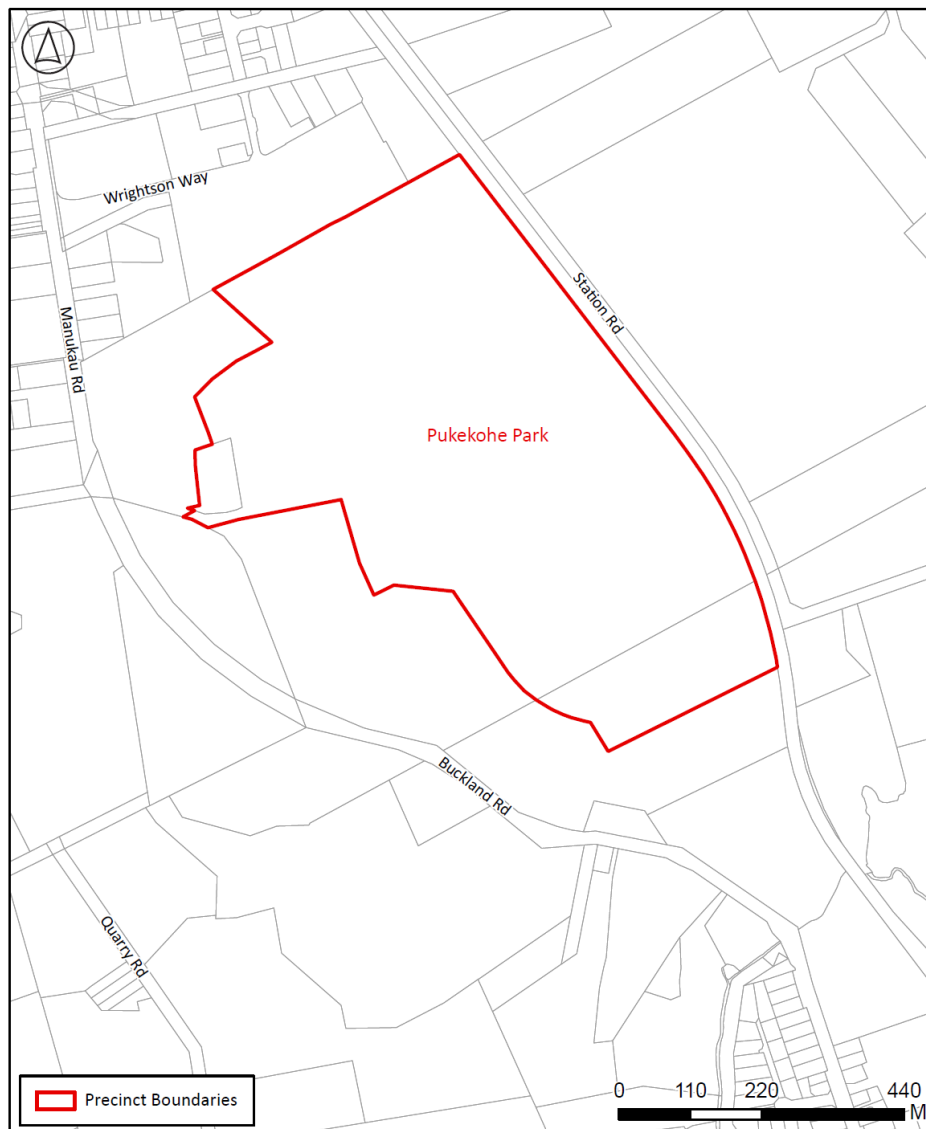


Figure 11: Amended Pukekohe Park Precinct Area.

In terms of access to the Pukekohe Park Precinct, the existing physical accesses through 222-250 Manukau Road will be retained and will continue to service the track and associated activities.

4.1.4 Proposed Amendments to Schedule 10 Notable Tree Schedule

The Plan Change seeks to amend Schedule 10 Notable Tree Schedule and the Notable Tree Overlay on the planning maps of the AUP.

The proposed amendments include the following:

- Remove Notable Tree Overlay layer (ID 2684) identifying a group of scheduled trees on the Pukekohe Park site from the planning maps, and delete ID2684 from the 'Franklin' section of Schedule 10 of the AUP in its entirety; and
- Identify seven individual trees within the Notable Tree Overlay layer of the planning maps (refer **Figure 12** below) and update the 'Franklin' section of Schedule 10 to schedule the seven trees identified below as Notable Trees.

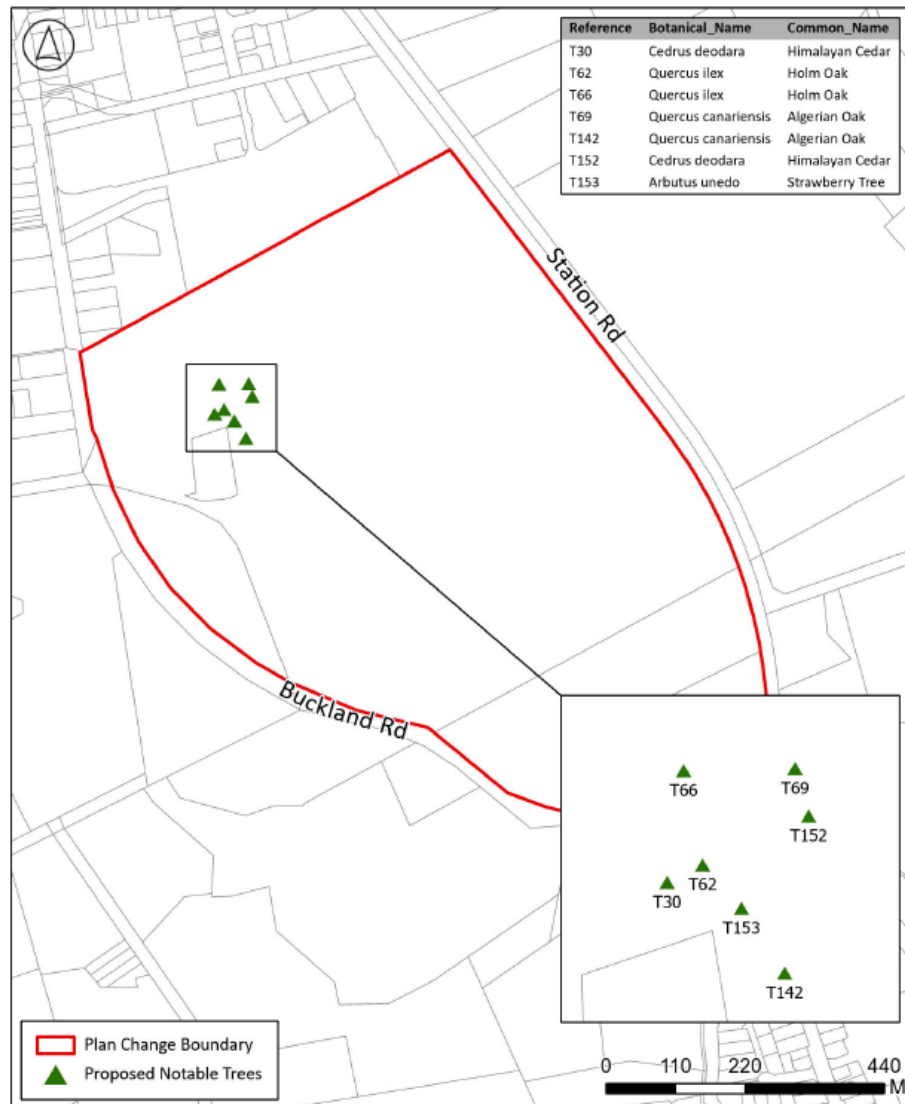


Figure 12: Proposed amendments to the Notable Tree Overlay layer of the AUP Planning Maps.

4.2 Purpose and Reasons for the Plan Change

Clause 22(1) of the Resource management Act 1991 ('RMA') requires that a Plan Change request explains the purpose of, and reasons for the proposed plan change.

The purpose of the Plan Change is to:

- Enable the development of a sustainable and comprehensively planned residential area, that contributes to a well-functioning urban environment and a quality compact urban form; and

- Provide for the ongoing operation of Pukekohe Park and the sustainability of New Zealand's thoroughbred horse racing industry within the Auckland region and ensure that the Pukekohe Park Precinct accurately reflects the existing and future activities that occur or will occur at Pukekohe Racecourse in accordance with the existing MRF zone.

The reason for this Plan Change request is to enable the Applicant, who is the landowner of the Plan Change area, to develop their landholdings in a manner consistent with the proposed zoning and planning framework.

This report provides an assessment of effects of the Plan Change and an evaluation of the Plan Change prepared in accordance with section 32 of the RMA. Supporting expert assessment reports are appended to this report. The evaluation of the Plan Change concludes that these amendments are the most appropriate way to achieve the purpose of the RMA.

5.0 Strategic Planning Framework

A number of strategic and statutory planning documents have informed the proposed Plan Change. This section provides a summary of those documents of particular relevance.

5.1 National Direction

Any change to the AUP must be in accordance with any relevant national policy statement and National Planning Standards.

5.1.1 National Policy Statement on Urban Development

The National Policy Statement on Urban Development 2020 ('NPS-UD') came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD has assessed all the local authorities within the country and classified them as either Tier 1, Tier 2 or Tier 3, with Tier 1 referencing the largest local authorities in New Zealand (including Auckland Council). The NPS-UD provides direction to decision-makers under the RMA on planning for urban environments. Objectives 1, 2, and 8 are of particular relevance to the Plan Change.

Well-Functioning Urban Environment

Under Policy 1 planning decisions must contribute to well-functioning urban environments. Policy 1 defines this as follows:

- (a) *have or enable a variety of homes that:*
 - (i) *meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) *enable Māori to express their cultural traditions and norms; and*
- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *support reductions in greenhouse gas emissions; and*

(f) are resilient to the likely current and future effects of climate change.

The components of a well-functioning urban environment that the Plan Change area will support include:

- A greater variety of homes, including in terms of price of location by providing for a new greenfield opportunity within Pukekohe;
- The Plan Change will provide good levels of accessibility for future residents through:
 - The provision of transport upgrades as the area is developed over time including for a new shared path and pedestrian crossing. These upgrades have been designed to be in keeping with the transport infrastructure identified for the development of neighbouring properties, and once completed, will contribute to an integrated transport network that provides for active modes of transport;
 - The Plan Change area is accessible to existing bus routes which provide connection to the Pukekohe Train Station, where bus and train connections are available to the local area and the city centre through the southern train line;
 - The Plan Change area is proximate to a number of retail facilities within the surrounding Business – General Business Zone, including a Fresh & Save supermarket; and
 - The proposed Precinct includes provision of a new accessible centrally located neighbourhood park, as well as new internal roads that are designed to prioritised pedestrian safety;
- The flood modelling undertaken by Woods and detailed in the Stormwater Management Plan ('SMP') included as **Appendix 3** confirms that future development can be located outside of the 1 per cent AEP floodplain (inclusive of the future effects of climate change). Flood hazard risk to the downstream environment can also be appropriately managed in accordance with the SMP.

Competitive Land and Development Markets

As identified in the Economic Assessment included as **Appendix 4**, the provision of residentially zoned land in this location will reduce the concentration of the greenfield land market in Pukekohe, where the majority of greenfield land is concentrated in one location (Paerata Rise). This will in turn contribute to downward pressure on house prices and achieving a competitive greenfield land market in Pukekohe.

Reduction in Greenhouse Gas Emissions

Objective 8 of the NPS-UD supports a reduction in greenhouse gas emissions and resilience to the current and future effects of climate change. In this case, the Plan Change area is an existing urban area, and as discussed above, the Plan Change includes provisions to encourage the use of public and active modes of transport, which will support a reduction in greenhouse gas emissions through reduced car dependency.

Summary

Overall, it is considered that proposed Plan Change gives effect to the NPS-UD.

5.1.2 National Policy Statement for Highly Productive Land 2022

The National Policy Statement for Highly Productive Land 2022 ('NPS-HPL') seeks to improve the way that highly productive land is managed under the RMA. It does not provide absolute protection of highly productive land, but rather it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production. The NPS-HPL does not apply to existing urban areas or land that councils have identified as future urban zones in district plans.

As the Plan Change area is within the Special Purpose – Major Recreation Facility Zone and Pukekohe Rural Urban Boundary, the NPS-HPL does not apply.

5.1.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity 2023 ('NPS-IB') applies to indigenous biodiversity in the terrestrial environment and seeks to identify, protect, manage, and restore indigenous biodiversity.

The NPS-IB requires every territorial authority to undertake a district-wide assessment to determine if an area is of significant indigenous vegetation and/or significant habitat of indigenous fauna and qualifies as Significant Natural Areas ('SNAs'). The NPS-IB also seeks to manage the effects of subdivision, use, and development on indigenous biodiversity outside of SNAs, and that areas outside SNAs which support specified highly mobile fauna are identified and managed to maintain their populations across their natural range.

The AUP has not been updated to identify SNAs in accordance with assessment approach outlined in Appendix 1 of the NPS-IB. Notwithstanding, the Plan Change area does not contain any identified significant ecological areas under the AUP, which are those areas that have been identified to contribute significantly to Auckland's biodiversity.

5.1.4 National Environmental Standards

The National Environmental Standards ('NES') that are relevant to this Plan Change include:

- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ('NESC'S'); and
- NES for Freshwater 2020 ('NES-FW').

These NES documents will apply to future development of the Plan Change area as part of the resource consent process. Overall, the Plan Change is considered to be generally aligned with the outcomes sought by the provisions of these national environmental standards, and any future development activities will need to be assessed for compliance against the relevant NES provisions.

5.1.5 National Planning Standards

The National Planning Standards came into effect on 5 April 2019. These codify the structure, mapping, definitions and noise/vibration metrics of District, Regional and Unitary Plans. Auckland Council has 10 years to implement these changes. This Plan Change applies the standard AUP zone and rule framework to the Plan Change area, which is broadly consistent with the planning standards.

5.2 Regional Policy Statement and Plans

5.2.1 Auckland Unitary Plan (Operative in Part)

The AUP is the primary statutory planning document for Auckland. It is comprised of the Regional Policy Statement ('RPS'), Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland's natural and physical resources while enabling growth and development and protecting matters of national importance.

The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. Section 75(3)(c) states that a District Plan must give effect to any RPS and Section 74(2)(a) states that a District Plan must be prepared having regard to a proposed RPS.

5.2.1.1 B2.2 Urban Growth and Form

The provisions of B2.2 Urban Growth and Form seek to achieve a well-functioning urban environment, where urban growth enables social, economic, and cultural well-being while supporting accessibility, infrastructure efficiency, and climate resilience. A quality compact urban form is emphasised, promoting development that enhances urban environments, enables the efficient use of existing and new infrastructure, improves transport connectivity, and reduces adverse environmental effects. The provisions also seek to protect natural and physical resources, including Mana Whenua values and areas prone to natural hazards.

In addition, it is anticipated that growth is primarily accommodated within the existing urban area, and that rezoning of land within the RUB is enabled where it will support a quality compact urban form, provide for a range of housing types, provide good accessibility, incorporate climate change resilience, and support the competitive operation of land and development markets.

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B2.2 Urban Growth and Form for the following reasons:

- The Plan Change area is located within the existing urban area of Pukekohe, and will contribute towards achieving a quality compact urban form within the existing RUB;
- Future residential development can be serviced by existing infrastructure for water supply and wastewater, as set out in the Infrastructure Assessment Report prepared by Woods, included as **Appendix 5**;
- As identified in the SMP included as **Appendix 3**, the Plan Change area can be developed to be resilient to the potential effects of climate change, including flooding risks associated with a conservative 3.8 degree temperature increase;
- The proposed Precinct provisions include transport infrastructure upgrades, which seek to improve accessibility and connectivity to the existing Pukekohe township; and
- As assessed in the economic assessment, and detailed above, the Proposed Plan Change will contribute to downward pressure on house prices and achieving a competitive greenfield land market in Pukekohe.

5.2.1.2 A Quality Built Environment

The provisions of B2.3 A Quality Built Environment focus on ensuring that subdivision, use, and development contribute to a well-functioning urban environment with a quality built environment. In particular, this is achieved by subdivision, use, and development responding to the intrinsic qualities and physical characteristics of the site and area, contributing to a diverse mix of choice and opportunity for people and communities, maximising resource and infrastructure efficiency, and improving resilience to the effects of climate change. The provisions promote the health and safety of people and communities, and also encourage innovative design address environmental effects.

In relation to the design of development, the policies require that the form and design of subdivision, use and development contribute to a well-functioning urban environment and support the planned future environment, including its shape, landform, outlook, location, and relationship to its surroundings, including landscape and heritage. Development is also required to contribute to the safety of the site, street, and neighbourhood, and enable a range of travel options while achieving a high level of amenity for pedestrians and cyclists.

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B2.3 A Quality Built Environment for the following reasons:

- The Proposed Plan Change includes a bespoke Precinct, which has been informed by a range of technical assessments and includes place-based provisions to ensure that future residential development can respond to the intrinsic qualities and physical characteristics of the Plan Change area and the surrounding environment;
- The proposed Precinct provisions include requirements for transport infrastructure upgrades, design guidance on the geometry of new roads, and acoustic attenuation design controls, which seek to promote the health and safety of people and communities and will provide a high level of amenity for future pedestrians and cyclists; and
- The Proposed Plan Change seeks to adopt the underlying provisions of the MHU zone and Auckland-wide Urban Subdivision chapters of the AUP, which will ensure future use, development, and subdivision can achieve an appropriate form and design;

5.2.1.3 B2.4 Residential Growth

The provisions under B2.4 Residential Growth focus on ensuring that residential intensification contributes to a well-functioning urban environment and supports a quality compact urban form. It is anticipated that residential growth is focussed within and around centres, along corridors, and in areas with good access to public transport, social facilities, and employment opportunities. Residential areas should be attractive, healthy, and safe, with quality development that reflects the planned built character.

Residential development should also be supported by existing infrastructure or provided with infrastructure at the time of development. Intensification should be avoided where it would adversely affect scheduled natural and physical resources, or where significant natural hazard risks exist, unless those risks can be mitigated. Development should be designed to promote the health, safety, and well-being of communities, with place-based planning tools used to recognise and manage neighbourhood character.

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B2.4 Residential Growth for the following reasons:

- The Proposed Plan Change will provide for increased residential capacity within the existing Pukekohe RUB, where it will be accessible to existing commercial and business activities, including retail and employment opportunities, community and social facilities, and public transport;
- As identified above, future residential development enabled by the proposed MHU zone can be serviced by existing infrastructure;
- The potential risks of natural hazards can be mitigated, including risks in relation to flooding and geotechnical considerations. The potential effects of natural hazards are further discussed at Section 7.0 below; and
- As identified above, the proposed Precinct includes place-based provisions which seek to promote the health, safety, and well-being of communities, and respond to the characteristics of the Plan Change area and the surrounding environment.

5.2.1.4 B2.5 Commercial and Industrial Growth

The relevant provisions under B2.5 Commercial and Industrial Growth seek to ensure that employment and commercial and industrial opportunities are enabled to meet current and future demands, and that commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors. There is an emphasised need to encourage commercial growth and development in centres, and to reinforce the function, role, and amenity of centres, including with respect to their role and purpose within the identified hierarchy of centres.

The proposed Plan Change seeks to rezone land within the Pukekohe RUB to primarily Residential and Open Space zones, and the provisions under B2.5 are not considered to be directly relevant as the proposal will not detract from the existing centres hierarchy. Nonetheless, it is noted that the proposal presents the potential to add to commercial and industrial growth and Objective B2.5(1) is relevant. The following comments are made in this respect:

- There remain existing development opportunities within existing live zoned Business land, including in Sub-Precinct C, which was rezoned through PC30; and
- Auckland Council has prepared the Pukekohe-Paerata Structure Plan 2019 which provides a framework to manage growth within the Pukekohe Future Urban Zone over the next 30 years. The Structure Plan was informed by technical analysis and the Structure Plan Map (Map 3) identifies the following zoning framework for commercial and industrial activities:
 - Commercial growth is reinforced within the existing Pukekohe Business – Town Centre Zone; and
 - New industrial growth areas are identified on land adjacent to the Plan Change area, including on the opposite side of Buckland Road and on the eastern side of the railway corridor.

On this basis, the proposed Plan Change will not compromise opportunities for commercial and industrial growth that have been identified, and is not considered to be contrary to B2.5(1).

5.2.1.5 B2.7 Open Space and Recreation Facilities

The relevant provisions under B2.7 Open Space and Recreation Facilities seek to ensure that recreational needs of people and communities are met through the provision of recreation facilities which contribute to a well-functioning urban environment, while ensuring that reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.

In particular, the relevant policies seek to enable the development and use of existing major recreation facilities and to avoid remedy or mitigate significant adverse effects from the use of recreational facilities on nearby residents and communities.

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B2.7 Open Space and Recreation Facilities for the following reasons:

- The proposed Plan Change seeks to retain the function of Pukekohe Park as a major recreation facility within the Auckland Region. Minor amendments proposed to delete references to motorsport activities, which have effectively ceased to operate since 2023, and to achieve consistency with other Special Purpose – Major Recreation Facility zoned precincts, for example, in relation to the generation of noise. No other amendments are proposed to the provision of other primary, accessory, and compatible activities under Table I434.4.1;
- An approximate 2 hectare area of Open Space – Informal Recreation zone is proposed at the interface of the new MHU zone and existing Pukekohe Park, and will provide a degree of separation between future residential activities, contributing to avoiding potential reverse sensitivity effects; and
- The Proposed Plan Change has been informed by technical Acoustic Assessment. As further discussed at Section 7.0 below, the location of the proposed MHU zone will not unduly constrain or restrict the operation of Pukekohe Park, while the potential noise effects associated from events will maintain a reasonable level of noise to future receiver sites.

5.2.1.6 B3.2 Infrastructure

The provisions under B3.2 Infrastructure focus on ensuring that infrastructure is resilient, efficient, and effective while recognising its benefits to communities, businesses, and the economy. In particular, the provisions seek to ensure that infrastructure planning and land use planning are integrated to efficiently service growth, and to protect infrastructure from reverse sensitivity effects caused by incompatible subdivision, use, and development.

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B3.2 Infrastructure for the following reasons:

- As identified above, future residential development enabled by the proposed MHU zone can be serviced by existing infrastructure; and
- The proposed Plan Change will not alter the use or function of the existing designated site located at 360 Buckland Road.

5.2.1.7 B3.3 Transport

The provisions under B3.3 Transport focus on ensuring that the transport system is effective, efficient, and safe, supporting the movement of people, goods, and services while integrating with a quality compact urban form. The provisions seek to ensure that transport infrastructure enables

growth, facilitates transport choices, supports accessibility and mobility for all sectors of the community, and avoids, remedies, or mitigates adverse effects on the environment, amenity values, and public health and safety.

Transport infrastructure should be designed to integrate with adjacent land uses, taking into account existing and planned intensity, scale, character, and amenity while providing effective pedestrian and cycle connections. Land use and transport should be integrated by ensuring transport infrastructure is planned, funded, and staged to support urban growth, encouraging development patterns that reduce private vehicle trips

The proposed Plan Change is considered to give effect to the relevant objectives and policies under B3.3 Transport for the following reasons:

- As identified above, the proposed Precinct provisions include requirements for transport infrastructure upgrades and contain design guidance on the geometry of new roads to ensure that the future transport network within and immediately adjoining the Plan Change area will support growth and accessibility, while providing for public health and safety;
- The inclusion of the PC30 land covenant transport upgrades into the proposed Precinct provisions will enable those identified transport upgrades to be managed cohesively with the above-mentioned upgrades, which are required to support future residential development; and
- The requirements for transport infrastructure will be informed by the location of future residential development, ensuring that the timing of infrastructure provision can be integrated with the timing of future development.

5.2.1.8 B4.5 Notable Trees

The objective under B4.5 Notable Trees seeks to ensure that trees with significant historical, botanical or amenity values are protected and retained. The policies require that trees or groups of trees be identified and evaluated based on identified factors before being included in Schedule 10 – Notable Trees Schedule. The effects of trees on human health, public safety, property, amenity values, and biosecurity must be taken into account during the evaluation process. Policy B4.5.2(1) and B4.5.2(2) set out the relevant factors for evaluating and identifying notable trees.

The Proposed Plan Change includes amendments to Schedule 10 under the AUP, and seeks to amend ID 2684, which relates to a group of trees within the Plan Change Area, to delete the existing identified trees and include seven new trees. The proposal has been informed by the Arboricultural Report prepared by Greenscene, which included individual assessment of trees within the Plan Change area, and included at Appendix 5. The proposal is considered to give effect to the relevant objective and policies under B4.5 Notable Trees for the following reasons:

- As set out within the Arboricultural Report, the existing group of notable trees included under ID 2684 of Schedule 10 includes a number of inaccuracies¹, and provides for the protection of trees that are not of a quality to meet the existing AUP criteria for scheduling and identification as a notable tree;
- Greenscene has undertaken individual assessment of over 180 trees present within the Plan Change area in order to identify the trees which meet the criteria for scheduling and therefore

¹ For example, the Pin Oaks and Totora listed in the Auckland Council issue information pack are not included in the AUP Schedule, no Beech trees were identified on site, and the identified English Oaks are Algerian Oaks.

warrant identification as a notable tree. Greenscene’s assessment utilised the British Standard BS5837:2012 and Auckland Council’s “Guidelines for Nominating a Notable Tree for Evaluation” document to identify a total of seven trees considered to be suitable for consideration as a notable tree;

- These seven trees were primarily based on their age and health, and visual contribution; and
- The Proposed Plan Change therefore seeks to amend Schedule 10 to incorporate these seven trees and ensure they can be protected in the future. The proposed amendments will improve the accuracy of the Schedule based on recent survey information that has been undertaken.

Further comments with respect to the factors identified under Policies B4.5.2(1) and B4.5.2(2) are set out below. This assessment has also considered in particular in relation to the two groups of trees identified within the proposed Precinct Plan as ‘Amenity Trees’ due to the potential for these trees to meet the relevant factors.

Table 1: Assessment against Policy B4.5.2(1) and B4.5.2(2).

Factor	Comment
a) heritage or historical association: the trees are associated with or commemorate a historic event, have a historic association with a well-known historic or notable figure, have a strong public association, or are strongly associated with a local historic feature and now form a significant part of that feature;	<p>Associated with or commemorate a historic event</p> <ul style="list-style-type: none"> • Pukekohe Park Racecourse was originally established in 1919 as the Franklin Racing Club. Historical aerial imagery (refer to Figure 4 of the Arboriculture Report) suggests the majority of the London plane trees were established around 1941. This is reaffirmed in the report by Paper Street Tree appended to the Arboriculture Report. There is no historical documentation linking the trees to the commemoration of any specific historic event. <p>Have a historic association with a well-known historic or notable figure</p> <ul style="list-style-type: none"> • There is no historical documentation linking the trees to a notable figure. As outlined above, historic aerials suggest that the trees were established following the original establishment of the Racecourse. <p>Have a strong public association, or are strongly associated with a local historic feature and now form a significant part of that feature</p> <ul style="list-style-type: none"> • The trees are not associated with a local historic feature that now forms a significant part of that feature. While groups of London plane trees were planted along the old Great South Road alignment as identified in the Landscape Visual Assessment included as Appendix 10 of the Section 32 Report, this is not considered to be a significant historic element of the site or the broader area as it represents a small section of the original road alignment, the remainder of which has been maintained along the Buckland Road and Manukau Road corridors. • A community day open to the general public was held as part of the engagement and consultation completed prior to the lodgement of the plan change. Greenscene attended the open day to address

Factor	Comment
	<p>proposed amendments to the Notable Tree schedule and the overall open space and landscape strategy. No members of the public raised comments in relation to existing trees at the event, and no written feedback was received identifying their historic importance, or local significance.</p> <p>In addition, there are no features within the existing Pukekohe Park site that are identified under Schedule 14 Historic Heritage Schedule, Statements and Maps of the AUP(OP), recognising that there are no features within the site (that could be associated with existing trees) that would meet the relevant heritage significance criteria.</p> <p>On this basis, the Plan Change area does not contain any trees which are considered to be notable with respect to Policy B4.5(1)(a).</p>
<p>b) scientific importance or rarity: the trees are the largest or only example of a species in Auckland, a significant example of a species rare in the Auckland region, a native species that is nationally or regionally threatened, or have outstanding value because of their scientific significance;</p>	<p>The trees are the largest or only example of a species in Auckland</p> <p>A significant example of a species rare in the Auckland region</p> <ul style="list-style-type: none"> As identified by Greenscene, the trees located within the Plan Change area are London plane, Elm, and Puriri and are not an example of a species rare in the Auckland region. The ‘Amenity Trees’ are not the only example of London plan trees in Auckland, there are at least 676 individual London plane trees within Schedule 10 which makes up approximately 17% of the species in the Schedule. Based on the scoring that Greenscene has undertaken, none of the trees within the Plan Change area are worthy of scheduling due to their size, and the trees are not the largest of their species within Auckland. <p>A native species that is nationally or regionally threatened</p> <ul style="list-style-type: none"> The trees within the Plan Change area are not nationally or regionally threatened. <p>Have outstanding value because of their scientific significance</p> <ul style="list-style-type: none"> The species of trees within the Plan Change area do not have outstanding value because of their scientific significance. <p>On this basis, the Plan Change area does not contain any trees which are considered to be notable with respect to Policy B4.5(1)(b).</p>
<p>c) ecosystem service or environmental function: the trees provide a critical habitat for a threatened species population;</p>	<p>The Ecological Impact Assessment prepared by Viridis (refer to Appendix 11 of the s32 Report) confirms that the ecological value of existing ecological features, including terrestrial connectivity and ecological function,</p>

Factor	Comment
	<p>as 'low'. As such, they are not considered to provide a critical habitat for a threatened species population.</p> <p>On this basis, the Plan Change area does not contain any trees which are considered to be notable with respect to Policy B4.5(1)(c).</p>
<p>d) cultural association and accessibility: the trees demonstrate a custom, way of life or process once common but now rare or in danger of being lost or have been lost; have an important role in defining the community identity and distinctiveness of the community though having special symbolic, spiritual, commemorative, traditional or other cultural value; or represent important aspects of collective memory, identity or remembrance, the meanings of which should not be forgotten;</p>	<p>The trees demonstrate a custom, way of life or process once common but now rare or in danger of being lost or have been lost</p> <ul style="list-style-type: none"> Trees within the Plan Change area do not represent a custom or way of life that is rare. In particular, existing trees are dominated by London plane trees, which are still being planted on Auckland streets and parks today. In the last two years there has been a significant increase of London plane trees being planted by Auckland Council in public places as indicated by recent Urban Ngahere planting programs. <p>Have an important role in defining the community identity and distinctiveness of the community though having special symbolic, spiritual, commemorative, traditional or other cultural value</p> <p>Represent important aspects of collective memory, identity or remembrance, the meanings of which should not be forgotten</p> <ul style="list-style-type: none"> The trees are not considered to define the cultural identity or distinctness of the community and do not have any special symbolic, spiritual, commemorative, tradition or cultural value. As outlined above, a community open day was held prior to the lodgement of this plan change request, and no comments or feedback were received identifying any cultural, symbolic, spiritual, commemorative, or traditional values associated with these trees. <p>In addition, the proposed amendments to the Schedule have been discussed in hui with Ngaati Te Ata Waiohau and Ngāti Tamaoho, and no cultural associations have been identified in relation to the trees which are proposed to be removed from the Schedule.</p> <p>On this basis, the Plan Change area does not contain any trees which are considered to be notable with respect to Policy B4.5(1)(d).</p>
<p>e) intrinsic value: the trees are intrinsically notable because of a combination of factors including size, age, vigour and vitality, stature and form or visual contribution</p>	<p>As identified in the assessment by Greenscene, seven trees within the Plan Change area score highly based on intrinsic values and largely due to their age and health, size, and visual contribution. These trees are therefore proposed to be included in the Notable Tree Schedule based on their intrinsic value, and having particular regard to amenity values as directed under policy B4.5.2(2)(d).</p> <p>The individual trees assessment undertaken by Greenscene did not identify any other trees that scored</p>

Factor	Comment
	<p>high enough to warrant scheduling based on intrinsic value.</p> <p>The following comments are also made with respect to London plane trees, which make up the majority of trees within the Plan Change area:</p> <ul style="list-style-type: none"> • London planes have been planted historically and are still being planted in Auckland streets today mainly due to their size in providing shade and canopy cover, as such given the large size of these trees they are potentially overly represented within the Schedule 10 (approx. 17%) given that they generally dominate their surroundings, as such they usually score highly for their size. • Existing trees within the road reserve, including pin oak trees along Buckland Road, will continue to grow and will over time reduce the visual impact of trees within the Plan Change area when viewed from the public street. • As outlined above, there are over 676 individual London plane trees within Schedule 10 spread across the Auckland Region (including Pukekohe). As identified above, with approximately 3867 separate tree points and groups of trees London planes make up approx. 17% of all Notable trees across Auckland. There are also examples of avenues of large London planes that are not included within Schedule 10 (i.e. Browning Street, Selbourne Street, Castle Street, Nottingham Street and Francis Street in Grey Lynn). London planes have been identified as being in the top 10 species of trees planted within streets in Auckland and within the top ten most common planted park trees in Auckland (Wilcox D, 2012). <p>On this basis, no other trees within the Plan Change area to the seven already identified are considered to be notable with respect to Policy B4.5(1)(e).</p>

For the reasons outlined above, and based on the Arboricultural Assessment undertaken by Greenscene, it is considered that the proposal is consistent with the objectives and policies of the RPS. In particular, the proposed amendments to Schedule 10 will ensure that trees which meet the criteria for protection based on their intrinsic value are retained value. The trees proposed to be deleted from the Schedule do not meet the relevant criteria, as demonstrated through the assessment outlined above against the relevant factors. Overall, the proposed amendments will ensure that trees of qualifying value are protected through the Notable Tree Schedule, while also improving the accuracy of the Schedule by removing trees that are not located on site or do not meet the criteria.

5.3 Strategic Plans

5.3.1 The Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes.

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as:

- Most development occurs in areas that are easily accessible by public transport, walking and cycling;
- Most development is within reasonable walking distance of services and facilities including centres, community facilities, employment opportunities and open space;
- Future development maximises efficient use of land; and
- Delivery of necessary infrastructure is coordinated to support growth in the right place at the right time.

In terms of belonging and participation, the Auckland Plan identifies the following relevant focus areas:

- Focus area 1: Create safe opportunities for people to meet, connect, participate in, and enjoy community and civic life; and
- Focus area 7: Recognise the value of arts, culture, sports and recreation to quality of life.

The Plan Change provides an opportunity to increase residential development capacity within the urban area of the Pukekohe township. The location is serviced by existing public transport and three waters infrastructure. In addition, future residential development will also be within a reasonable walking distance to retail amenities within the existing B-GB Zones surrounding the Plan Change area, and a new neighbourhood park to be provided within the Pukekohekohe Gateway Precinct.

The proposed Plan Change seeks to retain Pukekohe Park as a major recreation facility, ensuring its continued use for thoroughbred horse racing and other major recreation activities. The proposed amendments to Precinct I434 Pukekohe Park Precinct, along with the new Precinct provisions, seek to enable future residential development while ensuring that such development is compatible with the ongoing operation of Pukekohe Park for events and activities that contribute to the social wellbeing of the community.

Overall, it is considered that the Plan Change is generally consistent with the strategic direction of the Auckland Plan, and will contribute to achieving a quality compact approach to urban growth.

5.3.2 Auckland Future Development Strategy

The Auckland Future Development Strategy ('FDS') provides a long-term growth strategy for Auckland looking ahead to 2053. The FDS shows how and where future development will be

provided, promoting a quality-compact, multi-nodal growth model, with a strong focus on adaptation to the effects of climate change, and responding to funding constraints.

The FDS incorporates a strategic framework which identifies spatial outcomes and principles for growth and change which underpin and inform the spatial response. To achieve a well-functioning urban environment with a quality compact urban form, the following principles are identified:

- Principle 1: Reduce greenhouse gas emissions;
- Principle 2: Adapt to the impacts of climate change;
- Principle 3: Make efficient and equitable infrastructure investments;
- Principle 4: Protect and restore the natural environment; and
- Principle 5: Enable sufficient capacity for residential and business growth in the right place at the right time.

Also of relevance to the Plan Change area, the FDS identifies Pukekohe as a key rural node within the Auckland Region, and as the southern anchor node. Under the multi-nodal model illustrated in **Figure 13**, the Pukekohe node seeks to support sub-regional activity, employment, and infrastructure investment while also maintaining rural productivity and productive soils. Growth within the existing urban area of Pukekohe is expected through intensification, consistent with the quality compact approach identified under the Auckland Plan.

The FDS also recognises major investments to the area over the last five years, including rail intensification within the region and express rail to Hamilton to strengthen its connection to nearby Waikato rural towns and settlements.

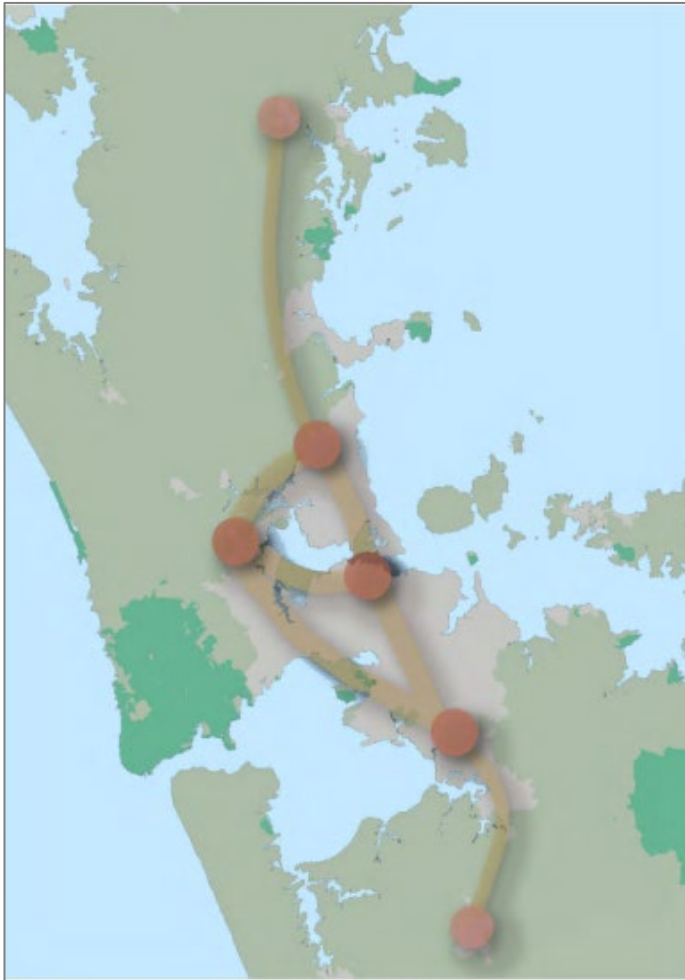


Figure 13: The Multi-nodal model under the FDS where Pukekohe is identified as the southernmost node (source: Auckland Council).

The Plan Change is considered to be consistent with the principles and spatial response identified in the FDS. In particular:

- Enabling the development of this land for residential activities will contribute to enabling intensification and growth within the existing urban area of Pukekohe while protecting the productive capacity of productive soil resources;
- Provision for active mode transport infrastructure to support future development, together with providing for growth within proximity to existing amenities and public transport services, will contribute to encouraging public and active modes of transport to support a reduction in greenhouse gas emissions;
- The SMP has assessed the potential for flood hazards to be exacerbated by climate change to ensure flood resilience. The results of the flood model confirm that within the Plan Change area, future flooding will not pose a risk to development areas or downstream environments;
- The Plan Change will protect and restore the natural environment through the planting, protection and restoration of riparian margins and ecological corridors as well as the protection of seven trees which meet the criteria for inclusion under the AUP Notable Tree schedule; and
- As identified above, the Plan Change will provide additional greenfield capacity in Pukekohe to reduce the concentration of the greenfield land market, which will contribute to improving

affordability. In this case, the provision for residential growth is also within the urban area, and will make efficient use of existing infrastructure.

5.4 Other Plans

Section 74(2A) of the RMA requires a council when considering a Plan Change request, to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

5.4.1 Iwi Planning documents

Engagement correspondence was sent to six Mana Whenua (Ngāi Tai ki Tāmaki, Ngāti Maru, Ngāti Tamaoho, Ngāti Te Ata, Te Ākitai Waiohua, and Waikato – Tainui) identified on Auckland Council's website with a registered interest in the Plan Change area. Of these six Mana Whenua, Ngaati Te Ata Waiohua and Ngāti Tamaoho confirmed their interest in being involved in this project on an on-going basis.

Of these mana whenua, the following iwi management plan has been identified following enquiry to the relevant iwi authorities:

- Ngaati Te Ata Waiohua Tribal Policy Statement 1991

This planning document is assessed below.

5.4.1.9 Ngaati Te Ata Waiohua Tribal Policy Statement 1991

The purpose of this Policy Statement is to lay down the Kaupapa of Ngaati Te Ata, to define procedures for negotiation between Ngāti Te Ata and external agencies, to articulate Ngaati Te Ata tribal policy for external agencies and to identify obligations of external agencies to Ngaati Te Ata.

The 1991 document covers a ten-year planning period which has since passed. However, the key principles and issues that are of importance to Ngaati Te Ata remain relevant.

Section 2 identifies the following kaitiaki objectives:

- (1) Restore the mana of the iwi
- (2) Plan long term usage of taonga
- (3) Protect sensitive features of the environment
- (4) Plan for the provision of kai (including kaimoana) for future generations.

Other key policies of relevance from this document includes that all resource management agencies, shall recognise and provide for the fact that only Ngaati Te Ata has the right to determine what is significant in terms of the Treaty of Waitangi in respect of natural and physical resources and other taonga within its tribal territories.

ATR has held regular hui and invited representatives from Ngaati Te Ata to attend regarding the Plan Change, including with technical specialists as requested. Ngaati Te Ata Waiohua have prepared a Cultural Values Assessment ('CVA') for the Plan Change and it is included as **Appendix 7**.

5.5 Pukekohe-Paerata Paths Plan

The purpose of the Pukekohe-Paerata Paths Plan is to establish an aspirational long-term network of walking, cycling, and bridle paths to enhance connectivity, recreation, and environmental stewardship in the Pukekohe-Paerata area. It aims to improve access to key destinations such as schools, parks, and transport hubs while supporting cultural heritage, ecological restoration, and community well-being. The plan also sets out priority projects to guide future development and secure funding for implementation over the coming years.

Priority Route 3 as illustrated in **Figure 14** below is relevant to the Plan Change. This route is a shared path along Manukau and Buckland Roads, connecting the Pukekohe Township to Buckland. It aims to link Future Urban Areas with the Pukekohe Train Station and local schools, and incorporates Plan Change area. Pukekohe Park is identified as a site of interest along this route, in addition to the Buckland War Memorial, Former Buckland Methodist Church, and St Paul's Anglican Church. The presence of these sites is identified to present an opportunity to form a heritage trail.

The Plan Change makes provision for transport upgrades, including a new 3m shared path along the Buckland Road frontage. Together with other transport upgrades required through plan changes 30 and 87 to the AUP, the Plan Change will contribute to the creation of a shared path along these parts of Manukau and Buckland Roads in accordance with the priority route identified Pukekohe-Paerata Paths Plan.



Figure 14: Priority Route 3 along Manukau and Buckland Roads. Source: Franklin Local Board.

6.0 Consultation and Engagement

The development of the Plan Change was subject to extensive consultation and engagement with a number of persons and organisations, including the following:

- Mana Whenua groups, including Ngāti Tamaoho and Ngaati Te Ata Waiohau;
- Auckland Council and its Controlled Organisations, including Plans and Places, Healthy Waters, Auckland Transport, and Watercare Services Limited;
- KiwiRail;
- The Pukekohe Thoroughbred community, including trainers, owners, farrier jockeys, officials, Counties Racing Members, and Horse Breeders; and
- The local community and general public.

A report summarising consultation and engagement undertaken to date is included as **Appendix 9**. The key outcomes of consultation and engagement undertaken with Mana Whenua, the local community, and general public is summarised below.

6.1 Mana Whenua

In respect to Mana Whenua, engagement correspondence was sent to six Mana Whenua groups identified on Auckland Council's website, in August 2024.

Ngāti Tamaoho and Ngaati Te Ata Waiohū have expressed interest in the Plan Change and have requested ongoing involvement. Written confirmation has also been received from Ngai Tai ki Tāmaki confirming withdrawal from this Kaupapa.

Since then, multiple hui have occurred between the Applicant and the Mana Whenua who are involved in this Plan Change, including a Mana Whenua led cultural induction for all technical specialists involved in the preparation of the Plan Change request, focused hui with subject matter experts and hui to work through the Plan Change request and the Precinct provisions included at **Appendix 2**. Engagement with Mana Whenua will be ongoing both throughout the Plan Change process as well as during future masterplanning, detailed design, resource consenting and construction stages. Cultural Values Assessments have been provided by Ngaati Te Ata Waiohū and Ngāti Tamaoho and are included at **Appendix 7** and **Appendix 8**.

Further detail on engagement with Mana Whenua is contained in the Consultation Summary Report included as **Appendix 9**.

6.2 Local Community and General Public

A public open day and information session was held at Pukekohe Park on Thursday 13 March 2025. The purpose of the session was to provide an introduction to ATR, an overview of the Plan Change area, and the proposed Plan Change, and to seek feedback on the proposal from the local community.

Over 50 people attended the open day, and the key feedback received at the event related to:

- The potential effects that new urban development and impervious areas will have on stormwater and downstream flooding. In particular, numerous attendees raised concerns in relation to historic flood events and existing blockages at the Buckland Road culvert;
- The character and amenity of future residential development, in particular the size of lots and the typology of dwellings;
- General support for naturalisation and enhancement works proposed within the OS-IR zoned area;
- General support for more housing provision in Pukekohe in this location; and
- Potential transport related effects, including congestion along Buckland Road, and the provision of carparking for future residential development.



Figure 15: Community Information Session held at Pukekohe Park on 13 March 2025.

7.0 Assessment of Environmental Effects

Schedule 1, clause 22(1) of the RMA requires an application for a Plan Change to describe the effects of the proposal, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the Plan Change.

7.1 Urban form

A Neighbourhood Design Statement ('NDS') has been prepared by Barker & Associates (refer to **Appendix 10**). The following structuring elements are identified within the proposed precinct plan and will determine the built urban form within the proposed Pukekohekohe Gateway Precinct:

- The identification of an efficient and connected internal block structure that encourages non-vehicular modes of transport, and provides for active mode connections to connect the site with surrounding amenities;
- The identification of and responding to key site characteristics and interfaces including mature trees, views to natural features and the racecourse;
- The inclusion of a landscape and built form treatment to reinforce key "gateway" locations to the Plan Change area and wider Pukekohe area;
- The identification of an indicative neighbourhood park that integrates with mature trees and maintains connections to the stream network and associated open spaces; and
- The identification of existing streams and riparian margins which will integrate with the development and provide stormwater, ecology, landscape amenity functions and recreational links for pedestrians and cyclists. These open space linkages enable accessibility and permeability across the community while ensuring the local waterway network remains integral to the local landscape.

The proposed precinct assessment criteria seek to ensure that the above key features and elements are delivered at the time of future subdivision and development. Overall, it is considered

that the Plan Change will enable the development of positive urban form outcomes that contribute to a quality compact urban form and well-functioning urban environment.

7.2 Landscape and Visual Amenities

A Landscape and Visual Assessment ('LVA') has been undertaken by Barker & Associates to support the Plan Change and is included as **Appendix 11**.

In the context of the existing Pukekohe Racecourse and peri-urban environment, it is important to note that any urban development will alter the existing landscape. However, the LVA considers the Plan Change will result in a low magnitude of effect on landscape values as most key landscape features are retained, and the susceptibility of the landscape to change. With respect to visual effects, the LVA also considers the overall level of effect to be low due to distance, low sensitivity to change and screening and softening provided by buildings and vegetation.

The LVA identifies a series of principles to underpin land use development within the proposed Pukekohekohe Gateway Precinct which have informed the development of the Plan Change provisions. **Table 2** below sets out how the Proposed Plan Change or operative AUP provisions address the principles identified in Section 5 of the LVA.

Table 2: Assessment of landscapes principles.

Landscape Principle	Relevant Provision
Where practicable, allow for views from the development to local geological features such as Pukekohe Hill, the Pukekohe East Explosion Crater and Bombay Hills.	<ul style="list-style-type: none"> • Activity IX.4.1 (A2); and • Assessment Criteria IX.8.2(1)(c).
Create a legible development layout that is broadly consistent with existing Pukekohe development patterns. Explore opportunities to integrate the future development with the surrounding area through open spaces and pedestrian and cycle movement networks.	<ul style="list-style-type: none"> • Activity IX.4.1 (A2); • Assessment Criteria IX.8.2(1)(a); • Precinct Plan 1 which identifies the indicative key local road network which will inform the design and layout of future blocks; • Policy E38.3(10); and • Assessment Criteria E38.12.2(7)(a).
Respect the underlying Pukekohe geology and topography through contour-sensitive development and minimisation of retaining structures.	<ul style="list-style-type: none"> • Policies E38.3(3), E38.3(14).
Create gateways that signal the main entrance to the Site and create a sense of arrival on the approach to Pukekohe from the south.	<ul style="list-style-type: none"> • Policy IX.3(2)(b); • Activity IX.4.1(A1); • Assessment Criteria IX.8.2(p); and • Precinct Plan 1 which identifies the location of Mahi Toi at the southern gateway.
Enhancement of ecological values through the integration of wetlands, streams, and riparian areas into a cohesive open space network. This will provide for stormwater management and enhanced ecology whilst contributing to	<ul style="list-style-type: none"> • Policies IX.3(2)(b), IX.3(9); and • Standard IX.6.4.

Landscape Principle	Relevant Provision
recreational opportunities visually softening views of the future development from the surrounding area.	
Streetscape and private lot planting to provide visual screening and the overall visual softening of new built-form.	Private lot planting and landscaping <ul style="list-style-type: none"> • Policy H5.3(2); and • Standard H5.6.11. Streetscape planting <ul style="list-style-type: none"> • Detailed design process at Engineering Plan Approval stage.
Where practicable, retention of existing trees within the Site and along Buckland Road.	Trees within the Plan Change area <ul style="list-style-type: none"> • Policy IX.3(6)(a); and • Assessment Criteria IX.8.2(1)(k); and • Precinct Plan which identifies amenity tree. Trees along Buckland Road <ul style="list-style-type: none"> • Chapter E17 Trees in Roads of the AUP.

The LVA concludes that the proposed MHU area is well positioned to accommodate the proposed development and enabled by this Plan Change, with the bespoke provisions set out in **Appendix 1**. Overall, it is considered that the proposed provisions will ensure that development consistent with the MHU zone is enabled, while responding to adjacent land users, key site characteristics and the natural environment. This sensitive response to the receiving environment will lead to a high-quality urban environment.

7.3 Ecology

An Ecological Impact Assessment ('EclA') prepared by Viridis has been undertaken to support the Plan Change and is included as **Appendix 12** to this report. This includes an assessment of ecological values of terrestrial and freshwater ecosystems. A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site.

7.3.1 Terrestrial Ecology

Vegetation within the Plan Change area (as identified in **Figure 16** below) is highly modified and largely mown grass and amenity plantings, with limited areas of native vegetation, which can be divided into the following categories:

- Exotic trees dominant;
- Christmas tree plantations;
- Native vegetation dominant;
- Weedy vegetation / rank grass; and
- Mown grass, covering the majority of the Plan Change area.

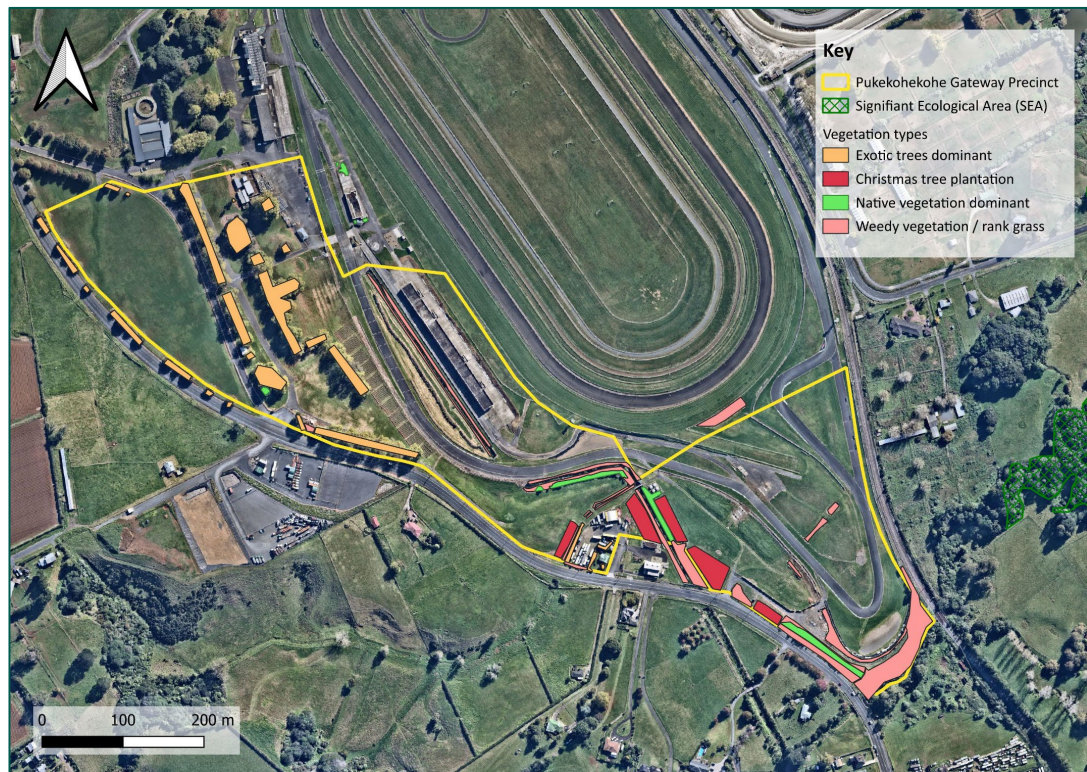


Figure 16: Vegetation map showing vegetation types and locations within the proposed MHU and OS-IR zones.
 Source: Viridis.

Overall, terrestrial ecological values within the Plan Change area are limited due to the small number of trees and shrubs present on the site, the dominance of exotic vegetation, with the key terrestrial ecological values being associated with potential fauna habitats. The ecological assessment does not identify any existing vegetation that would qualify as threatened or at risk, and there are also no SEAs within the Plan Change area.

Due to the significantly modified nature of the land form, it is considered that the effects of future development on terrestrial ecology and biodiversity values can be appropriately managed under the existing Auckland wide provisions of the AUP for land disturbance and any modification to or removal of vegetation.

In relation to the proposed amendments to Schedule 10 Notable Tree Schedule, Greenscene have undertaken an arboricultural assessment of the Plan Change area (refer to **Appendix 6**) and have identified that what has been scheduled under the Notable Tree Overlay is not accurate in terms of the species, numbers and locations of trees on the site. As such, Greenscene have surveyed and assessed every tree within the Plan Change area against the British Standard BS5837:2012 and Auckland Council Notable Tree Evaluation Guidelines to identify which trees are worthy of protection under the Notable Tree Overlay.

They conclude that only seven trees² scored over the threshold for protection under the Notable Tree Schedule, and accordingly that Schedule 10 Notable Trees is amended to include only those seven trees. In addition, 20 trees³ which did not meet the threshold for scheduling under the

² Trees 30, 62, 66, 69, 142, 152 and 153

³ 17 London Planes and three Elm trees

Notable Tree Schedule are also identified within the proposed Precinct provisions to be protected where practicable for character and amenity reasons.

Bird species identified within the site and within the local area comprise of common and exotic species typical across Auckland. While two At-Risk conservation bird species could be present on the site (pipit and red billed gull), due to the lack of suitable nesting or coastal habitat, neither of these species are likely to be present on site.

Areas of rank grass, weedy vegetation and debris could contain native skink species, however numbers of native skinks surveyed was very low. Future development of the Plan Change area (via resource consents) will require a consideration of potential impacts on native lizards, where adverse effects on native lizard populations can be mitigated through conditions of consent requiring lizard management plans.

With respect to bats, while the ecological value of the site for bats is considered to be low, there is the potential for a loss of low-quality bat habitat if larger trees with suitable cavities are removed. Assessment of effects on bats will be required at the resource consent stage, and where appropriate, conditions with respect to bat management will mitigate potential adverse effects.

The Precinct provisions provide considerable potential to restore and improve the quality and extent of habitats within the Plan Change area via the proposed riparian planting standard.

Overall, it is considered that the proposed Plan Change will not create adverse effects on terrestrial ecological values.

7.3.2 Freshwater Ecology

Viridis have undertaken an assessment of potential freshwater ecological effects that may result from future development. The Plan Change area includes a network of streams as shown in Figure 3 earlier, including:

- The Tutaenui stream, a permanent stream located at the south-eastern boundary;
- Two permanently flowing tributaries of the Tutaenui stream (Watercourses 1 and 2) which run through the centre of the Plan Change area and which have been extensively modified and impacted by channel modifications and piping; and
- Four intermittent artificial streams, constructed for drainage purposes (Watercourses 3, 4, 5 and 6).

The Plan Change will enhance the existing streams and the habitat that they provide. In particular the proposed riparian planting rule will require 10m of planting either side of permanent and intermittent streams within the Plan Change area (as shown in Precinct Plan 2 at **Figure 8** above).

Activities in relation to development near intermittent and permanent streams will require assessment at the resource consent stage in accordance with the provisions of the AUP and NES-FW. It is considered that the application of these provisions will be appropriate for managing adverse effects and mitigating / offsetting where required.

There are no natural inland wetlands within the Plan Change area or the wider site. Any natural inland wetlands within 100m of the Plan Change area are located upgradient of the site, and therefore unlikely to be adversely impacted by future development of the site.

The proposed stormwater management approach has been assessed by Viridis to be appropriate in terms of maintaining stream and wetland values, improving water quality and managing the quantity and quality of stormwater discharge.

Overall, it is considered that the effects of the urbanisation of land within the Plan Change area can be appropriately managed with regard to the ecological values of freshwater bodies.

7.4 Cultural Values

Engagement has been undertaken with all Mana Whenua groups with known customary interests in the Plan Change area. The consultation report at **Appendix 9** includes details on the results of this engagement to date.

It is noted that there are no known identified Sites of Significance or Value to Mana Whenua within the Plan Change area, as recorded under the AUP(OP).

As identified above, two Iwi groups have confirmed their interest in being involved, including Ngāti Tamaoho and Ngaati Te Ata Waiohua, and both groups have prepared a Cultural Values Assessment.

Discussions between ATR, Ngāti Tamaoho and Ngaati Te Ata Waiohua will be ongoing, in particular as ATR commence the master planning of the Plan Change area. Discussions regarding the most appropriate stormwater management approach for the site will also be ongoing and collaborative with Mana Whenua. ATR seeks the most appropriate stormwater and flooding strategy for the site, which will ensure that flooding hazards during extreme storm events, and water quality are appropriately managed, both for the site and areas downstream of the site.

Ngaati Te Ata Waiohua have identified the following key recommendations through their Cultural Values Assessment (refer to **Appendix 7**) that are particularly relevant to the Plan Change:

- Protect natural features and include retention and enhancement plans for existing waterways and wetlands in the masterplan;
- Undertake comprehensive archaeological and iwi cultural assessment to identify wāhi taonga on-site;
- Daylight and naturalise at least 500m of piped waterways and integrate riparian planting;
- Establish biodiversity corridors connecting waterways, wetlands and open spaces;
- Design open spaces that incorporate cultural narratives, including traditional uses of the land and align with Te Aranga principles;
- Design transport systems that encourage walking, cycling and public transport; and
- Incorporate design elements, such as carved pou, cultural motifs and traditional planting.

Ngāti Tamaoho note in the addendum to their Cultural Values Assessment that the Plan Change area sits within the cultural landscapes of the Ngāti Tamaoho rohe, which are of utmost cultural, spiritual, traditional and historical importance to the people of Ngāti Tamaoho. The addendum identifies areas of cultural significance to Ngāti Tamaoho, which include Pukekohe/Patumahoe (being the heartland of the Ngāti Tamaoho rohe), Te Awanui O Taikehu to the north and east and Pukekohekohe maunga to the south-west of the Plan Change area. Ngāti Tamaoho express that any effects and impacts of the development enabled by the Plan Change can be managed and mitigated with proper consultation and engagement with the iwi.

Ngāti Tamaoho have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Plan Change (refer **Appendix 8**):

- ATR to meaningfully engage with Ngāti Tamaoho governance and kaitiaki to provide for outcomes sought through the CVA;
- Consider the establishment of a dry basin to address any wastewater overflows;
- Incorporation of taller plants for shading of streams;
- Cultural Induction and Cultural Monitoring when pre-earthworks meetings commence;
- Overland flow paths to remain, Ngāti Tamaoho do not support piping of intermittent streams;
- Stormwater management that uses low impact green infrastructure, incorporates re-use of roof water for non-potable reuse, applies a treatment train approach and as few pipes as possible used only to convey stormwater under a road or path; and
- Undertake the restoration and enhancement of degraded waterways, promoting a 20m setback for all streams and eco-sourcing trees and plants.

ATR confirm that meaningful engagement will be ongoing with Mana Whenua throughout the duration of development within the Plan Change area to address the recommendations identified in the Cultural Values Assessments. Input will be sought from mana whenua at all stages of future development to manage potential effects on cultural values and heritage sites, and to enhance the natural environment.

These recommendations have been considered and adopted in developing the Plan Change where possible, particularly via the commitment to native planting of the riparian margin, requirements for stormwater systems to meet GD01 (or to achieve an equivalent level of contaminant or sediment removal performance as GD01) and enabling of Mahi Toi Cultural Structures. We also note that the wastewater servicing strategy, informed by technical input from Woods, is considered to be the Best Practicable Option. The AUP Auckland-wide provisions along with the proposed riparian planting and stormwater quality rules will manage freshwater quality. Further, the Plan Change presents an opportunity to restore and enhance the terrestrial, aquatic and freshwater quality values in the Plan Change area.

7.5 Transport

An Integrated Transport Assessment ('ITA') has been prepared by CKL for the Plan Change and is included as **Appendix 13** to this report.

The existing road and transport environment of the Plan Change area is characterised by:

- Buckland Road is a two-way, two-lane arterial road which runs along the western boundary of the Plan Change area. Buckland Road has a road corridor width between 20-35m, no footpath or cycling facilities and has a posted speed limit of 80km/hr which reduces to 50km/hr on approach to the Pukekohe and Buckland townships to the north and south, respectively. Kitchener Road (described below) intersects Buckland Road at a priority-controlled T-intersection to the north of the Plan Change area. Buckland Road will accommodate all vehicular traffic related to development within the Plan Change area, and is designated under the AUP as an arterial road, with Auckland Transport as the Road Controlling Authority;

- Manukau Road is a two-way, two-lane arterial road that connects to Buckland Road as the northern leg of the Kitchener Road/Buckland Road/Manukau Road priority-controlled intersection. Manukau Road has a road corridor width of approximately 12.6m, footpaths on both sides of the road corridor and a posted speed limit of 50km/hr;
- Kitchener Road is a two-way, two-lane road corridor providing an east-west connection between Manukau Road/Buckland Road at its eastern end and Towles Road/Blake Road at its western end. Kitchener Road has a road corridor width of 20m with footpaths provided on the entire length of the northern side of the road and a footpath on the southern side to the west of the Tuakau Road intersection; and
- The NIMT line runs along the north-eastern boundary of the Plan Change area.

It is proposed to provide staged vehicular access and active mode connections to the Plan Change area in response to the location of development within the Plan Change area.

The ITA indicates that all vehicle accesses to the Plan Change area will be provided off Buckland Road in the general locations identified in **Figure 8** above. The ITA recommends that the following access locations are provided before any future dwellings can be occupied in the Sub-precincts A and B outlined in rows (a) and (b) of Table 1 below. In addition to the staged vehicular access, the ITA also recommends that the following active mode connections outlined in rows (c) and (d) of Table 1 below are provided. These are aligned with the locations of development/occupancy within the Plan Change area, ensuring that efficient and safe active mode connections from the Plan Change area to surrounding amenities and other active mode facilities are provided.

In addition, the ITA identifies the transport upgrades required in relation to the PC30 land (sub-precinct C), which are outlined in Table 2 below. These upgrades are consistent with the requirements of the existing covenant relating to this land.

Table 3: Staging of Transport Upgrades in Sub-precinct A and Sub-precinct B.

Column 1 Activities or development enabled by Transport Infrastructure in column 2		Column 2 Transport infrastructure required to enable activities or development in column 1	
(a)	Prior to the occupancy of any new building within Sub-Precinct A	(i)	Provision of a roundabout with a formal pedestrian crossing facility across Buckland Road generally in the location shown in IX.10.1 Precinct Plan 1.
(b)	Prior to the occupancy of any new building within Sub-Precinct B	(i)	Provision of a priority-controlled intersection with a right-turn bay from Buckland Road, generally in the location shown in IX.10.1 Precinct Plan 1.
(c)	Prior to the occupancy of any new building within Sub-Precinct A or Sub-Precinct B	(i)	Provision of a 3m shared (walking and cycling) path along the eastern side of Buckland Road between the roundabout required in (a) and the southern boundary of the Precinct, as shown in IX.10.1 Precinct Plan 1; and
		(ii)	Provision of the southern refuge island crossing generally in the location shown in IX.10.1 Precinct Plan 1.
(d)	Prior to the occupancy of any new building within Sub-Precinct A and Sub-Precinct B	(i)	Provision of the active mode connection between Sub-Precinct A and Sub-Precinct B, generally in the location shown in IX.10.1 Precinct Plan 1.

Table 4: Staging of Transport Upgrades in Sub-Precinct C.

Column 1 Activities or development enabled by Transport Infrastructure in column 2		Column 2 Transport infrastructure required to enable activities or development in column 1	
(a)	Prior to the occupancy of any new building within Sub-Precinct C	(i)	Provision of a 1.8m footpath along the eastern side of Manukau Road for the extent of the Sub-Precinct C frontage north of the intersection of Kitchener Road with Manukau Road and Buckland Road, as shown in IX.10.1 Precinct Plan 1; and
		(ii)	Provision of a new pedestrian refuge generally in the indicative location of

		pedestrian refuge and bus stops shown in IX.10.1 Precinct Plan; and (iii) Provision of new bus stops on the east and west side of Manukau Road in the indicative location of pedestrian refuge and bus stops shown in IX.10.1 Precinct Plan 1.
(b)	Occupied development generating more than 75 vehicle movements per hour turning right out of a single access from Sub-Precinct C	(i) Provision of a single-lane roundabout at the intersection of Kitchener Road with Manukau Road and Buckland Road (northern intersection), generally in the location shown in IX.10.1 Precinct Plan 1, and including the necessary street lighting as part of the urban transition on the southern approach to the roundabout.

The ITA has demonstrated that the extent of development enabled by the proposed new residential zones can be accommodated within the surrounding road network, subject to the proposed transportation upgrades and vehicle access and active mode requirements. The inclusion of provisions relating to the PC30 land will enable the relevant transport upgrades to be managed cohesively.

The proposed precinct provisions include specific standards, matters of control and assessment criteria and special information requirements to ensure that the required transportation upgrades and vehicle accesses are provided in an integrated manner at the time of future development.

Overall, it is considered that the proposed Plan Change will enable the potential effects of on the existing and future transportation to be appropriately managed.

7.6 Infrastructure and servicing

The proposed stormwater management strategy and Stormwater Management Plan ('SMP') is set out in the assessment prepared by Woods, included as **Appendix 3** of this report.

The Plan Change area is located within the RUB and is serviced by existing reticulated infrastructure. The wastewater and water supply servicing strategy within the Plan Change area is set out in the Infrastructure Assessment Report prepared by Woods, included as **Appendix 5** of this report.

7.6.1 Stormwater Management

The SMP has been developed in accordance with the AUP, the requirements in the Network Discharge Consent ('NDC'), and in consultation with Healthy Waters. It is proposed that the SMP will be adopted into the region-wide stormwater Network Discharge Consent and provisional approval for the SMP will be sought during the plan change process.

The findings of the SMP are that the impacts on stormwater management – quality from the land use change from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban can be managed through the incorporation of a water sensitive design approach.

The SMP identifies the best practicable options for managing the quality of stormwater runoff as the elimination and minimisation in the generation of contaminants for all contaminant generating impervious surfaces via:

- Treatment to be provided for all impervious areas to GD01/TP10 treatment levels, consistent with the NDC; and
- A requirement to avoid high contaminant generating roof and cladding materials for all new buildings.

The proposed Plan Change includes provisions for stormwater quality treatment in accordance with the recommendations of the SMP and best practice. The proposed approach to managing stormwater quality will ensure that stormwater runoff from new impervious areas that has the potential to adversely affect waterways will be appropriately managed.

Hydrology mitigation is proposed to be implemented for all impervious areas to mitigate increased stormwater runoff associated with the proposed development. The development discharges to a stream environment (Tutaenui Stream) as shown in **Figure 17** below. It is proposed that the development will provide for the 95th percentile rainfall event, in accordance with the Schedule 4 of the NDC for 'Large Brownfield Development' sites.

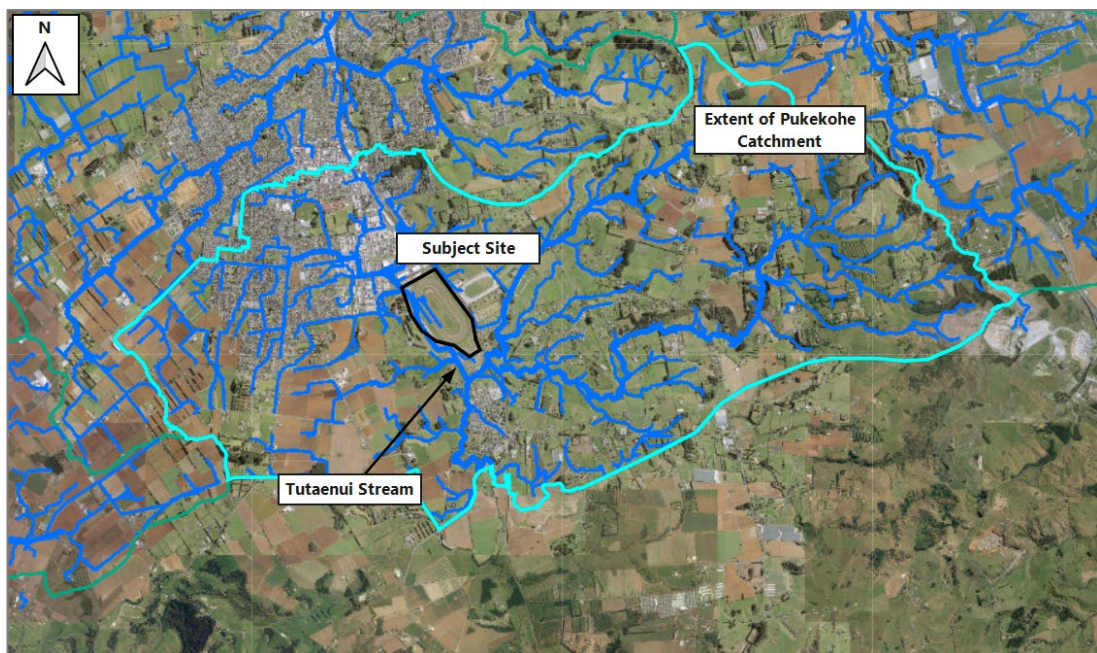


Figure 17: Map showing receiving environments. Source: Woods.

The SMP identifies the following devices as the best practicable options for meeting retention and detention requirements:

- Retention
 - Retention or re-use will be proposed for roofs via underground or above ground tanks. This volume of water will be used for non-potable uses.
 - Retention to ground for driveways, patios and other paved area via underground tanks.
 - Where retention to ground is not feasible, the retention volume will be included in the detention volume.

- Retention for public roads will be provided via communal wetlands sized and designed in accordance with GD01.
- Detention
 - Detention for roof areas and paved surfaces on individual lots and JOALs will be provided for via detention tanks and communal wetlands sized and designed in accordance with GD01.
 - Detention for runoff from public roads will be provided for via communal wetlands sized and designed in accordance with GD01.

SMAF 1 hydrology mitigation will be applied across the Plan Change area, and the SMAF 1 overlay is proposed through this Plan Change and will apply to the Pukekohekohe Gateway Precinct and 360 Buckland Road.

The findings of the SMP are that the stormwater management approach outlined above will result in hydrological mitigation that is consistent with Policy E1.3.10. The application of the SMAF 1 overlay will ensure that specific mitigation measures as set out within the SMP will be considered as part of a future resource consent process. This will enable an assessment of proposed options for managing the quality of stormwater runoff in the context of a particular development proposal.

Overall, it is considered that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas, to ensure aquatic ecosystems remain healthy and are enhanced where possible.

7.6.2 Wastewater Servicing

The assessment by Woods identifies that the wastewater servicing of the Plan Change area will be split into two wastewater catchments, with Sub-Precinct A utilising the existing 525mm diameter wastewater main and Sub-Precinct B utilising the existing 900mm diameter wastewater main as discharge points (refer to **Figure 18**). Both mains are gravity fed and connect to the Pukekohe Pump Station at 360 Buckland Road. Accordingly, future development within the Plan Change area is able to be serviced in terms of wastewater.



Figure 18: Wastewater servicing strategy proposed. Source: Woods.

7.6.3 Water Supply

The assessment by Woods confirms that there is an existing 150mm diameter public water supply main that runs through Buckland Road and Manukau Road to the west of the site, as well as an additional 800mm diameter/100mm diameter water supply main on the opposite side of Buckland Road (refer to Figure 19). WSL have also confirmed that a new bulk supply and transmission/distribution upgrade on the site or wider servicing plan in the Pukekohe Park Racecourse area will be provided. Based on the assessment by Woods, development within the Plan Change area can be serviced in terms of potable water supply.

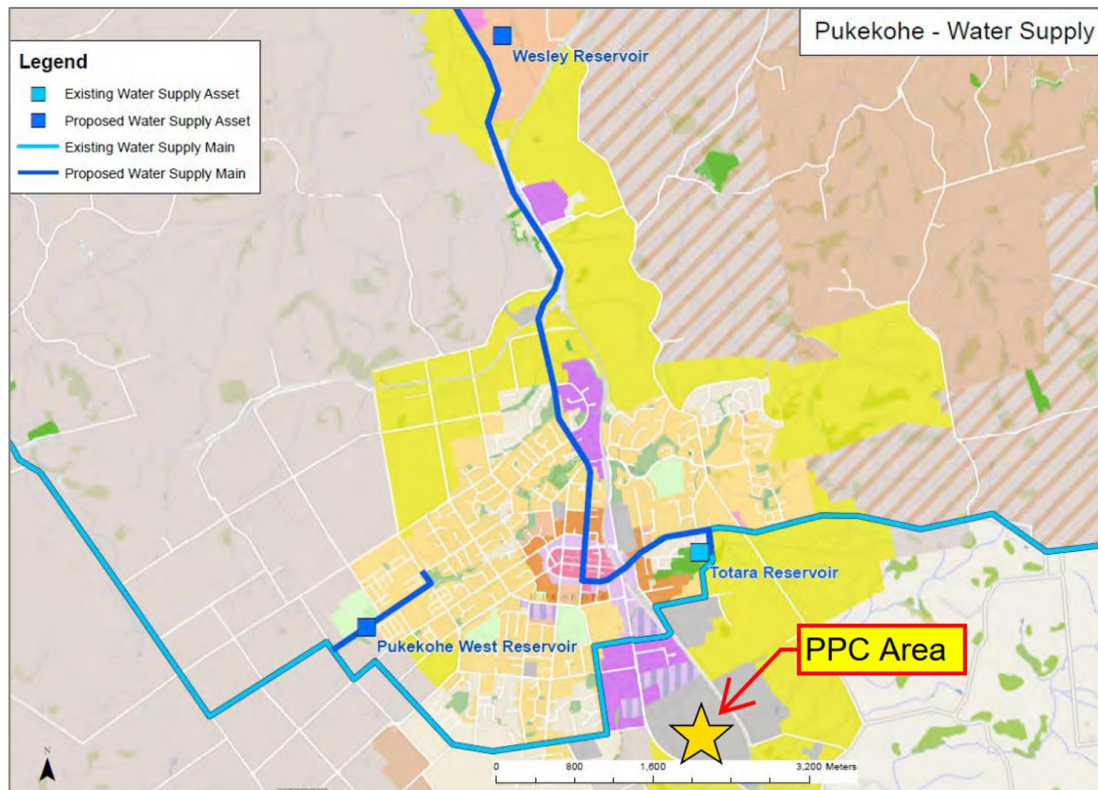


Figure 19: Water supply servicing strategy. Source: Woods.

7.6.4 Other Utilities

In terms of telecommunications, Woods confirm in their assessment that there is existing fibre reticulated through Buckland Road, adjacent to the western boundary of the site. A letter from Chorus has been provided confirming that the UFB fibre can be extended to service the Plan Change area.

In terms of power supply, there is also existing power reticulation through Buckland Road, adjacent to the western boundary of the site. Counties Energy have provided a letter of support confirming there is adequate existing power supply within the existing infrastructure for up to 500 dwellings within the Plan Change area.

Based on the above, development within the Plan Change area is able to be serviced in terms of power and telecommunications.

7.7 Natural Hazards

7.7.1 Flooding

The Plan Change area is identified on Auckland Council's GIS mapping system as being subject to overland flow paths and flood plains, and flood prone areas (refer to **Figure 20**). The SMP includes a flood risk assessment of the Plan Change area to identify any flooding effects associated with development of the Plan Change area and whether there is any need to provide flood mitigation measures.

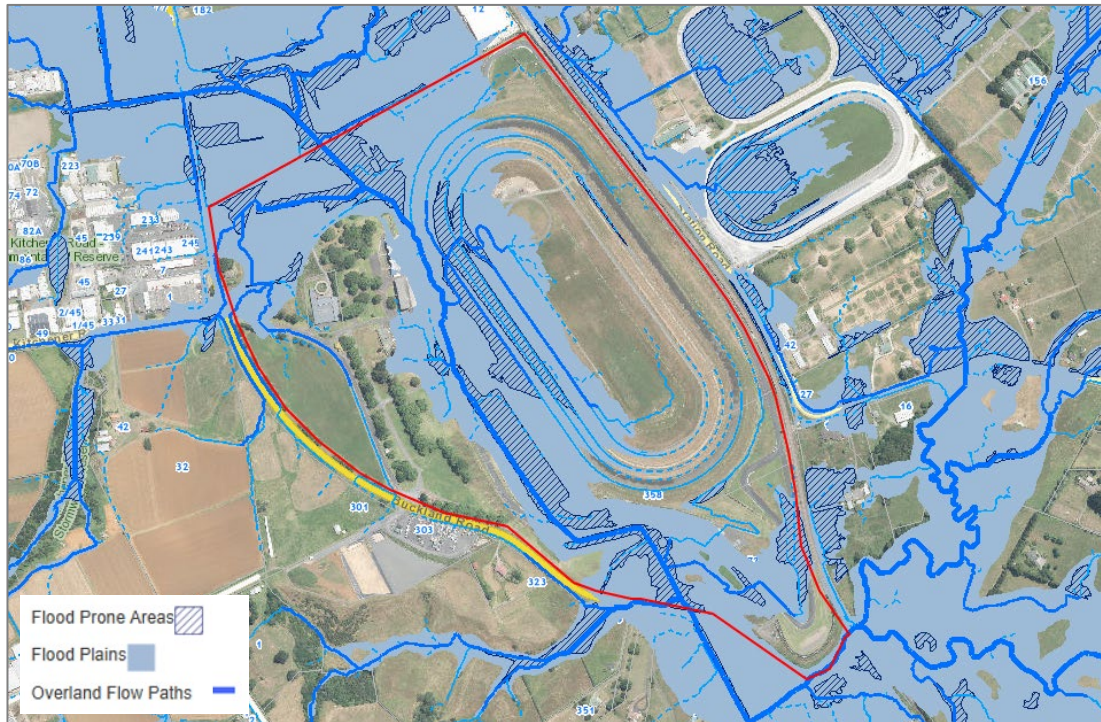


Figure 20: Aerial showing overland flow paths, flood prone areas and flood plains in the Plan Change area.
Source: Auckland Council.

The flood modelling undertaken uses the 3.8°C climate change assumptions to ensure flood resilience, which exceeds the current Auckland Council Stormwater Code of Practice requirement of 2.1°C. The flood strategy set out in the SMP is to utilise natural attenuation available within the site resulting from the stream naturalisation works. The model results show that post-development flooding of the Plan Change area, in this conservative climate change scenario, would not pose a risk to either upstream or downstream development areas, with sufficient storage capacity provided within the site for all modelled scenarios.

Based on the above, it is considered that development within the Plan Change area will not result in any adverse flood effects upstream or downstream of the Plan Change area.

7.7.2 Geotechnical

The landform within the Plan Change area typically comprises land which is very gently to gently sloping from the racecourse, up to Buckland Road on the western site boundary. Elevational changes within the site are generally in the order of 1-2m, with isolated low points in stormwater swales up to 5m below the surrounding area. In the southern portion, the land falls to the Tutaenui Stream.

A preliminary geotechnical assessment, including field investigation, has been undertaken by ENGEO and their report is included as **Appendix 14**. Their assessment identifies a number of geotechnical risks, primarily related to consolidation settlement and expansive soils. Notwithstanding, ENGEO confirms that these areas can be remediated and appropriately developed for the intended residential land uses following specific investigation.

Overall, the ground conditions within the Plan Change area have been assessed as being suitable for residential development and stable building platforms, with no areas presenting significant risk.

It is therefore considered that any geotechnical constraints can be addressed through future site-specific investigations to inform the detailed design and development of land.

Based on these findings, it is considered that the land conditions are generally suitable for urban development and can be appropriately managed through the resource consent process and the provisions of Chapter E36 Natural Hazards and Flooding of the AUP.

7.8 Land Contamination

A Preliminary Site Investigation ('PSI') has been undertaken by ENGEO and is included as **Appendix 15**. This PSI identifies that based on historic land uses, there is potential for contamination associated with site activities classified under the Hazardous Activities or Industries List ('HAIL'). Detailed Site Investigations under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('NESC') and AUP will be required at the time future development.

Resource consent requirements under the NESC and AUP would ensure that a Site Management Plan or Remediation Action Plan is prepared at the time of resource consent for subdivision or development. This will demonstrate how the works will be managed to ensure that any land disturbance and urban use of the land avoid and mitigate adverse effects on the environment and human health.

ENGEO concludes that the conversion of land with the identified HAIL activities is not uncommon and the presence of those activities does not make the land unsuitable for a future change of use in activity.

It is therefore considered that there is a high level of confidence that the Plan Change area can accommodate a change in land use activity and that the potential adverse effects of land contamination can be appropriately managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.

7.9 Heritage and Archaeology

An archaeological assessment of the Plan Change area has been prepared by Archaeology Solutions and is included as **Appendix 16**. There are no existing records of archaeological or other historic heritage sites being recorded within the Plan Change area, with the two recorded sites closest to the Plan Change area being European heritage sites related to the railway (refer to Figure 21).

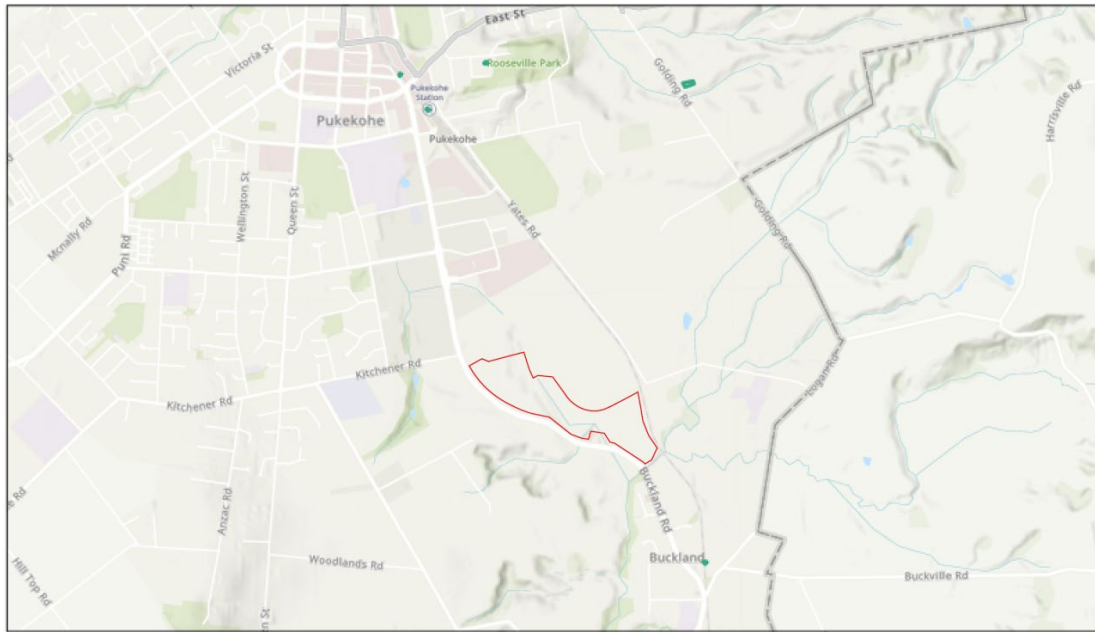


Figure 21: Recorded archaeological sites within the vicinity of the proposed MHU and OS-IR zones. Source: ArchSite.

Archaeology Solutions have undertaken a site survey of the Plan Change area, and no new archaeological sites were discovered. The assessment identifies there is the small potential for archaeological sites to be encountered within the racecourse area within the Plan Change area, related to the storage of wooden tools and taonga in the wetland.

It is therefore considered that the potential for encountering archaeological sites and cultural features as part of future earthworks and land disturbance, and any associated adverse effects on archaeological and cultural values can be suitably managed by the accidental discovery protocols contained in the AUP. These measures will ensure that archaeological values within the Plan Change Area are appropriately discovered, identified and acknowledged or recorded.

7.10 Noise and Vibration

An assessment of the potential noise and vibration effects associated with the Plan Change proposal has been prepared by Styles Group, included as **Appendix 17**.

The key conclusions and recommendations of their assessment are summarised below:

- Future residential development can be appropriately protected from noise effects from horse racing events occurring within the adjacent MRF zone through the application of the proposed general noise and special noise event standards within I434 Pukekohe Park Precinct;
- The establishment of new residential zoning is unlikely to give rise to any noise constraints and associated reverse sensitivity effects on activities in the adjacent Business – General Business zone;
- The AUP includes existing provisions which manage noise generated from the LIZ zone to a receiving residential zone. These provisions will apply following the proposed rezoning, and will provide for an acceptable level of amenity for new residential receivers;

- Additional requirements for acoustic treatment are recommended for activities located within 55m of the centreline of Buckland Road are recommended for all activities sensitive to noise located within 100m of the railway corridor;
- The application of a Vibration Alert Layer 60m from the NIMT. This is because the AUP does not include equivalent provisions for activities located within close proximity to the rail corridor. Styles Group consider that the Vibration Alert Layer will ensure that activities/future residents are aware of the higher than normal vibration levels experienced within 60m of the NIMT; and
- An additional requirement for buildings to be setback at least 5m from the NIMT, which will protect both the health and safety of future residents and protect the operation of the NIMT.

In addition, the following is noted in relation to the provision of future residential development within the proposed MHU zone adjoining the Pukekohe Park Precinct:

- As identified above and in the acoustic assessment, the proposed general noise and special noise standards are considered appropriate to provide ongoing protection of amenity values for future residents; and
- In addition, the allowance of up to five special noise events with a noise limit of 75dB LAeq(5min) and up to 15 special noise events with a noise limit of 65dB LAeq(5min) will ensure that Pukekohe Park can continue to be used as a venue for horse racing and events and continue to grow and adapt to the evolving needs of ATR and the thoroughbred horse racing industry. This seeks to recognise the findings of the 2018 Messara Report which sought to revitalise the racing industry in New Zealand.

The recommendations of Styles Group are proposed to apply in the precinct provisions included as **Appendix 2**.

Overall, it is considered that potential noise and vibration effects associated with the proposed Plan Change can be appropriately managed.

8.0 Section 32 Analysis

8.1 Appropriateness of the Proposal to Achieve the Purpose of the Act

Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives of the Plan Change are the most appropriate way to achieve the purpose of the RMA.

8.1.1 Objectives of the Plan Change

The purpose of the overarching objectives of the Plan Change is to enable the development of a sustainable and comprehensively planned residential community, that supports a well-functioning urban environment and a quality compact built form. The proposed precinct provisions will enable primarily medium-density residential development that integrates with the existing Pukekohe urban area, the Pukekohe Park Precinct, the natural environment and respects Mana Whenua values, while providing Open Space – Informal Recreation zone along the stream channel providing for enhancement opportunities.

The Plan Change area is also strategically located close to existing transport links and future residential and commercial growth within the surrounding live zoned and Future Urban zoned land. The location of the Plan Change area will ensure that future residents are located close to employment opportunities, commercial and social amenities, and transport infrastructure.

The proposed precinct incorporates objectives to guide development within the Plan Change area to achieve the following outcomes:

- The development of the Plan Change area will achieve a high-quality, comprehensively developed residential urban environment;
- Provision for Mana Whenua values are recognised and provided for;
- Development is coordinated with the provision of transport infrastructure;
- Adverse effects of stormwater runoff are minimised or mitigated;
- The protection, restoration, enhancement and maintenance of ecological habitats within the Plan Change area including riparian margins is achieved;
- The protection of people's health and amenity where activities sensitive to noise are located adjacent to the railway corridor; and
- Activities sensitive to noise located adjacent to the railway corridor does not unduly constrain the operation of the NIMT.

8.1.2 Assessment of the Objectives

In accordance with Section 32(1)(a), **Table 5** below provides an evaluation of the objectives of the plan change.

Table 5: Assessment of objectives against Part 2 of the RMA.

Objective	RMA s5 Purpose	RMA s6 Matters of National Importance	RMA s7 Other Matters	RMA s8 Treaty of Waitangi
Theme 1: Achieving integrated and quality development				
(1) Pukekohekohe Gateway Precinct is a comprehensively developed residential environment that integrates with the existing Pukekohe urban area and the natural environment, and is compatible with the activities enabled and expected within the adjacent Pukekohe Park Precinct.	The emphasis of the proposed objectives on achieving a comprehensively developed and integrated residential environment which integrates with the existing Pukekohe Urban area, the Pukekohe Park Precinct and the natural environment in a way which enables a safe and functional residential development will enable future communities of the Pukekohekohe Gateway Precinct to meet their social, economic, and cultural well-being. These objectives will ensure the built environment meets the reasonably foreseeable needs of future generations in accordance with s5(2)(a).	This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.	The objectives have regard to the maintenance and enhancement of amenity values and the quality of the environment in accordance with s7(c), through: <ul style="list-style-type: none">Seeking to achieve a comprehensively developed residential environment that integrates with the surrounding area.Seeking to achieve a safe and functional integrated residential development.Seeking to achieve a distinctive sense of place which responds to the natural environment and landform.	These objectives will not be contrary to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
(3) Pukekohekohe Gateway Precinct is subdivided and developed in a comprehensive and integrated way which enables a safe and functional residential development.				
(4) Development within Pukekohekohe Gateway Precinct creates a distinctive sense of place, which responds to natural features, landform, the unique characteristics of the adjacent Pukekohe Park Precinct which is a regionally and nationally important venue for horse racing.				
Theme 2: Mana Whenua				
(2) Development within the Pukekohekohe Gateway Precinct protects and respects the cultural values held by Ngaati Te Ata Waiohua and Ngāti Tamaoho, including their relationships with the ancestral lands, water, and wider cultural landscape.	Through respecting mana whenua values of the Plan Change area, the intrinsic values of the site and area are maintained for current and future generations.	S6(e) requires that the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga is recognised and provided for. It is considered that the proposed objective supports this.	The objective seeks to respect Mana Whenua values in accordance with s7(a), while enabling the efficient use and development of land outside of these areas (per s7(b)).	This objective is considered to appropriately account for the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
Theme 3: Transport Infrastructure				
(8) Access to, from and within the precinct for all modes of transport occurs in an effective, efficient and safe manner while managing adverse effects of traffic generation on the surrounding road network.	Through seeking the provision of safe and efficient access to, from and within the precinct for all transport this objective will ensure that the quality of the built environment meets the reasonably foreseeable needs of the community and future generations.	These objectives do not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of existing objectives which will appropriately manage any potential conflict between matters of national importance and infrastructure.	This objective does not compromise the recognition of, or the provision of other matters under section 7 of the RMA.	These objectives will not be contrary to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
(9) Development is coordinated with the availability of operational transport infrastructure.	The coordination of development and transport infrastructure will ensure that development occurs in a sustainable manner through ensuring that there is adequate infrastructure to service urban development and avoid or mitigate potential adverse effects on the receiving environment.		This objective does not compromise the recognition of, or the provision of other matters under section 7 of the RMA. In particular the alignment of transport infrastructure and land use planning will ensure development makes efficient use of land as a physical resource in accordance with section 7(b).	
Theme 4: Natural Environment				
(5) Stormwater quality and quantity is managed to avoid, as far as practicable, or minimise or mitigate adverse water quality or flooding effects on the receiving environment.	The emphasis of the proposed objectives is on the protection and enhancement of natural and ecological features as well as	These objectives recognise and provide for the preservation of the natural character of freshwater features and their margins	This objective has particular regard to the effects of the quality of receiving waters through ensuring that stormwater quality	These objectives will not be contrary to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Objective	RMA s5 Purpose	RMA s6 Matters of National Importance	RMA s7 Other Matters	RMA s8 Treaty of Waitangi
	the downstream adverse effects on receiving water bodies will ensure that the natural resources within the Plan Change area are sustained for future generations.	through ensuring the maintenance and enhancement of the ecological values within stream habitats.	is managed to avoid, minimise or mitigate water quality or flooding effects on the receiving environment.	
(6) Ecological values within stream habitats are protected, restored, maintained and enhanced.			Through the protection, restoration and enhancement of ecological values within stream habitats, the objective has regard to the intrinsic value of ecosystems (section 7(d)) and the maintenance and enhancement of the quality of the environment (section 7(f)).	
Theme 5: Activities Sensitive to noise adjacent to the rail corridor				
(7) Activities sensitive to noise adjacent to the rail corridor and Buckland Road are designed to protect people’s health and residential amenity while they are indoors, and in a way which does not unduly constrain the operation of the railway corridor or roads.	<p>Through managing activities sensitive to noise to protect people’s health and amenity, will ensure the built environment meets the reasonably foreseeable needs of future generations in accordance with s5(2)(a).</p> <p>Through not unduly constraining the operation of the railway corridor, this objective will provide for the ongoing operation of physical infrastructure resources to meet the reasonably foreseeable needs of future generations in accordance with s5(2)(a).</p>	This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.	Through managing activities sensitive to noise to protect people’s health and amenity, this objective has regard to the maintenance and enhancement of amenity values in accordance with s7(c).	This objective will not be contrary to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

8.2 Appropriateness of the Provisions to Achieve the Objectives

8.2.1 The Objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions (i.e. policies and methods) of the Plan Change are the most appropriate way to achieve its objectives by:

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

As the Plan Change is amending the AUP, the above assessment must relate to the provisions and objectives of the Plan Change, and the objectives of the AUP to the extent that they are relevant to the Plan Change and would remain if the Plan Change were to take effect.

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA on the basis of key themes relevant to the proposed Plan Change. The objectives relevant to each theme are identified below.

8.2.2 Other Reasonably Practicable Options for Achieving the Objectives

8.2.2.1 Theme 1: Zoning of Pukekohekohe Gateway Precinct Sub-Precinct A and Sub-Precinct B

The existing AUP and proposed precinct objectives which have particular relevance for Theme 1 include:

- B2.2.1(1A) 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;
- B2.2.1(1) A well-functioning urban environment with quality compact urban form that enables all of the following: (a) a higher quality environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) good accessibility for all people, including by improved and more efficient public or active transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; (g) reduced adverse environmental effects; and (h) improved resilience to the effects of climate change;
- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change;
- B2.4.1(1) Residential intensification contributes to a well-functioning urban environment and supports a quality compact urban form;
- B2.4.1(3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification; and

- B2.4.1(4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland’s diverse and growing population.
- IX.2(1): Pukekohekohe Gateway Precinct is a comprehensively developed residential environment that integrates with the existing Pukekohe urban area and the natural environment, and is compatible with the activities enabled and expected within the adjacent Pukekohe Park Precinct.
- IX.2(2): Development within the Pukekohekohe Gateway Precinct protects and respects the cultural values held by Ngaati Te Ata Waiohua and Ngāti Tamaoho, including their relationships with the ancestral lands, water, and wider cultural landscape.
- IX.2(3): Pukekohekohe Gateway Precinct is subdivided and developed in a comprehensive and integrated way which enables a safe and functional residential development.

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




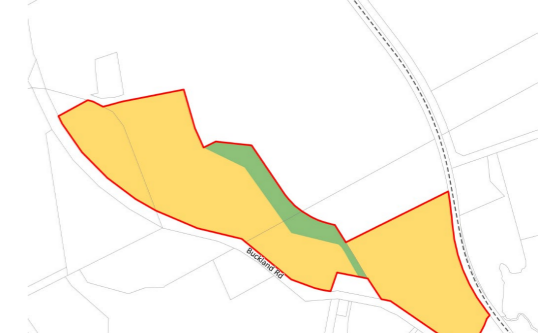
- Option 1 - Status quo
 - This option retains the status quo, being the retention of the Special Purpose – Major Recreation Facility zone
- Option 2 – Apply Residential – Mixed Housing Urban and Open Space – Informal Recreation zones to the Sub-Precincts
 - This option applies the Residential – Mixed Housing Urban zone to the majority of the Sub-Precincts, with an area of Open Space – Informal Recreation Zone applied to the stream naturalisation area
- Option 3 – Apply Residential – Terrace Housing and Apartment Building and Open Space Informal Recreation zones to the Sub-Precincts
 - This option applies the Residential – Terrace Housing and Apartment Building (‘THAB’) zone to the majority of the Plan Change area, with an area of Open Space – Informal Recreation Zone applied to the stream naturalisation area
- Option 4 – Apply Residential – Mixed Housing Suburban zone and Open Space Informal Recreation zones to the Sub-Precincts
 - This option applies the Option 4 – Apply Residential – Mixed Housing Suburban (‘MHS’) zone to the majority of the Plan Change area, with an area of Open Space – Informal Recreation Zone applied to the stream naturalisation area

Table 6 below evaluates these options against the requirements of section 32(1)(b).

Conclusion

It is considered that the most appropriate option is Option 2, where the proposed Plan Change applies the Residential – Mixed Housing Urban and Open Space – Informal Recreation zones to the Plan Change area.

Table 6: Theme 1 evaluation of options

	Option 1 – Status quo: retain Special Purpose – Major Recreation Facility Zone	Option 2 – Proposed Plan Change: apply MHU and OS-IR zones	Option 3 – Apply THAB and OS-IR zones	Option 4 – Apply MHS and OS-IR zones
Description of option	<p>This option retains the status quo, being the retention of the Special Purpose – Major Recreation Facility zone.</p> 	<p>This option applies the MHU zone to the majority of the Sub-Precincts, with an area of OS-IR zone applied around the existing watercourse.</p> 	<p>This option applies the THAB zone to the majority of the Sub-Precincts, with an area of OS-IR zone applied around the existing watercourse.</p> 	<p>This option applies the MHS to the majority of the Sub-Precincts, with an area of OS-IR zone applied around the existing watercourse.</p> 
Benefits				
<i>Environmental</i>	<p>This option will retain the character of the existing environment within Pukekohe Park.</p>	<p>This option will enable the Pukekohekohe Gateway Precinct area to be developed for residential activities, with future use and development undertaken in accordance with the anticipated outcomes of the MHU zone. This includes a planned urban built character of up to three storey buildings, and quality amenity outcomes in relation to future on-site occupants, neighbouring sites, and the street. This option will also achieve a consistent zoning pattern with residential land located on the opposite side of Station Road and adjacent to the north east (Pukekohe Golding Precinct).</p>	<p>This option will enable the Pukekohekohe Gateway Precinct area to be developed for residential activities and will ensure that future use and development is in accordance with the anticipated outcomes of the THAB zone under the AUP(OP). This includes an urban built character of up to five storey buildings, and quality amenity outcomes for residents and the street.</p>	<p>This option will enable the Pukekohekohe Gateway Precinct area to be developed for residential activities and will ensure that future use and development is in accordance with the anticipated outcomes of the MHS zone. This includes a planned urban built character of up to two storey buildings, and quality amenity outcomes in relation to future on-site occupants, neighbouring sites, and the street.</p>
<i>Economic</i>	<p>This option will enable the ongoing operation of Pukekohe Park, however, the land located within the Pukekohekohe Gateway Precinct is not currently utilised to support thoroughbred horse racing activities or any accessory activities or events.</p>	<p>This option will enable the efficient use of land within the Pukekohekohe Gateway Precinct for residential activities and will provide choice with flexibility in lot size and dwelling typologies in accordance with the MHU zone. As detailed in the Economic Assessment (Appendix 4), a proposed residential zoning within this location will contribute to a more competitive greenfield market within Pukekohe and a downward pressure on house prices. In addition, it is identified that masterplanned development outcome such as what would be enabled within the Plan Change area are able to produce a wide range of dwelling types at different price points.</p>	<p>This option will enable the efficient use of land within the Pukekohekohe Gateway Precinct for residential activities and will provide for the greatest extent of residential capacity and building height. As detailed in the Economic Assessment (Appendix 4), a proposed residential zoning within this location will contribute to a more competitive greenfield market within Pukekohe and a downward pressure on house prices. In addition, it is identified that masterplanned developments such as what would be enabled within the Plan Change area can produce a wide range of dwelling types and for different prices.</p>	<p>This option will enable the use of land within the Pukekohekohe Gateway Precinct for residential activities and will provide for some flexibility in terms of lot size and dwelling typologies in accordance with the MHS zone. As detailed in the Economic Assessment (Appendix 4), a proposed residential zoning within this location will contribute to a more competitive greenfield market within Pukekohe and a downward pressure on house prices.</p>
<i>Social</i>	<p>This option will retain the existing use of Pukekohe Park, with no change to the regulatory planning framework, which may be preferred by some members of the community.</p>	<p>The MHU zone will allow for a variety of dwelling typologies, including detached dwellings, terrace housing and low-rise apartments (up to three storeys) that will contribute to increasing housing supply and choice in Pukekohe. This option will enable more people to live within the urban area of Pukekohe, which is serviced by existing public transport, retail offering, employment opportunities, and community and social facilities.</p>	<p>The THAB zone will allow for dwelling typologies, including a focus on terrace housing and apartments (generally up to five storeys), and will enable the greatest increase to housing supply. This option will enable more people to live within the existing urban area of Pukekohe, which is serviced by existing public transport, retail offering, employment opportunities, and community and social facilities.</p>	<p>The zoning pattern will allow for detached and attached housing (up to two storeys) that will contribute to housing supply in Pukekohe. This option will enable more people to live within the existing urban area of Pukekohe, though not to the extent as Options 2 and 3. The inclusion of the OS-IR zone will also contribute to increased amenity values for future residents.</p>

Option 1 – Status quo: retain Special Purpose – Major Recreation Facility Zone		Option 2 – Proposed Plan Change: apply MHU and OS-IR zones	Option 3 – Apply THAB and OS-IR zones	Option 4 – Apply MHS and OS-IR zones
		The inclusion of the OS-IR zone will also contribute to increased amenity values for future residents and establishing separation with the thoroughbred racing activities.	The inclusion of the OS-IR zone will also contribute to increased amenity values for future residents.	
<i>Cultural</i>	There is no change to the cultural environment through this option.	The Plan Change area includes artificial and modified permanent and intermittent streams that flow to or are tributaries to the Tutaenui stream which is understood to hold cultural value to mana whenua. The application of OS-IR will ensure the scale of development is managed adjacent to these features.	The Plan Change area includes artificial and modified permanent and intermittent streams that flow to or are tributaries to the Tutaenui stream which is understood to hold cultural value to mana whenua. The application of OS-IR will ensure the scale of development is managed adjacent to these features.	The Plan Change area includes artificial and modified permanent and intermittent streams that flow to or are tributaries to the Tutaenui stream which is understood to hold cultural value to mana whenua. The application of OS-IR will ensure the scale of development is managed adjacent to these features.
Costs				
<i>Environmental</i>	This option will not facilitate the redevelopment of the Plan Change area for residential activities, and there is likely to be no change or improvement to the visual appearance or amenity values associated with the land located within the Pukekohekohe Gateway Precinct.	<p>This option will enable the redevelopment of the Plan Change area for residential activities, which has the potential to change the character of the surrounding environment and generate reverse sensitivity effects with the adjoining MRF zone.</p> <p>However, the potential effects of future development will be managed by the provisions of the MHU zone and Auckland-wide chapters of the AUP, as well as the proposed provisions in the Pukekohekohe Gateway Precinct. In addition, as assessed in the Acoustic Assessment included as Appendix 17, it is anticipated that the MRF zone can continue to generate noise that is compliant with the maximum noise limits provided for within the MRF zone. Pukekohe Park is anticipated to operate in a similar manner to other comparable precincts which interface with residential zones, including Ellerslie Racecourse Precinct and Avondale Racecourse Precinct. Further, the future open space will establish a separation buffer between the future residential activities and MRF zone activities.</p>	This option will enable the redevelopment of the site for residential activities which has the potential to change the character of the surrounding environment and generate reverse sensitivity effects with the adjoining MRF zone.	This option will enable the redevelopment of the site for residential activities which has the potential to change the character of the surrounding environment and generate reverse sensitivity effects with the adjoining MRF zone.
<i>Economic</i>	This option does not enable the efficient use of land resources and creates opportunity costs for the development of land that is no longer required to support the operational requirements or purpose of the MRF zone.	This option would displace a small amount of MRF zoned land. However, as identified, this land is not currently utilised to support thoroughbred horse racing activities or any accessory activities or events.	<p>As detailed in the in the Economic Assessment (Appendix 4), demand for apartment typologies in the Pukekohe-Paerata area is generally limited, with new dwelling supply being primarily stand-alone and terrace typologies. As the THAB zone has an emphasis on terrace housing and apartments rather than standalone, this option is likely to be less responsive to local market demands when compared to Options 2 and 4</p> <p>This option would also displace a small amount of MRF zoned land. However, as identified, this land is not currently utilised to support thoroughbred horse racing activities or any accessory activities or events.</p>	<p>This option would limit the range of housing types and price points in comparison to Options 2 and 3 and does not provide for the most efficient use of this land and infrastructure, which presents an opportunity to enable a masterplanned development that could produce a wide range of dwelling types and prices. In particular, the MHS zone will provide for lesser flexibility in terms of built form outcomes and housing typologies due to the provisions of the underlying zone.</p> <p>This option would also displace a small amount of MRF zoned land. However, as identified, this land is not currently utilised to support thoroughbred horse racing activities or any accessory activities or events.</p>
<i>Social</i>	This option will not enable redevelopment opportunities to provide housing supply and choice within Pukekohe.	The development of land within the Pukekohekohe Gateway Precinct for residential activities may not be in keeping with the expectations of some members of the community.	The development of land within the Pukekohekohe Gateway Precinct for residential activities may not be in keeping with the expectations of some members of the community.	The development of land within the Pukekohekohe Gateway Precinct for residential activities may not be in keeping with the expectations of some members of the community.

Option 1 – Status quo: retain Special Purpose – Major Recreation Facility Zone		Option 2 – Proposed Plan Change: apply MHU and OS-IR zones	Option 3 – Apply THAB and OS-IR zones	Option 4 – Apply MHS and OS-IR zones
			The THAB zone also provides for a greater intensity of development and has a lesser focus on the detached or standalone dwellings, which are predominantly in demand by the local market. This option therefore does not provide for the social needs of the community to the extent as Options 2 and 4.	This option will provide for less housing variety and choice in comparison to Option 2.
<i>Cultural</i>	There is no change to the cultural environment through this option.	The development of land within the Pukekohekohe Gateway Precinct to accommodate new residential activities has the potential to create adverse effects on cultural values.	The development of land within the Pukekohekohe Gateway Precinct to accommodate new residential activities has the potential to create adverse effects on cultural values.	The development of land within the Pukekohekohe Gateway Precinct to accommodate new residential activities has the potential to create adverse effects on cultural values.
Efficiency effectiveness achieving objectives	and in the This option is not efficient and effective in achieving the objectives, including B2.3.1(1), B2.4.1(3), and the relevant proposed objectives of the Pukekohekohe Gateway Precinct. Retaining the MRF zone will not enable the use of existing urban land to accommodate residential development, and the built environment will be less capable of adapting to changing needs.	This option is efficient and effective in achieving the objectives, including B2.2.1(1A), B2.2.1(1), B2.3.1(1), B2.4.1(4), and the relevant proposed objectives of the Pukekohekohe Gateway Precinct. Applying the MHU zone will enable the development of this land for a range of residential activities, contributing to meeting housing demands in Pukekohe and enabling people and communities to provide for their social wellbeing. This option will also enable a quality-built environment which responds to the intrinsic qualities of the site through the application of the OS-IR zone over the existing waterbody and providing for a scale and form of development that can integrate with the existing urban environment. The MHS zone will enable a diverse mix of choice and opportunity for people with respect to housing typology, and will ensure the built environment can adapt to changing needs. It also provides for the efficient use of infrastructure where there is capacity available to support urban development.	This option is less efficient and effective in achieving the objectives, B2.2.1(1A), B2.2.1(1), B2.3.1(1), B2.4.1(4), and the relevant proposed objectives of the Pukekohekohe Gateway Precinct. While applying the THAB zone will enable the development of this land for residential activities, the provision for higher density terrace housing and apartment typologies is likely to be less responsive to local market demands.	This option less efficient and effective in achieving the objectives, including B2.2.1(1A), B2.2.1(1), B2.3.1(1), B2.4.1(4), and the relevant proposed objectives of the Pukekohekohe Gateway Precinct. Applying the MHS zone will enable less flexibility in built form outcomes and less diversity and range housing choice in comparison to Option 2.
Summary	Option 2 is the preferred option, and it is considered that the application of the MHU and OS-IR zones is the most efficient and effective option in achieving the relevant objectives, particularly in relation to providing for the necessary capacity to accommodate additional residential demand and improve competitiveness within Pukekohe’s urban area and market, while making efficient use of infrastructure capacity. Overall, it is considered the benefits of zoning the Plan Change area to MHU outweigh the potential costs associated with the loss of a small portion of MRF zoned land.			

8.2.2.2 Theme 2: Integrated and High Quality Development in the Pukekohekohe Gateway Precinct

The existing AUP and proposed precinct objectives which have particular relevance for Theme 2 include:

- B2.2.1(1A): 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;
- B2.3.1(1) A well-functioning urban environment with a quality built environment where use and development respond to the intrinsic qualities and physical characteristics of the site and areas, including its setting, contribute to a diverse mix of choice and opportunity for people and communities, maximise resource and infrastructure efficiency, are capable of adapting to changing needs; and has improved resilience to the effects of climate change;
- B2.3.1(3) The health and safety of people and communities are promoted;
- B2.7.1(1): Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities which contribute to a well-functioning urban environment;
- B3.2.1(5): Infrastructure planning and land use planning are integrated to service growth efficiently
- B3.3.1(1): Effective, efficient and safe transport that supports the movement of people, goods and services, integrates with and supports a quality compact urban form, enables growth, avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities, and facilitates transport choices.
- IX.2(1): Pukekohekohe Gateway Precinct is a comprehensively developed residential environment that integrates with the existing Pukekohe urban area and the natural environment and is compatible with the activities enabled and expected within the adjacent Pukekohe Park Precinct.
- IX.2(2): Development within the Pukekohekohe Gateway Precinct protects and respects the cultural values held by Ngaati Te Ata Waiohua and Ngāti Tamaoho, including their relationships with the ancestral lands, water, and wider cultural landscape.
- IX.2(3): Pukekohekohe Gateway Precinct is subdivided and developed in a comprehensive and integrated way which enables a safe and functional residential development.
- IX.2(4): Development within Pukekohekohe Gateway Precinct creates a distinctive sense of place, which responds to natural features, landform, the unique characteristics of the adjacent Pukekohe Park Precinct which is a regionally and nationally important venue for horse racing.
- IX.2(5): Stormwater quality and quantity is managed to avoid, as far as practicable, or minimise or mitigate adverse water quality or flooding effects on the receiving environment.
- IX.2(6): Ecological values within stream habitats are protected, restored, maintained and enhanced.
- IX.2(7): Activities sensitive to noise adjacent to the rail corridor and Buckland Road are designed to protect people's health and residential amenity while they are indoors, and in a way which does not unduly constrain the operation of the railway corridor or roads.

- IX.2(8): Access to, from and within the precinct for all modes of transport occurs in an effective, efficient and safe manner while managing adverse effects of traffic generation on the surrounding road network.
- IX.2(9): Development is coordinated with the availability of operational transport infrastructure.

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

- Option 1 – Status quo – rely on the Auckland-wide and MHU zone provisions under the AUP.
- Option 2 – Proposed Pukekohekohe Gateway Precinct provisions.

Table 7 below evaluates these options against the requirements of section 32(1)(b).

Conclusion

It is considered that the most appropriate option is Option 2.

Table 7: Theme 2 evaluation of options.

	Option 1: Status quo – rely on Auckland-wide and MHU zone provisions	Option 2: Pukekohekohe Gateway Precinct provisions
Description of option	<p>Development and subdivision, the provision of new transport infrastructure, and the management of stormwater and riparian margins are managed by the provisions contained in the Auckland-wide and MHU zone chapters.</p> <p>The AUP does not include provision which require acoustic attenuation in close proximity to the railway corridor.</p>	<p>The proposed Pukekohekohe Gateway Precinct includes a bespoke set of provisions to guide development and subdivision, including:</p> <ul style="list-style-type: none"> Objectives and policies to ensure future development is integrated with the existing Pukekohe urban area, the Pukekohe Park Precinct, and the natural environment. Objectives and policies which recognise Mana Whenua values, a rule which provides for Mahi Toi Cultural Structures, and a special information requirement to ensure that consultation with Ngaati Te Ata Waiohua and Ngāti Tamaoho is undertaken for all land disturbance activities which require resource consent under the AUP; Objectives, policies, and standards which require acoustic attenuation to ensure activities sensitive to noise in close proximity to the railway corridor and arterial roads are designed to protect the health and safety of future occupants; Objectives, policies, and standards which require transport infrastructure to be provided at the time of development in specified locations, and which provide guidance on the design and geometry of new roads; Objectives, policies, and standards which promote stormwater management in accordance with a water sensitive approach and improvements to water quality, ecological habitat, and biodiversity; and Associated matters of discretion and assessment criteria.
Benefits		
<i>Environmental</i>	The potential effects of and use, development, and subdivision are managed by the underlying provisions in the AUP.	The bespoke precinct provisions will manage the potential effects of use, development, and subdivision, and will support a built form which responds to the qualities and characteristics of the proposed MHU area and surrounding environment.
<i>Economic</i>	A less complex set of planning provisions will apply. Plan users are also familiar with the operative portions of the AUP, resulting in cost efficiencies in relation to implementation and monitoring.	The provisions will enable the development of a high quality residential development, and associated economic benefits.
<i>Social</i>	Existing rules are retained and community expectations are maintained.	Expectations and requirements for future development under the proposed Precinct can be clearly set out for members of the community.
Cultural	Cultural values are managed by the underlying provisions in the AUP.	The proposed precinct provisions have been developed in consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohua. Provisions have been included to recognise and protect cultural values associated with existing whenua and awa, the maunga within the wider surrounding environment (Pukekohe Hill), and the prominence of the southern part of the proposed MHU area as the southern gateway to Pukekohe.
Costs		
<i>Environmental</i>	There would be no requirements to manage or deliver the outcomes provided for within the proposed Pukekohekohe Gateway Precinct.	This option will not result in any environmental costs.
<i>Economic</i>	Some costs associated with the implementation of the existing AUP provisions, however the provisions will be consistent with the operative Plan.	There are costs associated with implementing the proposed precinct provisions compared to Option 1.
<i>Social</i>	This option does not facilitate a quality built environment to the same extent as Option 2, through the inclusion of the proposed precinct provisions, resulting in greater social costs to the community.	This option may reduce the availability of land for development and the quantity of housing that can be provided within the proposed MHU area.
<i>Cultural</i>	This option does not recognise cultural values within the Plan Change area to the same extent as Option 2.	This option will not result in any cultural costs.
Efficiency and effectiveness in achieving the objectives	This option is less efficient and effective in achieving the objectives, including B2.2.1(1A), B2.3.1(1), B2.3.1(3), and the proposed objectives of the Pukekohekohe Gateway Precinct. Although the underlying provisions of the AUP will manage use, development, and subdivision to achieve a well-functioning urban environment and quality built environment, this option does not include specific place-based provisions to ensure the Precinct is developed in a comprehensive and integrated way. In addition, the operative AUP does not include requirements for acoustic attenuation to ensure that the design of	This option is most efficient and effective in achieving the objectives, including B2.2.1(1A), B2.3.1(1), B2.3.1(3), and the proposed objectives of the Pukekohekohe Gateway Precinct as the provisions seek to manage use, development, and subdivision to respond to the qualities and characteristics of the proposed MHU area and surrounding environment, including the adjacent Pukekohe Park. The proposed provisions will also require acoustic attenuation will promote the health and safety of future residents in relation to activities sensitive to noise located in close proximity to the railway corridor.

Option 1: Status quo – rely on Auckland-wide and MHU zone provisions		Option 2: Pukekohekohe Gateway Precinct provisions
	buildings for activities sensitive to noise will protect the health and safety of future occupants in relation to noise associated with the railway corridor.	
Summary	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to enable the comprehensive development of the Pukekohekohe Gateway Precinct will require quality built form outcomes that respond to the qualities and characteristics of the proposed MHU are and the surrounding environment. It is considered that the economic costs associated with implementation of the proposed provisions in addition to the AUP are outweighed by the significant environmental, social, and cultural benefits.	

8.2.2.3 Theme 3: Trees

The existing AUP objectives which have particular relevance for Theme 3 include:

- B4.5.1(1): Notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained; and
- D13.3(1): Notable trees and notable groups of trees are retained and protected from inappropriate subdivision, use and development.
- IX.2(4): Development within Pukekohekohe Gateway Precinct creates a distinctive sense of place, which responds to natural features, landform, the unique characteristics of the adjacent Pukekohe Park Precinct which is a regionally and nationally important venue for horse racing.

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

- Option 1 – Status quo – retain the existing Notable Tree overlay over the Plan Change area, and rely on the information contained under ID 2684 under Schedule 10.
- Option 2 – Proposed amendments to Schedule 10 to delete ID 2684 in its entirety and include seven new individual trees, as shown at **Appendix 2**.

Table 8 below evaluates these options against the requirements of section 32(1)(b).

Conclusion

It is considered that the most appropriate option is Option 2.

Table 8: Theme 3 evaluation of options.

Option 1: Status quo – retain Schedule 10 Notable Tree Schedule in relation to ID 2684		Option 2: Proposed amendments to Schedule 10 Notable Tree Schedule and application of the Pukekohekohe Gateway Precinct
Description of option	Retain ID 2684 under Schedule 10 Notable Tree Schedule, which identifies a group of trees located at Lot 2 DP 337473 and Lot 2 DP 100207, and includes Elm, Plane, Puriri, English Oak, and Common Beech species.	Amend Schedule 10 Notable Tree Schedule to delete ID 2684 in its entirety and include seven new trees of the following species: <ul style="list-style-type: none"> Himalayan Cedar (x2); Holm Oak (x2); Algerian Oak (x2); and Strawberry Tree (x1). Refer to the Arboricultural Assessment prepared by Greenscene and included as Appendix 6 for further details on the above trees. Identify within the Pukekohekohe Gateway Precinct 20 trees to be protected where practicable for amenity value.
Benefits		
<i>Environmental</i>	Will protect the existing group of notable trees identified within Lot 2 DP 337473 and Lot 2 DP 100207 and located within the western side of the Plan Change area in accordance with the operative provisions of the AUP and Chapter D13 Notable Trees.	Will protect seven trees which meet the criteria for consideration as a notable tree under Auckland Council’s “Guidelines for Nominating a Notable Tree for Evaluation” in accordance with the provisions of Chapter D13 Notable Trees, and protect other trees within the Pukekohekohe Gateway Precinct where practicable for their amenity value.
<i>Economic</i>	This option will retain the operative AUP provisions that plan users will be familiar with.	Through deleting the ‘group’ of trees that are protected under the provisions of Chapter D13 Notable Trees, this option will enable a greater extent of land to be developed for future residential activities.
<i>Social</i>	Through retaining the operative AUP provisions, this option maintains community expectations in relation to the management of existing trees within the Plan Change area.	This option will achieve protection for existing trees within the Pukekohekohe Gateway Precinct, commensurate with their value, including for visual and amenity values.
Cultural	Following consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohua, it is understood that there is no change to the cultural environment through this option.	Following consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohua, it is understood that there is no change to the cultural environment through this option.
Costs		
<i>Environmental</i>	This option retains the notable tree scheduling within the Plan Change area, and will provide for ongoing protection in accordance with the provisions of Chapter D13 Notable Trees. However, there are a number of errors within the schedule, creating uncertainty as to which trees are required to be protected.	Will provide for a lesser degree of protection to existing trees compared to Option 1.
<i>Economic</i>	Will reduce the availability of developable land and may create added costs associated with the removal of notable trees through the resource consent process. In addition, there are a number of errors within the existing Notable Tree Schedule in relation to ID 2684, which is likely to create unnecessary complexity and confusion for plan users.	Will reduce the availability of developable land and may create added costs associated with the removal of notable trees through the resource consent process, however not to the same extent as Option 1, which identifies significantly more trees under the Notable Tree overlay subject to the provisions of Chapter D13 Notable Trees.
<i>Social</i>	Will reduce the availability of developable land the provision of housing supply to meet the social needs of the community compared to Option 1.	The provision to alter or remove a number of existing trees within the Notable Tree overlay may not be in keeping with the expectation of the community.
<i>Cultural</i>	Following consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohua, it is understood that there is no change to the cultural environment through this option.	Following consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohua, it is understood that there is no change to the cultural environment through this option.
Efficiency and effectiveness in achieving the objectives	This option is less efficient and effective in achieving the objectives, including B4.5.1(1), D13.3(1), and IX.2(4). As discussed above, there are a number of errors within the existing Notable Tree Schedule in relation to ID 2684, and assessments undertaken by Greenscene for over 180 individual trees within the Plan Change area confirm that the majority of these trees do not meet the AUP criteria for scheduling or identification as a Notable tree. The application of the provisions under Chapter D13 Notable Trees is therefore likely to create significant inefficiencies at the time of future development and in terms of implementing and enforcing the operative Schedule.	This option is efficient and effective in achieving the objectives, including B4.5.1(1), D13.3(1), and IX.2(4) as it will maximise land available for future residential development while ensuring that the seven trees of the highest value and which meet the criteria for consideration as a notable tree under the AUP are protected under Chapter D13 Notable Trees. The proposed Precinct provisions will ensure other trees, which are of amenity value, can be protected where it is practicable, recognising that while the trees provide amenity value within the Plan Change area and for future residents, they do not meet the criteria for scheduling or identification as notable trees.
Summary	Option 2 is the preferred option as it will ensure that the Notable Tree Schedule is updated to reflect the most accurate information, as informed by recently completed arboriculture assessment undertaken on site. It is considered that the benefits under Option 2 outweigh the potential costs, including greater efficiencies in terms of implementing and enforcing the AUP and improved clarity for plan users.	

8.2.2.4 Theme 4: Pukekohe Park Precinct

The existing AUP objectives which have particular relevance for Theme 4 include:

- B2.7.1(1): Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities which contribute to a well-functioning urban environment.
- B2.7.1(3): Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.
- I434.2(1): Pukekohe Park is protected as a regionally and nationally important venue for horse racing.
- I434.2(2): A range of activities compatible with, or accessory to, the primary activities are enabled.
- I434.2(3) The adverse effects of the operation of Pukekohe Park are avoided, remedied or mitigated as far as is practicable recognising that the primary activities will by virtue of their nature, character, scale and intensity, generate adverse effects on surrounding land uses which are not able to be fully internalised.
- H26.2(1): Major recreation facilities are protected and enabled to provide for the social and economic well-being of people and communities.
- H26.2(2): Adverse effects generated by the operation, development, redevelopment and intensification of major recreation facilities are avoided, remedied or mitigated as far as is practical.
- H26.2(3): Major recreation facilities are protected from the reverse sensitivity effects of adjacent activities.

In determining the most appropriate method for achieving the objectives of the AUP, the following other reasonably practicable options have been considered:

- Option 1 – Status quo – No amendments to Chapter I434 Pukekohe Park Precinct.
- Option 2 – Proposed Plan Change – Amend I434 Pukekohe Park Precinct to reflect the new Precinct area and that motorsport activities have effectively ceased from Pukekohe Park, including consequential amendments to the provisions that manage noise.

Table 9 below evaluates these options against the requirements of section 32(1)(b).

Conclusion

It is considered that the most appropriate option is **Option 2**.

Table 9: Theme 4 evaluation of options.

Option 1 – Do nothing – No amendments to Chapter I434 Pukekohe Park Precinct		Option 2 – Proposed Plan Change – Amend I434 Pukekohe Park Precinct to reflect the new Precinct area and that motorsport activities have effectively ceased from Pukekohe Park, including consequential amendments to the provisions which manage noise
Description of option	This option involves retaining Chapter I434 as per the operative AUP.	This option involves updating the Pukekohe Park Precinct to: <ul style="list-style-type: none">• Reflect the new Precinct area;• Reflect that motorsport activities have effectively ceased from Pukekohe Park;• Introduce new general and special noise event standards which provide for up to five special noise events with a noise limit of 75dB LAeq(5min) and up to 15 special noise events with a noise limit of 65dB LAeq(5min); and• Increase the permitted duration of temporary buildings from 90 to 120 days.
Benefits		
Environmental	This option will enable the continued operation of Pukekohe Park, while the operative provisions will ensure that potential adverse effects, including reverse sensitivity effects, can be appropriately managed.	This option will enable Pukekohe Park to operate for thoroughbred horse racing activities and other events, while ensuring that potential adverse effects, including reverse sensitivity effects, can continue to be appropriately managed.
Economic	The administration of this option is less complex than Option 2 as there is no change to the existing regulatory framework for the Pukekohe Park Precinct.	Through proposing a series of consequential amendments to the existing Pukekohe Park Precinct to reflect that motorsport activities have effectively ceased to operate, and the proposed new Pukekohekohe Gateway Precinct being rezoned for residential development, this option will improve the accuracy of the Pukekohe Park Precinct, reduce complexity, and improve clarity for plan users. The proposed special noise event standard will ensure that Pukekohe Park can continue to be used as a venue for horse racing and events and continue to grow and adapt to the evolving needs of ATR and the thoroughbred horse racing industry.
Social	Existing rules and processes are retained, and community expectations are maintained.	This option reflects the existing operations of Pukekohe Park and will provide certainty for future residents of the Pukekohekohe Gateway Precinct around what level of noise and activities can be expected at the neighbouring Pukekohe Park.
Cultural	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
Costs		
Environmental	This option retains bespoke provisions within the Pukekohe Park Precinct for motorsport activities, which will provide for a land use that has effectively ceased from the Pukekohe Park and is no longer intended to occur on the site.	This option will enable the continued use of the Pukekohe Park Precinct for horse racing activities and other compatible activities as provided for under Table I434.4.1, which may create noise and amenity effects. However, potential effects can be appropriately managed in accordance with the operative precinct provisions and amendments proposed under the Plan Change, including with respect to noise and special noise events, as further detailed in Section 7 above and in the Acoustic Assessment (Appendix 17).
Economic	This option retains bespoke provisions within the Pukekohe Park Precinct for motorsport activities, which is likely to add additional complexities for plan users in terms of implementation and enforcement. There would be increased development costs for noise sensitive spaces within the Pukekohekohe Gateway Precinct to be acoustically treated and designed to ensure that the noise standards permitted by motorsport activities within the Pukekohe Park Precinct are managed and mitigated, regardless of the fact that the activities have effectively ceased.	There are administrative costs associated with implementing the proposed amendments to Chapter I434 Pukekohe Park Precinct.
Social	This option provides less certainty to the community around future activities at Pukekohe Park, including motorsport activities, as the provisions will not reflect the anticipated activities and associated noise effects associated with motorsport activities.	This option will delete bespoke provisions for motorsport activities within the Pukekohe Park Precinct, which may not be in keeping with the expectation of some community members. However, the amendments reflect existing operations of Pukekohe Park, where motorsport activities have effectively ceased to operate since 2023.
Cultural	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.

Option 1 – Do nothing – No amendments to Chapter I434 Pukekohe Park Precinct		Option 2 – Proposed Plan Change – Amend I434 Pukekohe Park Precinct to reflect the new Precinct area and that motorsport activities have effectively ceased from Pukekohe Park, including consequential amendments to the provisions which manage noise
Efficiency and effectiveness in achieving the objectives	This option is less efficient and effective in achieving the relevant objectives, including B2.7.1(1), B2.7.1(3), IX.2(1), I434.2(1), I434.2(2), and I434.2(3). While the operative provisions provide for recreational activities, the drafting style of provisions are tailored towards motorsports and accessory activities and events, do not represent an accurate representation of the actual operation of Pukekohe Park.	This option is efficient and effective in achieving the relevant objectives, including B2.7.1(1), B2.7.1(3), IX.2(1), I434.2(1), I434.2(2), and I434.2(3). The amendments will continue to manage use within the existing Pukekohe Park Precinct to respond to the ongoing operations, while continuing to support recreational needs of the community and horse racing and accessory activities. The proposed noise standards will also achieve consistency with similar standards included in other MRF precincts under the AUP, improving efficiency.
Summary	Option 2 is the preferred option. The amendments to I434 Pukekohe Park Precinct accurately reflect the activities anticipated to occur within the Precinct will ensure that development within the Pukekohekohe Gateway Precinct responds to the existing surrounding environment. This will also avoid the requirement for unnecessary acoustic design responses to manage reverse sensitivity effects associated with high noise generating motorsport activities that are provided for but will never be realised. Option 2 enables the Pukekohekohe Gateway Precinct to be comprehensively developed for residential use while ensuring that it integrates and responds to the Pukekohe Park Precinct and its unique characteristics as well as the existing and planned land use activities on this land. It is considered that the social costs associated with amending Chapter I434 Pukekohe Park Precinct are outweighed by the significant environmental, economic and social benefits.	

8.3 Risk of Acting or Not Acting

In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in the report above. For this reason, an assessment of the risk of acting or not acting is not required.

8.4 Section 32 Assessment Conclusion

On the basis of the above analysis, it is concluded that:

- The proposed objectives in the Pukekohekohe Gateway Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a suite of targeted planning provisions to enable future residential development;
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the Plan Change area; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

9.0 Conclusion

This report has been prepared in support of ATR's request for a Plan Change to the provisions of the AUP to:

- Enable residential development within the proposed Pukekohekohe Gateway Precinct and ensure that the development of PC30 is coordinated with existing identified transport infrastructure upgrades;
- Modify the Pukekohe Park Precinct under Chapter 1434 to remove motorsport activities, including consequential amendments to the provisions which manage noise;
- Refine the Pukekohe Park Precinct provisions to accurately reflect the current and intended use of Pukekohe Park, including the provision for ongoing events to occur on the site; and
- Amend the Notable Tree Schedule under Schedule 10 as it relates to Pukekohe Park.

Based on the assessment of environmental effects, as supported by specialist analysis, it is concluded that the proposed Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community. Other potential effects are able to be managed through the application of the proposed amendments, including the new precinct provisions, and the underlying AUP zone and Auckland-wide provisions.

An evaluation in terms the provisions of section 32 of the RMA is provided in Section 8 of this report. This includes an analysis of the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the plan change are the most appropriate way to achieve the objectives.

For the above reasons, it is considered that the proposed Plan Change accords with the sustainable management purpose and the principles in Part 2 of the RMA and should be accepted and approved.