

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 124 (Private)

Pukekohekohe Gateway Precinct

SUMMARY OF DECISIONS REQUESTED

Enclosed:

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

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 5pm on 08 May 2026
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 124 (Private) – Pukekohekohe Gateway Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
1	1.1	Nigel & Ruth Farmer	nigelfarmer@msn.com	Strongly urge decision-makers to reconsider this proposal and conduct a more thorough impact assessment before proceeding. Responsible urban planning should prioritise sustainability, safety, and the well-being of current and future residents.
1	1.2	Nigel & Ruth Farmer	nigelfarmer@msn.com	Auckland Council need to listen to the concerns of locals and address these issues directly.
2	2.1	Shihab Faraj	sfaraj@xtra.co.nz	That the plan change include clear and enforceable provisions to manage and mitigate traffic noise effects on existing residential properties, in particular: on existing residential properties. In particular: - Traffic calming measures to discourage rat-running on residential streets; - Road design and surface treatments that minimise vehicle noise; - Restrictions on heavy vehicle routing through residential areas; - Requirements for traffic noise assessments prior to development consent; - Staged infrastructure upgrades to occur before major development is enabled.
2	2.2	Shihab Faraj	sfaraj@xtra.co.nz	Support development that is well planned and balanced, but ask that the amenity and wellbeing of existing residents be protected through appropriate traffic and noise management controls.
3	3.1	Dave Mills	accounts@paneltech.nz	Decline the plan change.
4	4.1	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Amend the Pukekohekohe Gateway Precinct provisions as per Attachment A of the submission.
4	4.2	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Such other alternative or consequential relief to give effect to give effect to the matters raised in the submission.
4	4.3	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new objective as follows: <u>(10) Natural hazard risk to people and property associated with subdivision, use and development within the Precinct is managed using a risk-based proportionate approach.</u>
4	4.4	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new text as follows: All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above, <u>except E36.2 Objectives.</u>
4	4.5	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new policies as follows: <u>(13) Require natural hazard risk to be assessed with regard to existing and proposed mitigation measures.</u> <u>(14) Where subdivision, use or development is assessed within the Precinct as having very high natural hazard risk that risk must be avoided.</u> <u>(15) Natural hazard risk associated with subdivision, use or development within the Precinct that is assessed as having high, medium or low natural hazard risk must be managed using an approach that is proportionate to the level of natural hazard risk.</u> <u>(16) Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.</u> <u>(17) Require risk assessment prior to subdivision, use and development of land subject to instability.</u>

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4	4.6	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new text as follows: All relevant overlay, Auckland-wide and zone policies apply in this Precinct in addition to those specified above, <u>except E36.3 Policies.</u>
4	4.7	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Amend IX.4 Activity table introduction as follows: All relevant overlay, Auckland-wide and zone activity tables apply <u>except Activity Table E36.4.1A, Activity Table E36.4.1B, and where-unless-the activity is otherwise listed in Activity Table IX.4.1 below.</u>
4	4.8	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new activities to Table IX.4.1 Activity table as set out in the submission.
4	4.9	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add to IX.6. Standards the following: <u>(3) The Auckland-wide standards in E36.6.1 do not apply.</u> <u>(5) The following Auckland-wide standards do not apply to activities that comply with IX6.X Buildings and structures on land which may be subject to land instability:</u> <u>(a) E36.6.A1 General Standards</u>
4	4.10	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add new Standard as follows: <u>IX.6.12 Buildings and structures on land which may be subject to land instability</u> <u>Purpose: Require buildings and structures on land which may be subject to land instability to be designed and constructed to manage natural hazard risk.</u> <u>(1) Buildings and structures located on land which may be subject to land instability must be constructed in accordance with:</u> <u>(a) A Geotechnical completion report or similar professional report, approved by Council; and</u> <u>(b) Any conditions of resource consent of subdivision consent associated with the site relating to stability or geotechnical matters.</u>
4	4.11	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add to IX.8.1 Matters of discretion, additional text as set out in the submission.
4	4.12	Auckland Thoroughbred Racing Inc	sian.kilgour@russellmcveagh.com	Add to IX.8.2 Assessment criteria, additional text as set out in the submission.
5	5.1	Franklin Paths Programme - Auckland Council	mayur.chauhan@aucklandcouncil.govt.nz	Accept the plan with the amendments sought in the submission.

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5	5.2	Franklin Paths Programme - Auckland Council	mayur.chauhan@aucklandcouncil.govt.nz	Advocate for a single, continuous 3.0m shared path on the eastern side of Buckland Road/Manukau Road.
5	5.3	Franklin Paths Programme - Auckland Council	mayur.chauhan@aucklandcouncil.govt.nz	Amendment to the Pukekohe Gateway Precinct Plan and its provisions to mandate a continuous eastern-side shared path corridor and delete the indication for the path to transition to the western side.
6	6.1	Golding Meadow Developments Ltd	gmdl2027@gmail.com	The submitter requests that Auckland Council ensure PC124: a) Is supported by best-practice, up-to-date stormwater management modelling, b) Includes provisions requiring stormwater attenuation, peak flow control and climate-informed design, and c) There are no additional downstream effects on Buckland
7	7.1	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Decline the plan change, unless matters in the submission are adequately resolved.
7	7.2	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Decline unless such other relief is provided that will meet the concerns of the submitter.
7	7.3	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Provide such further, additional, alternative or consequential relief as is reasonably necessary to give effect to the submission.
7	7.4	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Further consideration of zoning and provisions is required to ensure any zoning and future residential development will not result in reverse sensitivity effects on existing or proposed business and industrial zoning and activities in the immediately surrounding area.
7	7.5	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	If reverse sensitivity effects are not suitably addressed, the proposed residential zoning sought under PC124 should be declined; or a different, less sensitive zone i.e. a business zone, should be applied.
7	7.6	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	The description and purpose of the Precinct should be amended to include reference to all of its existing and proposed zones and likely activities (including Sub-precinct C), not just the residential components.
7	7.7	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	The need to integrate with future urban areas, and proposed and future industrial development and activities, be included in both overarching and sub-precinct objectives and policies.
7	7.8	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Standard E27.6.1 Trip generation be included as provision that applies in the Precinct and as some specific triggers may be required to link to necessary infrastructure upgrades.
7	7.9	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Precinct Plan 1 – Indicative Road and Open Space Network Precinct 1 be amended to include an identified buffer of at least 20m along the southern boundary of the site / Sub-Precinct B, adjacent to the Tutaenui Stream. Include planting requirement for planting to ensure that any future development within Sub-Precinct B is sufficiently separated from the adjacent future urban zoned land at 466 Buckland Road, which is proposed to be rezoned to a Business – Light Industrial Zone and/or contain rural or business/light industrial activities. Objectives, policies and rules (including standards to provide consent triggers) be developed and included in the plan change to achieve this outcome.

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Summary of Decisions Requested

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7	7.10	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	The stormwater and flooding effects are appropriately mitigated, this includes without limitation: <ul style="list-style-type: none"> •Stormwater volume, flow rate and peak flow duration and timing effects – through network infrastructure and overland flow paths. •Location of overland flow paths. •Appropriate modelling for climate change scenarios.
7	7.11	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	The omissions failing to address the National Policy Statement for Natural Hazards and the National Policy Statement for Infrastructure and PC 120 be addressed and that any further objectives, policies and rules (including standards to provide consent triggers to ensure that off-site adverse stormwater effects are not created) are developed and included in the plan change.
7	7.12	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	The Buckland Road / Kitchener Road intersection upgrade to a roundabout be reviewed in light of the residential zoning proposed for Sub-Precincts A and B. The Submitter requests the SIDRA traffic modelling data for this intersection to better understand the traffic effects on this intersection. Subject to the outcome of modelling, further objectives, policies and rules (including standards needed to provide consent triggers to ensure that off-site adverse traffic effects are not generated) are developed and included in the plan change.
7	7.13	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	Further provisions, including rules and/or standards are required to ensure that if the land is not subdivided and/or the esplanade reserve is not taken, a sufficient separation distance, buffer and stream side planting are nonetheless achieved between any PC124 proposed residential activity or use and the proposed future Business – Light Industrial Zone and activities proposed for 466 Buckland Road. Objectives, policies and rules (including standards to provide consent triggers) be developed and included in the plan change to achieve this outcome.
7	7.14	Baltrese Holdings Limited	vanessa@scottwilkinson.co.nz	A rule and/or standard requiring the registration of an additional no complaints covenant on all lots to be used for residential activities in sub-Precinct B (to be zoned R-MHU Zone) be included in the proposed Precinct provisions to ensure that future residential activities in the plan change area are aware of, and do not complain about, the proposed future Business – Light Industrial activity promoted by the Pukekohe – Paerata Structure plan, and the plan change and resource consent being sought for 466 Buckland Road, to the immediate south. Objectives, policies and rules (including standards to provide consent triggers) be developed and included in the plan change to achieve this outcome.
8	8.1	Enviro NZ Services Ltd	kaaren.rosser@environz.co.nz	Decline the plan change.
8	8.2	Enviro NZ Services Ltd	kaaren.rosser@environz.co.nz	If the proposed plan change is not declined, then amend as outlined in the submission.
8	8.3	Enviro NZ Services Ltd	kaaren.rosser@environz.co.nz	That this land be re-zoned Business - Light Industrial Zone as shown in Figure 1 in the submission.
9	9.1	Goy Littlewood	gbirch@xtra.co.nz	Decline the plan change.
9	9.2	Goy Littlewood	gbirch@xtra.co.nz	If approved, the name of the precinct needs to change. The name Pukekohekohe will create confusion with the official town name 'Pukekohe'.
9	9.3	Goy Littlewood	gbirch@xtra.co.nz	Investigate what land is currently in the pipeline for development before approving any further plan changes in Pukekohe.
10	10.1	Ngati Tamaoho	edith@tamaoho.iwi.nz	Accept the plan change.

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11	11.1	Ngaati Te Ata Waiohua	karl_flavell@hotmail.com	That the recommendations the Ngaati Te Ata Waiohua CIA Report are provided for.
11	11.2	Ngaati Te Ata Waiohua	karl_flavell@hotmail.com	That the proposed precinct provisions incorporate and integrate Iwi (mana whenua) interests and values, cultural, economic and social wellbeing in the development.
11	11.3	Ngaati Te Ata Waiohua	karl_flavell@hotmail.com	That Auckland Thoroughbred Racing continue to engage and consult with Ngaati Te Ata Waiohua as the plan change develops, particularly what eventuates from the hearing process.
12	12.1	Health New Zealand	land-planning@tewhaturora.govt.nz	That within its various roles and responsibilities that Auckland Council (including via Council CCO, Auckland Transport) seriously consider safe pedestrian and vehicle (including emergency) access to and from Pukekohe Hospital.
12	12.1	Health New Zealand	land-planning@tewhaturora.govt.nz	The only relief that Health NZ asks for is that Auckland Council (and Auckland Transport) consider the concerns raised seriously.

Submissions

From: [Nige Farmer](#)
To: [Unitary Plan](#)
Cc: [Ruth Farmer](#); [Nige Farmer](#)
Subject: AUCKLAND UNITARY PLAN-PROPOSED PLAN CHANGE124(Private)-PUKEKOHE GATEWAY PRECINCT
Date: Tuesday, 27 January 2026 5:38:52 pm

To whom it may concern (Attention - John Duguid General Manager - Planning and Resource Consents

Ben Kildare - Policy Planner

As a resident of Buckland, we have received this notification and wish to comment on how this proposal will affect **ALL** Buckland residents.

Concerns Regarding the Proposed Development at Pukekohe Park

Having recently attended (March 2025) a poorly advertised information event regarding the proposed changes to land use at Pukekohe Park, I wish to express my strong concerns about the adverse effects of constructing up to 600 houses in this designated flood zone. The potential consequences of such a development are severe, impacting not only the immediate area but also the wider community.

Flooding Risks

This area is officially designated as a flood zone, and the addition of 600 new properties, alongside the associated roads and infrastructure, will exacerbate existing flood risks. The introduction of large impervious surfaces such as concrete and asphalt will increase surface runoff, reducing the land's ability to absorb excess rainwater. Scientific studies have shown that urbanisation in flood-prone areas can lead to more frequent and severe flooding events due to the loss of natural water absorption capacity (Pappenberger et al., 2012 and numerous other sources).

While it was stated during the event that consent would only be granted if the impact on flooding were deemed negligible, the proposed mitigation measures raise significant concerns. The plan to restore a stream to divert excess water to the Tutaenui Stream may provide some relief to the new subdivision; however, it risks worsening flooding in Buckland. This area has already experienced several major floods over the past decade, with water ingress into homes and properties. Without substantial improvements to the Tutaenui Stream's capacity, the additional runoff from the subdivision is likely to overwhelm drainage systems, accelerate soil erosion, and introduce urban pollutants into local waterways. The Tutaenui Stream has not been maintained by Auckland Council since 2003. Major investment is required on the stream first to stop further bank erosion (caged gambions required) and stop properties further down stream from flooding (5 Tonkin Place, and properties in

Glory Way).

Furthermore, residents in Buckland have previously been denied consent for home extensions due to the flood risk. Approving a large-scale development within the same flood zone raises serious concerns about the integrity and consistency of the planning process.

Strain on Medical Services

Pukekohe residents already face significant challenges accessing medical care, with long wait times for doctor and dental appointments. The addition of hundreds of new households will further strain these services. South Auckland's hospitals and medical facilities are already operating at or beyond capacity. Expanding residential areas in Pukekohe, Drury, and Ramarama without corresponding investment in healthcare infrastructure will lead to deteriorating service levels, negatively impacting both existing and new residents.

Traffic and Infrastructure Challenges

The proposed development will add at least 600 additional vehicles to Buckland Road, exacerbating traffic congestion in an area that already experiences significant delays during peak hours. No concrete plans have been presented to manage this increase in traffic, nor has there been consideration of an alternative access route. One potential solution could be constructing an underpass beneath the railway track to connect with Yates/Station Road; however, without a clear commitment to infrastructure improvements, the development is likely to worsen existing transportation bottlenecks.

Overburdened Schools

The proposed subdivision falls within the zoning for Buckland Primary School and Pukekohe High School, both of which are already struggling to accommodate current student numbers. The influx of additional families will place further pressure on these institutions, necessitating either expansion or the construction of new educational facilities. Without a clear plan to address school capacity, this development risks compromising the quality of education for existing and future students.

Conclusion

The proposal to build up to 600 houses in a flood-prone area without adequate planning for flood mitigation, infrastructure, healthcare, and schooling is deeply concerning. Although there are claims that there are plans and proposals in place to expand these services we have seen no evidence of that, and creating them in later years is too late; they need to be in place now, ahead of further residential expansion. While housing development is necessary to accommodate population growth, it must be done in a way that does not endanger current residents or overburden essential services. I strongly urge

decision-makers to reconsider this proposal and conduct a more thorough impact assessment before proceeding. Responsible urban planning should prioritise sustainability, safety, and the well-being of current and future residents. Auckland Council need to listen to the concerns of locals and address these issues directly. Unfortunately their reputation of failing to consider input from residents and rate payers and purely paying “lip service” to this process is renowned.

1.1

1.2

Nigel & Ruth Farmer

Buckland Residents

Tel:- 0212928740

From: [Shihab Faraj](#)
To: [Unitary Plan](#)
Subject: Submission on Plan Change 124 – Traffic Noise Effects
Date: Tuesday, 27 January 2026 7:37:09 pm

Tēnā koe,

I am writing to make a submission on Plan Change 124 (Private) – Pukekohe Gateway Precinct.

I am the owner/occupier of 10 Yates Road, Pukekohe, which is located close to the proposed rezoning area and is likely to be affected by changes resulting from increased development.

While I understand the need for growth and development in the area, I am concerned about the potential increase in traffic volumes and associated traffic noise, particularly on local residential streets such as Yates Road.

Increased residential, business, and event-related development is likely to result in:

- higher daily traffic volumes,
- increased heavy vehicle movements,
- greater peak-time congestion,
- and elevated road noise levels, including during early morning and evening periods.

I seek that the plan change include clear and enforceable provisions to manage and mitigate traffic noise effects on existing residential properties. In particular, I request consideration of the following:

- Traffic calming measures to discourage rat-running on residential streets;
- Road design and surface treatments that minimise vehicle noise;
- Restrictions on heavy vehicle routing through residential areas;
- Requirements for traffic noise assessments prior to development consent;
- Staged infrastructure upgrades to occur before major development is enabled.

2.1

I support development that is well planned and balanced, but ask that the amenity and wellbeing of existing residents be protected through appropriate traffic and noise management controls.

2.2

Thank you for the opportunity to make this submission.

Nāku noa, nā,

Shihab Faraj
10 Yates Road
Pukekohe

Sent from my iPhone

S Faraj

From: [Irene Mills](#)
To: [Unitary Plan](#)
Subject: Unitary plan change for Buckland.
Date: Wednesday, 4 February 2026 8:47:57 am

My name is Dave Mills and I am submitting a submission against change to the Unitary plan for the Buckland Area. I, and several people in this area have been making repeated attempts to get a serious problem resolved. This problem is the flooding of our properties due to Auckland Councils lack of ability to maintain the Tutaenui stream that is the main water outlet for this area. This stream was totally cleaned out and walls put up etc in 2003 and for 8 yrs, no flooding, but now, every time we have a heavy downpour or storm we go underwater. We have already lost a resident to this, but obviously human life is not a problem for Council, but it does worry us rate payers as we don't want any more lives lost. I dispute this plan change (although I was told yesterday that consent had already been given) on the grounds that we were told by Kelly Cotter from Auckland Council at a meeting we had with him and Healthy waters, that no one was allowed to build in an area that would burden further and already overburdened waterway which is exactly what this will do. If this build on the Pukekohe park goes ahead, then the water of the 400 house properties will not be absorbed into the ground as there will only be concrete so all that extra water will now have only one place to go and that's into the Tutaenui stream and where does that end up, in our properties only now its deeper. If this did come to fruition, that will put around another 600 to 800 more cars out onto a rd that is seriously incapable of handling what it already must handle so infrastructure is not adequate to support this. I own 505 Buckland and 507 has just been sold to a couple of developers and from what we have been told They are proposing to build 3 3storey units on that property as Council, yes you, have changed the zoning from 1 house to open 3 units which is going to then flood my property as one again, concrete does not let water into the earth so it can only end up in my property and the neighbours property behind as well and THEN, into the overburdened stream. Do any of you in Council see where I am going with this?. Its pretty simple, this cannot go ahead at the park, and leave 507 Buckland Rd still under PC78 plan not PC120 then that will stop multiple buildings and let nature allow the water to be absorbed hence reducing then flooding issue. There are approx. 30 of us affected by this stream flooding so we are seeking Legal advise as to who we can claim for damage and harm caused by Auckland Councils inability to be able to understand the people and issues involved here as 1 life lost is 1 to many so we do not want to loose anymore

Kind regards,

David Mills
Paneltech (2006) Ltd.

3.1

SUBMISSION ON PROPOSED PLAN CHANGE 124 – PUKEKOHE PARK

TO: Auckland Council
SUBMITTER: Auckland Thoroughbred Racing Inc

1. SUBMITTER DETAILS

- 1.1 This is a submission on the Plan Change 124 – Pukekohekohe Gateway Precinct ("**PC124**") to the Auckland Unitary Plan ("**AUP**") on behalf of Auckland Thoroughbred Racing Inc ("**ATR**"). PC124 was notified by Auckland Council on 23 January 2026.
- 1.2 ATR could not gain an advantage in trade competition through this submission.

2. INTRODUCTION TO ATR

- 2.1 ATR is the largest thoroughbred racing club in New Zealand and plays an important role in Auckland's community. 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. ATR is the landowner of and manages Pukekohe Park, and annually hosts a number of major racing events such as the Auckland Cup, Counties Cup, Karaka Millions and Champions Day.
- 2.2 Pukekohe Park is used to race, trial, train and stable thoroughbred racehorses. Thoroughbred horses have been raced at Pukekohe Park for over 100 years. Motorsport racing activities were held on this site as well (although this has generally ceased). In addition to its primary operations, Pukekohe Park hosts numerous stand-alone activities including car shows, school balls, weddings, graduations, birthdays, concerts etc. ATR has spent a considerable amount of time identifying and divesting non-critical assets in accordance with the Government's Messara Report recommendations, including developing a comprehensive masterplan at Pukekohe to ensure its ongoing viability as a racecourse into the future.

3. SUBMISSION**Introduction**

- 3.1 PC124 is a private plan change requested by ATR to rezone 23.5 hectares of land within the Pukekohe Park Precinct from Special Purpose – Major Recreation Facility zone to Residential – Mixed Housing Urban, Open Space – Informal Recreation, and Business – Light Industry zones.
- 3.2 The Plan Change also seeks to apply the Pukekohekohe Gateway Precinct to approximately 21 hectares of land, comprising the Business – General Business zone Residential – Mixed Housing Urban zone. The Pukekohekohe Gateway Precinct is proposed as it includes place-based provisions that create a framework for future development.
- 3.3 Since the preparation of the Pukekohekohe Gateway Precinct provisions, the National Policy Statement for Natural Hazards 2025 ("**NPS-NH**") came into force on 15 January 2026. Auckland Council also notified Plan Change 120 Housing Intensification and Resilience ("**PC120**"). PC120 proposes extensive amendments to the Regional Policy Statement ("**RPS**")

and Chapter E36 Natural Hazards of the AUP(OP). ATR made a submission on PC120 raising concerns that the proposed provisions for the management of natural hazards would create an inefficient and costly planning framework, and sought a number of amendments.

- 3.4 Accordingly, ATR has now identified several aspects of PC124 that need to be amended to give effect to the NPS-NH and ensure an efficient and effective planning framework for managing natural hazard risk associated with future subdivision, use, and development within Precinct. Amendments are sought to the notified Pukekohekohe Gateway Precinct to introduce a site-specific approach to managing natural hazards and replace provisions under Chapter E36 Natural Hazards and Flooding.
- 3.5 The amendments sought by ATR to the notified version of the Pukekohekohe Gateway Precinct are summarised below and detailed in **Attachment A**.

Reasons for Submission

- 3.6 The proposed approach to managing natural hazard risk within the Pukekohekohe Gateway Precinct under PC124 as notified is to rely on the Auckland-wide provisions under Chapter E36 Natural Hazards and Flooding. These provisions are proposed to be substantially amended through PC120.
- 3.7 ATR is concerned that reliance on the provisions under Chapter E36 Natural Hazards and Flooding as proposed to be amended through PC120 will not enable an efficient or effective risk-based proportionate approach for the management natural hazard risk within the Precinct. ATR is also concerned that the proposed PC120 Chapter E36 provisions will result in repetitive technical assessment for subsequent use, development and subdivision.
- 3.8 The preparation of PC124 was informed by detailed site-specific analysis, including analysis relating to natural hazard risks associated with flooding and geotechnical matters. In addition, resource consent BUN60455499 was approved 16 December 2025 to undertake physical works within the Pukekohe Park site to increase flood conveyance and storage efficiency within the Precinct area. On completion, these works will modify the areas within the Precinct that are subject to flooding natural hazards, and reduce overall flood risk.
- 3.9 The amendments sought by ATR enable natural hazard risk within Pukekohekohe Gateway Precinct to be managed based on the existing information informed by site-specific investigations. In particular, the amendments include place-based provisions that are informed by, and accurately recognise:
- (a) The level and detail of technical analysis that has already been undertaken to identify and assess flooding and geotechnical natural hazards;
 - (b) With respect to flooding natural hazards, the technical analysis undertaken which confirms that subject to mitigation measures that can be implemented as part of the resource consent process, natural hazard risks upstream and downstream of the Pukekohekohe Gateway Precinct can be appropriately managed;
 - (c) Physical works that will be completed under resource consent BUN60455499 which will reduce exposure to flooding natural hazard exposure; and
 - (d) With respect to geotechnical natural hazards, the technical analysis undertaken which confirms that residual risks associated geotechnical natural hazard will be low or moderate, subject to mitigation measures that can be implemented as part of the resource and building consent processes.

3.10 The amendments to the Pukekohekohe Gateway Precinct provisions sought by ATR are included at **Attachment A**. Precinct specific policy direction (objective and policies) and corresponding activity tables, standards and matters for discretion and assessment criteria are proposed to achieve the efficient and effective management of natural hazard risk associated with development within the Precinct. Overall, ATR consider that the amended provisions will enable a risk-based proportionate approach to the management of natural hazards using the best available information pertaining to flooding and geotechnical natural hazards. On this basis ATR considers that the amended provisions give effect to the NPS-NH.

Relief Sought

3.11 The relief sought by ATR is set out in the body of this submission and at the amendments to the Pukekohekohe Gateway Precinct provisions included at **Attachment A**. In addition to that specific relief, ATR seeks such other alternative or consequential relief to give effect to the matters raised in this submission. | 4.1
| 4.2

3.12 ATR wishes to be heard in support of its submission.

AUCKLAND THOROUGHBRED RACING INCORPORATED by its solicitors and authorised agents
Russell McVeagh:

Signature:



Daniel Minhinnick

Date:

20 February 2026

Address for Service:

C/- Sian Kilgour
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone:

+64 9 367 8000

Email:

sian.kilgour@russellmcveagh.com

IX. Pukekohekohe Gateway Precinct

IX.1. Precinct Description

The Pukekohekohe Gateway Precinct applies to 28.8ha of land in the southern part of Pukekohe, adjacent to the Pukekohe Park Precinct, which has facilitated horse racing (and previously motorsports) for over 100 years. Development within the Pukekohekohe Gateway Precinct will be compatible with the activities enabled and expected within the Pukekohe Park Precinct.

The Pukekohekohe Gateway Precinct is located adjacent to Buckland Road to the west, Pukekohe Park Precinct to the north east, the North Island Main Trunk to the east and the Tutaenui Awa to the south.

The purpose of the Pukekohekohe Gateway Precinct is to provide for the subdivision and development of a sustainable and comprehensively planned residential community, that supports a well-functioning urban environment and a quality compact built form.

There are three Sub-precincts in the Pukekohekohe Gateway Precinct:

- Sub-Precinct A is zoned Residential – Mixed Housing Urban Zone and Open Space – Informal Recreation zone and is accessed from the Indicative Central Intersection as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1;
- Sub-Precinct B is zoned Residential – Mixed Housing Urban Zone and is accessed from the Indicative Southern Intersection as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1; and
- Sub-Precinct C is zoned Business – General Business Zone and has existing access from Manukau Road.

The Precinct identifies specific transport infrastructure upgrades required prior to the occupation of buildings within Sub-Precincts A, B and C.

The Precinct seeks to promote the enhancement of ecological values present within the existing waterbody that flows to the Tutaenui Awa and its tributaries, and recognises its cultural importance to Ngaati Te Ata Waiohua and Ngāti Tamaoho (and other relevant tangata whenua).

The Precinct recognises the cultural values associated with the site as it forms part of the cultural landscape of importance to tangata whenua, including Ngaati Te Ata Waiohua and Ngāti Tamaoho.

The Precinct includes controls to ensure that new and altered buildings containing Noise Sensitive Spaces that are adjacent to the North Island Main Trunk and arterial roads (Buckland Road) are designed, constructed and maintained to provide occupants with an adequate level of internal noise amenity. Areas within the Precinct that are within 60m of the North Island Main Trunk may experience vibration levels higher than would normally be experienced. A Vibration Alert Area is shown on IX.10.2 Pukekohekohe Gateway: Precinct Plan 2. The zoning of land within this Precinct is Residential – Mixed Housing Urban Zone, Open Space – Informal Recreation Zone, and Business – General Business Zone.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

IX.2. Objectives

Sub-Precinct A and Sub-Precinct B

- (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.
- (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.
- (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, and the unique characteristics of the adjacent Pukekohe Park Precinct which is a regionally and nationally important venue for horse racing.
- (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.
- (6) Ecological values within stream habitats are protected, restored, maintained and enhanced.
- (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.

Sub-Precinct A, Sub-Precinct B and Sub-Precinct C

- (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.
- (9) Development is integrated and coordinated with the availability of operational transport infrastructure.
- (10) Natural hazard risk to people and property associated with subdivision, use and development within the Precinct is managed using a risk-based proportionate approach.

4.3

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above, except E36.2 Objectives.

4.4

IX.3. Policies

Sub-Precinct A and Sub-Precinct B

- (1) Enable medium density residential development while requiring subdivision and development to be comprehensively designed and integrated with natural features and landform, Buckland Road, and the Pukekohe Park Precinct.
- (2) Development recognises, protects and enhances cultural values, including by:
 - (a) Taking an integrated approach to stormwater management which protects and enhances the mauri of freshwater, in particular with regard to the Tutaenui Awa and its tributaries;
 - (b) Providing opportunities for the establishment of Mahi Toi Cultural Structures;
 - (c) Requiring the restoration and enhancement of riparian margins;
 - (d) Acknowledging the visual and physical connections to open spaces and the surrounding landscape in the layout and/or design of development; and
 - (e) Identifying opportunities to incorporate traditional names or other names put forward by Ngaati Te Ata Waiohua and Ngāti Tamaoho into open space areas, roads, or other community spaces.
- (3) Require the Indicative Shared Path to be provided generally in the location shown in IX.10.1 Pukekohekohe Gateway: Precinct Plan 1, while allowing for variation where it would achieve a highly connected street layout and active mode network that integrates with the surrounding transport network.
- (4) Require development which provides a local road and active modes network that achieves a highly connected street layout that integrates with the surrounding transport network, and contributes to the safety and amenity of the open space and stream network.
- (5) Require the transport network to be attractively designed and appropriately provide for all transport modes in accordance with IX.11: Appendix 1.
- (6) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of well-connected open spaces for the Pukekohekohe Gateway Precinct, including by:

- (a) Incorporating distinctive site features, including the Amenity Trees as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 3, where practicable;
 - (b) Providing a Neighbourhood Park generally in the location as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1; and
 - (c) Enhancing the stream network to provide amenity for future residents and users of the Pukekohe Park Precinct.
- (7) Require subdivision and development to be consistent with an approved stormwater management plan including by:
- (a) The use of inert building materials to eliminate or minimise the generation and discharge of contaminants;
 - (b) Requiring treatment of runoff from all directly connected impervious surfaces by a water quality device designed in accordance with GD01; and
 - (c) Requiring tanks to capture roof runoff to provide retention and detention.
- (8) Require the design of infrastructure and devices (including communal devices) to be efficient and effective, with consideration given to whole lifecycle costs, ease of access and operation, and integration with the built and natural environment.
- (9) Contribute to improvements to water quality, habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams.
- (10) Ensure that activities sensitive to noise adjacent to the railway corridor and Buckland Road are designed, constructed and maintained to reduce rail and road noise to protect people's health and residential amenity while they are indoors and that such activities do not unduly constrain the operation of the railway corridor or roads.

Sub-Precinct A, Sub-Precinct B and Sub-Precinct C

- (11) Require development within the Precinct to be coordinated with required transport infrastructure upgrades to manage the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.
- (12) Require the Indicative Key Intersections to be provided generally in the location shown in IX.10.1 Pukekohekohe Gateway: Precinct Plan 1, while allowing for variation, including where it would achieve a highly connected street layout that integrates with the surrounding transport network.
- (13) Require natural hazard risk to be assessed with regard to existing and proposed mitigation measures.
- (14) Where subdivision, use or development is assessed within the Precinct as having very high natural hazard risk that risk must be avoided.

4.5

- (15) Natural hazard risk associated with subdivision, use or development within the Precinct that is assessed as having high, medium or low natural hazard risk must be managed using an approach that is proportionate to the level of natural hazard risk.
- (16) Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.
- (17) Require risk assessment prior to subdivision, use and development of land subject to instability.

All relevant overlay, Auckland-wide and zone policies apply in this Precinct in addition to those specified above, except E36.3 Policies.

4.6

IX.4. Activity table

All relevant overlay, Auckland-wide and zone activity tables apply except Activity Table E36.4.1A, Activity Table E36.4.1B, and where unless the activity is otherwise listed in Activity Table IX.4.1 below.

4.7

Activity Table IX.4.1 specifies the activity status of subdivision and development in the Pukekohekohe Gateway Precinct pursuant to sections 9 and 11 of the Resource Management Act 1991.

Table IX.4.1 Activity table

Activity		Activity status
Use and Development		
(A1)	Mahi Toi Cultural Structures up to 5m in height	P
(A2)	New buildings and development prior to subdivision, including private roads within Sub-Precinct A or Sub-Precinct B	RD
(A3)	New buildings within Sub-Precinct C	RD
(A4)	Development that does not comply with Standard IX.6.1 or IX.6.2	D
(A5)	Development that does not comply with Standards IX6.3 to IX.6.11	RD
(A5A)	<u>New buildings or earthworks in the 1 per cent annual exceedance probability (AEP) floodplain</u>	<u>RD</u>
(A5B)	<u>New buildings or earthworks within an overland flowpath</u>	<u>RD</u>

4.8

Activity		Activity status
(A5C)	<u>New buildings or earthworks on land which may be subject to land instability</u>	<u>RD</u>
Subdivision		
(A6)	Subdivision, including private roads within Sub-Precinct A or Sub-Precinct B	RD
(A7)	<u>Subdivison of land within any of the following natural hazard areas:</u> <ul style="list-style-type: none"> • <u>1 per cent annual exceedance probability (AEP) floodplain;</u> • <u>Overland flow paths;or</u> • <u>Land which may be subject to land instability.</u> 	<u>RD</u>

Note: For the purpose of IX.4.1(A1), Mahi Toi Cultural Structures includes but are not limited to pou, carvings, tohu, and cultural interpretive elements located in public spaces or gateways designed in partnership with Ngaati Te Ata Waiohua and Ngāti Tamaoho.

IX.5 Notification

- (1) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) When deciding on who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

IX.6. Standards

- (1) Unless specified in Standard IX.6(2) or IX.6(3) below, all relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IX.4.1 above.
- (2) The Residential – Mixed Housing Urban zone and Open Space – Informal Recreation zone standards do not apply to Mahi Toi Cultural Structures up to 5m in height within the Pukekohekohe Gateway Precinct.
- (3) The Auckland-wide standards in E36.6.1 do not apply.
- (4) The following Auckland-wide standards do not apply to residential activities that comply with IX.6.1. Staging of Development with Transport Upgrades within Sub-Precinct A

4.9

and Sub-Precinct B or IX.6.2 Staging of Development with Transport Upgrades within Sub-Precinct C:

(a) E27.6.1 Trip generation

(5) The following Auckland-wide standards do not apply to activities that comply with IX6.X Buildings and structures on land which may be subject to land instability:

(a) E36.6.A1 General Standards

(6) All activities listed in Activity Table IX.4.1, except Mahi Toi Cultural Structures provided for at IX.4.1(A1), must also comply with the following Standards as relevant below. All activities listed in Activity Table IX.4.1 must also comply with IX.9 Special Information Requirements.

Where there is any conflict or difference between standards in this precinct and the Auckland-wide and zone standards, the standards in this precinct will apply.

IX.6.1 Staging of Development with Transport Upgrades within Sub-Precinct A and Sub-Precinct B

Purpose:

- Manage the adverse effects of traffic generation on the surrounding local and wider road network, consistent with Policy IX.3(11).
- Achieve the integration of land use and transport, consistent with Policies IX.3(3), (4) and (5).

(1) Prior to the occupation of any new dwellings within the Pukekohekohe Gateway Precinct Sub-Precinct A or Sub-Precinct B, the transport upgrades in Table IX.6.1.1. must be provided in accordance with Standard IX.6.1(2).

Table IX.6.1.1 Staging of Transport Upgrades

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 dwelling within Sub-Precinct A	(i) Provision of a roundabout with a formal pedestrian crossing facility across Buckland Road (Central Intersection) generally in the location shown in IX.10.1 Precinct Plan 1.

Column 1		Column 2
Activities or development enabled by Transport Infrastructure in column 2		Transport infrastructure required to enable activities or development in column 1
(b)	Prior to the occupancy of any new dwelling within Sub-Precinct B	(i) Provision of a priority-controlled intersection with a right-turn bay from Buckland Road (Southern Intersection), generally in the location shown in IX.10.1 Precinct Plan 1.
(c)	Prior to the occupancy of any new dwelling 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 dwelling 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.

(2) Applications for resource consent in respect of activities or development identified in Column 1 of the Table will be deemed to comply with this standard IX.6.1(1) if the corresponding infrastructure identified in Column 2 of the Table is:

- (a) Constructed and operational prior to lodgement of the resource consent application; or
- (b) Under construction with relevant consents being given effect to prior to the lodgement of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational prior to the occupation of any dwellings; or
- (c) Proposed to be constructed by the applicant as part of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational prior to the occupation of any dwellings.

(3) Any application lodged in terms of IX.6.1(2) (b) or (c) above must confirm the applicant's express agreement in terms of section 108AA(1)(a) of the RMA and on an *Augier* basis to the imposition of consent conditions requiring (as relevant) that:

(a) No dwellings shall be occupied until the relevant infrastructure upgrades are constructed and operational.

(4) For the purpose of this standard:

(a) 'Occupation' and 'occupied' mean occupation and use for the purposes permitted by the resource consent but not including occupation by personnel engaged in construction, fitting out or decoration; and

(b) 'Operational' means the relevant upgrade is available for use and open to all traffic.

IX.6.2 Staging of Development with Transport Upgrades within Sub-Precinct C

Purpose: Manage the adverse effects of traffic generation on the surrounding local and wider road network, and achieve coordination of land use and transport, consistent with Policy IX.3(11).

(1) Prior to the occupation of any new buildings within the Pukekohekohe Gateway Precinct Sub-Precinct C, the transport upgrades in Table IX.6.2.1. must be provided in accordance with Standard IX.6.2(2).

Table IX.6.2.1 Staging of Transport Upgrades

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 1; 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.

Column 1		Column 2
Activities or development enabled by Transport Infrastructure in column 2		Transport infrastructure required to enable activities or development in column 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.

- (2) Applications for resource consent in respect of activities or development identified in Column 1 of the Table will be deemed to comply with this standard IX.6.2(1) if the corresponding infrastructure identified in Column 2 of the Table is:
- (a) Constructed and operational prior to lodgement of the resource consent application; or
 - (b) Under construction with relevant consents being given effect to prior to the lodgement of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational prior to the occupation of any buildings; or
 - (c) Proposed to be constructed by the applicant as part of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational prior to the occupation of any buildings.
- (3) Any application lodged in terms of IX.6.2(2) (b) or (c) above must confirm the applicant's express agreement in terms of section 108AA(1)(a) of the RMA and on an Augier basis to the imposition of consent conditions requiring (as relevant) that:
- (a) No buildings shall be occupied until the relevant infrastructure upgrades are constructed and operational.
- (4) For the purpose of this standard:
- (a) 'Occupation' and 'occupied' mean occupation and use for the purposes permitted by the resource consent but not including occupation by personnel engaged in construction, fitting out or decoration; and
 - (b) 'Operational' means the relevant upgrade is available for use and open to all traffic.

IX.6.3 Road Design within Sub-Precinct A or Sub-Precinct B

Purpose: To ensure that any activity, development and/or subdivision complies with IX.11 Appendix 1: Road Function and Design Elements Table.

- (1) Any activity, development and/or subdivision must comply with IX.11 Appendix 1: Road Function and Design Elements Table.

IX.6.4 Riparian Margins within Sub-Precinct A or Sub-Precinct B

Purpose: Contribute to improvements to water quality, habitat and biodiversity.

- (1) Riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of bank of the stream, provided that:
 - (a) This rule shall not apply to road or active mode crossings over streams;
 - (b) Walkways and cycleways must not locate within the 10m riparian planting area;
 - (c) When the riparian planting area is located on private land it is protected and maintained in perpetuity by an appropriate legal mechanism.

IX.6.5 Stormwater Quality within Sub-Precinct A or Sub-Precinct B

Purpose: Contribute to improvements to water quality and stream health.

- (1) Stormwater runoff from all directly connected impervious surfaces, excluding roofs, must be treated with a stormwater management device(s) meeting the following standards:
 - (a) The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or
 - (b) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'.
- (2) New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that avoid the use of high contaminant yielding building products which have:
 - (a) Exposed surface(s) or surface coating of metallic zinc of any alloy containing greater than 10% zinc; or
 - (b) Exposed surface(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or

- (c) Exposed treated timber surface(s) or any roof material with a copper-containing or zinc-containing algaecide.
- (3) Roof runoff must be directed to a tank sized for the minimum of 5mm retention volume for non-potable reuse within the property.

IX.6.6 Building setback along the railway corridor within Sub-Precinct B

Purpose: Buildings are setback from the railway corridor to ensure the safe operation of the railway corridor by providing for buildings on adjoining sites to be maintained within their site boundaries.

- (1) Buildings must be setback at least 5 metres from any boundary which adjoins the railway corridor.

IX.6.7 Acoustic Barrier along the railway corridor within Sub-Precinct B

Purpose: To provide an acoustic barrier to protect people's health and residential amenity adjacent to the railway corridor.

- (1) Either prior to or concurrent with the first development for any activities sensitive to noise within 100m of the rail line within Sub-Precinct B, a 2m high acoustic barrier must be constructed at the location shown in IX.10.4 Pukekohekohe Gateway: Precinct Plan 1.

IX.6.8 Activities sensitive to noise within 100m of the North Island Main Trunk within Sub-Precinct B

Purpose: Ensure activities sensitive to noise adjacent to the railway corridor are designed to reduce rail noise to protect people's health and residential amenity while they are indoors and that such activities do not unduly constrain the operation of the railway corridor.

- (1) Any new building, or alteration to an existing building that contains a Noise Sensitive Space, within 100m of the nearest rail line must be designed, constructed and maintained to reduce external noise to not exceed 35 dB LAeq(1 hour) in bedrooms and sleeping areas, and 40 dB LAeq(1 hour) for all other Noise Sensitive Spaces. Written certification of such compliance shall be submitted from a Suitably Qualified and Experienced Acoustic Consultant with the building consent application for the building concerned. The design certificate shall be based on:
 - (a) A source level for railway noise of 72 LAeq (1hour) at a distance of 12 metres from the nearest track; and
 - (b) The attenuation over distance being:
 - i. 3 dB per doubling of distance up to 40m and 6 dB per doubling of distance beyond 40m; or

- ii. As modelled by a Suitably Qualified and Experienced Acoustic Consultant using a recognised computer modelling method for freight trains with diesel locomotives, having regard to factors such as barrier attenuation, the location of the dwelling relative to the orientation of the track, topographical features and any intervening structures.

- (2) The requirements of IX.6.8(1) do not apply where the Noise Sensitive Space(s) within 100m of the boundary of the nearest rail line is in a location where it can be demonstrated by way of prediction or measurement by a Suitably Qualified and Experienced Acoustic Consultant that the rail noise level at all exterior façades of the Noise Sensitive Space(s) is no more than 15 dB above the relevant internal noise levels in IX.6.6(1).

IX.6.9 Activities sensitive to noise within 55m of the centreline of Buckland Road within Sub-Precinct A and Sub-Precinct B

Purpose: Ensure activities sensitive to noise adjacent to Manukau Road and Buckland Road are designed to protect people's health and residential amenity while they are indoors.

- (1) Any new building or alteration to an existing building that contains a Noise Sensitive Space within 55m of the centreline of Buckland Road must be designed, constructed and maintained so that road traffic noise from Buckland Road does not exceed 40 dB LAeq (24 hour) in all Noise Sensitive Spaces.
- (2) Written certification of compliance with IX.6.9(1) shall be submitted from a Suitably Qualified and Experienced Acoustic Consultant with the relevant building consent application. The certification shall be based on the existing measured or predicted noise levels plus 3 dB. Noise level predictions for the building may be modelled by a Suitably Qualified and Experienced Acoustic Consultant using a recognised computer modelling method for road traffic, having regard to factors such as barrier attenuation, the location of the dwelling relative to the road, topographical features, any changes to the road environment and any intervening structures.

IX.6.10 Mechanical cooling and ventilation requirements for Noise Sensitive Spaces in IX.6.8 and IX.6.9

Purpose: Ensure activities sensitive to noise adjacent to the railway corridor or Buckland Road are designed to protect people's health and residential amenity while they are indoors.

- (1) If opening windows of Noise Sensitive Spaces must be closed to achieve the design noise levels in IX.6.8(1) or IX.6.9(1) those spaces must be designed, constructed and maintained with a mechanical cooling and ventilation system that achieves the following requirements:

- (a) Provides mechanical ventilation that can operate continuously to satisfy clause G4 of the New Zealand Building Code and that provides at least 1 air change per hour, but no less than 7.5L/s per occupant; and
- (b) Provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C when assessed using a 2.5% design weather condition for Pukekohe. An acceptable design weather set would include IRHACE Yearbook 2009 NIWA weather data; and
- (c) Any system installed in compliance with IX.6.10(1)(a) and (b) above, must not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser. The noise level must be measured after the system has cooled the rooms to the temperatures in IX.6.10(1)(b), or after a period of 30 minutes from the commencement of cooling (whichever is the lesser);

OR:

- (d) Alternatively, in lieu of section IX.6.10(1)(a) - (c) above, a design verified by a suitably qualified and experienced HVAC expert stating the design proposed will provide ventilation and internal space temperature controls to meet or exceed the outcomes described in IX.6.10(1)(a)-(c).
- (2) A commissioning report must be submitted to the Council prior to occupation of the building demonstrating compliance with the mechanical ventilation system performance requirements in IX.6.10(1)(a)-(c) or IX.6.7(1)(d).

IX.6.11 Fencing Interface Control within Sub-Precinct A

Purpose: Provide privacy for dwellings while ensuring development positively contributes to the visual quality and safety of open spaces.

- (1) Fences, or walls, or a combination of these structures, within a rear or side yard directly adjoining the Fencing Interface Control as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1 (excluding roads) must not exceed 1.5m in height, measured from the ground level at the boundary.

IX.6.12 Buildings and structures on land which may be subject to land instability

Purpose: Require buildings and structures on land which may be subject to land instability to be designed and constructed to manage natural hazard risk.

- (1) Buildings and structures located on land which may be subject to land instability must be constructed in accordance with:
 - (a) A Geotechnical completion report or similar professional report, approved by Council; and

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- (b) Any conditions of resource consent of subdivision consent associated with the site relating to stability or geotechnical matters.

IX.7 Assessment – Controlled Activities

There are no controlled activities in this precinct.

IX.8. Assessment – Restricted Discretionary Activities

IX.8.1. Matters of discretion

The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

- (1) Subdivision, or new buildings and development prior to subdivision, including private roads within Sub-Precinct A or Sub-Precinct B:
 - (a) Location and design of the key local roads, key intersections, and key active mode connections to achieve an integrated street network, and appropriately provide for all modes;
 - (b) Provision of cycling and pedestrian networks and connections;
 - (c) Open space network;
 - (d) Stormwater and flooding effects;
 - (e) Cultural values;
 - (f) Matters of discretion IX.8.1(1)(a)-(e) apply in addition to the matters of discretion in E38.12.1.
- (2) New buildings within Sub-Precinct C:
 - (a) Matters of discretion H14.8.1(4) apply.

(2A) Subdivision, new buildings or earthworks in the 1 per cent annual exceedance probability (AEP) floodplain:

- (a) The effects of the location of the structures and building platforms;
- (b) The effects of flood hazards on the structural integrity of a building or structure;
- (c) The effects of storage of outdoor goods and materials;
- (d) The effects of the location and design of roads, accessways and parking areas;

4.11

- (e) The extent of any associated earthworks;
- (f) The effects of potential changes in flood depth, velocity and frequency on adjoining sites, including upstream and downstream from buildings and structures;
- (g) The extent to which methods for long term maintenance of areas affected by flooding, such as easements, are provided;
- (h) The effects of the use of spaces under buildings; and
- (i) The effects on the operational or functional needs of network utilities and infrastructure.

(2B) Subdivision, new buildings or earthworks in overland flow paths:

- (a) The effects of flooding on the activity proposed, including whether it is a more or less vulnerable activity;
- (b) The effects on the location of habitable rooms;
- (c) The design of the building and how it provides for safe access and the potential effects of flood hazards on chosen access routes; and
- (d) The effects on people during a flood event and the ability to avoid, remedy or mitigate these.

(2C) Subdivision, new buildings or earthworks on land which may be subject to land instability:

- (a) The type of activity being undertaken and its vulnerability to the potential effects of land instability;
- (b) The consequences of the potential effects of land instability in relation to more vulnerable activities;
- (c) The possible effects on public safety and other property resulting from the proposed development or activity;
- (d) The likelihood of a hazard arising from unstable land event and the likely extent of any damage;
- (e) The effects on landscape values, associated earthworks and land form modifications;
- (f) The methods provided to manage activities and uses within the site, including safe egress from buildings and structures and the management of people and property during a hazard event;

- (g) Any exacerbation of an existing land instability hazard or creation of a new land instability hazard as a result of the proposed activity or development and possible effects on public safety and other property;
 - (h) The proposed use of, necessity for and design of hard engineering solutions for land instability hazards;
 - (i) The ability to relocate buildings or structures within a hazard area, including the proposed duration of occupation of the structures or building; and
 - (j) The ability to design, construct and maintain buildings or structures so that they are resilient to land instability hazards.
- (3) Infringement to Standard IX.6.3 Road Design within Sub-Precinct A or Sub-Precinct B:
- (a) The design of the road, and associated road reserve and whether it achieves policies IX.3(5) and (6);
 - (b) Design constraints;
 - (c) Interface design treatment at property boundaries, particularly for pedestrians and cyclists.
- (4) Infringements to Standard IX.6.4 Riparian Margins within Sub-Precinct A or Sub-Precinct B:
- (a) Effects on water quality, stream habitat and biodiversity.
- (5) Infringements to Standard IX.6.5 Stormwater Quality within Sub-Precinct A or Sub-Precinct B:
- (a) Matters of discretion E9.8.1(1) apply.
- (6) Infringement of Standard IX.6.6 Building setback along the North Island Main Trunk within Sub-Precinct B:
- (a) Effects on the safe operation of the North Island Main Trunk, by providing for buildings on adjoining sites to be maintained within their site boundaries.
- (7) Infringement of Standard IX.6.7 Acoustic Barrier along the railway corridor within Sub-Precinct B, Standard IX.6.8 Activities sensitive to noise within 100m of the rail line within Sub-Precinct B or Standard IX.6.9 Activities sensitive to noise within 55m of the centreline of Buckland Road within Sub-Precinct A and Sub-Precinct B:
- (a) Effects on human health and residential amenity while people are indoors and effects on the operation of the railway corridor and roads.

- (8) Infringement of Standard IX6.10 Mechanical cooling and ventilation requirements for IX6.8 and IX.6.9:
- (a) Effects on human health and residential amenity while people are indoors and effects on the operation of the railway corridor.
- (9) Infringement of Standard IX.6.11 Fencing Interface Control:
- (a) Effects on privacy and the amenity and safety of the open space.

IX.8.2. Assessment Criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

- (1) Subdivision, and new buildings and development prior to subdivision, including private roads within Sub-Precinct A or Sub-Precinct B:

Location of roads and other transport connections

- (a) Whether the Indicative Local Roads and Indicative Active Mode Connections are provided generally in the location shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1 to achieve a highly connected street layout and active mode network that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:
- i. The presence of natural features, natural hazards, contours or other constraints and how this impacts the placement of Indicative roads and the Indicative Shared Path; and
 - ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities.
- (b) Whether a high quality and integrated network of local roads is provided within the precinct that achieve a good degree of accessibility and support a walkable and cyclable street network.
- (c) Whether street and block patterns are designed to provide visual and physical connections to open spaces and the surrounding landscape including Pukekohe Hill and the Hunua Ranges.

Design of roads and key intersections

- (d) Whether the design of new local roads accord with the road design details provided in IX.11.1 Pukekohekohe Gateway: Appendix 1: Road Function and Design Elements Table.
- (e) Whether the design of key intersections provides for the safe and efficient function of the existing and future planned transport network and can be accommodated within the available road reserves.
- (f) Where an interim upgrade is proposed whether the design allows for the ultimate upgrade to be efficiently delivered.

Sequencing of upgrades to the existing road network

- (g) Where the active mode connection on the western side of Buckland Road is not constructed and operational, whether local road connections are provided within Sub-Precinct A to connect active modes to the intersection of Kitchener / Buckland / Manukau Road.
- (h) Where the footpath required in Standard IX.6.2 has not been provided, whether a safe interim connection for active modes is provided along the Sub-Precinct C frontage.

Open space network

- (i) Whether a Neighbourhood Park is provided generally consistent with the indicative size and location shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1.
- (j) Whether the Neighbourhood Park has adequate street frontage to ensure it is visually prominent, accessible, and safe.
- (k) Whether existing Amenity Trees, as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 3, are retained for amenity reasons, where practicable, having regard to the following operational and functional matters:
 - (i) Existing contours and the extent of earthworks required to create suitable levels;
 - (ii) The presence of natural hazards;
 - (iii) The operational and/or functional needs of three waters infrastructure; and
 - (iv) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities.

Stormwater and flooding

- (l) Whether development is in accordance with an approved Stormwater Management Plan and policies E1.3(1) – (14).

- (m) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, life-cycle cost, ease of access, operation, ongoing viability and maintenance, and integration with the surrounding environment including the road corridor where relevant.
- (n) Whether the proposal ensures that subdivision and development manages flooding effects (including cumulative effects) downstream of the precinct so that the risks to people, property, and infrastructure are not increased for all flood events, up to a 1% AEP flood event, including allowance for climate change.

Cultural values

- (o) Whether the proposal achieves policy IX.3(2).
- (p) Whether the development provides for the delivery of Mahi Toi Cultural Structures in the location identified on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1.

(2A) Subdivision, new buildings or earthworks in the 1 per cent annual exceedance probability (AEP) floodplain:

- (a) Whether the building platform can be located outside of the 1 per cent AEP floodplain so as not to block or impede the flood waters;
- (b) Where the building cannot be practically located outside or above the flood plain, how the building can be designed and managed to minimise increase in flood related risks experienced by other properties, including those upstream or downstream such as, maintaining a clear undercroft, allowing for the passage of flood waters;
- (c) Whether buildings likely to be affected by flood waters should be wet proofed or dry proofed to minimise damage to the building and its contents; and
- (d) Site layout and management to avoid hazardous and floatable materials including cars and other stored items being carried off site.

4.12

(2B) Subdivision, new buildings or earthworks in overland flow paths:

- (a) The extent to which the overland flow path is maintained to convey stormwater runoff safely from a site to the receiving environment;
- (b) The location of habitable rooms in relation to the overland flow path;
- (c) The extent to which the design of the building provides for safe access and the potential effects of flood hazards on chosen access routes; and
- (d) The extent to which people are affected during flood events and the extent to which effects are avoided, remedied or mitigated.

(2C) Subdivision, new buildings or earthworks on land which may be subject to land instability:

- (a) The likelihood of a land instability hazard event occurring, its magnitude and duration, the consequences of the event and its effects on public health, safety, property and the environment;
- (b) The extent to which site-specific analysis, such as engineering, or stability reports and its analysis have been undertaken and any other information the Council may have on the site and surrounding land;
- (c) The extent to which landscape and other environmental values are affected by any works proposed in association with the building or structure or mitigation of the hazard; and
- (d) The extent to which any building or structure can be relocated in the event of a land instability hazard occurring.

(2) New buildings within Sub-Precinct C:

- (a) Assessment criteria H14.8.2(4) apply.

(3) Infringement to Standard IX.6.3 Road Design within Sub-Precinct A or Sub-Precinct B:

- (a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.
- (b) Whether the design of the road and associated road reserve achieves policies IX.3(5) and (6).
- (c) Whether the proposed design and road reserve:
 - i. incorporates measures to achieve the required design speeds;
 - ii. can safely accommodate required vehicle and active mode movements;
 - iii. can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment.
- (d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.

(4) Infringement to Standard IX.6.4 Riparian Margins within Sub-Precinct A or Sub-Precinct B:

- (a) Whether the infringement is consistent with Policies IX.3(7) and IX.3(9).

(5) Infringement to Standard IX.6.5 Stormwater Quality within Sub-Precinct A or Sub-

Precinct B:

- (a) Assessment criteria E9.8.2(1) apply.
 - (b) Whether the proposal is in accordance with an approved Stormwater Management Plan and Policies E1.3(1) – (10) and (12) – (14).
 - (c) Whether a water sensitive approach is implemented to treat runoff so that all contaminant generating surfaces are treated, including cumulative effects of lower contaminant generating surfaces.
- (6) Infringement of Standard IX.6.6 Building Setback of the North Island Main Trunk within Sub-Precinct B:
- (a) Whether the proposal ensures that buildings can be maintained within their site boundaries while providing for the safe operation of the North Island Main Trunk, including:
 - i. the size, nature and location of the buildings on the site;
 - ii. the extent to which the safety and efficiency of railway operations will be adversely affected;
 - iii. any characteristics of the proposal that avoid or mitigate any effects on the safe operation of the North Island Main Trunk; and
 - (b) The outcome of any consultation with KiwiRail.
- (7) Infringement of Standard IX.6.7 Acoustic Barrier along the railway corridor within Sub-Precinct B, Standard IX.6.8 Activities sensitive to noise within 100m of the rail line within Sub-Precinct B or Standard IX.6.9 Activities sensitive to noise within 55m of the centreline of Buckland Road within Sub-Precinct A and Sub-Precinct B:
- (a) Whether activities sensitive to noise adjacent to the rail line are designed to protect people's health and amenity while they are indoors, and whether such activities unduly constrain the operation of the rail line. This includes:
 - i. the extent to which building(s) containing activities sensitive to noise have been located and designed with particular regard to proximity to the rail corridor and Buckland Road;
 - ii. the extent of non-compliance with the noise standard and the effects of any non-compliance;
 - iii. the extent to which topographical features or location of other buildings or structures will mitigate noise effects; and

- iv. Any noise management implications arising from technical advice from an acoustic expert and the relevant transport authority.
- (8) Infringement of Standard IX6.10 Mechanical cooling and ventilation requirements for IX.6.8 and IX.6.9:
- (a) The extent to which any alternative ventilation and temperature control system provides sufficient thermal comfort and fresh air supply to ensure that the requirements of Clause G4 of the New Zealand Building Code are met and that occupants of Noise Sensitive Spaces can remain cool and comfortable at all times without having to open windows and doors for cooling or fresh air (where doing so would result in the indoor noise levels exceeding the standards in IX.6.8 and IX.6.9.
- (9) Infringement of Standard IX.6.11 Fencing Interface Control:
- (a) Whether the proposal positively contributes to the visual quality of the adjoining open space, while providing an adequate degree of privacy and security for residents; and
 - (b) Any specific or unique characteristics of the site which is relevant to the standard.

IX.9 Special information requirements

- (1) Riparian planting plan
- (a) An application for land modification, development and subdivision which adjoins a permanent or intermittent stream must be accompanied by a riparian planting plan identifying the location, species, planter bag size and density of the plants. Plant species should be predominantly native and resilient to the potential adverse effects of flood risk. The planting plan must include details of any management and maintenance requirements.
- (2) Development adjacent to the North Island Main Trunk
- (a) Activities sensitive to noise proposed within 100m of the rail corridor which infringe Standard IX.6.6 and/or buildings proposed within 5m from any boundary which adjoins the North Island Main Trunk which infringe Standard IX.6.8 must demonstrate evidence of consultation with KiwiRail and its responses to that consultation.
- (3) Consultation with Ngaati Te Ata Waiohua and Ngāti Tamaoho
- (a) Land disturbance within Sub-Precinct A or Sub-Precinct B requiring resource consent under Chapter E11 Land Disturbance – District or Chapter E12 Land Disturbance – Regional must demonstrate evidence of consultation with Ngaati Te Ata Waiohua and Ngāti Tamaoho with written advice.

(4) Development within Sub-Precinct C

- (a) Any development within Sub-Precinct C must demonstrate compliance with Standard IX.6.2.1(b) Staging of Development with Transport Upgrades within Sub-Precinct C, and must identify the maximum number of right turn exiting vehicle movements generated per hour out of a single existing or proposed vehicle crossing within Sub-Precinct C through an assessment prepared by a suitably qualified and experienced person.

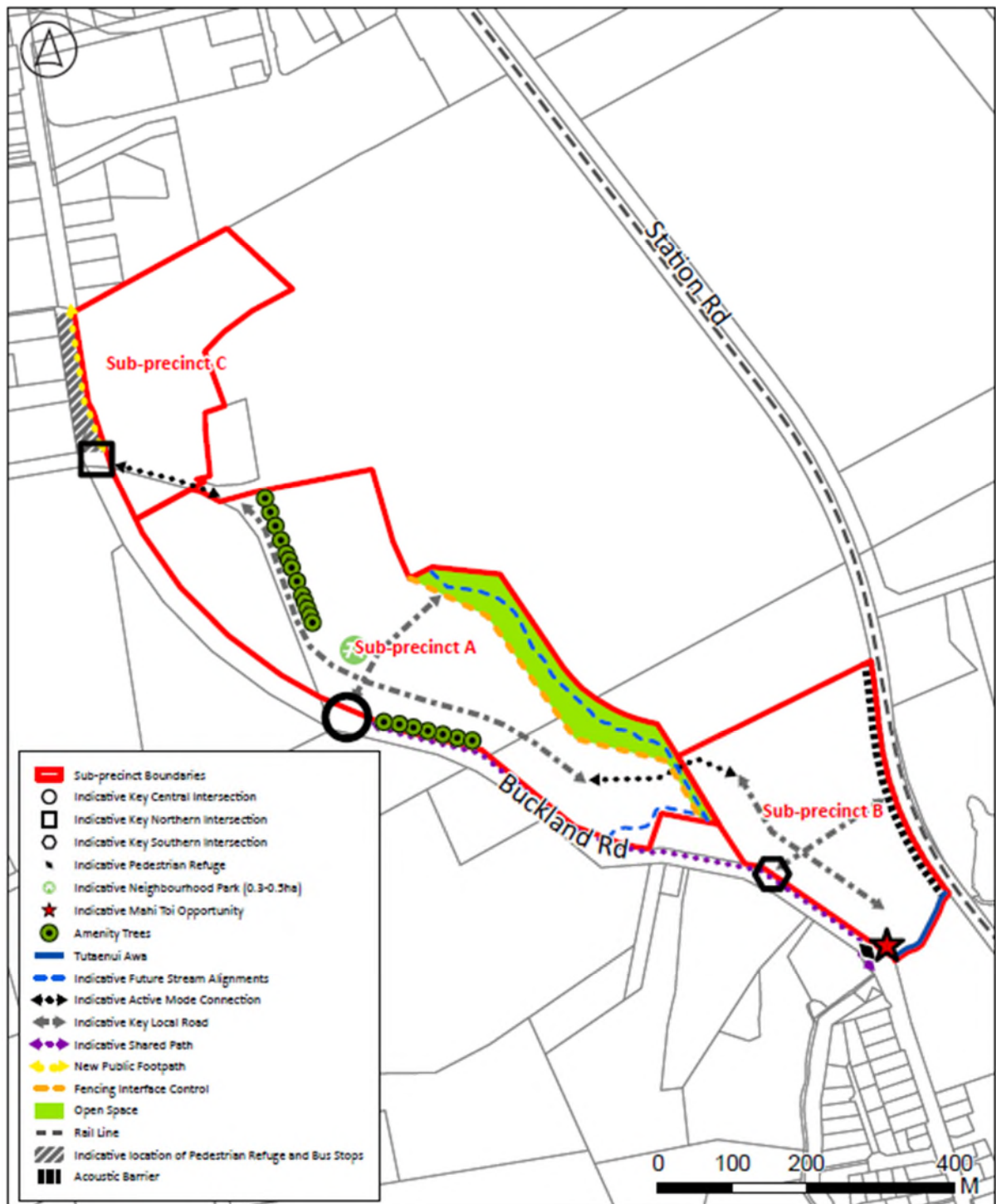
(5) Transport Design Report

- (a) Any proposed new key intersection or upgrade to an existing intersection, or any proposed new local roads as shown on IX.10.1 Pukekohekohe Gateway: Precinct Plan 1 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer. The Report must demonstrate that the location and design of any new local road or intersection supports the safe and efficient function of the existing and future planned transport network and can be accommodated within the available road reserves. This may be included within a transport assessment supporting land use or subdivision consents.

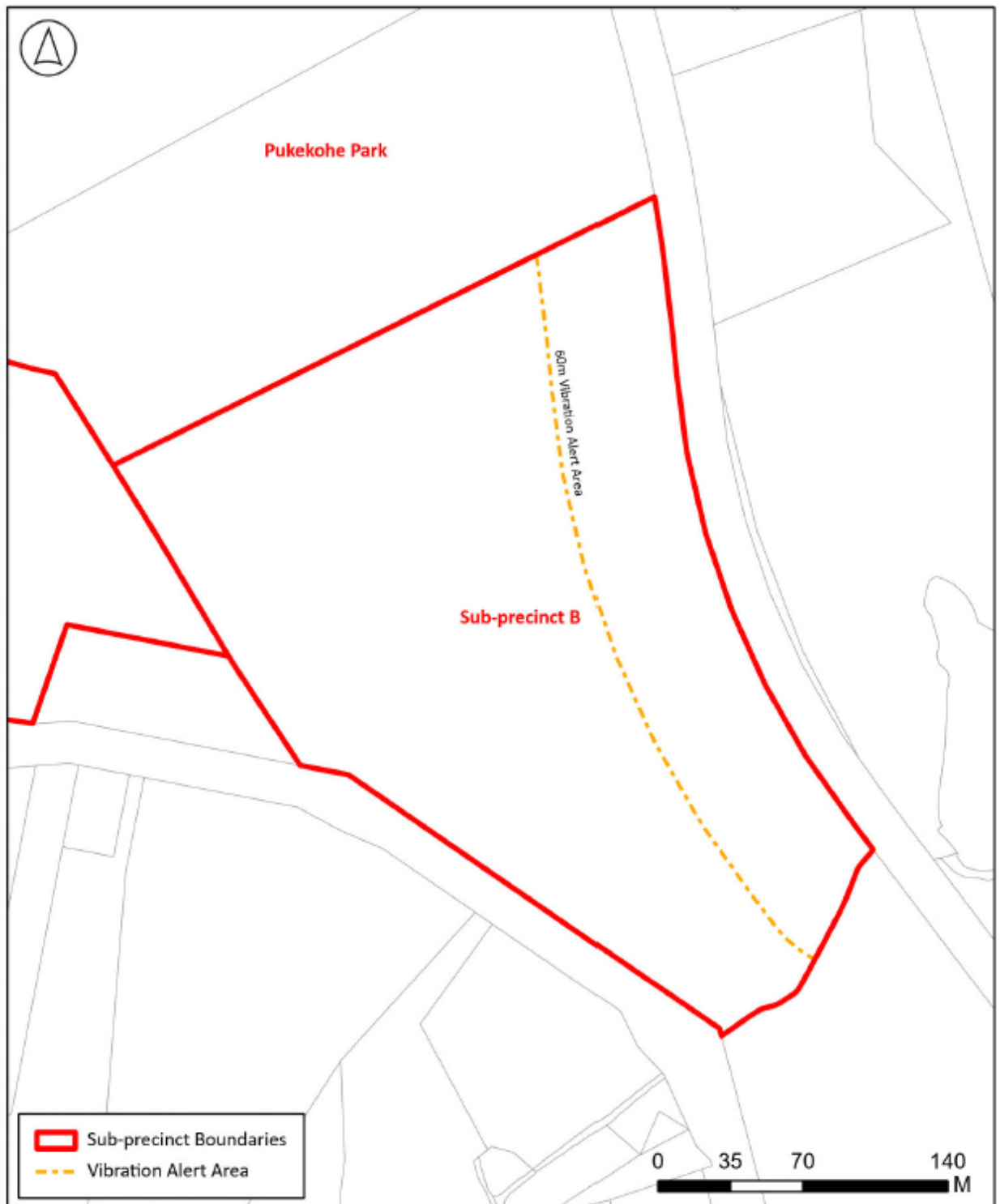
In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.

IX.10 Precinct Plans

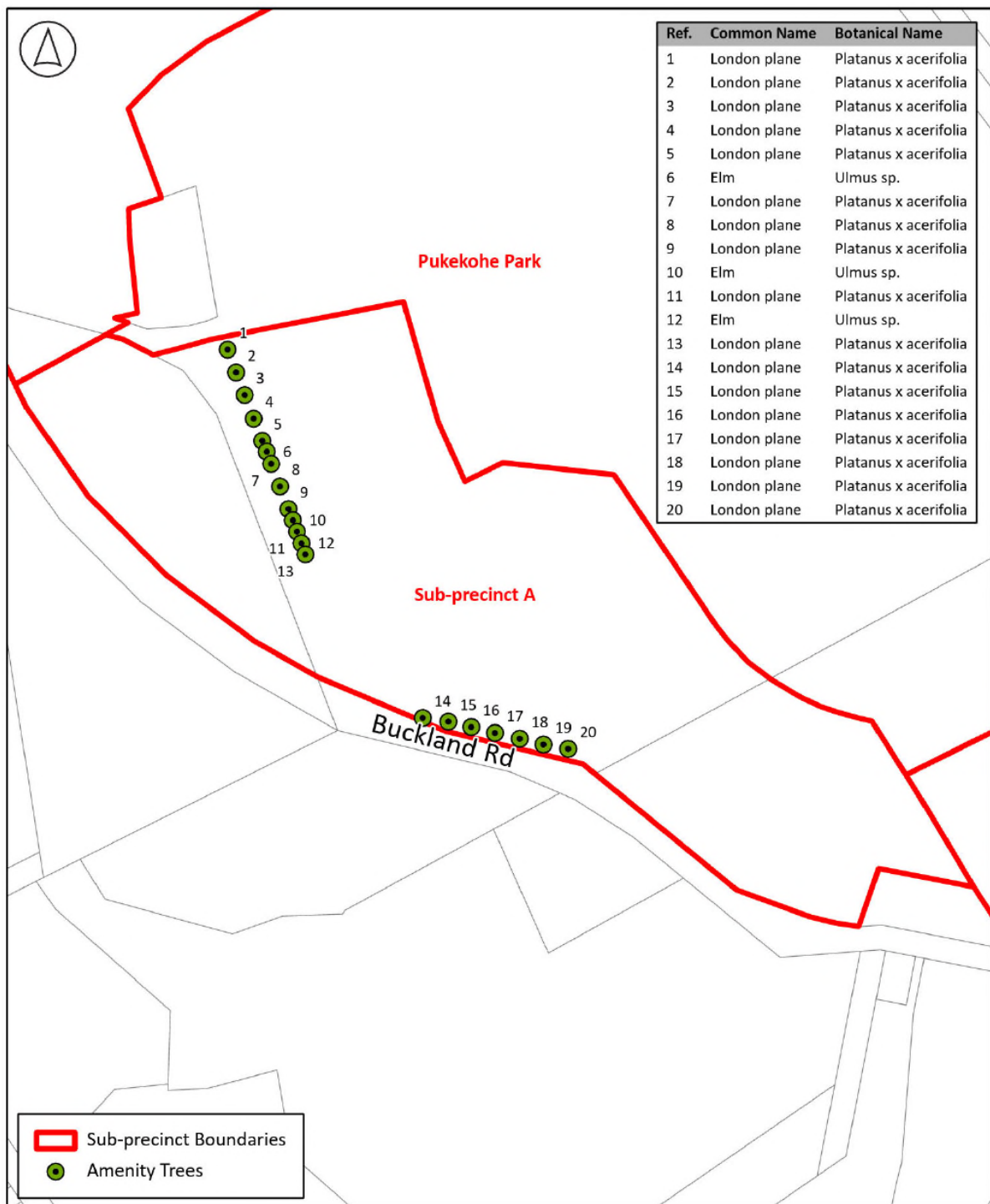
IX.10.1 Pukekohekohe Gateway Precinct: Precinct Plan 1 – Indicative Road and Open Space Network



IX.10.2 Pukekohekohe Gateway Precinct: Precinct Plan 2 – Rail Vibration Plan



IX.10.3 Pukekohekohe Gateway Precinct: Precinct Plan 3 – Amenity Trees



IX.11 Appendices

Appendix 1: Road Function and Design Elements Table

Road Function and Required Design Elements Table										
Road Name (refer to Precinct Plan 1)	Proposed Role and Function of Road in Precinct Area	Min. Road Reserve (subject to note 1)	Total number of lanes	Speed Limit	Access Restrictions	Median	Bus Provision	On Street Parking	Cycle Provision	Pedestrian Provision
Indicative Key Local Roads	Local	16m	2	30	No	No	No	Yes On-street parking (interspersed between trees)	Optional	Yes Both sides

Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirement

From: [Mayur Chauhan](#)
To: [Unitary Plan](#)
Subject: Submission - PC 124 (Private) – Pukekohe Gateway Precinct
Date: Sunday, 22 February 2026 10:25:39 pm
Attachments: [pc124-form 5 - Franklin Paths Programme - MC.pdf](#)

To the Auckland Council Unitary Plan team,

Please find attached our formal Form 5 submission for Private Plan Change 124 (Pukekohe Gateway Precinct) on behalf of the Franklin Paths Programme.

Our submission specifically seeks an amendment to the active mode connections described in Section 5.3 of the transport report. We are advocating for a continuous 3m shared path on the eastern side of Buckland Road to ensure a safer, more direct route that aligns with our strategic goals for the area.

Please find attached: **Completed Form 5**

We confirm that we wish to be heard in support of this submission. Could you please acknowledge receipt of this email?

Ngā mihi,

Mayur Chauhan | Franklin Paths Programme Manager
Customer & Community Partnerships Team

Waea pūkoro / Phone 027 203 5246

Te Kaunihera o Tāmaki Makaurau / Auckland Council

Level 13, Te Wharau o Tāmaki Auckland House, 135 Albert Street, Auckland

aucklandcouncil.govt.nz

Music in Parks. Enjoy free live music events from 7 January to 21 February.

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

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

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

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

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

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mayur Chauhan

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

Franklin Paths Programme - Auckland Council

Address for service of Submitter

135 Albert Street

Auckland Central, Auckland 1010

Telephone: 027 203 5246

Email: mayur.chauhan@aucklandcouncil.govt.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number PC 124 (Private)

Plan Change/Variation Name Pukekohekohe Gateway Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

The Indicative Active Mode connections and proposed transport infrastructure as detailed in Section 5.3 and Figure 16 of the Integrated Transportation Assessment (Appendix 13). This includes the proposed 3m shared path along the eastern frontage of the PPC site, the subsequent 'blue' shared path connection on the western side of Buckland Road (associated with PC87), and the return to a 1.8m footpath on the eastern side of Manukau Road (Sub-Precinct C). My submission specifically addresses the lack of a continuous, unified active mode corridor on the eastern side and the resulting requirement for users to navigate multiple arterial road crossings to maintain connectivity

Or

Property Address

Or

Map

Or

Other (specify)

Submission

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

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

5.1

The Franklin Paths Programme opposes the fragmented 'zig-zag' alignment proposed in the CKL ITA Figure 16.

We advocate for a single, continuous 3.0m shared path on the eastern side of Buckland Road/Manukau Road.

5.2

The requirement for multiple road crossings creates unnecessary safety risks and conflicts with the strategic objectives of the Pukekohe-Paerata Paths Plan for a legible, continuous eastern corridor.

We seek an amendment to the Pukekohe Gateway Precinct Plan and its provisions to mandate a continuous eastern-side shared path corridor and delete the indication for the path to transition to the western side.

5.3

I wish to be heard in support of my submission

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

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

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

Mayur Chauhan

Signature of Submitter

(or person authorised to sign on behalf of submitter)

22/2/26

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Submission on Plan Change 124

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

Name of Submitter: Golding Meadow Developments Ltd

Address for Service: 199 Pakuranga Road, Pakuranga, Auckland, 2010

Email: gmdl2027@gmail.com

1 INTRODUCTION

- 1.1 Golding Meadow Development Ltd ("the submitter") welcomes the opportunity to provide a submission on Private Plan Change 124 (PC124) relating to the Pukekohe Gateway Precinct.
- 1.2 The submitter owns land within the Pukekohe Golding Precinct, and therefore has an interest in PC124 and its implications for the wider stormwater network and sub-catchment interactions in the Pukekohe area.
- 1.3 The submitter's interest arises from:
 - a. The location of their land within the Pukekohe Golding Precinct, which is hydrologically connected to the broader Pukekohe stormwater system that drains to the Waikato River; and
 - b. The confluence of sub-catchments at Buckland, where stormwater effects from the Pukekohe Gateway Precinct, the submitter's land, and surrounding areas coincide.
- 1.4 Ensuring coordinated stormwater management is therefore essential.

2 SUBMITTERS POSITION ON THE PLAN CHANGE

- 2.1 The submitter is neutral on PC124 provided that the stormwater management framework proposed under the plan change, particularly the Stormwater Management Plan (SMP) and associated modelling, meets best practice standards and manages flooding.
- 2.2 The submitter seeks assurance that:

- **There is no adverse effects from stormwater discharge in Buckland:** The SMP and its supporting hydrological/hydraulic modelling should demonstrate that stormwater discharges from the PC124 area will not increase flooding risk at Buckland or other downstream locations.
- **The necessary attenuation is included:** The PC124 provisions and SMP should incorporate appropriate stormwater attenuation and flow mitigation to manage future impervious surfaces within the plan change area.
- **Up-to-date climate change predictions:** All modelling and assumptions must reflect current climate change projections, including updated rainfall intensity and allowances for future growth in storm events.
- **No Adverse Effects on Golding Precinct Requirements:** PC124 must not alter, dilute, or conflict with the established stormwater requirements applicable to the Pukekohe Golding Precinct, nor create new burdens or constraints on the submitter's land.

2.3 The submitter also supports the deletion of the acoustic standards associated with motorsport from Pukekohe Park.

3 RELIEF SOUGHT

3.1 The submitter requests that Auckland Council ensure PC124:

- a) Is supported by best-practice, up-to-date stormwater management modelling,
- b) Includes provisions requiring stormwater attenuation, peak flow control and climate-informed design, and
- c) Ensures there are no additional downstream effects on Buckland.

6.1

3.2 If these matters are appropriately addressed, the submitter remains neutral on the Plan Change.

3.3 The submitter wishes to be heard in support of this submission.

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

23 February 2026

Level 4, 60 Parnell Road, Parnell
PO Box 37-359,
Parnell, Auckland 1151

(09) 354-4166

www.scottwilkinson.co.nz



23 February 2026

Project Number: 4384.01

Planning Technicians
Level 16,
Planning and Resource Consents
Auckland Council
Private Bag 92 300,
AUCKLAND 1142

Attention: Planning Technicians

By Email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

SUBMISSION ON PLAN CHANGE 124 (PRIVATE) – PUKEKOHEKOHE GATEWAY PRECINCT

Baltrese Holdings Limited owns the 3.2 hectare site at 466 Buckland Road, Buckland. 466 Buckland Road is located immediately south of the Tutaenui Stream and the Proposed Plan Change 124 area.

PC124 seeks to rezone part of the Auckland Thoroughbred Racing Inc owned land from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban, Open Space – Informal Recreation, and Business – Light Industry zones. It also seeks to introduce the ‘Pukekohekohe Gateway Precinct’ over part of the rezoned land; and to amend the existing Pukekohe Park Precinct to reflect the current and future activities that occur, or are planned to occur, at Pukekohe Racecourse.

Baltrese Holdings Limited is **opposed to** Plan Change 124 for the reasons set out in the attached submission.

Baltrese Holdings Limited would be pleased to discuss its submission further. To this extent, if there are any queries, please do not hesitate to contact the undersigned on (09) 354 4166 or 021 0242 7744.

Yours faithfully

SCOTT WILKINSON PLANNING

Vanessa Wilkinson
Planning Consultant

let-submissioncoverletter-01-vw

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 124 (PRIVATE) – PUKEKOHEKOHE GATEWAY PRECINCT

1 SUBMITTER DETAILS

Submission By:

Baltrese Holdings Limited
Owner of 466 Buckland Road, Buckland

Agent and Address for Service for Submission:

Vanessa Wilkinson
Scott Wilkinson Planning
PO Box 37-359
Parnell
Auckland
Email: vanessa@scottwilkinson.co.nz
Phone: (09) 354 4166 or Mobile: 021 0242 7744

2 SUBMITTER LOCATION AND BACKGROUND

Baltrese Holdings Limited (**the Submitter**) owns the 3.2 hectare site at 466 Buckland Road, Buckland. 466 Buckland Road is located immediately to the south of the Tutaenui Stream and the Proposed Plan Change 124 area. The location of 466 Buckland Road in relation to the Plan Change 124 (**PC124**) area is identified in **Figure 1** below. This submission relates to the whole of PC124 and seeks that PC124 is declined unless the matters in this submission are adequately resolved.

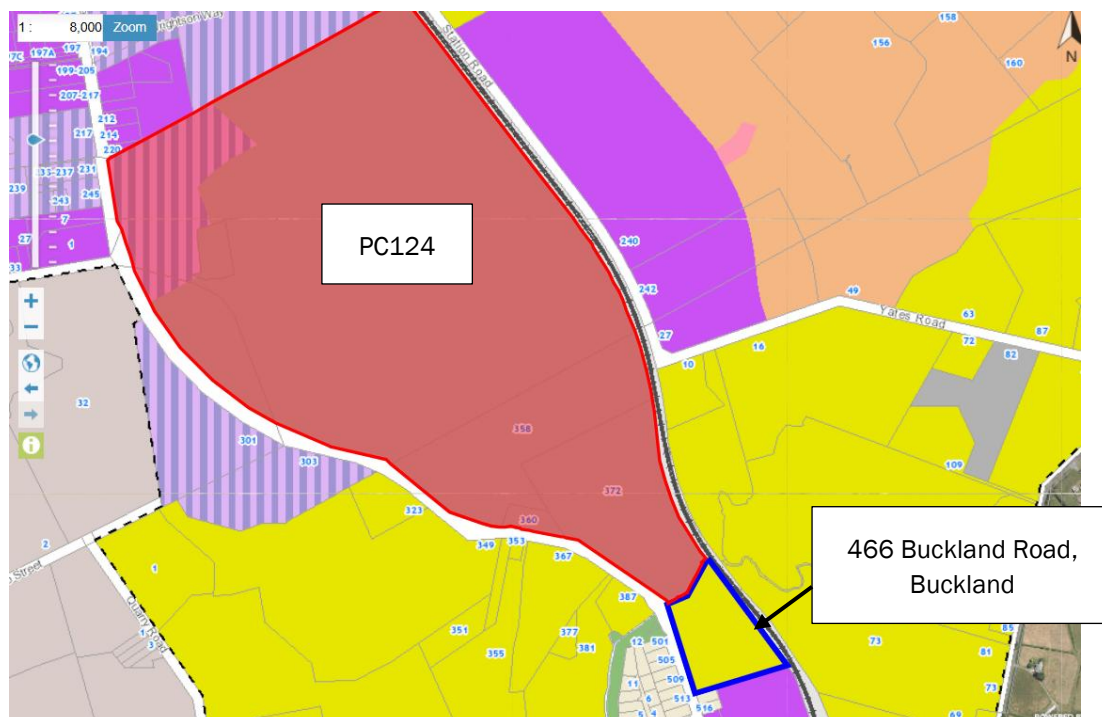


Figure 1: Submitter's site location in relation to PC124 area

466 Buckland Road is zoned Future Urban Zone and contains two residential dwellings. However, Auckland Council is currently processing a resource consent for the use of the site as a 'vehicle storage facility'. Furthermore, resource consent BUN6031177 was previously granted for use of the land as a 'vehicle storage facility' in 2017, on a time limited basis.

In addition, the Submitter is in the process of preparing its own private plan change request and further associated resource consents to Auckland Council for the rezoning of 466 Buckland Road to a Business – Light Industrial Zone and its use for this purpose. The proposed plan change request has been the subject of discussions with Craig Cairncross, Planning and Resource Consents, Auckland Council.

3 SUBMISSION

Proposed Zoning

The Submitter notes that the Auckland Plan 2050 identifies Pukekohe as a “rural node” and a “satellite town”, where Pukekohe is expected to “function semi-independently from the main urban areas of Auckland”.

The Auckland Plan strategic vision for Pukekohe is being implemented through the Pukekohe – Paerata Structure Plan, which refines the staging and timing of development and identifies the mix and location of housing, employment, retail, commercial and community facilities required.

The Pukekohe-Paerata Structure Plan 2019 was prepared under the provisions of the Local Government Act 2002. It was also prepared in accordance with the structure plan guidelines as set out in Appendix 1 of the Auckland Unitary Plan. While it is a non-statutory document under the RMA, it informs the basis of future Auckland Council or privately initiated plan changes. The proposed Structure Plan map shows the location of new zoning areas including 80 – 100 hectares of new business zoned land, including 466 Buckland Road and the area surrounding the proposed PC124 area, within an area denoted ‘Area H’.

The Pukekohe Paerata Structure Plan recognises the favourable location of Area H for future business land, including Business – Light Industrial zoning, for the reasons summarised as follows:

- (i) good access to the existing and proposed road network, especially freight routes and routes that will limit the need for traffic to travel through the Pukekohe town centre;
- (ii) relatively flat land to reduce the need for future earthworks and to enable larger floor areas and outdoor storage areas often needed by industrial activities;
- (iii) proximity to existing business zoned areas, e.g. Manukau Road, so that the addition of new industrial areas to established industrial areas limits potential reverse sensitivity issues between zones and allows the opportunity for the co-location of similar activities and businesses;
- (iv) proximity to existing “less sensitive” activities which limits potential reverse sensitivity issues, such as the Rural Production Zone and Special Purpose – Major Recreation Facility Zone (e.g. the Pukekohe Park Raceway).

The Submitter is concerned about the proposed Residential - Mixed Housing Urban (**R-MHU**) zoning and associated residential development sought under PC124, particularly Sub-Precinct B. The residential zoning and development proposed under PC124 is not automatically compatible with the need for business zoned land, in particular the Business – Light Industrial Zone to be proposed for 466 Buckland Road, identified in the Pukekohe-Paerata Structure Plan 2019.

Further consideration of the proposed PC124 Precinct zoning and provisions is required to ensure any proposed R-MHU zoning and future residential development will not result in reverse sensitivity effects on existing or proposed business and industrial zoning and activities in the immediately surrounding area.

7.4

If reverse sensitivity effects are not, or cannot be, suitably addressed by the proposed plan change and Precinct provisions then, the proposed residential zoning sought under PC124 should be declined; or a different, less sensitive zone i.e. a business zone, should be applied to the Auckland Thoroughbred Racing Inc land.

7.5

Proposed Precinct Description

The proposed precinct description describes the purpose of the Precinct as:

“...to provide for the subdivision and development of a sustainable and comprehensively planned residential community, that supports a well-functioning urban environment and a quality compact urban form”.

This purpose only reflects the purpose of Sub-Precinct’s A and B. The description and purpose do not provide any description of and purpose for proposed Sub-Precinct C and the Business- General Business zoning. The Submitter is of the view that the description and purpose of the Precinct should be amended to include reference to all of its existing and proposed zones and likely activities, not just the residential components.

7.6

Proposed Precinct Objectives and Policies

The Precinct is framed as being a comprehensive precinct encompassing a range of zones and activities. However, there are only sub-precinct objectives and policies. There are no over-arching whole of Precinct objectives and/or policies proposed that require the co-ordinated development of the Precinct as a comprehensive whole.

There are no objectives provided to identify the open space outcomes sought for the Precinct or support the open space policies.

Proposed Sub Precinct Objectives and Policies

The proposed Sub-Precinct objectives and policies require the Precinct to be comprehensively developed and compatible with the existing Pukekohe urban area. These objectives and policies do not recognise the substantial amount of future urban area that is adjacent and surrounding the plan change area, and that the future urban area is identified as being suitable for broader industrial development and use. Recognition of the need to integrate with future urban areas, and proposed and future industrial development and activities, should be included in both overarching and sub-precinct objectives and policies.

7.7

Proposed Standards

It is considered that Standard E27.6.1 Trip generation should not be excluded from the proposed Precinct and its future development, as the proposed Precinct development may not progress as the ITA submitted with the plan change envisages. To the contrary, it must be included and as outlined below some specific triggers may be required to link to necessary infrastructure upgrades.

7.8

Proposed Precinct Plan IX.10.1 Pukekohekohe Gateway Precinct: Precinct Plan 1 – Indicative Road and Open Space Network

The Submitter considers that proposed Precinct Plan 1 should be amended to include an identified buffer of at least 20m along the southern boundary of the site / Sub-Precinct B, adjacent to the Tutaenui Stream. Such a buffer should be planted and is necessary to ensure that any future development within Sub-Precinct B is sufficiently separated from the adjacent future urban zoned land at 466 Buckland Road, which is proposed to be rezoned to a Business – Light Industrial Zone and/or contain rural or business/light industrial activities. Objectives, policies and rules (including standards to provide consent triggers) should be developed and included in the plan change to achieve this outcome.

7.9

Stormwater and Flooding

The Submitter opposes PC124 unless it can be confirmed that any flooding effects, including on the Tutaenui Stream and the adjoining property at 466 Buckland Road, from any residential rezoning and/or proposed development within the PC124 area, will not be increased and all adverse stormwater and flooding effects are appropriately mitigated such that storm and flood water does not back up along the Tutaenui Stream and associated streams and waterways and cause flooding to 466 Buckland Road. This includes without limitation:

7.10

- Stormwater volume, flow rate and peak flow duration and timing effects – through network infrastructure and overland flow paths.
- Location of overland flow paths.
- Appropriate modelling for climate change scenarios.

7.10

It is also noted that the notified plan change documents do not provide any assessment of PC124 against the any recently implemented National Policy Statements, such as the National Policy Statement for Natural Hazards and the National Policy Statement for Infrastructure. Furthermore, PC124 does not provide any assessment against the provisions (objectives and policies) of Auckland Council’s recently notified PC120. PC120 identifies the PC124 land as subject to a ‘very high’ flood hazard risk. The Submitter seeks that these omissions be addressed and that any further objectives, policies and rules (including standards to provide consent triggers to ensure that off-site adverse stormwater effects are not created) are developed and included in the plan change.

7.11

Traffic

The Submitter is concerned about the traffic effects identified at the Buckland Road /Kitchener Road intersection. The PC124 ITA identifies a considerable delay for the right turn from Kitchener Road into Buckland Road in the PM peak (i.e Level of Service F in Table 7 of the ITA). It is considered that the trigger point for an upgrade of this intersection to a roundabout should be reviewed in light of the residential zoning proposed for Sub-Precincts A and B. The Submitter requests the SIDRA traffic modelling data for this intersection to better understand the traffic effects on this intersection. Subject to the outcome of modelling, further objectives, policies and rules (including standards needed to provide consent triggers to ensure that off-site adverse traffic effects are not generated) are developed and included in the plan change.

7.12

Esplanade Reserve and Associated Planting Along Tutaenui Stream

The Submitter supports the establishment of an esplanade reserve with associated planting along the plan change areas southern boundary, being the edge of the Tutaenui Stream. An esplanade reserve and associated planting would likely ensure a physical and visual buffer is provided between any future residential development (if approved) in the PC124 area and any business or industrial zoning/ activity anticipated by the Pukekohe – Paerata Structure Plan and the proposed future Business – Light Industrial zone and activity being prepared and sought for 466 Buckland Road.

However, it is submitted that further provisions, including rules and/or standards, in the proposed Precinct are required. These are necessary to ensure that if the land is not subdivided and/or the esplanade reserve is not taken, a sufficient separation distance, buffer and stream side planting are nonetheless achieved between any PC124 proposed residential activity or use and the proposed future Business – Light Industrial Zone and activities proposed for 466 Buckland Road. Objectives, policies and rules (including standards to provide consent triggers) should be developed and included in the plan change to achieve this outcome.

7.13

No Complaints Covenant

A rule and/or standard requiring the registration of an additional no complaints covenant on all lots to be used for residential activities in sub-Precinct B (to be zoned R-MHU Zone) should be included in the proposed Precinct provisions to ensure that future residential activities in the plan change area are aware of, and do not complain about, the proposed future Business – Light Industrial activity promoted by the Pukekohe – Paerata Structure plan, and the plan change and resource consent being sought for 466 Buckland Road, to the immediate south. Objectives, policies and rules (including standards to provide consent triggers) should be developed and included in the plan change to achieve this outcome.

7.14

4 RELIEF SOUGHT

Without derogating from the above the submitter seeks the following relief:

1. That PC124 be **declined** unless the matters raised above are adequately addressed. | 7.1
- OR**
2. Such other relief that will meet the concerns of the Submitter. | 7.2
- AND**
3. Such further, additional, alternative or consequential relief as is reasonably necessary to give effect to this submission. | 7.3

5 OTHER

The Submitter will not gain an advantage in trade competition through this submission.

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

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

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



Terry Lines

Duly authorised agent for
Baltrese Holdings Limited

Date: 23 February 2026

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

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

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

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

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

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

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

Address for service of Submitter

Telephone: Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

| 8.1

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

| 8.2

I wish to be heard in support of my submission

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

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



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

Date

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

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

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

I could /could not gain an advantage in trade competition through this submission.
If you could gain an advantage in trade competition through this submission please complete the following:
I am / am not directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

ENVIRO NZ SERVICES LTD SUBMISSION ON THE PROPOSED PLAN CHANGE 124

Submitter Details:

1. Name: Enviro NZ Services Ltd (Enviro NZ)
2. Address for Service:
Postal: C/- Enviro NZ Services Ltd
PO Box 92810
Penrose
AUCKLAND 1642

Email: kaaren.rosser@environz.co.nz
3. Contact Person: Kaaren Rosser
Environmental Planner
Laurence Dolan
Environmental Manager
4. Date of Submission: 23 February 2026

Introduction:

5. Enviro NZ Services Limited (Enviro NZ) is the second-largest solid and liquid waste management company in New Zealand.
6. Enviro NZ owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. Enviro NZ also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. As a materials management and resource recovery company, Enviro NZ is committed to managing, recovering and processing waste streams to deliver sustainable outcomes. In the delivery of these outcomes, District Plans are important documents that need to allow for essential waste infrastructure in a city or district. They must ensure that appropriate and resilient waste infrastructure is provided for as the vulnerability of society to infrastructure short-comings can be severely detrimental to the economic, health and social well-being.
8. Enviro NZ operates the only refuse transfer station in Pukekohe at 10 Austen Place, Pukekohe. This refuse transfer station handles material received from kerbside collections, commercial waste and household waste from the public.

Scope of Submission

9. Enviro NZ makes this submission on the following parts of the Proposed Plan Change 124:
- The proposed Mixed Housing Urban zoning proposed for the south-western and southern portions of the plan change area;
 - The economic assumptions for the proposed residential zone change request;
 - The further information provided in relation to consideration of alternative zones.



Comments on the Proposed Plan Change

10. Enviro NZ **opposes** the proposed change in zoning for those portions of the raceway proposed to be zoned Residential – Mixed Housing Urban Zone. Enviro NZ seeks that this land be re-zoned Business - Light Industrial Zone as shown in Figure 1 below. 8.3
11. A Light Industry zone is requested which will accord with the Pukekohe-Paerata Structure Plan. It will also prevent reverse sensitivity effects to future Industrial land to the south and existing General Industrial zoned land to the west.

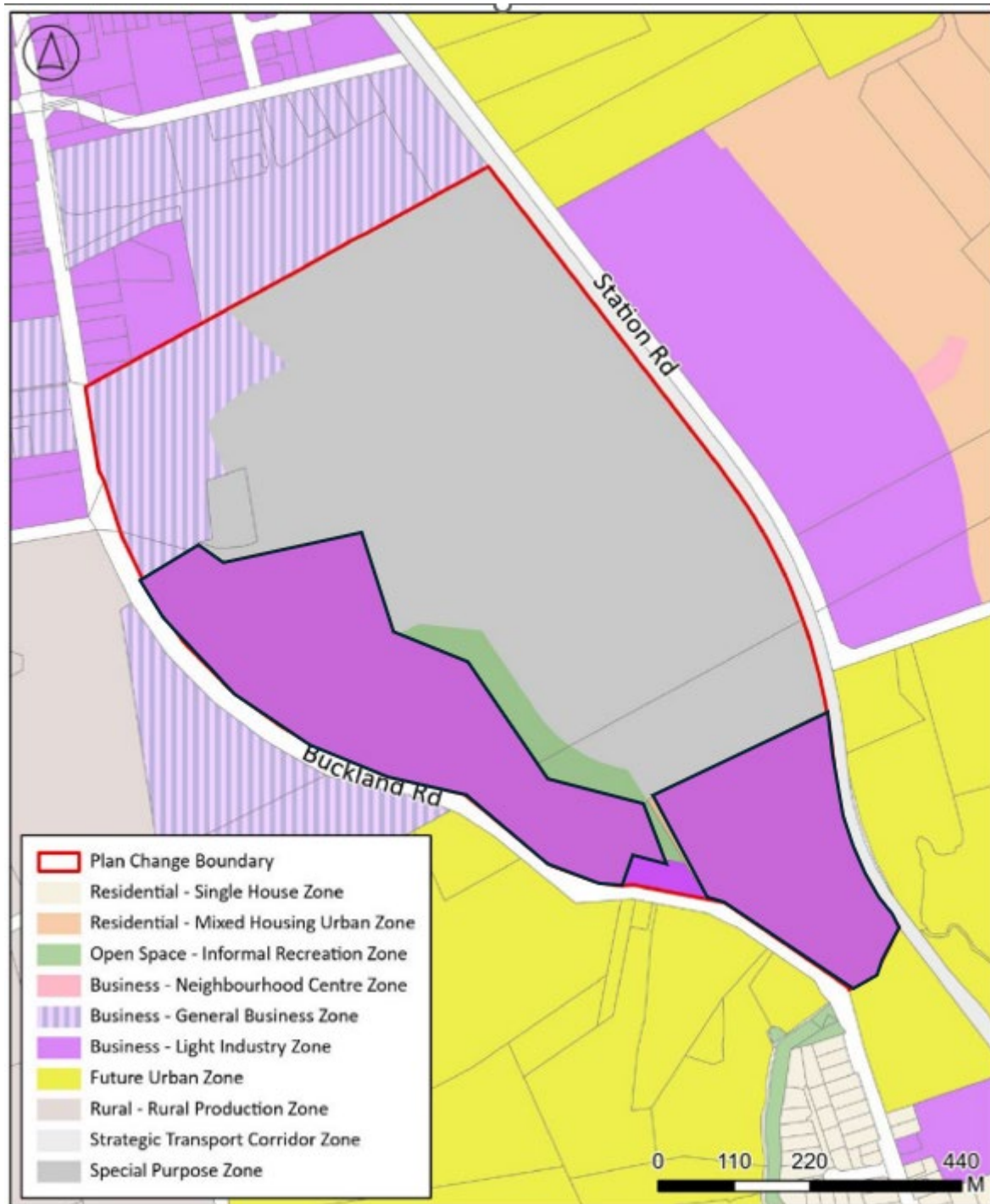


Figure 1 – Plan showing amended re-zoning from proposed Residential to Business - Light Industrial.

12. The Economic Assessment starts from the premise of proving that the residential capacity of the plan change will meet the NPS-UD objectives in reducing the housing shortfall. However, nowhere does it consider that there is also a real and current industrial land shortfall in Pukekohe.
13. The Economic report for PC110 (**attached**) identifies that there is a strong demand for industrial land in and around Pukekohe and Paerata, with very low vacancy rates of existing industrial land. The proposed land to be rezoned at the raceway could easily meet this demand. The economic assessment for Pukekohekohe Gateway should assess this scenario.
14. Enviro NZ does not consider that sufficient attention has been paid to potential reverse sensitivity effects on existing and future industrial zoned land. The proposed rezoning

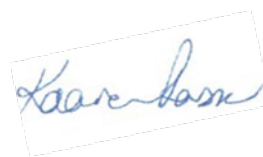
will allow activities (residential) sensitive to air discharges to potentially within 20m of industrial zones (the width of Buckland Road). As industrial zones are the only zones where industrial processes that may discharge to air can occur, maintaining adequate separation to sensitive activities is vital.

15. Activities that require air discharge consents have the potential to adversely affect sensitive activities. 300 metres to residentially zoned areas is a recognised and appropriate separation distance (required for the processing of consents for waste handling sites as a Controlled Activity). Finding a site that meets this requirement can only be found if the industrial zone is sufficiently large enough for this separation to occur, or separated by non-sensitive zones.
16. By locating residential land as proposed in this plan change, achieving this separation becomes significantly harder to achieve (given the Structure Plan future zoning) and severely limits the locations where waste infrastructure facilities (and other industrial processes requiring air discharges) can occur.
17. Similarly, industrial activities that operate over 24 hours or with early starts can also be impacted by adjacent residential activities. Noise complaints often occur where separation between zones is insufficient. While acoustic design of dwellings will mitigate noise, elimination of all reverse sensitivity impacts from noise is unlikely. An industrial zoning would not constrain the use of future adjacent industrial sites, and given the location, unlikely to be constrained itself.
18. An industrial zoning, with appropriate overlays to cover interfaces with the raceway, and perhaps some further control of the types of industry next to the raceway, would better serve the Pukekohe area. It would provide much needed industrial land with good access to the roading network, of good topography and with little surrounding sensitive uses.
19. The plan should be declined or amended as described above.
20. The submitter wishes to be heard in support of this submission.

Signed for and on behalf of Enviro NZ Services Ltd:



Laurence Dolan
Environmental Manager
MSc(Hons) Dip Nat Res



Kaaren Rosser
Environmental Planner
BSc, Dip Nat Res, CPlan, Assoc. NZPI



Final Report: 29 August 2024

Economic Assessment of Proposed Industrial Plan Change in Pukekohe

Prepared for: **GBar**

Authorship

This document was written by Fraser Colegrave and Steve Hoskins.

Contact Details

For further information about this document, please contact us at the details below:

Phone: +64 21 346 553

Email: fraser@ieco.co.nz

Web: www.insighteconomics.co.nz

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1. Executive Summary

GBar Properties Limited (**GBar**) owns a 5.35-hectare tract of land in Pukekohe that is currently zoned Future Urban Zone (**FUZ**), but which is earmarked for light industrial activities in the Pukekohe-Paerata Structure Plan 2019 (**PPSP**). To enable anticipated future development of the site, GBar now seeks a private plan change to create a “live” zoning. To assist, this report briefly assesses the likely economic effects of the proposed plan change.

The assessment starts by identifying and describing the subject site, explaining how it fits into the broader strategic/planning context, and then summarising the latest indicative subdivision plan. It provides for nine new industrial buildings ranging in size from 900m² to 1,962m². Collectively, these provide 12,560m² of new industrial floorspace.

To provide context, we summarise the findings of various reports and studies, which consistently project the need for significant additional industrial land to meet growth in demand (in Pukekohe and Paerata). We also summarise various recent real estate research reports, which identify and explain strong and sustained demand for new industrial premises from both occupiers and investors.

Having set the scene, we then discuss the rationale for the proposal. We show that it not only directly responds to the need for additional industrial zoned land, but that it does so in an area that has already been identified as suitable for light industrial purposes and thus directly gives effect to the planning vision for the site. We then demonstrate that the site is a good fit with industrial site/location criteria.

Finally, we consider a range of economic effects of the proposal. They include:

- **Improved Supply Responsiveness** – the proposal will help the industrial land market to be more responsive to growth in demand, which will help slow the rate at which land prices grow. This will not only improve industrial land affordability, which is important given the land hungry nature of many industrial land uses, but it will also help to control the costs (and thus prices) of the various goods and services provided by industrial land users to other parts of the regional economy. This, in turn, helps improve the overall competitiveness of the Auckland region.
- **One-Off Economic Stimulus** – the various processes associated with obtaining consents, finalising the subdivision plan, preparing the land for development, installing necessary infrastructure, and constructing the various buildings enabled by the proposal will generate significant one-off economic impacts. In fact, we estimated that they will provide direct employment for more than 160 FTE-years, provide \$11 million in household wages/salaries, and directly generate nearly \$21 million in GDP.
- **Ongoing Employment Potential** – once operational, the nine buildings planned for the site could provide full-time employment for approximately 125 people.
- **Highest & Best Use of Land** – finally, we note that the proposal puts the land to its highest and best use, and hence maximises economic efficiency in the underlying land market.

The main economic cost/risk of the proposal relates to infrastructure servicing. However, the Council has tools to shift this cost and risk onto the developer, so it is a moot point.

Given the strong and enduring economic benefits of the proposal, as outlined above, and noting the absence of any material economic costs, we support it on economic grounds.

2. Introduction

2.1 Context & Purpose of Report

GBar Properties Limited (**GBar**) owns a 5.35-hectare tract of land in Paerata that is currently zoned Future Urban, but which is earmarked for light industrial uses in the Pukekohe-Paerata Structure Plan 2019 (**PPSP**). To enable anticipated future development to proceed, GBar now seek a private plan change to create a “live” zoning for the land. To assist, this report assesses the likely economic effects of the proposed plan change.

2.2 Scope and Depth of Assessment

Because eventual urbanisation of the land is anticipated by its zoning, and because the plan change essentially just gives effect to the underlying structure plan, most of its likely economic effects have already been considered during the structure plan formulation process. Accordingly, this report provides a brief and high-level assessment of the proposal.

2.3 Structure of Report

The remainder of this report is structured as follows:

- **Section 3** locates the subject site, summarises its strategic/planning context, and sets out the indicative subdivision and building plan enabled.
- **Section 4** assesses the current state of the industrial land market as context for the proposal.
- **Section 5** considers the rationale and need for the proposal.
- **Section 6** assesses the proposal’s economic effects on the industrial land market.
- **Section 7** provides a summary and conclusion.

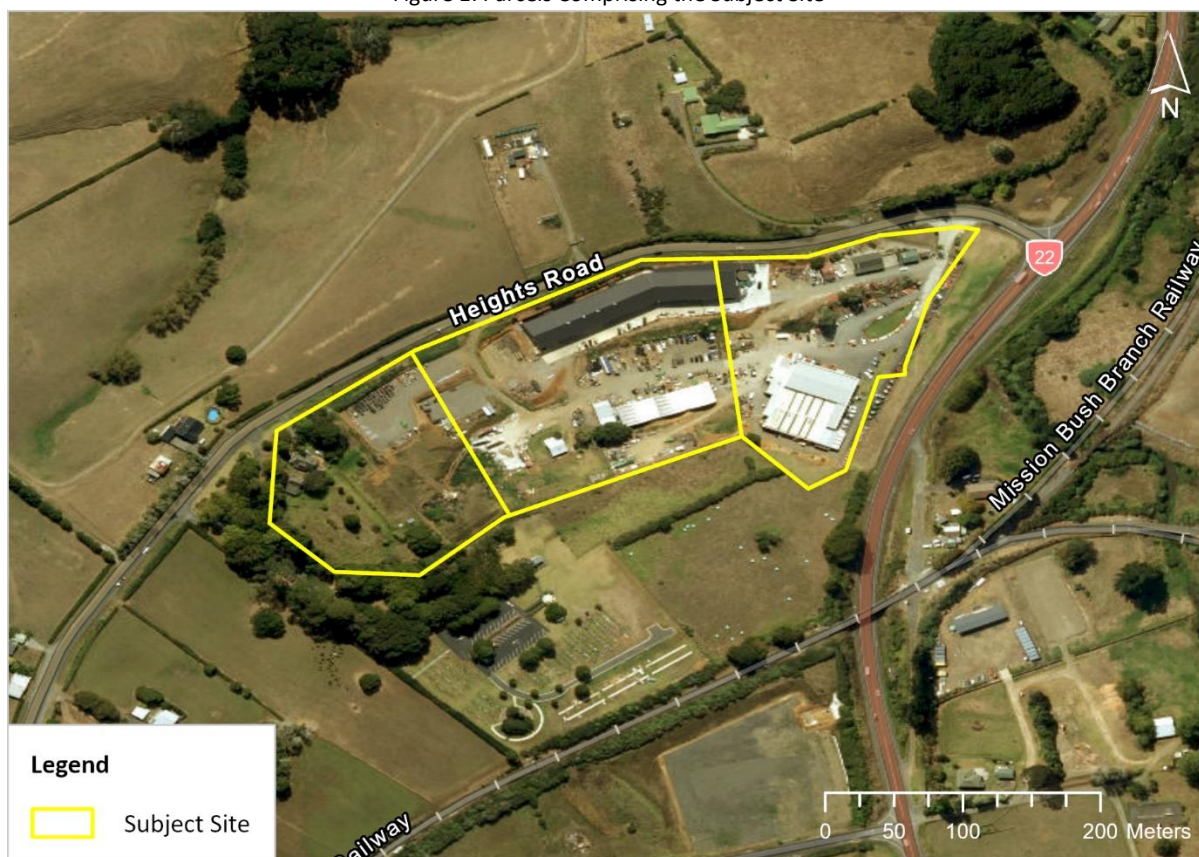
3. About the Proposal

This section identifies the subject site and describes the proposal.

3.1 Site Location & Description

The subject site spans three contiguous parcels (9, 33, and 49 Heights Road in Paerata), which are illustrated by the yellow outlines in the map below.

Figure 1: Parcels Comprising the Subject Site

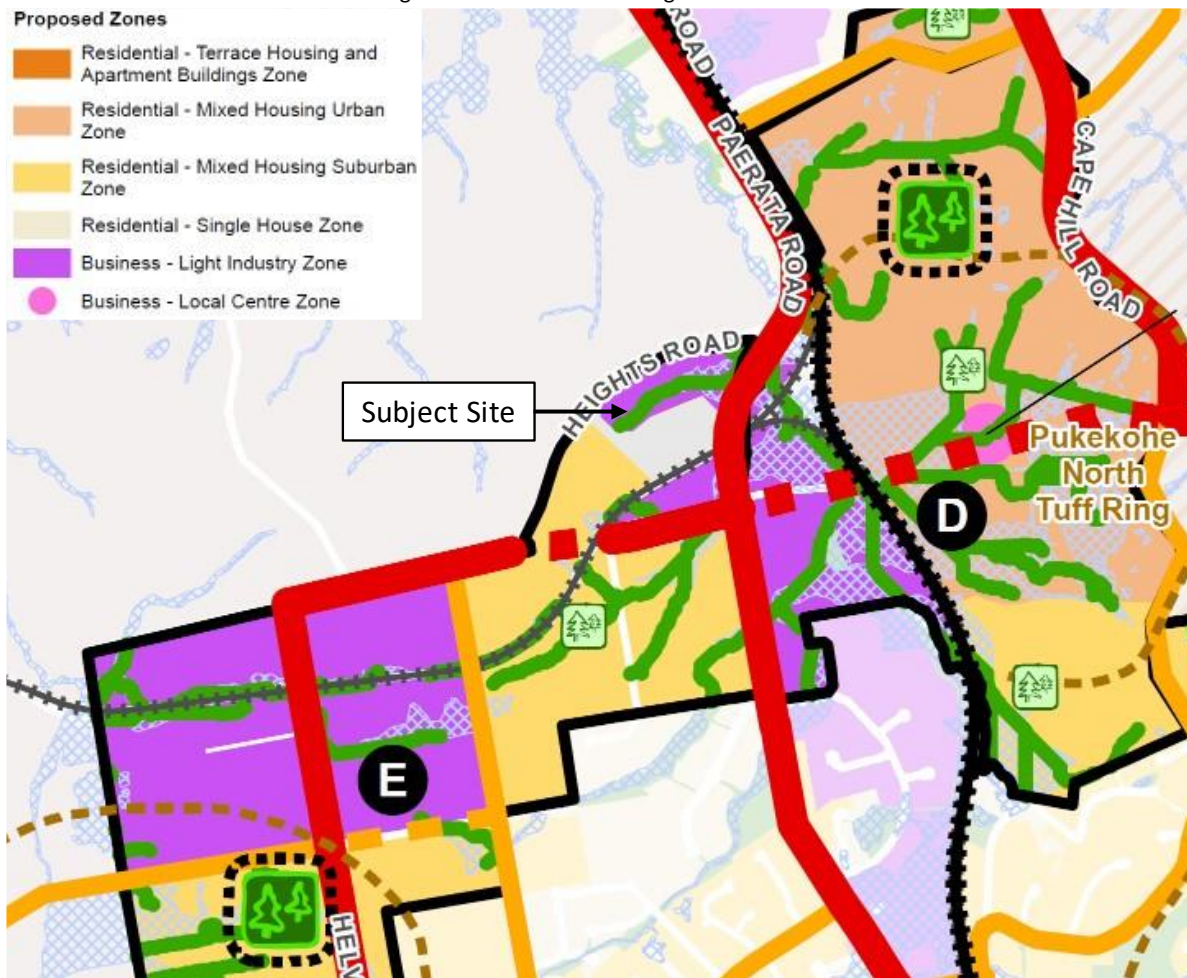


The site is bound by Heights Road to the north, and rural land in all other directions. It spans approximately 5.35 hectares and is currently used for industrial activities. The primary activity operating on the site is The Tractor Centre, which provides services for tractors and other farm machinery, including servicing and repair, retail of new and used tractors, machinery and parts, light engineering, and a panel and paint shop. A large new shed was recently constructed on the northern boundary of the middle site, and is used for the storage of industrial machinery and equipment associated with The Tractor Centre.

3.2 Strategic/Planning Context

The site is currently zoned “Future Urban Zone” (FUZ) under the Auckland Unitary Plan (AUP), but it is earmarked for a light industrial zoning under the PPSP. This is shown in the map of the PPSP below, where the purple shaded area represents the Business - Light Industry zone.

Figure 2: Intended Site Zoning under the PPSP



Auckland Council’s recently adopted Future Development Strategy (FDS) reassesses all future urban areas (FUAs) to evaluate their appropriateness for future growth. The subject site is located within the Pukekohe-Paerata FUA cluster and is part of the Pukekohe North-West node. The reassessment of this cluster does not identify any significant challenges that would make development inappropriate, provided plan changes occur in line with the associated structure plan and after all infrastructure provisions are met.¹

3.3 Indicative Masterplan

The proposal seeks to rezone the land to match the light industry zone proposed for it in the structure plan diagram above. The figure below shows the indicative masterplan prepared to show a potential build-out of the site under the proposed LIZ provisions. The buildings shaded in light blue represent proposed developments enabled by the rezoning.

¹ Auckland Future Development Strategy 2023-2053. Auckland Council. Appendix 7. Appendix Page 53.

Figure 3: Indicative Masterplan



The indicative plan provides for nine new industrial buildings of varying sizes, as indicated below. These range from 900m² to 1,962m² GFA, with a total of more than 12,560m².

Table 1: Table of Indicative Buildings Enabled

Building	GFA (m ²)
1	1,819
2	1,962
3	950
4	1,000
5	900
6	1,550
7	1,500
8	1,500
9	1,382
Total	12,563

4. Current State of Industrial Land Market

This section assesses the current state of the industrial land market as context for the proposal.

4.1 Regional Context

The availability of suitable land to accommodate light industrial activity in the region is under growing scrutiny. High industrial land values, increased construction costs, and the current high interest rate environment are all affecting development feasibility. This is likely to be exacerbated over time as intensification of centrally-located land drives land values even higher. Accordingly, land-extensive activities, including light industry, are under growing pressure through competition from more valuable land uses.

This issue is highlighted in Council’s latest housing and business development capacity assessment (HBA), which was released in September 2023. The assessment, prepared under the National Policy Statement on Urban Development 2020 (NPSUD), finds that Auckland has sufficient aggregate industrial capacity to accommodate projected growth over the short, medium, and long terms.

However, as acknowledged in the HBA, market feedback indicates that land suitable for industrial use is in short supply and that new opportunities can only be realistically provided in greenfield locations where land is both available to be identified in advance, and relatively cheaper per square metre. This is also reflected in elevated demand for industrial premises, with vacancy rates at historic lows.

4.2 Local Context

The need for extra industrial land in and around Pukekohe and Paerata has long been recognised in a suite of background documents and strategies. For example, a 2018 report by Property Economics (PE) assessed the likely future business land needs for the “West Franklin” catchment in which the site falls. They estimated industrial employment growth of 8,000 people between 2028 and 2048, which translates to an additional 396 hectares of industrial land (including a 15% NPSUD competitiveness margin).

Although the PE report also identified 580 hectares of vacant industrial land in West Franklin, most of that was concentrated in Glenbrook/Waiuku/Tuakau, rather than in the more urbanised areas where demand will be strongest. When attention is limited to the key employment nodes in the catchment, particularly Pukekohe, PE identify an industrial land supply deficit of 286 hectares to 2048. In the words of the report:

“This is the result of, at a broad level, the Pukekohe Urban Area generating the majority of demand for industrial activity in the wider West Franklin catchment, but exhibiting minimal capacity at present.”

MRCagney peer reviewed the PE report just summarised and similarly noted the large tracts of vacant industrial land residing in the catchment’s rural fringes. They concluded that 80 to 100 hectares of developable industrial land will be required in Pukekohe-Paerata to 2048 if the vacant land in Glenbrook and Waiuku is taken up. If not, the requirements for Pukekohe-Paerata will be correspondingly higher.

In light of PE's findings and MRCagney's peer review, the PPSP identified 100 hectares of additional industrial land to be provided in and around Pukekohe and Paerata, five hectares of which is on the subject site. Accordingly, and as previously mentioned, the proposal responds – and directly gives effect – to the land use pattern identified via the structure planning process.

4.3 Current Market Situation

The high demand for industrial floorspace signalled in the various reports above is also confirmed by real estate research, which reports strong demand from both occupiers and investors. We briefly tease these out below.

4.3.1 Occupier Demand

A major driver of industrial floorspace demand is the sustained shift towards online shopping and the associated growth of the logistics sector. These activities require modern, high-stud, large-footprint warehousing space, which is usually located in light industrial zones. Further, the rapid emergence of demand from the datacentre sector is creating additional impetus for the demand for larger, modern fit outs.

Auckland's position within the golden triangle also plays an important role. Containing more than half of the nation's population and generating more than half its GDP, the Golden Triangle is home to the country's two biggest seaports and its largest airport.² It is widely recognised as the engine room of the national economy.

Bayleys' Q3 2023 Commercial Market Update for South Auckland indicates low vacancy rates³ due to ongoing demand for warehousing. At the same time, it points to a scarcity of industrial land available for development, as well as industrial properties of all types and qualities.

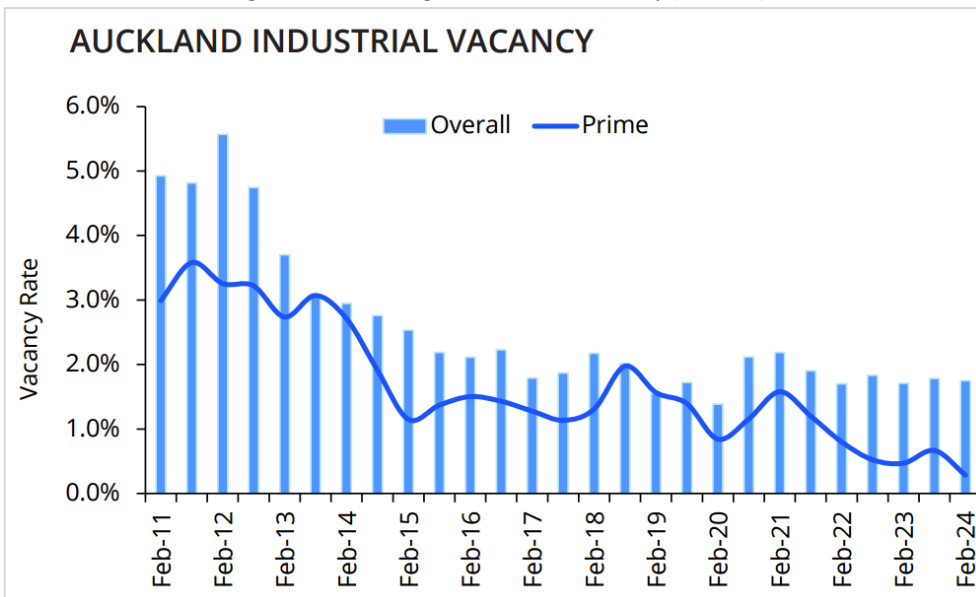
A similar dynamic is playing out at the regional level. Colliers' latest regional update⁴ shows prime industrial vacancies at an historic low of 0.3%, with overall vacancies at 1.75%, as illustrated in Figure 4 below. In comparison, a vacancy rate of about 5% is considered desirable to ensure that businesses can move in and out of premises as required to meet evolving needs.

² The Golden Triangle Logistics, Bayleys, 2019

³ 1.5% overall.

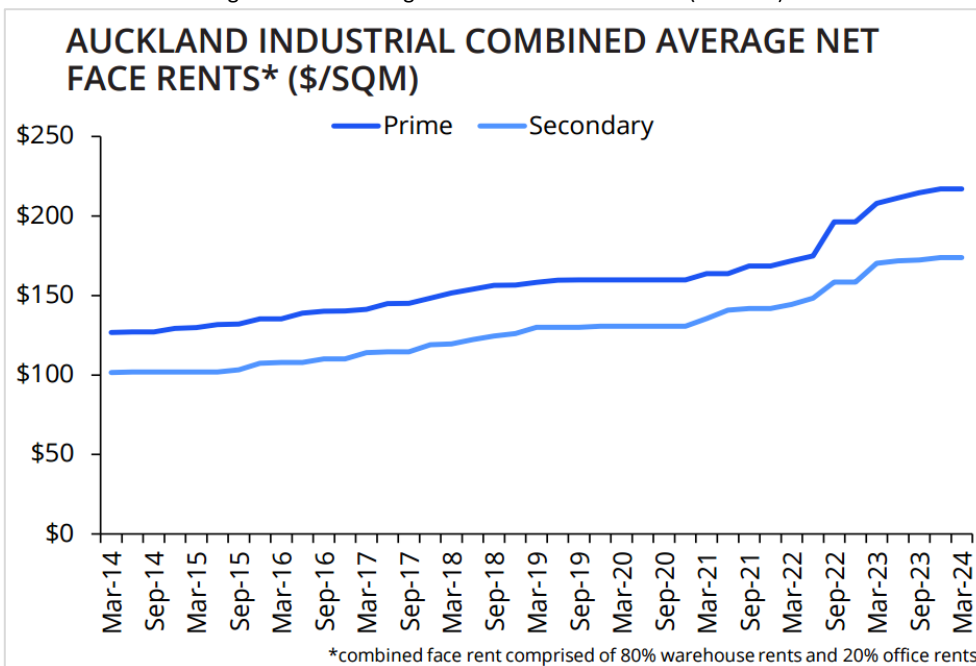
⁴ Colliers Essentials Auckland Industrial Report 1H 2024. Available at <https://www.colliers.co.nz/en-nz/real-estate-research/colliers-essentials-akl-industrial-1h-24>

Figure 4: Colliers Regional Industrial Vacancy (1H 2024)



Unsurprisingly, this very high and sustained demand for industrial premises has caused rents to rise. This is illustrated in the chart below, which shows a strong uptick in the second half of 2022 followed by sustained rental growth in recent years.

Figure 5: Colliers Regional Industrial Rent Trends (1H 2024)



In summary, recent research suggests that the demand for industrial property will continue to be strong, including in the south of Auckland where the subject site is located.

4.3.2 Investor Demand

Not only is occupier demand for industrial space strong, but so too is investor demand. There are several factors at play. First, New Zealand has relatively high property yields compared to other parts

of the Asia Pacific region. And, within the “commercial” property sector, industrial property often has healthy returns.

A recent article entitled “*Industrial property: the property's sector's new black?*”⁵ points to several other factors underpinning strong investor demand. First, industrial property has proven largely resilient in the face of economic ups and downs. Second, tenants tend to be stable, with leases frequently lasting seven years or more. Third, investing in industrial property is becoming more accessible, with the lending environment increasingly comparable to residential investment, and with syndicates now also emerging to enable investment at lower entry points.

Finally, there has recently been a flight from residential property investment, following legislative changes that remove tax relief against interest costs on new residential property investment. Coupled with extensions to the bright-line test, residential property investment has become less attractive. This was noted by *Bayleys*, who describe an influx of new buyers in the industrial market chasing yield in response to the new regulations.⁶

As a result, despite higher interest rates, tightening bank lending criteria and an uncertain economic outlook, industrial property remains an attractive investment option.⁷

⁵ <https://www.stuff.co.nz/business/124968669/industrial-property-the-property-sectors-new-black>

⁶ Bayleys Auckland Industrial Market Update 2021

⁷ <https://www.barfoot.co.nz/commercial/auckland-market-reports/auckland-property-market-commentary-october-2023>

5. Rationale for the Proposal

This section assesses the rationale for the proposal.

5.1 Meets Short-Term Need for Additional Supply

With more than five hectares of developable industrial land being brought to the market, the proposal represents a significant and much-needed boost in industrial land supply. As summarised in the previous section, the region's industrial property sector is running hot, with strong demand from both occupiers and investors. This has caused vacancy rates to approach or hit 20-year lows in many key industrial areas.

The proposal acknowledges and directly responds to this need for additional industrial zoned land by enabling the development of nine new lots/buildings of varying shapes and sizes in an area that has already been identified as suitable for light industrial purposes.

5.2 Gives Effect to Planning Vision

Not only does the proposal significantly boost industrial land supply, but it also directly gives effect to the long-held planning vision for the site.

5.3 Fit with Location Criteria

Unsurprisingly, then, the site is a good fit with common industrial site and location criteria. This is demonstrated by the summary in Table 2 below.

Table 2: Assessment Against Site/Location Criteria

Industrial Land Success Criteria for the Pukekohe-Paerata Structure Plan area ⁸	Application to GBAR Site
Access to major road/transport routes	Immediate access to SH22 Paerata Rd. 10min drive to SH1. Both prevent traffic movements through Pukekohe town centre.
Appropriate land features (flat land, no floodplain, large contiguous site)	GBar is >5ha contiguous site, adjacent to large light industrial zone. Master plan details site levelling works. ⁹
Ability to buffer adverse effects	Site is buffered from existing and future residential activity by Heights Road, Paerata Road, railway, and Heights Park cemetery. Prevents reverse sensitivity.
Exposure/profile/visibility	Adjacent to Paerata Rd, main commuter route to Auckland.
Existing or proposed public transport	1.5km from planned train station at Paerata, northward residential expansion of Pukekohe will improve bus services.
Additional Criteria from 2011 Harrison Grierson report¹⁰	
Proximity to ports	Reasonably close to Auckland Airport via road (30 – 35min), has rail access to Ports of Auckland and (forthcoming) Ruakura Inland Port, which connects via eastern trunk to Tauranga.

⁸ From MR Cagney (2018) Technical Note: Locational prerequisites for commercially successful business land

⁹ Note though that about half of the site is in a floodplain per the climate layer at GeoMaps:
<https://geomapspublic.aucklandcouncil.govt.nz/viewer/index.html>

¹⁰ Harrison Grierson (2011) Auckland Council Group 1 Business Land Assessment. A report for Auckland Council.

Close to other industrial land	Sizeable existing light industry along Adams Drive, structure plan will expand this all the way to GBar site, and add even more at Helvetia Road. Strong opportunity for co-location, local economic linkages, thus agglomeration economies.
Access to rail	Adjacent to North Island Main Trunk.
Proximity to workforce	Rapidly growing workforce from Pukekohe, Pokeno, Tuakau, Drury.
Complementary business services	Adjacent light industry, commercial services in Pukekohe centre.

6. Likely Economic Effects

This section considers the likely economic effects of the proposal.

6.1 Improved Supply Responsiveness

In addition to directly boosting industrial land supply, the proposal may also help the market to be more responsive to growth in demand over time. This causes the market price of industrial land to increase slower, and more new land to be released, in response to ongoing growth in demand.

By flattening the price path and hence reducing the rate at which land prices grow, the proposal will help to improve industrial land affordability. This is particularly important for two reasons. First, industrial land uses are typically land hungry, so even a small decrease in land prices (relative to the status quo) can significantly aid affordability.

Second, industrial land uses often have strong linkages with the rest of the economy through the provision of various goods and services. Hence, by keeping industrial land prices as affordable as possible, the proposal – and others like it – can help control the costs (and thus prices) of the various goods and services provided by industrial land users to other parts of the regional economy. This, in turn, helps improve the overall competitiveness of the Auckland region.

6.2 Impacts on GDP, Jobs, and Wages

The process of obtaining all necessary consents, finalising the subdivision plan, preparing the land for development, installing necessary infrastructure, and constructing the nine buildings associated with the proposal will generate one-off economic impacts on GDP, jobs, and wages.

We quantified these using a technique called multiplier analysis, which enables the wider economic impacts of a change in one sector (or sectors) to be traced through to estimate the overall impacts.

These impacts include:

- **Direct effects** – which capture onsite activities directly enabled by the proposal; and
- **Indirect effects** – which arise when businesses working directly on the project source goods and services from their suppliers, who in turn may need to source goods and services from their own suppliers, and so on.

These economic effects are usually measured in terms of:

- **Contributions to value-added (or GDP).** GDP measures the difference between a firm's outputs and the value of its inputs (excluding wages/salaries). It captures the value that a business adds to its inputs to produce its own outputs.
- **The number of people employed** – which is measured in terms of full-time equivalent employees (FTEs).
- **Total wages and salaries** paid to workers, which are often labelled 'household incomes.'

Having defined these key terms, the following table shows the estimated economic impacts of the various activities enabled by the proposal.

Table 3: One-Off Economic Impacts of Development

Planning/Design/Consent	Direct	Indirect	Total
FTEs – 1 year	3	2	5
GDP \$m	\$0.5	\$0.2	\$0.7
Wages/Salaries \$m	\$0.3	\$0.1	\$0.4
Land Development			
FTEs – 1 year	5	13	18
GDP \$m	\$0.8	\$1.7	\$2.4
Wages/Salaries \$m	\$0.3	\$0.9	\$1.2
Building Construction			
FTEs – 2 years	21	48	69
GDP \$m	\$5.1	\$12.5	\$17.6
Wages/Salaries \$m	\$3.2	\$6.3	\$9.5
Project Totals			
FTE-Years	50	110	160
GDP \$m	\$6.3	\$14.3	\$20.6
Wages/Salaries \$m	\$3.7	\$7.3	\$11.0

In summary, we estimate that:

- Future planning/design/consenting work will create full-time employment for about 5 people for 12 months, generating \$400k in wages/salaries;
- Land development (including infrastructure) will generate full-time work for approximately 18 people for 1 year, with \$1.2m in wages/salaries paid; and
- Construction of industrial buildings will provide full-time work for around 69 people for two years, with around \$9.5 million paid in wages and salaries.

6.3 Ongoing Employment Potential

In addition to the one-off economic impacts estimated above, the proposal will also enable businesses to establish onsite, which themselves will have ongoing economic impacts.

To estimate this, we reviewed recent work for Auckland Council by Market Economics, which estimated an average industrial workspace ratio (WSR) for each part of the region.¹¹ It suggested that a typical industrial area in the south employs about one person per 100 square metres of gross floorspace. Applying this ratio to the proposal's estimated industrial floorspace of 12,560 square metres indicates that the proposal could support permanent future employment for 125 people.

¹¹ <https://knowledgeauckland.org.nz/media/1583/nps-udc-housing-and-business-development-capacity-assessment-for-auckland-dec2017.pdf>

6.4 Higher & Better Use of Land

The subject land is currently used for relatively low-value rural purposes. The proposal addresses this and enables the land to be put to a higher and better use. As a result, it maximises economic efficiency in the underlying land market while also supporting the overarching purpose of the RMA (to enable the sustainable use and development of natural and physical resources).

6.5 Infrastructure Servicing Cost and Risk

A potential economic downside of the proposal is the cost and risk of providing the infrastructure needed to enable it, such as roads, water, wastewater, and parks/reserves. However, all works within the boundary of the development are the sole responsibility of the applicant, with the cost and risk of works beyond the subject site also able to be (mainly or largely) transferred to them via development contributions levied on future industrial land use development. Accordingly, any infrastructure costs and risks on the Council should be negligible.

7. Summary and Conclusion

The need for additional industrial land in the south has been clearly signalled in various background reports and studies, which led to 100 hectares of light industrial land being provided for in the PPSP. This high demand continues today, with numerous real estate research reports noting unprecedented demand, which has led to historically low vacancy rates.

The proposed plan change directly acknowledges and responds to the need for more industrial land in the general locality, while also giving direct effect to the underlying structure plan. Moreover, enabling the land to be put to the proposed industrial uses will unlock significant and enduring economic benefits. Accordingly, we support the proposal on economic grounds.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Ms Goy Littlewood

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

Address for service of Submitter

Telephone:

Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 124 (Private)

Plan Change/Variation Name

Pukekohekohe Gateway Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

All of it.

Or

Property Address

Or

Map

Or

Other (specify)

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

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

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

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

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

Submission

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

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

9.1

See attached.

I wish to be heard in support of my submission

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

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

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

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

23/2/26
 Date

Notes to person making submission:

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

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

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

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

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

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

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

Submission on Plan Change 124

Absolutely oppose this plan change for the following reasons:

1. Land availability:

- Plan changes recently approved for Pukekohe are yet to go ahead – eg the land area between Golding and Ngahere Roads in Pukekohe. This land has been sitting dormant for sometime.
- Pukekohe currently has plenty of land already zoned for subdivision that is either yet to be developed or currently being developed. For example the subdivision adjacent to Anselmi Ridge is only half full. I am also aware of applications that have been received and approved by Auckland Council still awaiting development.
- With large amounts land also being subdivided in nearby Drury and Karaka, by approving this application you run the risk of there being an over supply of housing.

2. Roothing Network

There appears to be no upgrade to the roading network proposed to alleviate the extra load that will be placed on Manukau Road, and all arterial roads in/out of Pukekohe. Manukau Road, is a main through road which is often congested along with the roads connecting into it. If this plan change is approved the additional congestion this will place on these roads is unacceptable.

Raceday events at the track will add to this congestion.

3. Flooding zone

This area of Manukau Road has a history of flooding. Franklin District Council attempted to alleviate this some years ago by installing piped drainage through the Park. This has not completely alleviated the flooding during heavy rainfall and it doesn't matter what stormwater system is proposed, the addition of intensification housing will add to this and we will see the same thing happening like the Belmont subdivision. Council thought it had provided an adequate stormwater system but this was not the case. During Cyclone Gabrielle many houses further down the Whangapouri stream were badly affected and deemed unsuitable for inhabitation. Ratepayers have had to wear the cost of buying out the affected houses property owners. I believe the soil in this area is peat which is not particularly good drainage and not good for building on.

4. Noise factor

Siting residential properties adjacent to a racing track will no doubt result in noise complaints – with noise from early morning horse training and raceday events. This will be a drain on Council resources and another cost to the ratepayers.

If this PC is approved, the name needs to change. The name Pukekohekohe will create confusion with the official town name 'Pukekohe'.

Please consider the effect on the community if this goes ahead, rather than the developer, who is only interested in making money, and giving nothing back to the community.

The Unitary plan is supposed to be about the need! There is currently no need for further residential land in Pukekohe.

Please do your homework on this! I urge you to investigate what land is currently in the pipeline for development. This should be used up before more plan changes are approved.

9.3

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

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

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

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)



NGAATI TE ATA WAIOHUA

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

23rd February 2026

**SUBMISSION REGARDING:
PC 124 (Private) – Pukekohekohe Gateway Precinct Auckland Thoroughbred
Racing (ATR)**

AUCKLAND COUNCIL
Unitary Plan Department
Submissions
unitaryplan@aucklandcouncil.govt.nz

Teena Koe

Application Details

This private plan change aims to:

1. Rezone part of the land from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban, Open Space – Informal Recreation, and Business – Light Industry zones.
2. Introduce the ‘Pukekohekohe Gateway Precinct’ to cover part of the rezoned land.
3. Amend the existing Pukekohe Park Precinct to reflect the current and future activities that occur, or are planned to occur, at Pukekohe Racecourse.

Issues Raised with ATR

Our assessment of the PPC is guided by a commitment to protecting the mana, mauri, and integrity of the natural and cultural landscapes within and around the development site.

Ngaati Te Ata Waiohua has identified specific outcomes and elements *that we would strongly oppose* if included as part of the development:

- **Gated community:** We do not support the establishment of an exclusive or gated community that restricts access and fosters social division.
- **Elitist community:** The development must be inclusive and reflect the diverse character of Pukekohe, avoiding any design or planning that prioritises exclusivity.
- **Towering apartment blocks:** High-rise structures that dominate the skyline and detract from the natural character of the area are unacceptable.
- **Blocked sightlines and viewshafts:** The development must preserve viewshafts to

significant natural features, such as hillsides and mountain ranges, ensuring that the area's visual and cultural connections are maintained.

• **Poorly designed southern gateway:** As a key entry point from the Waikato, the southern gateway must be welcoming and thoughtfully designed to reflect the natural and cultural character of the region.

• **Inadequate stormwater management:** Stormwater management must be robust, incorporating well-designed and constructed naturalised waterways that enhance ecological health and support kaitiakitanga and which doesn't exacerbate upstream or downstream flooding.

Position

Ngaati Te Ata Waiohua **conditional support** on condition that the following are provided for:

- 1. That the recommendations in our CIA Report are provided for. | 11.1
- 2. That the proposed precinct provisions incorporate and integrate Iwi (manawhenua) interests and values, cultural, economic and social wellbeing in the development. | 11.2
- 3. That Auckland Thoroughbred Racing (ATR) continue to engage and consult with us as the plan change develops, particularly what eventuates from the hearing process. | 11.3

This submission represents only a starting point for initial engagement and will require further consultation and dialogue between Ngaati Te Ata and ATR. Further discussion will be needed around the matters raised in this submission, implications of the future development of the proposed plan change and the issues that will be raised as a result of the hearing.

It is intended that this submission will assist with ongoing decision making from all relevant parties involved and ensure that Ngaati Te Ata Waiohua issues, concerns, interests and values are provided for, including resource consent requirements.

We wish to be heard in support of our submission.



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



23 February 2026

Auckland Council
135 Albert Street
Private Bag 92300
Auckland 1142

Delivered by email: unitaryplan@aucklandcouncil.govt.nz

Attention: Planning Technicians

Tēnā koutou,

Health New Zealand Submission – Private Plan Change 124

This letter is Health New Zealand | Te Whatu Ora's (Health NZ) primary submission on Private Plan Change 124 – Pukekohekohe Gateway Precinct to the Auckland Unitary Plan Operative in part (PC124).

Health NZ's submission on the PC 124 represents an integrated view that reflects local, regional and national perspectives on the health estate and health infrastructure – as it relates to matters specific to the Pukekohe Hospital site and other relevant, particularly Southern Auckland, health service demands and facilities.

Background:*National Directions*

1. On January 15, 2026, the *National Policy Statement for Infrastructure 2025* (NPS-I) came into force. The NPS-I fixes a long-running anomaly in the Resource Management Act, 1991 (the Act) by explicitly including health infrastructure within the definition of "infrastructure" (via "additional infrastructure").

The Health Estate

2. The Pae Ora (Healthy Futures) Act 2022 (the Pae Ora Act) provides for the funding and provision of health services in New Zealand. The Pae Ora Act also establishes Health NZ and its responsibilities – including provisioning for the public health system.
3. The Health Estate in New Zealand is extensive and complex. To support the delivery of nationally and regionally significant health services (utilising a range of operating models) Health New Zealand owns and operates a nationwide network of landholdings and facilities – including hospitals, other clinical and non-clinical facilities and their component parts.
4. In the Auckland Region:
 - a. Health NZ owns over 121 hectares of land (in addition to interests in other leased sites).

- b. Health NZ operates 9 hospital campuses / healthcare facilities (and a range of other clinical / non-clinical sites that support the campuses) that are part of the regional and national health network serving just over approximately one third of New Zealand's population.
5. In Franklin, Health NZ owns and operates the Pukekohe Hospital at 1 Tuakau Road, Pukekohe (the Hospital):
- a. located less than 600m from the PC 124 landholdings (measured closest point, boundary to boundary) and the proposed Kitchener / Manukau / Buckland Road intersection upgrades;
 - b. with site access is via entry gates on both Tuakau and Kitchener Roads – with the public accessing the site along Tuakau Road and Health NZ staff (including community fleet vehicles) and emergency services via Kitchener Road (and Tuakau Road); and
 - c. providing a range of planned clinical (and support) services – including for Adult Rehabilitation and Health of Older People; Pukekohe Birthing Unity and Maternity Services; Community Mental Health; Community Health and Public Health Nurses. There is no emergency department – however emergency services are a reality at the Hospital.
6. The Minister of Health has announced a range of health investment, including:
- a. Second stage Facilities Infrastructure Remediation Programme investment at Auckland City Hospital¹; and
 - b. A future South Auckland hospital²

The Existing Road Environment

- 7. Safe site access (pedestrian and vehicular, including emergency vehicles) is vitally important at all Health NZ hospitals and facilities.
- 8. The local road network environment surrounding the Hospital – includes open drains, unformed road berms (without footpath connections to bus stops) and posted road speeds that reflect the rural / rural service town environment. Pukekohe is growing – with increased urban development and associated traffic and construction works.
- 9. Health NZ staff, patients and visitors anecdotally observe (and in some cases reported incidents and near miss events) about concerns relating to the local road environment – including difficult safe site access (pedestrian and vehicle) and local intersection performance (queuing times / poor visibility).
- 10. Health NZ is unclear about how the design, capacity and safety of the local road environment around the Hospital is being monitored and managed by Auckland Council and Auckland Transport – particularly regarding managing what appears to be increasingly urban traffic on rural roads.

¹ [Resilience of Auckland City Hospital future-proofed | Beehive.govt.nz](https://www.beehive.govt.nz/news/resilience-of-auckland-city-hospital-future-proofed)

² [Interest sought for new Drury hospital site | Beehive.govt.nz](https://www.beehive.govt.nz/news/interest-sought-for-new-drury-hospital-site)
[TeWhatuOra.govt.nz](https://www.beehive.govt.nz)

Introduction:

11. Health NZ confirms that it:

- a. Is not a trade competitor.
- b. Does not wish to be heard in relation to its submission.

Submission:

1. Health NZ is not expressing a view about the merits or not of the proposed development and road improvements that could occur if PC 124 is successful. Health NZ will leave that matter to the Independent Hearing Panel and subsequent Auckland Council decisions.
2. Instead, Health NZ's submission identifies safety concerns about the existing road network design and performance in relation to safe staff, patient, visitor and emergency pedestrian and vehicle access to the Hospital. These concerns are based on anecdotal staff / patient / visitor feedback, incident and near miss records and observations of senior staff familiar with day-to-day site operations.
3. Health NZ submits that the existing road network and traffic volumes around the Hospital is already of concern to Health NZ – particularly because:
 - a. It appears that the roads are not suited / potentially beyond the rural design capacity for the existing / increased urban and rural traffic volumes – particularly during traffic peaks. In particular – reduced visibility to make cross-traffic turns; uncontrolled intersections / wait times and the lack of pedestrian facilities (footpaths, refuge areas / crossing open swales / drains) between the Hospital and bus stops.
 - b. The Hospital provides a range of planned community services to particularly vulnerable community groups where navigating challenging traffic environment (such as unformed berms / open drainage and uncontrolled righthand turns during traffic peaks) is particularly hazardous / impractical.
 - c. Anyone (such as staff) walking to / from the Hospital from local bus stops cannot do so safely e.g. with safety barriers / traffic controls etc.
 - d. The Hospital is also a hub of community nursing – involving regularly fleet travel to / from the site – Health NZ staff have reported that challenges in safely accessing the local road network has impacted on timeliness of in-community appointments.
4. Health NZ submits that the development that could occur following PC 124 may add to the existing road network issues that already impact the Hospital.
5. Health NZ is neutral about the PC 124 and seeks that within its various roles and responsibilities that Auckland Council (including via Council CCO, Auckland Transport) | 12.1

seriously consider safe pedestrian and vehicle (including emergency) access to and from Pukekohe Hospital. Health NZ considers that Auckland Council has at least the following opportunities (if not others) to address these concerns:

12.1

- a. Regulatory decisions about the cumulative effect of development on the design, performance and safety of the local road (including drainage and pedestrian facilities) network on critical access to / from Pukekohe Hospital (especially during traffic peaks);
- b. Road Controlling Authority decisions about intersection / road network design, capacity, performance and investment – particularly for rural and urban traffic; approving the timing / sequencing of construction traffic management in the local road network; and pedestrian facilities – particularly via / crossing open drainage in the unformed road berm.

Note: Health NZ acknowledges that PC 124 includes road improvements that are intended to, at least in the immediately localised area, accommodate the proposed development. Health NZ will leave the consideration of those matters to Auckland Council and appropriately qualified traffic experts.

Conclusion:

The successful function of the New Zealand Health System is nationally and regionally significant to all New Zealanders and their whānau. Health sector infrastructure involves the flexible arrangement of services and facilities across a network of sites. Accordingly, it is critical that health infrastructure is effectively and consistently recognised for its significance, prioritised as a critical function and enabled to operate without unreasonable impediments.

Safe site access (pedestrian and vehicular, including emergency vehicles) is vitally important at all Health NZ hospitals and facilities.

Health NZ acknowledges that we do not have traffic and/or crash data to support this submission. Instead, Health NZ relies on the credible observations (and in some cases incident and near miss reporting) of our staff, patients and visitors in expressing our concerns about the ability to safely access the Pukekohe Hospital.

The only relief that Health NZ asks for is that Auckland Council (and Auckland Transport) consider the concerns raised seriously. Health NZ does not wish to be heard in relation to this submission – but does invite the opportunity to talk with relevant officers in relation to the local roading network. Please direct all enquiries to the undersigned or Helen Hamilton at land-planning@tewhatauora.govt.nz.

12.2

Ngā mihi nui,



Paulette Sorensen

Group Manager – Land
 Infrastructure and Investment

TeWhatuOra.govt.nz

PO Box 5013, Wellington, 6014