

18 February 2022

Issued via email: robert@scottwilkinson.co.nz

Dear Robert,

RE: Clause 23(1) Resource Management Act 1991 Further Information – Private Plan Change request by Pukekohe Limited

Thank you for the private plan change request lodged with Auckland Council on 25 January 2022 to rezone 7.8 ha of land at 301 and 303 Buckland Road from the Future Urban Zone to the Business: General Business Zone.

Further to this request under Clause 21 to Schedule 1 of the Resource Management Act 1991, the Council has now completed an assessment of the information supplied.

Pursuant to Clause 23(1) of the Resource Management Act 1991, the Council requires further information to continue processing the private plan change request.

Appendix 1 attached to this letter sets out the further information requested and the reasons for these requests.

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**

Appendix 1:

Further information requested under Clause 23 First Schedule of the Resource Management Act 1991

Contents

Planning, statutory and general matters – Jimmy Zhang 2

Economics matters – Derek Foy, Formative..... 16

Transport matters – Wes Edwards, Arrive 25

#	Category of information	Specific Request	Reasons for request
Planning, statutory and general matters			
P1	Shape files	Please provide shape files showing the proposed plan change area.	Shape files are required to show the extent of the Private Plan Change (PPC) request on the AUP(OP) GIS Viewer upon notification.
P2	Consultation	Please clarify whether Auckland Transport have been consulted with in the preparation of the PPC, and if so what the outcome of that consultation was.	Given the PPC will increase the number of trips generated on the current and future local and strategic network, it would be helpful to understand the extent of consultation undertaken with AT as the road controlling authority.
P3	Integrated Planning approach	Please provide an assessment of the potential effects of the zoning proposal on the future implementation of the Pukekohe-Paerata Structure Plan, as well as any other potential risks/issues associated with rezoning the land General Business ('GB').	<p>In setting council's strategic direction for the FUZ surrounding Pukekohe-Paerata, the Pukekohe-Paerata Structure Plan has indicated a preference for the Light Industry ('LI') zone over the plan change area.</p> <p>The Urban Economics assessment notes that both the LI and GB zones are appropriate for the PC land. It appears that the GB zone is preferred due to the 'flexibility' it provides, as it enables a wider range of activities relative to the LI zone.</p> <p>The benefits of increased flexibility for a site needs to be considered alongside the strategic implications for the surrounding Future Urban zone ('FUZ') indicated for LI and the need to carefully manage the expansion of the GB zone.</p>

P4	Integrated Planning approach	Please explain how the mitigation measures outlined in Table 1 of the Commute ITA can be implemented, and also delivered in a manner which ensures the safety and efficiency of the road network, if no precinct is proposed to sit over the land.	This information is required to better understand the transport effects and their management, particularly given the range of uncertainties including the future use of the land, the range and scale of activities enabled through the zoning and the potential for multiple landowners and future subdivision.
P5	Precinct provisions	Has consideration been given to the application of a SMAF:1 overlay over the plan change area?	The AUP states that for greenfield areas adverse effects of development shall be avoided as far as practicable or otherwise remedied or mitigated and this includes changes in hydrology (Policy E1.3.8).
P6	Clarification	Please confirm if the upgrade of 'footpaths' in Table 1 of Commute's ITA will include kerb and channelling.	Point of clarification on whether upgrades to kerb and channelling are included in the provision of 'footpaths'.

#	Category of information	Specific Request	Reasons for request
Economics: Derek Foy			
E1	Business land per capita ratio	Clarification as to the geographic area that the 108ha land (GBZ and Business Light Industry Zone “BLIZ”) included in Figure 3 (of the Urban Economics report) relates to, and discussion about how relevant Auckland average ratios are to a peripheral location such as Pukekohe.	It is unclear from Figure 3 and the associated text whether the 198ha relates to all the land within the primary and secondary catchment, or only the land in Pukekohe. If the 108ha doesn't include all GBZ and BLIZ land in the primary and secondary catchment, then it will be important to understand how much GBZ and BLIZ land there is in the primary and secondary catchment in total. This affects the land per capita ratios which flow through into the land demand estimates provided in Figure 4. It is important that the ratio calculated uses the same geographic area for the land area quantified and the population used in the calculation. The assumptions and data in figures 3 and 4 underpin all the assessment of demand for additional business zoned land in Pukekohe, and are relied on in forming conclusion in the Urban Economics report.
E2	Vacant business land	Please describe any areas of vacant business land that have been considered in the assessment of economic effects, that are located outside of the Pukekohe town centre. If this has not been considered, please provide an explanation as to the rationale for this.	Availability of other (vacant) business zoned land in Southern Auckland may draw demand for additional business land for both LFR and general and light industry activities in Pukekohe to other locations, especially if they are large and new.

#	Category of information	Specific Request	Reasons for request
E3	Business land prices	Please describe whether the trend of rapid increase in land prices shown in Figure 10 is unique to Pukekohe or is consistent with wider Auckland trends, and discuss the extent to which trends in Pukekohe are influenced by macroeconomic factors as opposed to local land supply constraints.	Understanding the potential drivers of recent local price growth for commercial and industrial land is important in order to establish whether the trend is any evidence of an undersupply of business land, or supports the need for the PPC.
E4	FLR floorspace estimates	Please explain how the estimate of demand for an additional 64,000m ² LFR (p26 of the Urban economics report) were arrived at. That estimate is inconsistent with the estimate of 25,000-30,000m ² additional LFR demand presented on p29.	The demand for LFR is relied on in part as justification for the PPC request, so it is important to understand the origin of the numbers and reason for any differences between numbers presented.
E5	Economic effects	Please provide some assessment of the direct and indirect economic effects of on the Pukekohe Town Centre if the site was exclusively occupied by LFR. This assessment should explain what assumptions have been made about where spend resident in the catchment is directed, and the degree to which spend is likely to leak into the catchment from other places, or out of the catchment to competitor locations.	The demand for LFR is one justification for the proposal to re-zone land. It is important to consider how the PPC request might affect the Pukekohe town centre and to ensure that there would be enough demand to support the proposal without resulting in significant adverse effects on existing centres. This assessment would expand on the key economic costs identified in section 13 (p26 of the Urban Economics report).

E6	Economic benefits	Please provide some assessment of the number of jobs that are likely to be supported on the PPC site, and the associated economic benefits.	Development of the site will likely support increased employment in Pukekohe, reducing the need to travel for work, and to travel to access goods and services provided on the site. This is not discussed in the Urban Economics report.
----	-------------------	---	---

Transport matters – Wes Edwards

#	Category of information	Specific Request	Reasons for request
T1	Assumed land use	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.	<p>The BGBZ is a zone that provides for Large Format Retail [LFR] in addition to a wide range of business, food and beverage, and light industrial activities.</p> <p>The transport assessment is based on a development scenario consisting of 12,400m² GFA, representing 16% coverage of the gross land area. Allowing for some loss of developable land due to internal roads, the assumed building coverage appears to be at the low end of what the proposed zoning could enable.</p> <p>The assumed gross floor area is made up of 40% retail, 26% motor vehicle sales showrooms, 26% warehousing, and 8% commercial and office activity. The proposed BGBZ could provide for a different mix of activities with significantly higher intensity. For example, there could be significantly more retail including a substantial proportion of LFR, home-improvement, trade retail, and fast-food and/ or dine-in food</p>

			and beverage retailing, and a far lower proportion of motor vehicle sales and warehousing.
T2	Trip Generation Rates	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.	The assessment adopts the RTA shopping centre recommended trip generation rates for all retail activity. Rates for smaller and/ or stand-alone retail developments and for activities such as food and beverage retailing can be significantly higher.
T3	Trip Generation Rates	Please provide assessment of the weekend midday peak period.	The ITA estimates the trip generation of the PCA during the weekday AM and PM peak periods. No estimates are provided for weekday or weekend midday periods. The weekend midday period could be a critical period for analysis, particularly as a considerable proportion of the site could be used for retail activity.
T4	Trip Splits	Please recalculate movements with directional splits based and provide evidence to support the splits used.	<p>The assessment is based on a peak-hour split of 80/20 for warehousing activities and commercial/ office activities. Available data indicates this split is likely to be closer to 90/10 AM and 85/15 PM for both warehousing and office.</p> <p>The assessment is based on a 50/50 split for retail and motor vehicle sales. The available data suggests that retail splits are more likely to be around 60/40 AM, and motor vehicle sales around 75/25 AM and 40/60 PM.</p>
T5	Trip distribution	Please provide an assessment with 90% of all trips generated by the site (and by the PC30 development) assigned to and from the north.	The assessment assumes a directional distribution of traffic with 60% north, 30% south and 10% west. Given the site is located on the southern fringe of its primary catchment of Pukekohe with most growth located in the north, the proportion of traffic arriving and departing to and from the north could be in the order of 90%.

T6	Basis for Analysis	Please provide analysis of the proposal against a future development environment such as 2036.	<p>The basis for the transport analysis appears to be a 2018 survey of traffic movements at the Manukau/ Kitchener intersection plus some allowance for development of PC30. It appears no allowance has been made for traffic growth from any source other than PC30.</p> <p>The assessment does not consider an appropriate future transport environment. Existing resource consents for developing the sites are held and one is currently being implemented, so it may be some years before the site is fully developed to the potential enabled by the BGBZ. This reinforces the need to assess an appropriate future environment.</p>
T7		Please assess the impact of the proposal on the transport environment in the weekend midday peak hour	<p>An appropriate future environment for assessment would account for the significant growth in travel demand that is expected to occur as Pukekohe and surrounding areas are developed over the next ten or so years. An analysis horizon of around 2032-2036 would be appropriate for a plan change assessment such as this.</p> <p><i>Note: SGA has recently undertaken extensive, albeit high-level and longer-term, modelling of the Pukekohe area reflecting expected development patterns, infrastructure provision and expected travel behaviour. That work, with localised refinement and enhancement and adjustment to account for different land use assumptions (e.g., BGBZ replacing LIZ), may provide a suitable basis for analysis.</i></p>
T8	Pukekohe Park Events	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.	Events at Pukekohe Park opposite the PCA are a feature of the existing environment. Some events attract large crowds, high traffic volumes, and generate a high demand for parking, as evidenced by the parking controls across the PCA frontage. These events occur at times when many or all the activities likely to establish in the BGBZ would be

			<p>operating.</p> <p>The ITA does not provide any description of these events, assess the impact of the PPC on the operation of the road network or on users of Pukekohe Park during the events, and does not assess how events may affect operation of the PCA.</p>
T9	Public Transport	Please update the ITA to consider the planned public transport environment.	The ITA describes the public transport services currently available at the site and suggests the PPC could enable increased service frequencies. The Pukekohe-Paerata Structure Plan [PPSP] ITA provides a map of planned public transport services for the future, and no services are shown passing the site. Auckland Transport is unlikely to have funding to enable additional services or increased frequency of services.
T10	Manukau / Kitchener / Buckland/ Pukekohe Park Gate 2 Intersection	Please provide an assessment of how this intersection would operate during events at Pukekohe Park in the future.	<p>The ITA analyses the performance of this intersection as a single-lane roundabout based on 2018 volumes plus some allowance for PC30 development. As noted above, this intersection should be assessed for the future environment, and allow for events at Pukekohe Park.</p> <p>Given the future environment includes cycling and walking facilities, public transport on Kitchener Rd and Manukau Rd, potentially a lower speed limit, and new business development on surrounding land including Pukekohe Park, the future environment is expected to include higher levels of walking and cycling activity. Arterial road roundabouts typically provide poor environments for pedestrians and cyclists, and traffic signals are often preferred.</p>
T11		Please provide an assessment of how this intersection could operate under traffic signal control.	
T12		Please provide concept drawings of intersection layout(s) showing how a safe and efficient intersection could be provided.	

T13		Please provide diagrams from the modelling software to confirm the layout(s) modelled.	
T14	Buckland / PU-NS-2 Intersection	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.	<p>The PPSP ITA describes the planned PU-NS-2 collector road route, noting it may need to include Quarry Rd (a short distance west of the PCA) due to steep land and stream crossings between the PCA and Quarry Rd. This is likely to result in an alignment through the end of Webb Street, as shown in the PPSP. The PPSP ITA shows the PU-NS-2 intersecting with Buckland Rd approximately 100m north of Pukekohe Park Gate 3 where it would form a right-angle with Buckland Rd and be located around 300m north of a bend in Buckland Rd that constrains sight distances.</p> <p>The ITA recommends there be no road connection to Webb Street which is inconsistent with the PPSP. The ITA assumes the new Collector intersection will initially be priority-controlled and later controlled by a single-lane roundabout. The ITA states there is sufficient land within the road reserve or the site to accommodate a roundabout, but that has not been demonstrated.</p> <p>The ITA also recommends that this intersection provide access to Pukekohe Park. If Pukekohe Park Gate 3 is to remain in the existing location, this is likely to result in the PU-NS-2 road joining Buckland Rd at an acute angle which is undesirable. Gate 3 has three internal roads connecting</p>
T15		Please clarify if this 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.	
T16		Please demonstrate how the intersection(s) could operate safely, particularly in relation to Pukekohe Park access.	
T17		Please provide information on the sight distances and operating speeds at the proposed intersection location(s).	
T18		Please provide an assessment of how this intersection would operate during events at Pukekohe Park in the future.	

T19		Please provide an assessment of how this intersection would operate under traffic signal control.	<p>immediately adjacent to Buckland Rd which is likely to result in adverse intersection operation. The intersection would also be located approximately 200m from the bend to the south with shorter sight distances.</p> <p>If the intersection is to be co-located with an existing or relocated access to Pukekohe Park, that would form a crossroads intersection which is incompatible with a busy arterial road environment for safety reasons unless controlled by a roundabout or traffic signals.</p>
T20		Please provide concept drawings of the intersection layout(s) showing how a safe and efficient intersection could be provided.	
T21		Please provide diagrams from the modelling software to confirm the layout(s) modelled.	
T22	Pedestrians and cyclists	Please provide an assessment of the need for pedestrian and cyclist facilities, both along and across roads.	The activities enabled by the proposed zoning are likely to attract walking and cycling trips, potentially including trips from Pukekohe Park. The ITA does not consider how these people could cross roads, or what crossing facilities may be required to provide for development of the land. Other improvements to the transport environment, such as the provision of footpaths, cycling facilities along the road, or street lighting, are not considered in the ITA.
T23	Access	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.	<p>The ITA expects activities in the PCA could obtain access either from the new collector road or directly from Buckland Rd, and recommends a flush median be installed on Buckland Rd to facilitate direct access.</p> <p>Given the arterial nature of Buckland Road, the relatively high operating speed, the curved alignment, the desire to distance property access from major access points and intersections with controls such as right turn bays or roundabouts, potentially queuing at nearby intersections and</p>
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.	

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.	access points, and the planned presence of walking and cycling facilities along the corridor, it is expected that direct access from Buckland Rd would be minimised with most or all access being from the new collector road.
T26	Regional Policy Statement	Please provide an assessment of the walkable catchment that includes walking distances of 400m and 800m.	The ITA provides an assessment of the proposal against the Regional Policy Statement [RPS] which the ITA says was superseded by the Auckland Unitary Plan [AUP]. The RPS is now contained in Appendix B of the AUP. The RPS Policies listed under B3.3.2 (5) require development to, among other things, locate high trip generating activities (some of which are enabled by the BGBZ) so “they can be efficiently served by key public transport services and routes.” The ITA is of the view the site is located within a walkable catchment of schools and local services and has good access by public transport, but this is predicated on walking distances well beyond those typically used for such assessments, and on the existing low frequency bus services.
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.	
T28	Implementation Plan	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.	The ITA makes several recommendations about the provision of transport infrastructure to provide for development of the land under the proposed zoning and summarises these in an Implementation Plan. The ITA has identified that providing for development of the land would require mitigation such as the construction of roundabouts at two intersections yet suggests the need for this mitigation be reassessed at time of resource consent. This can lead to difficulty in achieving suitable mitigation
T29		Please explain how the form and location of new or upgraded transport infrastructure would be well integrated	

		with development occurring on the site.	<p>measures, particularly where development is fragmented or occurs in stages.</p> <p>The Implementation Plan notes that the installation of a flush median, the construction of footpaths, and a lowering of the speed limit on Buckland Rd should be triggered by any development on the site but does not propose a mechanism capable of ensuring such works are undertaken. The plan change provides no appropriate mechanism for preventing or controlling development in the absence of these measures being implemented.</p>
--	--	---	---