

11 May 2022

Issued via email: robert@scottwilkinson.co.nz

Dear Robert,

RE: Clause 23(2) Resource Management Act 1991 Further Information – Private Plan Change request by Pukekohe Limited

Pursuant to Clause 23(2) of the Resource Management Act 1991, Council requires additional information following consideration of responses to its request for further information dated 18 February 2022.

Additional information is sought in relation to:

- Transport (Wes Edwards – Arrive)

Please see attached memo for the request.

I can confirm that the requests for further information on planning and economics matters have been satisfied.

If you have any queries regarding the above, please do not hesitate to contact me at jimmy.zhang@aucklandcouncil.govt.nz.

Kind regards,



**Jimmy Zhang | Planner
Plans and Places**

Plan Change. 301-303 Buckland Road, Pukekohe. Evaluation of additional transport information provided

Request	Response	Comment
T1. Please assess a more intensive development scenario for the site including greater building coverage with a high proportion of more intensive activities including LFR and little, if any, motor vehicle sales or industrial activities.	Additional scenario provided with 50% of land as LFR with 33% building coverage, remainder as per ITA.	<p>The ITA scenario over-represented low-intensity activities such as vehicle sales and warehouse activities at 16% floor area ratio.</p> <p>The new scenario has additional moderate-intensity LFR activity at 33% coverage, taking the average floor area ratio to around 25% coverage, but still has a considerable proportion of low-intensity vehicle sales and warehousing.</p> <p>Drive-through restaurants and other food and beverage activities are permitted at any scale in the BGBZ. These activities can have high trip generation and are not accounted for in the assessment.</p> <p>The information provides no corroborating information, such as information from similar BGBZ areas, to justify the proposed floor area ratio, development intensity or overall trip generation on a per-hectare basis. It has not been demonstrated that the assumed level of development is a good match for what the proposed zoning would enable.</p> <p>There is still insufficient information to conclude that the two scenarios provided for analysis are sufficient.</p> <p>Additional information required</p>

Request	Response	Comment
T2. Please adopt higher trip generation rates for retail and provide evidence to demonstrate the adopted trip generation rates represent the activities that could develop on the site.	Smaller retail, which typically has higher trip generation rates is discretionary or non-complying in the zone, and rates reasonable for permitted scale of retail.	The proposed rate is appropriate for the larger-scale retail activities permitted by the proposed zoning, provided food and beverage activities are accounted for separately. Request satisfied
T3. Please provide [trip generation] assessment of the weekend midday peak period.	Trip generation has been provided for the Saturday midday peak.	Sufficient information provided, subject to being updated in accordance with T1. Request satisfied.
T4. Please recalculate movements with directional splits based and provide evidence to support the splits used.	No evidence to support splits provided. Alternative splits tested.	The alternative splits provided for the assumed land uses are reasonable. Splits for other land uses are yet to be provided or reviewed. Additional information required
T5. Please provide an assessment with 90% of all trips generated by the site (and by the PC30 development) assigned to and from the north. (60% north/ 30% south/ 10% west used in ITA.)	90% north not realistic as existing traffic on Buckland Rd is split north/ south about 50/50 on Saturday and 60/40 on weekdays, and significant population located south of the site (Buckland, Tuakau, Pokeno). 70% north/ 30% south/ 0% west tested.	Most population growth is expected to the north of the site, so the north is likely to represent an increasing proportion of trips in future. Insufficient information has been provided to support the assumed north/ south splits. Additional information required
T6. Please provide analysis of the proposal against a future development environment such as 2036.	Not provided. PPSP ITA considers future environment, considered to be outside scope of this plan change. Analysis shows there is spare capacity at the roundabouts. Proposed zoning provides employment.	Large-scale ITA's such as PPSP are broader in scope and explicitly state subsequent smaller-scale ITA's such as this one need to provide more detail. While there may be spare capacity at current traffic volumes, the impact of the proposal on the future environment or the capacity of the proposed intersections in the future have not been demonstrated, regardless of how much employment may be provided, particularly as the proposed zoning differs from that assumed in the PPSP ITA. Additional information required
T7. Please assess the impact of the proposal on the transport environment in the weekend midday peak hour	Analysis of intersection performance in Saturday midday peak period provided.	Sufficient information provided, subject to being updated in accordance with T1. Request satisfied

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T8. Please assess the impact of the proposal on and during large events at the wider Pukekohe Park site, including on the temporary traffic management deployed for large events.	Not provided. Events are infrequent, and under control of Traffic Management Plans so additional assessment not appropriate.	While the events are infrequent, they have the potential to generate significant adverse effects. The impact of the proposal on the ability to implement appropriate Traffic Management Plans for events and potentially change the impact of the events remains unknown. The ability of activities on the site to operate safely and efficiently while events are occurring also remains unknown. Additional information required
T9. Please update the ITA to consider the planned public transport environment.	Acknowledgment that additional bus services may not be available. ITA not updated.	Request satisfied
T10. Please provide an assessment of how this [Manukau / Kitchener / Buckland/ Pukekohe Park Gate 2] intersection would operate during events at Pukekohe Park in the future.	See T8.	Additional information required (See T8)
T11. Please provide an assessment of how this [Manukau / Kitchener / Buckland/ Pukekohe Park Gate 2] intersection could operate under traffic signal control.	Auckland Transport assessed a roundabout as part of PC30. Roundabout preferred to reduce speed on urban-rural threshold. All other intersections [that do not have Give Way or Stop controls] in Pukekohe are roundabouts.	Insufficient information provided on relative merits of traffic signals and roundabouts on matters such as efficiency, safety, and pedestrian and cyclist safety and amenity, particularly considering future urbanised environment. No information assessing intersection choice considering safe system assessment framework. Additional information required
T12. Please provide concept drawings of intersection layout(s) showing how a safe and efficient intersection could be provided [at Manukau / Kitchener / Buckland/ Pukekohe Park Gate 2]	Concept intersection layout drawing provided.	Request satisfied
T13. Please provide diagrams from the modelling software to confirm the layout(s) modelled [at Manukau / Kitchener / Buckland/ Pukekohe Park Gate 2].	See Attachment B.	Diagrams not provided in Attachment B. Additional information required
T14. Please clarify the proposed location of the PU-NS-2 road alignment through the site, connections with Webb St, the location of the intersection with Buckland Rd, and the rationale for the proposed route and intersection location.	Proposed to be opposite Pukekohe Park Gate 3. The best location as can serve development on both sides of the road. Connection to Webb St inappropriate now but could occur in future.	Request satisfied

Request	Response	Comment
T15. Please clarify if this [Buckland / PU-NS-2] intersection will provide access to or from the racecourse site, and how any such access will be arranged. If the intersection will be separate to any Pukekohe Park access, please provide details on the proposed separation distances.	See T14.	Request satisfied
T16. Please demonstrate how the Buckland / PU-NS-2 intersection(s) could operate safely, particularly in relation to Pukekohe Park access.	See T14 and concept drawing.	Request satisfied
T17. Please provide information on the sight distances and operating speeds at the proposed [Buckland / PU-NS-2] intersection location(s).	Speeds provided. Available sight distance of 230m exceeds minimum desirable distance of 181m.	Request satisfied
T18. Please provide an assessment of how this intersection would operate during events at Pukekohe Park in the future.	See T8.	Additional information required (See T8)
T19. Please provide an assessment of how this intersection would operate under traffic signal control.	See T11.	Additional information required (See T11)
T20. Please provide concept drawings of the intersection layout(s) showing how a safe and efficient intersection could be provided.	Concept intersection layout drawing provided.	Request satisfied
T21. Please provide diagrams from the modelling software to confirm the layout(s) modelled.	See Attachment B.	Diagrams not provided in Attachment B. Additional information required.
T22. Please provide an assessment of the need for pedestrian and cyclist facilities, both along and across roads.	Comments on provision along roads provided. No assessment of crossing facilities provided.	Please provide information around selection of appropriate pedestrian (and cyclist) crossing facilities, particularly across Buckland Road, and how proposed provisions respond to the need for crossing facilities. Additional information required
T23. Please provide data on Austroads SISD sight distances and operating speeds at various locations along the PCA frontage, along with other features such as queuing at intersections or access to Pukekohe Park, to demonstrate where safe access may or may not be possible.	See T3. Information for one possible intersection location provided for T17.	No information provided to enable an assessment of the appropriateness of proposed direct property access to Buckland Road at other locations. Additional information required
T24. If safe access at any point is dependent on a change to the posted speed limit, please provide discussion on how safe access could be provided in the event a speed limit change is delayed or does not eventuate.	No information provided at locations other than the proposed intersection.	Additional information required

Request	Response	Comment
T25. Please provide a concept design and/ or a series of road cross-section diagrams, showing how an appropriate flush median could be provided while also providing a safe road environment including sealed shoulders, existing features such as trees and streetlighting, and planned features such as pedestrian and cyclist facilities.	Concept layout drawing provided showing sealed shoulder on southern side removed.	Request satisfied
T26. Please provide an assessment of the walkable catchment that includes walking distances of 400m and 800m.	Map with 400m and 800m isochrones provided, and acknowledgement that the walking catchment is limited.	Request satisfied
T27. Please provide an assessment of how any high trip-generating activities that may locate in the PCA could be efficiently served by key public transport services, or how such activities could be controlled.	<p>There are existing bus services along Buckland Rd (currently no stops nearby), and a connector service within 800m walk.</p> <p>Standard E27.6.1 requires an assessment for high trip-generating activities (if triggered).</p> <p>No other control proposed.</p>	<p>Existing bus services not key services.</p> <p>The assessment criterion for activities exceeding the E27.6.1 threshold may not include consideration of RPS matters which are intended to be addressed at plan change stage.</p> <p>Request satisfied</p>
T28. Please explain how development of the PCA is proposed to be controlled in the event the transport infrastructure identified in the ITA as being necessary for development is delayed or not provided and/ or a robust mechanism by which Council could ensure that the identified mitigation measures could be achieved prior to development operating.	<p>Some infrastructure (flush median, footpaths, lower speed limit) required straight away. Roundabout likely triggered early but not straight away.</p> <p>Subdivision and/or any new building would require consent. Any development triggering the E27.6.1 threshold would require consent.</p> <p>No additional control proposed.</p>	<p>Confirmation that no control proposed, other than existing controls in AUP.</p> <p>Request satisfied</p>
T29. Please explain how the form and location of new or upgraded transport infrastructure would be well integrated with development occurring on the site.	See T28.	<p>Confirmation that no control proposed, other than existing controls in AUP.</p> <p>Request satisfied</p>