Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

Warkworth Service Centre 05 JUL 2019

To: A	Auckland Council
1	L. SUBMITTER DETAILS
	Name of Submitter: Warwick and Hueline Massey
	Name of Submitter: Warwick and Hueline Massey  Postal Address: Post Box 335, Warkworth 0941
	Phone: 09 425 9246 Email: Massey w 930@ gwail. com
	This is a submission on Auckland Council's Proposed Plan Change 25.
	Could you gain an advantage in trade competition through this submission?  Please select one of the below options:
	☐ I <b>could</b> gain an advantage in trade competition through this submission.
	I could not gain an advantage in trade competition through this submission.
	Are you directly affected by an effect of the Proposed Plan Change in so far as it:  a) Adversely affects the environment; and  b) Does not relate to trade competition or the effects of trade competition.
	Please select one of the below options:
	$\square$ I <b>am</b> directly affected by an effect of the subject matter of the submission.
	(1) am not directly affected by an effect of the subject matter of the submission.
2	. SCOPE OF SUBMISSION
	The specific provisions of the proposal that this submission relates to are:
	☐ The whole of Proposed Plan Change 25
	A specific part of Proposed Plan Change 25 as detailed below:
	In our opinion PPC.25 has a far better oxidcome
	for the river verges which flows along the East
	boundary of the Turnstone side. Turnstone have
17.2	shown protection of the western side of the river with open
	spaces and revegetation along this sheeten.
	The Warkword Structure Ran (andopted) shows
	fushor Industrial development along this shock of the site - NOT A GOOD PLANNING DECISION!
	of the Site - NOT H GOOD PLANNING DOCIOIS.

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

#### 3. SUBMISSION

Do you support or oppose the specific provisions of the proposal for which this submission relates? Please select one of the following:

Support As indicated on previous page.

Moppose See bolow.

As submitters we fully supposed the submission by the Warkwords Area hidson Group (whiten by Roger Williams). This submission expresses all our grown concer about the waragement of draffic through this area from Harmsell Drive to SHI junction.
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about the waragement of draffic through this
Ches Took Took Took To
the and that all The male a Danal and of Elected
not proceed until the Western hink Road is
Completed.
The hospons of heavier traffic loads on Hudson
and Falls Rd/View Rd is totally unacceptable.
I seek the following amendments to Proposed Plan Change 25:
That the Western hinle Road by shown
fully extended through the site and
completed before development begins.

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

4.	DECISIONS SOUGHT
	I seek the following decision from Auckland Council:
	☐ <b>Accept</b> Proposed Plan Change 25
	Accept Proposed Plan Change 25 with amendments as outlined above
	☐ <b>Decline</b> Proposed Plan Change 25
5.	APPEARANCE AT COUNCIL HEARING
	Do you wish to be heard in support of your submission? Please select from the following:
	☑ I/we wish to be heard in support of my/our submission
	☐ I/we <b>do not</b> wish to be heard in support of my/our submission
	If others make a similar submission, I/we will consider presenting a joint case with them at the hearing: <i>Please circle one</i> :
	™YES
	□ NO
<b>6</b> .	GENATURE AND DATE SIGNED  HELLING MESSELL
	05/07/2019
	Signature of person(s) making submission  Date

#### Step 1 - Submitter and agent details

#### Full name of submitter

Z Energy Limited

#### Organisation name (optional)

Enter the organisation name if the submission is on behalf of an organisation.

Z Energy Limited

#### Agent's full name (optional)

Enter the name of your agent if applicable.

Mark Laurenson, 4Sight Consulting Limited

#### Email address

markl@4sight.co.nz

Postal address (required under section 352 of the act if no email address available)

PO Box 911 310, Victoria Street West

#### Suburb

Auckland

#### City

Auckland

#### Postcode

Find your postcode

1142

#### Step 2 – Submission details

Specific provisions

Z Energy Limited operates an existing service station (Z Warkworth) from the site at 1 Hudson Road (corner of Hudson Road and SH1). The site is zoned Business - General Business Zone in the partially operative Auckland Unitary Plan.

PPC 25 proposes to rezone a large tract of land including land adjacent the Submitter's site. As part of the documentation in support of the rezoning, the Applicant is relying on a long-term wastewater solution that is based on certain assumptions. The Submitter is aware that a residential wastewater loading has been assumed and applied to the Submitter's site at 1 Hudson Road. This is depicted at Figure 10 to the Applicant's s32 Analysis Report dated 21 January 2019 (and also in the Land Development Report at Appendix 18), which encompasses the Submitter's site within East Catchment B Zone and records that the catchment is zoned residential.

#### Property address (optional)

Enter the property address that the submission relates to.

1 Hudson Road, Warkworth (Z Warkworth)

### Do you support or oppose the provisions you have specified?

I or we support the specific provisions identified

I or we oppose the specific provisions identified

#### Do you wish to have the provisions you have identified above amended?

Yes

O No

#### Reason for views

The Submitter supports the development of a long-term wastewater solution for Warkworth North, including the site at 1 Hudson Road but seeks to ensure that the promoted solution makes sufficient provision for wastewater volumes arising from the existing operational service station at Z Warkworth. The Submitter is concerned that this may not be the case as Figure 10 to the s32 Analysis Report that accompanies the plan change (and the underlying Land Development Report) identifies the site as being within a residential catchment area (East Catchment B) when in fact Z Warkworth is an established service station in a General Business Zone. The Submitter notes that the application of residential wastewater loadings to this site does not provide an adequate assessment of existing or potential wastewater loadings. The Submitter wishes to see the wastewater loading potential for this site amended accordingly (to recognise the Business zoning of the site and the potential wastewater loading that can be associated with such a zoning, having regard to the potential for changes in land use or land use intensity over time in accordance with the zoning of the site).

#### I or we seek the following decision by council

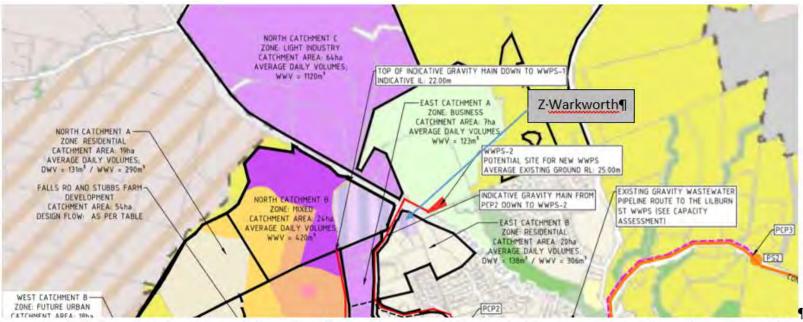
- Accept the plan modification
- Accept the plan modification with amendments
- O Decline the plan modification
- Amend the plan modification if it is not declined

#### Amendments sought

Ensure that any wastewater solution provided through PPC25 is appropriately designed to accommodate the potential commercial wastewater loadings that can be generated from the business zoned site at 1 Hudson Road, including Z Warkworth.

The Submitter understands from a meeting with Watercare (Ilza Gotelli, 28 June 2019) that these loadings have already been factored into Watercare's long term plans but seeks to ensure that the appropriateness of doing the same is clearly recognised in the assumptions made in association with the development of the land subject to PPC25 and in the documentation supporting PPC25.

18.1



 $Figure \cdot 1 - \cdot Z \cdot \underline{Warkworth} \cdot in \cdot the \cdot context \cdot of \cdot the \cdot options \cdot for \cdot was tewater \cdot servicing \cdot for \cdot the \cdot Plan \cdot Change \cdot area, \cdot adapted \cdot from \cdot Figure \cdot 10 \cdot to \cdot the \cdot applicant's \cdot s32 \cdot assessment \cdot report \cdot dated \cdot 21 \cdot January \cdot 2019. \P$ 

## Attend a hearing

Step 3 of 4

< Back to start

Do you wish to be heard in support of your submission?





If you 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.

# Could you gain an advantage in trade competition through this submission? Yes

#### Are you directly affected by an effect of the subject matter of this submission that:

- · Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition
- Yes

No

✓ I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## PROPOSED PRIVATE PLAN CHANGE 25 – WARKWORTH NORTH

#### 1 SUBMITTER DETAILS

#### Submission by:

Summerset Villages (Warkworth) Limited
Owner of Summerset Falls Village at 31 Mansel Drive, Warkworth

#### Agent and Address for Service for Submission

Andrew Wilkinson Scott Wilkinson Planning PO Box 37-359 Parnell Auckland

Email: andrew@scottwilkinson.co.nz

Phone: (09) 354 4166 or Mobile: 021 619 571

#### 2 SUBMITTER LOCATION AND BACKGROUND

Summerset Villages (Warkworth) Limited own the 79,357m<sup>2</sup> site known as Summerset Falls Village containing a comprehensive care retirement village that has 204 independent units, plus 44 care apartments and 41 care beds located at 31 Mansel Drive, Warkworth.

The location of the Summerset Falls Village is identified as a mark-up on the map provided as Attachment 1 to this submission.

The Summerset Falls Village was established in 2010 and further extended in 2016 - 2018.

#### 3 SUBMISSION

#### 3.1 ZONING

The submitter agrees that a plan change is necessary to facilitate development of the Warkworth North area.

The submitter supports the Residential – Single House and Residential - Mixed Housing Suburban zoning identified to the north of their site on the northern side of Falls Road as it will provide an appropriate level of intensity of development in the Warkworth North area; and is reflective of the intensity of existing development in proximity to the area, such as the Summerset Falls Village.

The submitter would oppose any increase in intensity in residential zoning above that indicated in Proposed Private Plan Change 25 in the areas north of the Summerset Falls Village.

#### 3.2 INFRASTRUCTURE PROVISION

Proposed Private Plan Change 25 proposes a wastewater treatment pumping station (identified as WWPS Location – 1) and a 'dry basin' stormwater device (Device A) to be located on land outside of the private plan change area and not owned by the private plan change proponent, to the more immediate north of the Summerset Falls Village.

The submitter opposes and objects to the proposed location of the proposed wastewater treatment pumping station (WWPS – Location 1) and proposed dry basin (Device A) in close proximity to their site, given the potential for adverse amenity impacts on the existing residential retirement village from odour; and from wastewater and stormwater overflows and flooding.

The submitter considers that the plan change proponent should locate all infrastructure associated with their Private Plan Change area within that Private Plan Change area on their own land.

#### 3.3 TRAFFIC AND ROADING

The traffic environment surrounding the Summerset Falls Village is identified to change substantially, especially along Mansel Drive and to the north as a result of the proposed western link road.

The western link road is proposed to be a four-lane road within a corridor of 29.5m. This is expected to connect to the currently two-lane, approximately 20m wide, Mansel Drive at the southern end.

The submitter is concerned about the cumulative and increased traffic effects on the Summerset Falls Village and the limited ability for these to be mitigated on Mansel Drive; as a result of the combination of the proposed western link road, the need to develop the intersection of Falls Road / Mansel Drive and the western link road with traffic signals; and the re-zoning and likely development that is indicated to occur under the now adopted Warkworth Structure Plan for the wider Warkworth area.

The submitter seeks better indication and understanding of the likelihood and timing of any upgrades or widening to Mansel Drive, noting the current width (i.e. approximately 20m wide) and existing development on either side (i.e. Summerset Falls Village and Mitre 10) that any ability to widen Mansel Drive is considered to be limited.

The submitter provided feedback on the draft Warkworth Structure Plan. In that feedback the submitter advised that they consider that transport agencies should be in direct discussions with them as an affected landowner. Furthermore, the submitter reserved the right to comment further on roading and traffic matters when Council provides details of what Mansel Drive is anticipated to look like in 2046 under the Auckland Unitary Plan (road cross-section and vpd), compared to the Warkworth Structure Plan (road cross-section and vpd). This matter is reiterated in this submission, in light of the Proposed Private Plan Change and the traffic and roading submission points made above.

#### 4 RELIEF SOUGHT

The submitter seeks the following relief:

- That the location of Residential Single House and Residential Mixed Housing Suburban zones as identified in the map provided as Attachment 1 to this submission and as identified in the Proposed Private Plan Change 25 maps, be confirmed.
- 2. That the proposed wastewater pumping station (WWPS Location 1) and dry basin (Device A) identified on land to the north of the Summerset Falls Village be relocated away from the submitters property and contained wholly within the private plan change proponents land.
  - 3. That further and better consideration be given to the cumulative and increased traffic effects and potential mitigation measures and their limitations on Mansel Drive as a result of the both the development of the western link road; any connections to Mansel Drive required under the proposed private plan change and development of the western link road; and as a result of the development of the wider Warkworth Structure Plan area.

OR

4. Such other relief that will meet the concerns of the Submitter.

#### AND

5. Such consequential relief necessary to give effect to this submission.

#### 5 OTHER

Summerset Villages (Warkworth) Limited will not gain an advantage in trade competition through this submission.

Summerset Villages (Warkworth) Limited 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.

Summerset Villages (Warkworth) Limited 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.

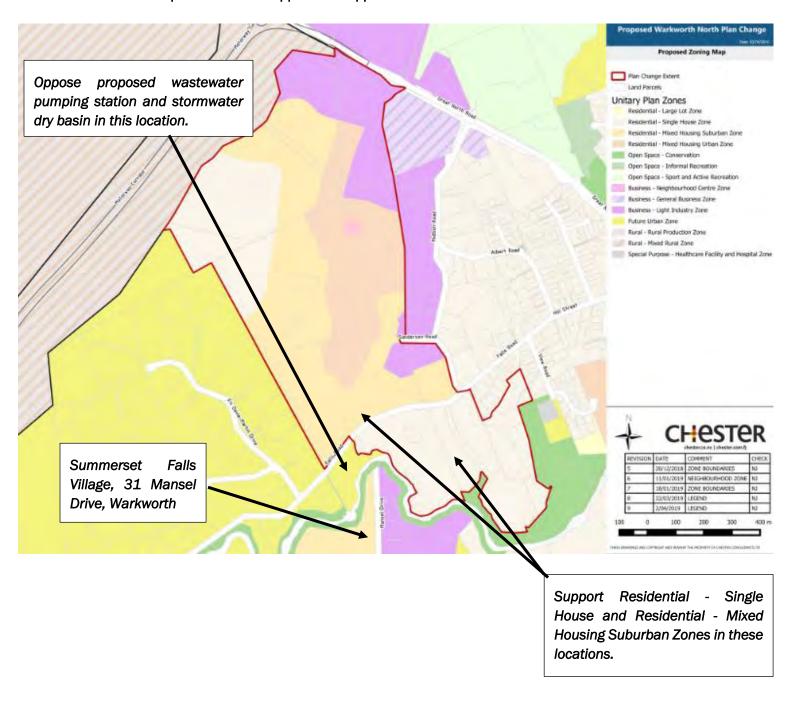
**Aaron Smail** 

Duly authorised agent for Summerset Villages (Warkworth) Limited

Date: 3 July 2019

#### ATTACHMENT 1

Location of Summerset Falls Village, 31 Mansel Drive, Warkworth and identification of submission point locations supported or opposed



#### SUBMISSION ON

#### PROPOSED PRIVATE PLAN CHANGE 25 WARKWORTH NORTH, WARKWORTH

#### **SUBMITTER DETAILS:**

1. Name: Atlas Concrete Ltd

2. Address for Service:

Postal: c/- Haines Planning

PO Box 90842

Victoria Street West AUCKLAND 1142

Email: <u>kaaren.rosser@hainesplanning.co.nz</u>

3. Contact Person: Kaaren Rosser

Senior Planner Haines Planning

4. Date of Submission: 5 July 2019

#### **SCOPE OF SUBMISSION:**

- 5. This submission by Atlas Concrete Limited ("Atlas") relates to the property at 24 & 26 Hudson Road, Warkworth, which is owned and operated by Atlas as a concrete batching plant and dry goods sales depot.
- 6. This submission relates to the request made by Turnstone Capital Ltd to Auckland Council for a private plan change. Private Plan Change 25 ('PPC25') seeks to rezone 99 hectares of Future Urban zone land in the north of Warkworth, between Falls Road and State Highway 1, to a mix of business and residential zones.
- 7. This submission relates to the proposed re-zoning of land proximate to the Atlas Concrete site.

#### INTRODUCTION

- 8. Atlas is an incorporated company that supplies ready mix concrete, pre-cast concrete, aggregates and other related products within the Auckland and Northland regions through 11 branches across five divisions: Atlas Concrete, Atlas Quarries, Atlas Recycling, Mount Rex Shipping and Atlas Tilt Slab.
- 9. Atlas operates a concrete batching plant and trade supplies (dry goods) depot at 24 and 26 Hudson Road, Warkworth. The concrete plant has recently become operational, and the trade supply depot is in its final stages of construction.
- 10. 24 and 26 Hudson Road have been identified as affected properties with respect to PPC25 as they are immediately to the east of the proposed Plan Change area.
- 11. Atlas previously submitted on the separate Draft Warkworth Structure Plan and Warkworth Structure Plan consultations initiated by Auckland Council. These submissions focussed on transport connections and reverse sensitivity effects and generally supported Auckland Council's approach to the future zoning of land in Warkworth North. Auckland Council has subsequently adopted the Warkworth Structure Plan as outlined below.

#### COUNCIL-ADOPTED WARKWORTH STRUCTURE PLAN

- 12. On 4 June 2019, the Planning Committee of Auckland Council adopted the Warkworth Structure Plan (WSP). The WSP provides for future employment growth and new industrial areas at a capacity that equates with Warkworth being a significant satellite town. Three new industrial areas are proposed, with two of these areas being adjacent to existing industrial areas.
- 13. **Figure 1** below shows the Council-proposed industrial area (coloured purple) located to the west of the existing industrial properties along Hudson Road. The western boundary of the extended industrial area is the proposed Western Link Road. The Structure Plan document states that the proposed industrial land 'limits the interface of the new industrial land with potentially sensitive uses and allows industrial activities to co-locate'. It also states that the 30-metre wide Western Link Road 'will act as a buffer, providing physical separation between the industrial land and the residential land uses on the other side of the road to prevent conflicts between these uses'.
- 14. The WSP also recommended, for amenity reasons between zones, that urban design solutions for the frontages of the industrial zone along the Western Link Road would be needed.
- 15. As noted, Atlas supports the Council's decision on the location of industrial land under the adopted WSP, the latter having been established through assessment of the land's characteristics and extensive community consultation. It is therefore considered that unsatisfactory planning outcomes will result from PPC25, which does not align with the WSP.

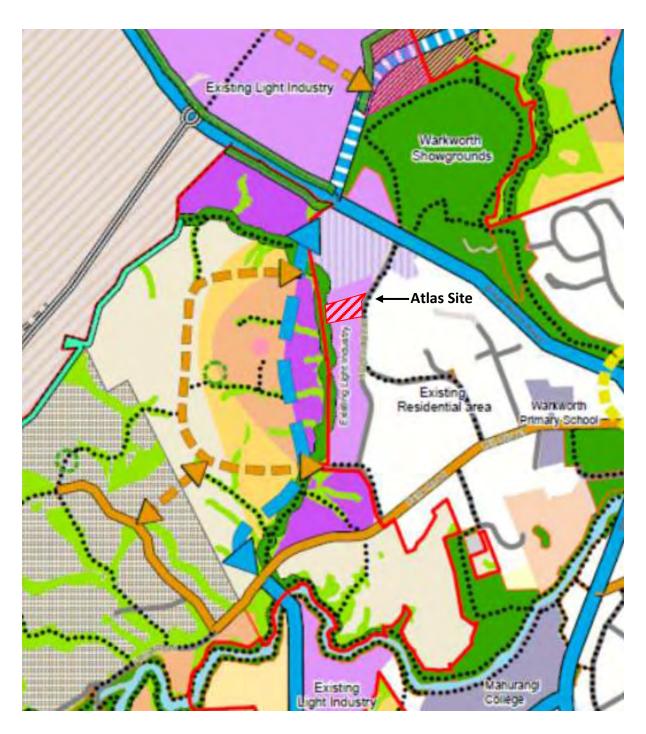


Figure 1: Excerpt from Auckland Council adopted Warkworth Structure Plan

#### **PPC25 PROPOSED ZONING PATTERN**

16. Atlas opposes the proposed zoning of land (west of the existing industrial area at Hudson Road) to Residential - Mixed Housing Urban. As shown at **Figure 2** below,

the proposed Mixed Housing Urban zones are immediately adjacent to the majority of the Hudson Road industrial area and within 30 metres of Atlas's newly completed concrete batching plant. As noted, the proposed PPC25 residential zoning conflicts with the Council's adopted Warkworth Structure Plan.



Figure 2: PPC25 Proposed zoning in relation to Atlas site

- 17. Atlas disagrees with the conclusions of the privately proposed Warkworth North Structure Plan (WNSP) and Section 32 report of PPC25, particularly with regards to the location of the proposed residential zoning.
- 18. The WNSP fails to take into consideration recognised 'edge effects' with the existing Hudson Road Light Industry Zone, being potential amenity and reverse sensitivity effects at this edge. The WNSP suggests that these effects will be managed by locating roads or open spaces between industrial and residential areas.
- 19. The WNSP also proposes a "schematic proposed road" (shown as a green line) on the western side of the stream running parallel to a fanciful proposed road (shown as brown dos) thereby "borrowing" land on the eastern side of the

- stream to give the impression of a wide open space buffer between the two roads. Refer **Figure 3** below.
- 20. The green "schematic proposed road" is then excluded from related precinct plan maps which feature only a narrow SEA overlay for the stream valley, with this being the only buffer between the Atlas site and proposed Mixed Housing Urban Zone. Additionally, the WNSP map shows proposed roads (solid green lines) located to the west of the stream and Hudson Road industrial land. However, Precinct Plan 2 of the WNSP shows no indicative roads at this location.
- 21. The proposed zoning and precinct provisions also do not provide any certainty that open spaces will be provided or that landscaping will result in providing a suitable buffer for the existing industrial uses.
- 22. Approximately half of the stream at the western edge of the Hudson Road industrial area is located within the existing industrial land owned by Atlas. The WNSP Ecological Assessment reports that this stream has an average width of 1.2 metres. The PPC25 documents suggest that open space will be achieved by the creation of esplanade reserves through subdivision. Where the stream is located within or adjoining the Hudson Road industrial properties, it is very unlikely that they will be subdivided, if at all. The stream width is also insufficient (a minimum of 3 metres is required) to trigger an esplanade reserve within the Stubbs Farm land.
- 23. While the precinct rules provide for protection of streams and wetlands as a Permitted Activity, the Stream standard I1.6.2 does not <u>require</u> planting which would act as a visual buffer to the existing industrial uses. Nor is there a corresponding precinct rule for non-compliance of the proposed 'stream enhancement' standard. Only stream loss along this particular section of stream requires a resource consent. Accordingly, any visual landscape buffer is unlikely to result. Nor does PPC25 recognise that landscape planting, by itself, will not offer any acoustic protection.

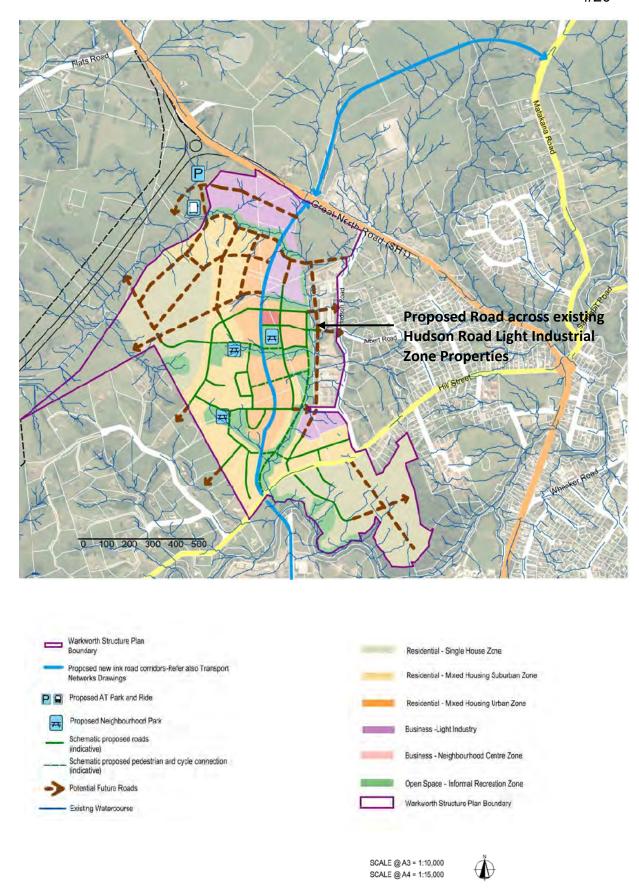


Figure 3: Proposed Warkworth North Structure Plan (for PPC25)

- 24. The submitter considers that the provision of Light Industrial zone land to the west of the existing Hudson Road industrial properties, the proposed Western Link Road, will best provide the required buffer as already proposed in the Council-adopted Warkworth Structure Plan.
- 25. The co-location of industrial zone land, on both sides of the valley floor, will generally eliminate any adverse air discharge effects from the existing industrial land. It would also improve noise compliance given the topography of the land and location of the proposed Western Link Road. Similarly, landscaping to a 3 metre depth needs to be provided adjoining the land zoned Open Space zone land., while landscaping is also required within the 2m front yard of the proposed Light Industry zone land. Given the valley contours, this would significantly reduce any visual effects from the existing industrial land.
- 26. The Precinct policies should also recognise reverse sensitivity effects from the existing industrial areas and provide for visual screening and other controls around the edge of existing industry zoned land.

#### **DECISION SOUGHT**

- 27. Atlas <u>OPPOSES</u> the proposed re-zoning pattern in PPC25 as notified, and considers that it:
  - a) Will not promote the sustainable management of existing land and improvements (being natural and physical resources); and
  - b) Will otherwise be inconsistent with the purpose and principles of the Resource management Act 1991('RMA')
- 28. Further, it is considered that the objectives, policies and methods of the method of PPC25 as they relate to the submitter's site are inappropriate and unjustified in terms of s32 RMA.
- 29. Atlas seeks the following relief from the Council:
  - a) That PPC25 be refused; or
  - b) Replace the proposed PPC25 zoning pattern to align with the proposed land pattern shown in the Council's adopted Warkworth Structure Plan, particularly as it relates to land proximate to the Atlas landholding at 24 and 26 Hudson Road.
- 30. Atlas agrees to participate in mediation or other alternative dispute resolution and would be pleased to discuss the content of this submission with Council staff if required.

20.1

For and on behalf of Atlas Concrete Ltd:

\_\_\_\_\_

Kaaren Rosser (BSc, Dip Nat Res, CertPlan, Assoc.NZPI)

Senior Planner

Laare Lase

1404 PPC25 SUB

## Submission on the Auckland Unitary Plan (Operative in Part)

## **Proposed Plan Change 25**

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

To: Au	kland Council
1.	SUBMITTER DETAILS
	Name of Submitter: David Oliver
	Postal Address: 24 Viv Davie - Martin Drive
	Warkworth 0984
	Phone: 0272 657 570 Email: warkwortholivers @ gmail.com
	This is a submission on Auckland Council's Proposed Plan Change 25.
	Could you gain an advantage in trade competition through this submission?  Please select one of the below options:
	$\square$ I <b>could</b> gain an advantage in trade competition through this submission.
	I could not gain an advantage in trade competition through this submission.
	Are you directly affected by an effect of the Proposed Plan Change in so far as it:  a) Adversely affects the environment; and b) Does not relate to trade competition or the effects of trade competition.
	Please select one of the below options:
	☐ I am directly affected by an effect of the subject matter of the submission.
	☐ I <b>am not</b> directly affected by an effect of the subject matter of the submission.
2.	SCOPE OF SUBMISSION
	The specific provisions of the proposal that this submission relates to are:
	☐ The whole of Proposed Plan Change 25
	A specific part of Proposed Plan Change 25 as detailed below:
_	The "Potential Future Roads" that enter the VIV Davie-Martin Drive sub-division on the South West boundary
	VIV Davie-Martin Drive sub-division on the South West boundary
_	The Bush and River Walkerens
_	The Public use areas - Food, Outdoor, Circina, Maygraind
-	The Indicative western link Road

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

3.	SUBMISSION
	Do you support or oppose the specific provisions of the proposal for which this submission relates? Please select one of the following:
	☐ Support
	Oppose
	The reasons for my views are:
	I appare the potential future roads that are marked
	to enter the UN Davie-Martin Drive sub-division as they will
	have adverse effects on a large number of properties along the Davie-
	Martin Drive by driving down land values, increased treffic noise,
	loss of protected bush areas, stress to residents on or adjacent to
	affected properties, "rat running", high level of uncertainty
	for years as to whether the road will exer be reeded or
	installed thus severely impacting a large number of residents.
	I support the public use areas including food
21.2	areas, bush walks river walks, outdoor cinema
ŀ	and playgrounds
	I seek the following amendments to Proposed Plan Change 25:
	Have the roads that are marked to enter the UN Daix-Marks
21.1	subdivision converted to cut desacs at the boundary
	and removed as possible future roach

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

4.	DECISIONS SOUGHT
	I seek the following decision from Auckland Council:
	☐ Accept Proposed Plan Change 25
	Accept Proposed Plan Change 25 with amendments as outlined above
	☐ <b>Decline</b> Proposed Plan Change 25
5.	APPEARANCE AT COUNCIL HEARING
	Do you wish to be heard in support of your submission? Please select from the following:
	☐ I/we <b>wish</b> to be heard in support of my/our submission
	we <b>do not</b> wish to be heard in support of my/our submission
	If others make a similar submission, I/we will consider presenting a joint case with them at the
	hearing: Please circle one:
	□ YES
	□NO
6.	SIGNATURE AND DATE SIGNED
	-17/19
	Signature of person(s) making submission  Date



Level 11, HSBC House 1 Queen Street Private Bag 106602 Auckland 1143 New Zealand T 64 9 969 9800 F 64 9 969 9813 www.nzta.govt.nz

#### FORM 5

## Submission on a notified proposal for Private Plan Change 25 Warkworth North under Clause 6 of Schedule 1 Resource Management Act 1991

5th July 2019

Auckland Council Plans and Places Private Bag 92300 Auckland 1142 Attn: John Duguid

Email: unitaryplan@aucklandcouncil.govt.nz

#### Name of submitter: The New Zealand Transport Agency

This is a submission on Private Plan Change 25 Warkworth North (**Plan Change**) to the Auckland Unitary Plan (operative in Part).

The New Zealand Transport Agency (the Transport Agency) could not gain an advantage in trade competition through this submission.

#### NZ Transport Agency role and responsibilities

The Transport Agency is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (LTMA). The Transport Agency's objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. The Transport Agency's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to areas that adjoin and potentially affect State Highway 1; both the existing State Highway 1 (Great North Road) and Ara Tuhono – Puhoi to Warkworth, which is presently under construction. The Transport Agency's interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.

- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.
- A collaborative partner in Te Tupu Ngātahi (Supporting Growth Alliance).

#### Government Policy Statement on Land Transport.

The Transport Agency also has a role in giving effect to the Government Policy Statement (GPS), the GPS outlines the Government's strategy to guide land transport investment over the next 10 years. The GPS is required under the Land Transport Management Act 2003, which sets out the scope and requirements for the GPS.

The four strategic priorities of the GPS are safety, access, environment and value for money. The National Objectives for land transport include a transport system that:

- Is a safe system, free of death and serious injury.
- Provides increased access to economic and social opportunities.
- Enables transport choice and access.
- Is resilient.
- Reduces greenhouse gas emissions, as well as adverse effects on the local environment and public health.
- Delivers the right infrastructure and services to the right level at the best cost.

A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, its impact on transport are long term. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use.

#### **Transport Sector Outcomes Framework**

In June 2018, the Ministry of Transport launched the Transport Sector Outcomes Framework (Framework). The Framework defines the long-term strategic outcomes for New Zealand's transport system and explains how Government and the transport sector should work towards these outcomes through a guiding principle of mode neutrality. The purpose of the transport system is to improve people's wellbeing, and the liveability of places. It does this by contributing to the following outcomes:

- Inclusive Access enabling all people to participate in society through access to social and economic opportunities, such as work, education, and healthcare.
- Economic prosperity supporting economic activity via local, regional, and international connections, with efficient movement of people and products.
- Healthy and safe people protecting people from transport-related injuries and harmful pollution and making active travel an attractive option.
- Environmental sustainability transitioning to net zero carbon emissions, and maintaining or improving biodiversity, water quality, and air quality.
- Resilience and security minimising and managing the risks from natural and human-made hazards, anticipating and adapting to emerging threats, and recovering effectively from disruptive events.

#### Wider Context

In making this submission, the Transport Agency is cognisant of the context of the Plan Change and ongoing planning processes and projects. These include:

- The construction of the Ara Tuhono Puhoi to Warkworth (**P2Wk**) motorway by the Northern Express Group.
- The Transport Agency's Notice of Requirement for works to widen State Highway 1 between Hudson Road and the new northern connection to P2Wk (under appeal).

- The Transport Agency's planning process for the Ara Tuhono; Warkwork to Wellsford project.
- The Notice of Requirement (NoR) lodged by Auckland Transport for the 'Matakana Link Road' connecting Matakana Road to State Highway 1 with an intersection in proximity to the plan change area.
- Te Tupu Ngātahi's (Supporting Growth Alliance) planning work on the Warkworth transport network which includes an arterial (proposed Western Link Road) to connect to State Highway 1 (SH1) in the vicinity of the proposed SH1/Matakana Link Road intersection.
- Application for a new supermarket (Foodstuffs) (Sec 4 SO 476652) directly east of the plan change site.
- The Council adopted Warkworth Structure Plan.

A high level of care is required to ensure integrations between the projects in the area and the planning outcomes being sought, all of which have differing timeframes.

#### **Decision sought**

The Transport Agency does not oppose the Plan Change but seeks amendments and / or further information to provide greater certainty around the provision of transport infrastructure.

Decisions that the Transport Agency seeks on the Plan Change are set out in its submissions contained in **Table 1**. The Transport Agency also seeks any consequential changes to the Plan Change required to give effect to the relief described in **Table 1**.

#### Hearings

The Transport Agency wishes to be heard in support of its submission. If others make a similar submission, the Transport Agency will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:

**Evan Keating** 

Principal Planner

Cun

NZ Transport Agency

Address for Service of person making submission:

NZ Transport Agency

Contact Person: Evan Keating Email: Evan.Keating@nzta.govt.nz

22.1

22.2

Table 1: Plan Change 25: Warkworth North Submission

No.	Provision Number	Provision	Agency Submission / Relief Sought New text <u>underline</u> Deleted text <del>strikethrough</del>
1	Planning Maps and Precinct Provisions – Maps (Appendix 1 Parts 1 and 2)	Plan Change Boundaries	Submission: Retain with amendment.  Reason: Maps within the Private Plan Change (PPC) do not consistently reflect the boundary of the PPC area (denoted in red). For example, the area to the south of Falls Road is included in some maps but not on others.  Maps should be updated to clearly reflect the extent of the PPC.
2	Planning Map	Vehicle Access Restriction	Submission: Adopt new mapped provision.  Reason: The PPC is located in close proximity to the Ara Tuhono Interchange – Puhoi to Warkworth. As is provided for at other motorway interchanges under the Auckland Unitary Plan, a Vehicle Access Restriction (VAR) is proposed to be applied to manage the establishment of vehicle accesses in close proximity to the interchange.  The VAR is proposed in the location identified on Figure 1. No additional rules are necessary to support the change to match extent as activity is already managed within E27.4.1(A7).  Figure 1: VAR Location (Green Dash)

3	Whole of plan change	Reference to Western Link Road / east-west link	Submission: Retain with amendment. Reason: The Western Link Road is referred to both as the east-west link and the Western Link Road. To assist plan users, it is requested that terminology used is consistent, with the Western Link Road being preferred (instead of east-west link) within the PPC.  Consequential changes throughout the PPC will be required.	22.3
4	Whole of plan change	Location of Western Link Road	Submission: Support with amendment. Reason: The Western Link Road alignment is currently under investigation and is not yet confirmed. The Transport Agency's agreement to the connection of the Western Link Road to Great North Road/SH1 is required.  The specific location of the connection points to Great North Road/SH1 and Falls Road should provide more flexibility on the Precinct Plans. In particular, the Transport Agency requests that two key intersections are more generally indicated as approximate locations (rather than defined points currently shown).  Relief sought:  New notations (for example, circles at intersections) are provided on the Precinct Plans to indicate some flexibility for intersection locations.	22.4
5	Whole of plan change	Whole of plan change	Submission: Support in part.  Reason: Strategic planning documents (Auckland Plan, FULSS and Council's adopted Structure Plan) signal Warkworth as a satellite town and an area to accommodate residential and business growth. The Transport Agency generally supports the proposal as its broader purpose is largely consistent with this strategic direction.  Council has progressed this strategic vision to include a Future Urban Zone within the Auckland Unitary Plan and a recently adopted Structure Plan (ASP). The Transport Agency supports the Council's structure plan process including through its transport planning input within Te Tupu Ngātahi (Supporting Growth Alliance).  The PPC identifies less business zoned land than the ASP. The Transport Agency considers that careful analysis of changes to the ASP should be made given the extent of investigation and investment in this process. Failure to do this potentially undermines forward planning in transport infrastructure based on the ASP wider planning process.  The applicant has provided an Integrated Transport Assessment (ITA) to support its PPC. A review of the ITA indicates that there are a number of areas where additional information or clarification should be provided as the current traffic methodology and outputs do not provide the necessary confidence for Transport Agency to recognise any potential implications to the transport system, including its network.	

			Relief Sought: The applicant should provide a revised ITA with the methodology/content being developed and agreed with both the Transport Agency and AT. The methodology should consider a more appropriate intermediate modelling tool that spans the strategic ART model and SIDRA. The modelling and methodology should include clear statements about input assumptions for both the ART model and those for the PPC, employment and residential trip generation rates and totals (to understand the traffic forecasting process) and assumptions on proposed mode split. Finally, the revised ITA should include commentary and analysis on the effects of the reduction in business zoned land relative to the ASP.  The Transport Agency seeks any consequential changes to the provisions and zoning which ensure that effects on the transport system identified in the revised ITA are appropriately managed and mitigated.	22.5
6	Objective I1.2(1)	(1)To achieve high quality urban design outcomes through: a. providing key road connections securing an east west link to connect with the Mansel Drive extension;	Submission: Retain with amendment.  Reason: Objective 1 refers to delivery of the east west link connection to Mansel Drive but omits reference to the northern connection point (to Great North Road/SH1). The Transport Agency, as a participant in Te Tupu Ngātahi (Supporting Growth Alliance), strongly supports a suitable connection between Mansel Drive and Great North Road/SH1 as part of ensuring an integrated transport network both for the PPC area and the wider development of Warkworth. The following amendment to Objective 1 is requested:  a. providing key road connections securing the Western Link Road an east west link to connect with the Mansel Drive extension and Great North Road/SH1.  The proposed addition is considered to support and align with E27.2. Objective (1) Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; [] and Objective (2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.	22.6
7	Objective I1.2(1)	(1)To achieve high quality urban design outcomes through: f. Providing a balance of employment land and places for people to live with a choice of living types and environments.	<b>Submission:</b> Retain as notified. <b>Reason:</b> The provision of business land within Warkworth is supported as a method of managing transport system effects.	22.7

8	Policy I1.3(3)	(3) Provide an indicative route for the Western Link to secure this option should it be required.	Submission: Retain with amendment.  Reason: Policy 3 does not reflect the strategic importance of the Western Link Road.  (3) Provide an indicative route for the Western Link Road. to secure this option should it be required.	22.8
9	Activity Table I1.4	(A1) Subdivision or development adjacent to the indicative Western Link Road, unless an alternative road alignment has been approved by resource consent and is constructed, or being constructed.	Submission: Retain with amendment.  Reason: An amendment to this provision is proposed to improve clarity and to ensure the Western Link Road location has been determined and constructed prior to any development within the PPC. In particular, the term 'adjacent' does not provide any certainty about which land parcels/areas would be captured by Rule (A1).  (A1) Subdivision or development in the Warkworth North Precinct in accordance with Standard I1.6.1 adjacent to the indicative Western Link Road, unless an alternative road alignment has been approved by resource consent and is constructed, or being constructed.	22.9
10	Activity Table I1.4	New provision	Submission: Adopt new provision.  Reason: Activities undertaken prior to the construction of the Western Link Road (Rule (A1) and Standard I1.6.1) would currently default to a discretionary activity under Rule C.1.7 of the Auckland Unitary Plan. Recognising the critical nature of the Western Link Road, a non-complying activity status is considered to be more appropriate. Amendments are proposed.  (A1A) Subdivision or development in the Warkworth North Precinct not meeting Standard I1.6.1  Non-complying activity within Warkworth North Precinct and Sub Precinct A	22.10
11	Activity Table I1.4	(A2) Subdivision or development of land including, or adjacent to 'future road connections' indicated on the Warkworth North Precinct Plan.	<ul> <li>Submission: Adopt new provision.</li> <li>Reason: There are two matters which require amendment within this provision:</li> <li>a. Rule (A2) provides little certainty as to what land the provision would apply to (ie. by the use of land including, or adjacent to []).</li> <li>b. The Warkworth North Precinct Plan 1 shows 'point' locations for potential future road connections but no road alignments.</li> <li>A wording change is proposed to address point (a).</li> <li>Reference to Precinct Plan 2 (which contains potential future road locations) is proposed to address point (b).</li> </ul>	22.11

			<ul> <li>(A2) Subdivision or development of land with access including, or adjacent to 'future road connections' indicated on the Warkworth North Precinct Plan Precinct plan 2 – Warkworth North Stormwater Catchment Management Plans.</li> <li>Consequential amendments to the key/legend on Precinct Plan 1 and Precinct Plan 2 may be required.</li> </ul>	22.11
12	11.5 Notification	(2) Any application for resource consent for the following activity / any of the following activity that infringes the following standard(s) will be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:  (a) Standard I1.6.1 Western link Road	<ul> <li>Submission: Oppose.</li> <li>Reason: For the following reasons, the Transport Agency has a significant interest in the formation of the Western Link Road:         <ul> <li>The Western Link Road will be in close proximity to the Ara Tuhono – Puhoi to Warkworth interchange; and</li> <li>The Transport Agency, as a partner with Auckland Transport within Te Tupu Ngātahi (Supporting Growth Alliance), generally supports the provision of growth within the Warkworth area in accordance with the Council's adopted Warkworth Structure Plan.</li> </ul> </li> <li>The final location and design of the Western Link Road has yet to be determined and development which may determine the alignment of the Western Link Road could have implications for the safe, efficient and effective operation of the State highway network. In this regard precluding public or limited notification on such development is not considered appropriate.</li> <li>(2) Any application for resource consent for the following activity / any of the following activities and/or an activity that infringes the following standard(s) will be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:</li></ul>	22.12
13	I1.5 Notification	11.5(1)	<b>Submission:</b> Retain with amendment. <b>Reason:</b> It is suggested that I1.5(1) could be deleted as there are no listed control activities (as noted in I1.7) within Activity Table I1.4.	22.13
14	I1.6.1 Standard – Western Link Road	Purpose: • To provide road connectivity that will assist in securing an East West link for Warkworth.	<b>Submission:</b> Retain with amendment. <b>Reason:</b> The PPC precinct plans proposes to include the entirety of the Western Link Road. At a high level, the Transport Agency supports the Western Link Road noting that its final design and alignment have yet to be determined. The purpose of the standard is supported with amendment.	•

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			Purpose: • To provide road connectivity by providing for the Western Link Road within the Warkworth North Precinct. That will assist in securing an East West link for Warkworth.	22.14
15	I1.8.1(1) Matters of discretion	(1) Roading infrastructure: (a) Practical and effective connectivity to adjacent land; and (b) Appropriateness of construction standard to fulfil the transport function of the road.	Submission: Retain with amendment.  Reason: The matters of discretion do not comfortably align with I1.8.2 Assessment Criteria (either with or without amendments proposed by the Transport Agency) or E27.2 Objectives (1) and (2) which support a transport network for all modes.  (1) Transport Roading infrastructure: (a) Safe, efficient Practical and effective connectivity to adjacent land; and (b) Appropriateness of design construction standard to fulfil the transport network purpose function of the road; and: (c) Provision for active transport modes.	22.1
16	I1.8.2(1) Assessment criteria	(1) assessment criteria for Roading infrastructure; (a) A road network shall be developed that responds to the transportation needs of Warkworth North and the wider area now and into the future which may include the preferred Western Link collector route. (a) The extent to which roading connections are provided to adjacent land areas as indicated on Precinct plan 1 - Warkworth North Precinct.	<b>Submission:</b> Retain with amendment. <b>Reason:</b> As indicated in Submission points 9 and 11, the Transport Agency is seeking greater certainty that the Western Link Road is appropriately considered. The proposed assessment criteria do not provide a suitably refined suite of criteria and amendments. In addition, the matters of discretion do not recognise the potential for active modes to be accommodated or the functioning of a holistic transport network.  (1) assessment criteria for transport Roading infrastructure; (a) A transport road network shall be developed that responds to the transportation needs of Warkworth North and the wider area now and into the future which may includes the Western Link Road. preferred Western Link collector route. (a b) The extent to which transport roading connections are provided in accordance with Precinct plan 2 – Warkworth North Stormwater Catchment Management Plans and to adjacent land areas as indicated on Precinct plan 1 – Warkworth North Precinct. (c) the provision of connected active transport modes.	22.10

### Submission no 23

### **Submission**

## **Private Plan Change 25**



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Submission on Proposed Private Plan Change 25 to the Auckland Unitary Plan (Operative in Part)

**Turnstone Capital – Warkworth North** 

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

#### To: Auckland Council

#### 1. SUBMITTER DETAILS

Name of Submitter: Turnstone Capital Ltd (Turnstone)

This is a submission on Proposed Private Plan Change 25 (PPC25) to the Auckland Unitary Plan – Operative in Part (AUP).

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

#### 2. SCOPE OF SUBMISSION

The specific aspects and provisions of PPC25 that this submission relates to are:

- a) Consistency with the recently adopted Warkworth Structure Plan and rationale for any differences.
- b) The zoning pattern, including the size and location of each zone and the introduction of new zones.
- c) The deletion of one proposed road connection.

#### 3. SUBMISSION

#### 3.1 Introduction

Turnstone requested a private plan change following an extensive developer-led structure planning process. The notified version of PPC25 was prepared in consultation with Auckland Council. The notified zoning map was prepared in late December 2018 / early January 2019.

The notified zone layout was prepared on advice from Council that it closely aligned with the Draft Structure plan that the Council was soon to notify for public feedback.

Auckland Council had advised that they would not recommend the private plan change request be accepted for processing unless and until it aligned with the Council's draft Structure Plan.

At the time that the notified zoning map was amended Turnstone had not been provided with the Council's draft Structure Plan and nor was it publicly available.

### **Submission**

## **Private Plan Change 25**

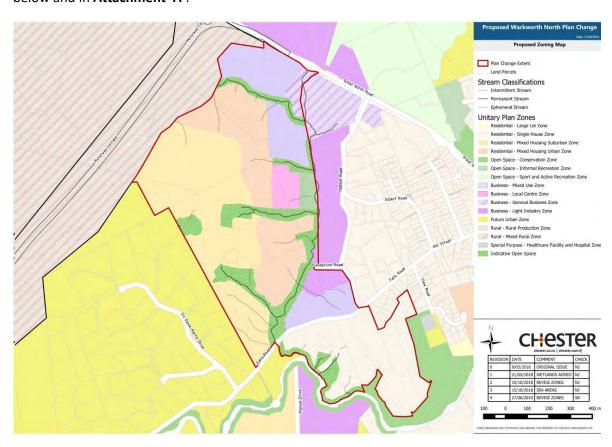


In the time since the notified zoning map was prepared, Council has notified the draft Structure Plan, received and considered feedback on it, and adopted the now Warkworth Structure Plan.

Turnstone has reviewed the submissions, the Council reports and the adopted Warkworth Structure Plan. This submission seeks to respond to the adopted Warkworth Structure Plan prepared by Council. It has taken and received advice from its independent specialist experts in relation to the Council reports that support the adopted Warkworth Structure Plan and any impacts on their own individual assessments previously undertaken in support of the developer-led Structure Plan and the related private plan change request.

All independent specialist expert assessments have been reviewed in the context of the adopted Warkworth Structure Plan.

Fundamental changes are now proposed to the zone layout from that notified, as shown below and in **Attachment 'A'**:



There is no change to the extent of the area affected by PPC25. This request for an amended zoning pattern is on PPC25 as the plan change seeks to rezone FUZ land to live urban zonings. All zones shown in the zoning pattern are urban or complementary open space zones, and no additional land is sought to be live-zoned by the submission.

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#### 3.2 Turnstone's Response to Adopted Structure Plan

#### 3.2.1 Planning Principles

The Warkworth Structure Plan has been guided by a number of planning principles. These principles are identified as being Warkworth specific and intended to be considered in addition to existing objectives and policies as set out in the Auckland Plan, and the Regional Policy Statement provisions of the Unitary Plan guiding Warkworth's growth. The Warkworth Structure Plan planning principles are grouped under seven headings:

- The Mahurangi River is Warkworth's taonga
- Character and identify
- A place to live and work
- Sustainability and natural heritage
- A well-connected town
- Quality built urban environment
- Infrastructure

These principles were set by Council following consultation associated with preparation of the draft Structure Plan for Warkworth.

Turnstone supports the principles of the Warkworth Structure Plan as useful guidance in reflecting community outcomes sought for the future growth of Warkworth. The Turnstone submission seeks changes to PPC25 to respond to, and better align with, these principles.

#### 3.2.2 Business – Light Industry

The Warkworth Structure Plan shows an extension to the existing Hudson Road Business – Light Industry area that extends west across the tributary of the Mahurangi river; north to the State Highway adjoining the existing Business – General Business zoned land and also extends south up to Falls Road and west to the river tributary – see Council Adopted Warkworth Structure Plan **Attachment B**.

The Warkworth Structure Plan states that Business – Light Industry is placed by existing light industry areas to minimise reverse sensitivity effects.<sup>1</sup> The Warkworth Structure Plan also states that new industrial areas are "...generally required to be located on relatively flat land, have efficient access to freight routes, and be efficiently served by infrastructure. Their location needs to consider reverse sensitivity effects by not locating close to sensitive activities (e.g. high density residential, schools)...". Specifically, the Warkworth Structure Plan addresses

<sup>&</sup>lt;sup>1</sup> Adopted Warkworth Structure Plan, page 47 – Attachment A (page 49) to the Council Agenda, Planning Committee 4 June 2019.

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the additional industrial land it proposes in the north at section 3.3.5.1 – Additional northern industrial land.

As notified, PPC25 proposed Business – Light Industry in the vicinity of Sanderson Road and in the north-east of the PPC25 area.

Turnstone no longer supports, or seeks, a proposed Business – Light Industry zoning in the north-east.

The Turnstone zoning pattern – **Attachment A** does not propose any extension to the existing Business – Light Industry zone, other than across the two existing sites to the south of Sanderson Road that contain the established storage activity and the Watercare water treatment plant. This zoning is applied to reflect those established activities, to recognise both the topography and the fact the sites are able to be well screened with landscaping from sites further south, and to reflect the Business – Light industry zoning on the other side of Sanderson Road.

The Turnstone zoning pattern proposes Business – Mixed Use for some areas shown Business – Light Industry in the Warkworth Structure Plan, including the area in the north-east shown as Business – Light Industry in the notified PPC25. Turnstone independent experts consider that Business – Mixed Use is a more appropriate zoning to provide a range of employment options suitable with the adjoining residential activities and also activities to support existing business zoned land areas in this location.

Turnstone considers that any further extension to the Business – Light Industry zone will not achieve the guiding principles of the Warkworth Structure Plan. Extending the Business – Light Industry zone in the locations shown by Council also increases reverse sensitivity issues. There are known issues with disruption to the residential properties on the eastern side of Hudson Road. This situation will be exacerbated by increasing industrial activity in this location. In addition, the Turnstone zone layout will achieve better urban design and economic outcomes as discussed in the respective technical summary assessments attached. The Urban Design assessment is **Attachment C** and an economic review prepared by Phil McDermott and Fraser Colegrave is **Attachment D**.

In summary the Turnstone zoning pattern provides a more optimal land use outcome with respect to reverse sensitivity, ecological impacts, urban design outcomes and economic sustainability matters. We have prepared a table summarising the effects associated with the respective proposed land uses and that is **Attachment E.** 

The submission seeks to amend PPC25 to replace the Business – Light Industry Zone in the north east with Business – Mixed Use.

## **Submission**

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The submission also seeks to introduce an area of Business – Mixed Use in the south of PPC25, rather than Residential – Mixed Housing Suburban along the Falls Road frontage.

#### 3.2.3 Residential

As notified, PPC25 included an area of Residential – Single House zone in the western corner of the site abutting the future motorway corridor and adjacent the Viv Davie-Martin Drive development.

The Warkworth Structure Plan shows the majority of the northern portion of the PPC25 area as Residential – Single House. The reasoning set out in the Structure Plan at section 3.3.2 states that "Lower intensity residential areas are located in places that are not close to centres and public transport, are subject to high environmental constraints or natural and physical constraints, or where there is an existing suburban area with an existing neighbourhood character (recently consented and / or built developments). In the steeper areas around Warkworth, a lower density residential zone is used to minimise the scale of earthworks required (and therefore associated sediment generation)". At 3.3.2.2 the Structure Plan states "The Warkworth Structure Plan applies the Single House zone in areas that are not close to public transport routes or centres and in areas with natural and physical constraints..... The Single House land to the east of Viv Davie-Martin Drive is not suitable for higher density residential development due to its location on the long-term north western edge of Warkworth, its slopes, and geotechnical issues....2."

The Turnstone zone layout now proposes Residential – Mixed Housing Suburban over the area identified as Residential - Single House in the north western portion of PPC25 as notified with consequential changes to the boundary of the Mixed Housing Urban and Mixed Housing Suburban zones. The reasons for this are:

- The land is not geotechnically unsuitable for higher density development. Detailed geotechnical investigation has been undertaken.
- The Residential Mixed Housing Suburban and Urban zone provisions encourage and provide for a greater interrelationship between subdivision and land use outcomes thus achieving higher quality urban outcomes than the Residential Single House zone provisions.
- Geotechnically challenging land in Warkworth has typically been zoned for higher density development to enable efficient use of the urban land resource e.g. the Residential – Mixed Housing Urban zoned land at the end of Belvedere Place in Warkworth that was rezoned through the Unitary Plan process and a higher density applied because of the geotechnical constraints and costs of developing the land efficiently.

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<sup>&</sup>lt;sup>2</sup> Adopted Warkworth Structure Plan, page 29 - Attachment A (page 31) to the Council Agenda - Planning Committee 4 June 2019

# **Submission**

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Healthcark Facility and Hospital Phase

- The land is close to a proposed centre (Business- Local Centre); to existing zoned Business – General Business land; Business – Mixed Use and also Business – Light Industry land at Hudson Road and more importantly on the opposite side of the State Highway 1.
- The Western Link Road will traverse through the PPC25 area and will presumably accommodate public transport given it is proposed as an arterial route.
- A Park n Ride is proposed at 80 Great North Road, Warkworth and this project has funding. The proposed Park n Ride is approximately 1-kilometre walking distance on existing roads to a central location within the PPC25 area as shown below:

## **Submission**

# **Private Plan Change 25**



Distance: 1,165,5 Weters

Westpark

Westpark

Westpark

Westpark

Sarderson Road

The Western Link Road will contain cycleway connections and off road, formed cycle
paths connections area proposed adjacent to the river as part of the Stubbs Farm
Estate development. The area will be well connected and accessible to public
transport and a proposed Park n Ride.

In summary the opinion of Turnstone experts is that application of an appropriate mix of Residential – Mixed Housing Urban and Suburban zones will achieve more optimal land use outcomes than the Residential – Single House zone; will result in a more efficient use of the urban land resource; will achieve better urban design outcomes and will have no worse ecological effects associated with land development and sedimentation because of the controls that will apply to earthworks and land development regardless of zoning.

The submission seeks to amend PPC25 to remove the Residential – Single House zone from the area of the Plan Change north of Falls Road entirely and to rezone that part of the site as Residential – Mixed Housing Suburban.

The submission also seeks to amend the layout and boundaries of the Residential – Mixed Housing Suburban and Urban zones, by wrapping the Mixed Housing – Urban zone around the northern extent of the extended Mixed Housing Suburban zone providing a transition to the Business – Mixed Use zone.

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#### 3.2.4 Business – Neighbourhood Centre

As notified PPC25 showed a Business – Neighbourhood Centre in a central location of PPC25. Turnstone, supported by independent expert assessments now proposes a Business – Local Centre zone instead over a larger area.

The Warkworth Structure Plan states that "Considering the existing and planned supply, the Future Urban zone areas around Warkworth require only small centres for the local convenience needs of surrounding residential areas".

Turnstone commissioned McDermott Consultants and Insight Economics to provide independent input and assessment to inform the Turnstone zoning pattern. This assessment is **Attachment D**. This report concludes "…there is justification for Business – Local Centre". The assessment summarises the Business – Local Centre zone at section 11 stating:

Area 5.7ha, approximately 290 jobs (at 50/ha)

Based upon the analysis of sector, workplace, and vocation gaps and opportunities undertaken in support of PC25, it is important to support residential growth "with the capacity to accommodate a range of commercial investment while meeting neighbourhood and local retail needs".

The proposed Business - Local Centre precinct will achieve this enabling a wide range of final demand activities (retailing, hospitality, personal services, education and care services, and personal business services) to an immediate catchment that can be defined north of Hill St (serviced by Albert Rd), Warkworth North, and North East. Its household service and retail roles will be two-fold, providing neighbourhood goods and services through a network of local roads, walkways, and cycleways; and complementing this with higher order goods and services in response to enhanced accessibility to a much wider semi-rural hinterland with the pending road connections.

A Local Centre also provides a base for local business services (law, accountancy, training, placement, testing, and consultancy), meeting the needs of an expanding industrial sector anticipated north of the Showgrounds, supporting new investment and entrepreneurship, and a range of small office-based services. In this way it should be able to sustain a range of vocational (education, training, placement) and employment activities<sup>4</sup>.

The Urban Design review assessment provided by Pacific Environments also addresses the proposed expansion of the Business- Neighbourhood Centre to Business – Local Centre noting that the Turnstone proposal takes advantage of a well-connected location; provides greater

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<sup>&</sup>lt;sup>3</sup> Adopted Warkworth Structure Plan, page 40 - Attachment A (page 42) to the Council Agenda - Planning Committee 4 June 2019

<sup>&</sup>lt;sup>4</sup> McDermott Consultants / Insight Economics report, page 10

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choice for community facilities to be provided that will support and utilise the planned open space adjacent to the river and is appropriate in the context of the proposed urban structure<sup>5</sup>.

Turnstone experts therefore consider that the proposed Business – Local Centre zone will provide a more optimal planning outcome than the proposed Business – Neighbourhood Centre in PPC25 as notified and the combination of Business-Neighbourhood Centre and Business – Light Industry zoning shown on the Warkworth Structure Plan for this location.

The submission seeks to amend PPC25 by removing the Business – Neighbourhood Centre zone and replacing it with a larger Business – Local Centre zone in the central location of the plan change area adjacent the proposed WLR.

**3.2.5 Open Space** As notified, PPC25 did not propose any open space zonings. Turnstone wishes to create an open space zone between the Business – Local Centre and the river to create optimal urban design and community outcomes.

The submission seeks to amend PPC25 by introducing an area of Open Space adjacent to the river on land that was proposed in the notified PPC25 to be Residential – Mixed Housing Urban and is shown in the Warkworth Structure Plan as Business – Light Industry.

#### 3.2.1 Transport

PPC25 as notified shows an indicative Western Link Road (WLR) on Precinct Plan 1. A version of this roading connection is also shown on the Adopted Warkworth Structure Plan. Turnstone does not propose any change to its indicative alignment. The Council's alignment of the indicative WLR is not supported for a range of reasons including land usability, land stability and contour.

It is agreed that the eastern extent of the WLR will need to form a cross roads with the Matakana Link Road creating a full intersection at State Highway 1. The south-western extent of the WLR will also need to align with, and form an appropriate intersection at, Mansel Drive.

There are a number of factors that need to be taken into account when setting the alignment of the road between these two intersections. Turnstone remains of the view that its proposed alignment will achieve better urban design, engineering, planning and community outcomes.

The location of the road alignment significantly influences the proposed zoning pattern. As shown in **Attachment A**, Turnstone proposes that the existing Business – General Business zoning at the corner of State Highway 1 and Hudson Road be extended north to the future alignment of the WLR providing a legible and coherent zoning pattern in future.

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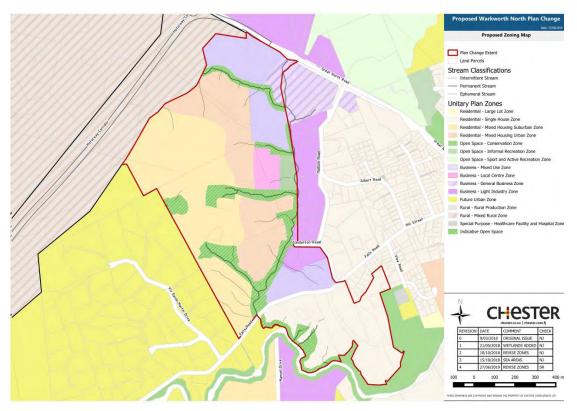
<sup>&</sup>lt;sup>5</sup> Pacific Environments Urban Design review, 1 July 2019, page 5

## **Submission**

# **Private Plan Change 25**



#### 3.3 Turnstone's Proposed Zoning



The submission responds to the planning principles underpinning the Council's Warkworth Structure Plan. The key differences between the notified zoning pattern, the proposed zoning pattern requested through this submission, and the Council's Warkworth Structure Plan are:

- The notified zoning has a Business Neighbourhood Centre, as does the Council's Structure Plan. The submission instead seeks a Business – Local Centre to provide for a broader range of business activities and opportunity for a more vibrant centre associated with the planned parks and open spaces.
- Neither the notified zoning nor the Council's Structure Plan shows any areas of open space zone. The submission seeks an area of Open Space – Informal Recreation zoned land between the proposed Local Centre and the river that backs the existing Hudson Road industrial area. This will remain in private ownership but be for public use.
- The two land holdings to the south of Sanderson Road remain as proposed to be zoned Business Light Industry to reflect the existing lawfully established land uses there the Watercare water treatment plan and the storage activity. The submission seeks to zone the adjacent land to the south Business Mixed Use rather than Residential Mixed Housing Suburban as shown in PPC25 as notified or Residential Single House in Council's Warkworth Structure Plan.
- With the exception of the two Sanderson Road sites noted above the submission seeks to zone the land that is shown on the notified plan to be Business Light

## **Submission**

# **Private Plan Change 25**



Industry Business - Mixed Use or General Business instead. A small extension to

Industry Business - Mixed Use or General Business instead. A small extension to Business – General Business is proposed along SH1 to extend the existing live zoned Business – General Business to the eastern boundary of the WLR, with the remainder to Business – Mixed Use. The extent of Business – Light Industry differs from Council's Warkworth Structure Plan which shows Business – Light Industry fronting the existing SH1 and also extending from north to south through the plan change area up to Falls Road and between Hudson Road and the river on the land to the south of Sanderson Road.

- There is no change to the zoning south of Falls Road, which remains as Residential Single House. The notified zoning also included a portion of Residential Single House to the north of Falls Road and the Council's Warkworth Structure Plan indicates a large area of Residential Single House. The submission seeks to replace the Residential Single House zone north of Falls Road with Residential Mixed Housing Suburban. The Residential Single House zoning is now contained to the south of Falls Road where that zone will enable a consistent type of outcome to the existing residential area. The key reason for removing the Residential Single House zone to the greenfields land to the north of Falls Road is because its provisions do not direct a strong urban design outcome and the Residential Mixed Housing Suburban is a zone that does direct a more comprehensive approach to subdivision and built form and is more likely to achieve better urban design outcomes.
- The proposed residential zoning sought through this submission seeks a mix of Residential Mixed Housing Urban and Residential Mixed Housing Suburban. The mix and layout are generally in keeping with the planning principles and rationale behind the Council's Warkworth Structure Plan.

A minor change is also sought to the Precinct Plan to remove one of the indicative road connections through to Viv Davie-Martin Drive. This is consistent with the Council's Warkworth Structure Plan which shows less intensive development at Viv Davie-Martin Drive that was originally envisaged in the preparation of the plan change request. It also reflects the topographical and engineering challenges that a potential connection in this location would have involved, and responds to issues raised during ongoing consultation with the residents of Viv Davie-Martin Drive. An Overlay Map showing the proposed Turnstone zoning pattern on the Warkworth Structure Plan is **Attachment F**.

#### 3.4 Analysis

The team of independent specialist experts advising Turnstone have carefully reconsidered the notified zone pattern in response to the Council's Warkworth Structure Plan and issues raised during ongoing consultation with the community.

The following summarises the outcome of the analysis:

## **Submission**

# **Private Plan Change 25**



#### Business – Light Industry:

- The Structure Plan zone pattern will create an impermeable seam of industrial development at the bottom of a valley, either side of a river and located between upslope residential development on either side.
- Economic analysis states there is a significant over supply of Business Light Industry land in Warkworth.
- A better mix of employment opportunities is required to support sustainable growth and development.
- The existing urban areas will not provide the necessary supply of this mix for a range of reasons including timing of re-development, land ownership patterns etc.
- Reverse sensitivity effects will be exacerbated and compounded by extending an industrial zoning in the middle of existing and planned residential environments.
- Poorer ecological outcomes are likely to arise locating Business Light Industry adjacent to the river when Open Space options are being put forward with associated cycleways and pedestrian connections.
- A better opportunity exists to provide for land use changes over time, rather than cementing in inappropriate land uses with zoning extensions.

#### <u>Business – Neighbourhood Centre:</u>

- Business Neighbourhood Centre zone is not sufficiently sized to provide for a
  meaningful variety of employment opportunities. Nor does it provide for an
  appropriate mix of community facilities.
- Lost opportunity for a cohesive and vibrant centre utilising the open space attributes of the location and planned opportunities for pedestrian and cycleway connectivity.
- The Business Local Centre zone enables a better mix of community and supporting activities.
- The Centre will in fact support existing residential areas at Albert Road, Hill Street, Viv Davie-Martin etc and not be limited to only servicing new residential areas within the Plan Change 25 area and further along Falls Road.

#### Business – Mixed Use:

The Unitary Plan states that the Business – Mixed Use zone "...is typically located around centres and along corridors served by public transport. It acts as a transition area, in terms of scale and activity, between residential areas and the Business – Metropolitan Centre zone and Business – Town Centre zone". Whilst the proposed zoning does not transition from the Business – Town Centre zone it is still considered to be the most appropriate zone to achieve business land uses, as sought by the

# **Submission**

# **Private Plan Change 25**



Council's Warkworth Structure Plan and create an appropriate transition between residential and business activities. This is the only business zone that provides for activities appropriate for that transition in land uses.

• The location of this proposed zoning is appropriate given the motorway extension; transition in activities across Falls Road from residential to industrial adjacent to Sanderson Road and also the relationship with the existing Business — General Business zoned land on the corner of Hudson Road and State Highway 1.

#### Business - General Business:

The land on the corner of Hudson Road and State Highway 1 is live zoned Business –
General Business. PPC25 proposes to rezone a small area between that existing zone
and the indicative WLR intersection with SH1. A consistent zoning of Business –
General Business across the land adjacent SH1 between Hudson Road and the WLR is
preferred.

#### Residential - Single House:

- The land areas previously identified for Residential Single House zone to the north of Falls Road are not limited, or restricted by high environmental constraints.
- Inefficient use of the urban land resource and will achieve lesser quality urban design outcomes because the zone does not encourage a comprehensive approach to subdivision and land use.
- Zone provisions do not contain as many standards as other residential zones to achieve quality urban design outcomes.
- Greenfields Residential Single House developments are not achieving the
  outcomes sought by the Regional Policy Statement provisions with respect to
  achieving a quality compact urban form (B2.2); enabling higher residential
  intensification in and around centres; along identified corridors and close to public
  transport and social facilities including open space; and employment opportunities
  (B2.2.2 (5)); and B2.3.1 and B2.3.2; B2.4.

#### Residential - Mixed Housing Urban:

- The proposed location around the centre reflects the Council's Warkworth Structure Plan and the proposed location of the WLR with associated public transport, cycleways and pedestrian connectivity supports residential density.
- The proposed public open space network along the river; adjacent to watercourses connected to bush areas and the wider Warkworth esplanade connections support this as a higher density residential area.

#### Residential – Mixed Housing Suburban:

- As above this is a preferable zone to Residential Single House to achieve the objectives and policies of the RPS that relate to urban development.
- Better urban design outcomes will be achieved through application of the Residential

## **Submission**

# **Private Plan Change 25**



Date: 5 July 2019

- Mixed Housing Suburban zone rather than Residential Single House.
- The area is not an established residential neighbourhood therefore the purpose of the Single House zone is not directly relevant and the choice option stated in the Zone description is not valid because the Residential – Mixed Housing Suburban zone can deliver a variety of site sizes and built outcomes more so than the Single House zone and has a greater scope to respond to site characteristics in a positive way.

#### <u>Open Space – Informal Recreation:</u>

 The proposed public open space network along the river; adjacent to watercourses connected to bush areas and the wider Warkworth esplanade connections provides an enhanced urban outcome for the community.

#### 4. DECISIONS SOUGHT

Turnstone Capital seeks the following relief from Auckland Council (or other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission):

- a) Zone the land as shown in **Attachment A** and make consequential changes to all associated maps and provisions, including the Precinct provisions as shown in **Attachment G**.
- b) Amend the Warkworth North Precinct Plan 1 as per the amended precinct plan attached in **Attachment G**.

Turnstone Capital wishes to be heard in support of this submission.

If others make a similar submission Turnstone Capital will consider presenting a joint case with them at the hearing.

Swette O'Connow

Burnette O'Connor, Barker & Associates Ltd (Persons authorised to sign on behalf of submitter)

#### 5. ADDRESS FOR SERVICE

Turnstone Capital Limited c/- Barker & Associates Ltd PO Box 591 Warkworth 0941

Attn: Burnette O'Connor

# **Submission**

# **Private Plan Change 25**



Mobile: 021 422 346

Email: burnetteO@barker.co.nz

#### **Attachments:**

A - Proposed Zone Map

B - Adopted Auckland Council Structure Plan

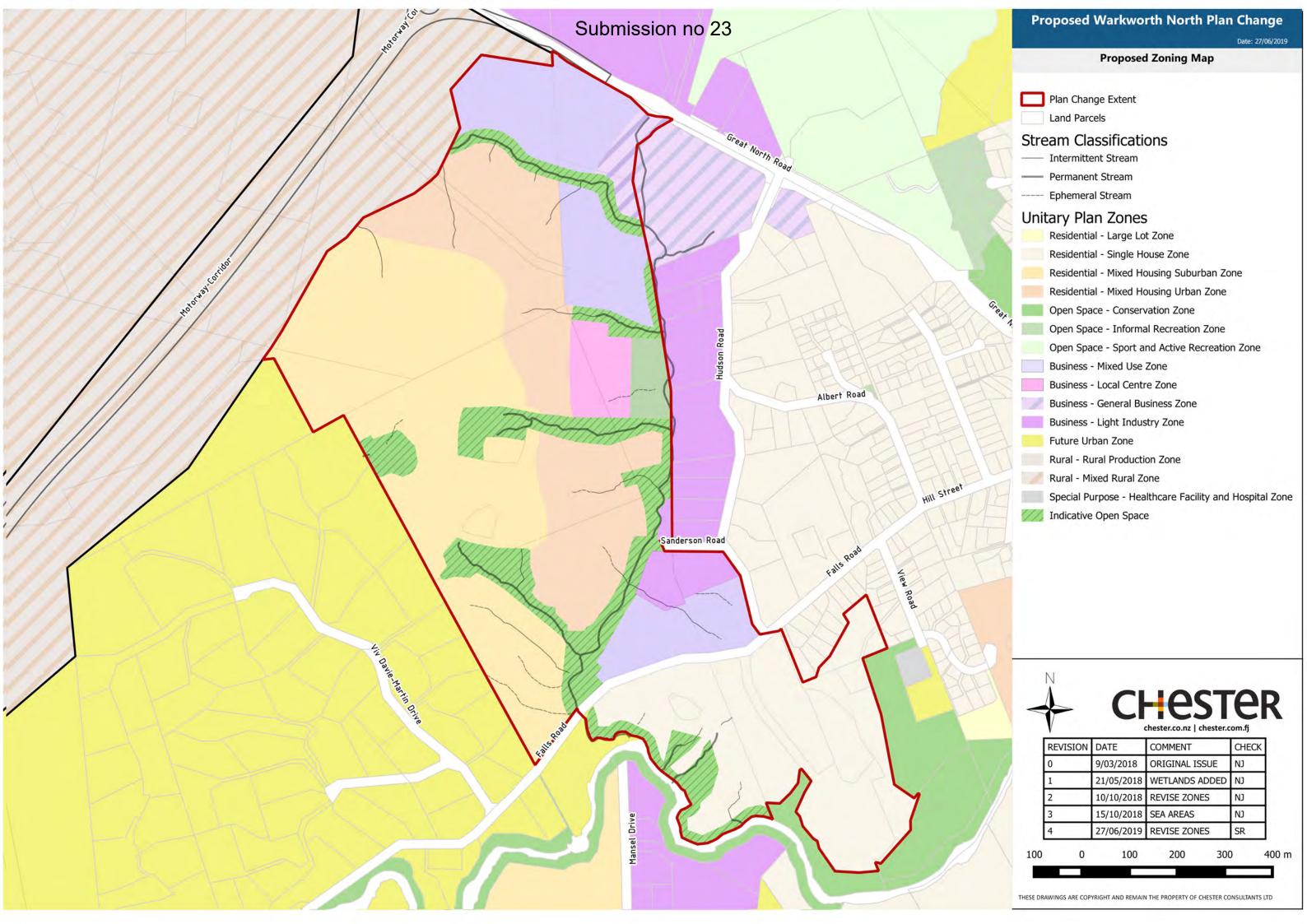
C - Urban Design Assessment

D - Economic Review

E - Zone Comparison Table

F - Proposed Zoning Overlay of WW Structure Plan

G - Full set of zone and Precinct maps and Precinct provisions



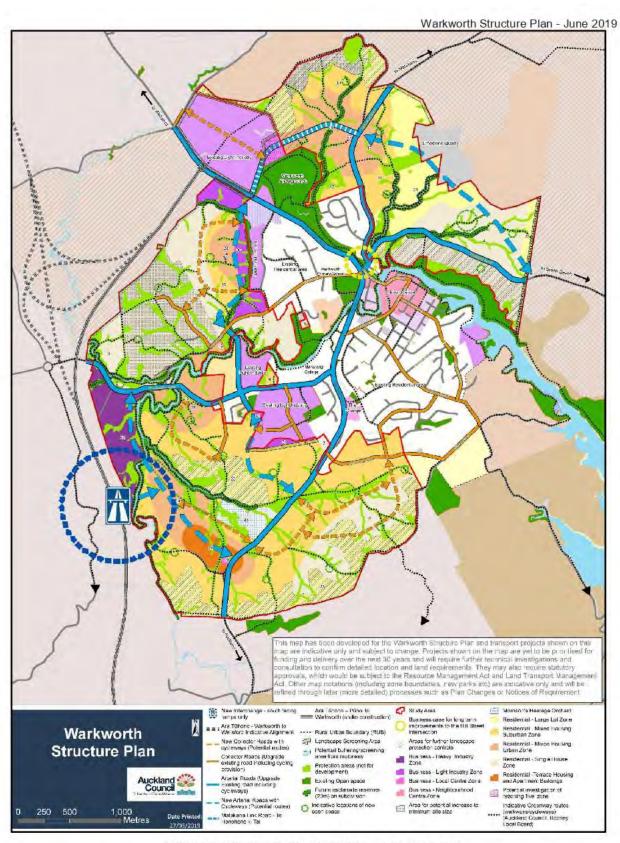


Figure 1: Warkworth Structure Plan - Land use plan

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Urban Design Report on the submission to the *Warkworth North Private Plan Change 25* (**PC25**) by Turnstone Capital, July 1<sup>st</sup> 2019.

The **PC25** applicant is submitting some changes in zoning to their original application. This report comments on those changes based on the drawing "Proposed Zoning Map" Rev 4 27/6/2019 by Chester Consultants. Illustrations pasted in below are from this document and have additional descriptive comments added.

Significantly, Auckland Council has adopted the *Warkworth Structure Plan* (**WWSP**) since **PC25** was accepted by Council and has identified potential zoning for this same area. This report will reference the applicants changes against the proposed **WWSP** zones where relevant.

#### 1. 220 Falls Road area:



It is proposed in this submission to change the originally applied for zoning (Mixed Housing Suburban(MHU)) for the site around 220 Falls Road to Business-Mixed Use (Business-MU).

In the **WWSP** adopted by Council this land is proposed to be zoned *Light Industrial*.

pacific environments

This zone change in the **PC25** submission is supported, and it is considered that a light industrial zoning is a poor outcome for this site.

Comment:

#### Business-MU as appropriate transitional zoning

Given the live zoned light industrial land on Hudson Road, It is acknowledged that a business type activity may not be inappropriate. It is considered that a business mixed use zone would be a better transitional zone to the residential zones than light industrial indicated in the council structure plan. This allows living and residential orientated uses as well as business, and gives potential for these living activities as a compatible edge to the Falls Road residential zoned area.

*H13.1 Zone Description* of the Unitary Plan notes the appropriateness of *Business MU* as a transitional zone.

#### Light Industrial zone is out of character with the residential streetscape of Falls Road

Falls Road is of a strongly residential scale and character, with existing single house sites fronting it. A strip of light industrial land facing this residential Falls Road environment will be out of character and will detract from it.

The **WWSP** proposes Residential Single House zone across Falls Road from this site. It is considered that an industrial use on 220 Falls Road will compromise this proposed single house zoned area and the quality of life of the people who live in it, particularly those on the Falls Road frontage.

Negative effects from the *Light Industrial* zoning to the existing and proposed residential street can be caused by the significant difference in scale, and the potential for environmental (noise) reverse sensitivity caused by Light Industrial development. Design expectations are typically lower in Business Light Industrial zones than Business Mixed Use zones.

#### Business- MU keeps residential opportunities both sides of Falls Road

It is considered a better outcome for residential areas to have the same or similar use on both sides of the road, and to change uses mid-block with an appropriate internal buffer. This gives better street legibility and a consistent sense of urban character. *Light Industrial* will remove any possibility of this happening and a built outcome will be similar in effect to Marua Road in Mt Wellington. Marua Road is considered a suboptimal urban residential environment.

Business-MU can avoid an unsafe and anomalous proposed Light Industrial strip in an otherwise residential street

# pacific environments

Residential uses are proposed further west along Falls Road in the Council structure Plan. An industrial frontage presents a challenging streetscape for pedestrians, with these proposed residential areas within an easily walkable distance to the local primary school. Introducing this industrial use in the otherwise residential context brings in an anomaly of wide driveways, and significant truck crossovers of the footpath.

If the area is serviced as *Light Industrial* by an internal road only, and buildings do not face Falls Road, the visual outcome will be even worse for the Falls Road residential character- as it will now consist of the back ends of industrial buildings, and associated security fencing.

#### Business-MU avoids heavy traffic in local street compared to Light Industrial

The **WWSP** shows the western collector deviating from this area, therefore the only industrial traffic introduced into this area will be from this strip of zoning only.

#### Business- MU gives direction to future of Hudson Road in a residential setting

Business Mixed Use zoning would also give a direction should the Hudson Road live zoned light industrial zone become redundant in the future; for the Hudson Road strip to change zoning to a business/residential mix that is more compatible with the surrounding context.

#### **Business- MU gives employment choices**

The council Warkworth Structure Plan chose light industry as its dominant employment zone, a *Business-MU* zone gives more nuance and choice to employment options in greater Warkworth, while still providing for living opportunities originally proposed for this site.

#### 2. Change to proposed Light Industry zone against SH1 to Business – Mixed Use





#### **Appropriate for location**

This proposed change is supported, it is considered Business Mixed Use activities are appropriate at the proposed motorway exit and gateway into Warkworth.

This zoning will provide for activities that the council Warkworth Structure Plan did not entirely facilitate, in what are considered good locations for them such as travellers accommodation, convention facilities, and medical facilities. It also gives a more appropriate zone in the context of the planned supermarket on the Corner of Hudson Road and the existing SH1.

#### Good access to surrounding area

Being adjacent to the future key road transport connection of the under-construction motorway and SH1 northwards, this area as *Business-Mixed Use* can acknowledge that Warkworth is a service town that reaching outside the Auckland Council area. Warkworth needs an opportunity to provide larger scale retail to service the wider region in an accessible and connected position, within the regional roading structure for private, goods, and public transport access.

#### Provides choice for business investment in Warkworth

It was this applications' first choice to use Business General zoning in the area, and as is explained in the planning report, was changed on advice from Council at a preapplication meeting into a zone that, while we considered barely adequate, would not produce the highest and best urban design outcomes for this site and for Warkworth.

Further on, now in response to the council structure plan not addressing a new supplies of Business land, consider it best to change this zoning here to enable options and richness in employment land investment that will better provide for a diverse future population.

#### Transitional and gateway opportunities

This land will provide a better transitional outcome (as intended in the Unitary Plan zone Description) to the residential zones in the **PC25** area from the highway, and from the live zoned *Business Light Industrial land* across the highway from it.

Business Mixed Use will also provide development of a better visual quality, as design expectations and outcomes are higher from Business Mixed Use than Business Light Industrial zones. This is important as the area will be the urban gateway to Warkworth on completion of the motorway currently under construction.

3.





#### 4. Expansion of Neighbourhood Centre to Local Centre and Open Space



#### Opportunity to provide a vibrant community area

The economic rationale behind this change is commented on in reporting by relevant experts, in urban design terms it is appropriate to support this proposed change because it creates opportunity for a more vibrant community hub for not only the Structure Plan area, but also the existing residential zoned area in Warkworth from Hudson Road to the existing SH1 off Albert Road.

#### Takes advantage of well-connected location

In the **SP25** application a potential connection was indicated to Albert Road from this area. This connection is entirely feasible and would provide good direct connectivity. It is highly unusual that Council chose not to indicate this realistic and highly beneficial connection in its own structure plan.

#### Gives more choice for community facilities

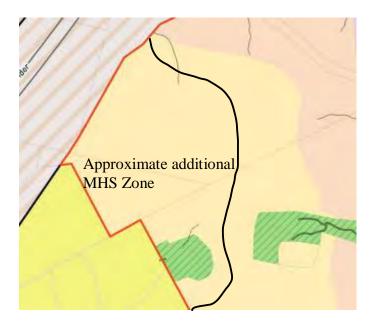
This connection to both Albert Road and the **PC25** area makes the Local Centre a pivotal place, and the available land gives opportunity for larger footplate amenity uses such as a swimming pool complex, and for significant urban open park space to be formed. A highly desirable feature like a swimming pool would cover more than the previously proposed 3000m2 itself, yet alone additional neighbourhood facilities.

#### Area is appropriate to be increased in context of proposed urban structure

The proposed local area is contiguous with the northern *Business Mixed Use* zone and will allow a continuation of urban structure and scale, instead of a step down in scale from Light Industry to Neighbourhood Centre.



#### 5. Change in Single House zone to MHS zone



#### Choice determined by natural and market variables

This change is supported as *Mixed Housing Suburban (MHS)* is considered a more sustainable development approach that lets topography, physical constraints, and market demand decide lot size, not an over-arching zone ideology. Larger lots are still able to be created if the market demands them.

#### Better design outcome

MHU has a higher level of design quality assessment than single house zone and will produce a better residential environment overall compared to the unassessed permitted activity of Single house zone.

#### Deals with site specific issues

This area has several issues that are better able to be dealt with on a superlot scale as opposed to single house, such as geotechnical and proximity to the motorway. MHU will allow attached housing, this is more cost effective to acoustically mitigate than single houses, and can be used to form noise reducing blocks to the rest of the area.



#### 6. Additional Mixed Housing Urban land at northern end of PC25 area.



The applicant is submitting to increase the area of Mixed Housing Urban. This is supported as the additional area is conjunctive with the proposed *Business Mixed Use*, and is within a walkable distance to the significant amenity this zone can provide.

Additionally, it is likely a transport node of some form linking to the proposed motorway, for example bus stop or bus station, will be within the Business Mixed Use area.

#### 7. **Summary**

The proposed changes to the zones indicated in this submission to **PC25** are supported in their entirety, and will produce better urban design outcomes than the original application in response to Councils adopted **WWSP**.



Grant Neill

B Arch, M Urb Des (1<sup>st</sup> cl. Hons)

Urban Designer

For and on behalf of

Pacific Environments NZ Ltd

Registered Architects



**INSIGHT** | ECONOMICS

#### The Provision of Business Land in Warkworth North

#### 3 July 2019

#### 1. Purpose

Turnstone Capital Ltd commissioned McDermott Consultants and Insight Economics to assess the business zones in the proposed Warkworth North Plan Change (PC25), including whether it is appropriate to:

- (1) Zone Business Light Industry (LIZ) land in the PC25 area as provided for in the Warkworth Structure Plan (WSP);
- (2) Zone a Business Local Centre in the PC25 area as proposed in the 2018 draft of the Warkworth North Structure Plan rather than the Neighbourhood Centre in the WSP.
- (3) Introduce a Business Mixed Use Zone in the Plan Change 25 area.

The assessment is qualified by the uncertainty around the changing nature of investment and demand for labour. This is demonstrated by varying estimates of land needs since 2016 (Table 1), confirming the need for a flexible and adaptable approach to future business land.

#### 2. Our Conclusions

We conclude that there is no need to provide additional LIZ land in Warkworth North via the WSP as this will simply exacerbate the substantial existing oversupply.

Conversely, we conclude that there is justification for Business - Local Centre and Business – Mixed Use zones in the area covered by PC25. This conclusion is justified:

- To support planned residential growth and job needs in Warkworth North, Warkworth town (over the longer term), and continuing growth in the Warkworth hinterland;
- In recognition of the dynamic, diverse, and rapidly-evolving nature of the organisation of work, work practices, and vocations;
- To maximise local work (and shopping) opportunities and reduce outbound commuting;
- By the need for flexible investment paths to support these work needs in an economy with a current bias towards light industry and facing considerable economic uncertainty;

#### 3. Background

In January 2018, Insight Economics was commissioned by Turnstone Capital to provide an independent assessment of the differences in opinion between the experts retained to assess business land use demands by Auckland Council (Market Economics Ltd)<sup>1</sup> and Turnstone Capital Ltd (McDermott Consultants Ltd)<sup>2</sup>. The review supported:

Market Economics (January 2019) Review of dwelling and employment – Warkworth Draft Structure Plan

McDermott Consultants (January 2019) Economic Assessment, Appendix 8, Warkworth North Proposed Plan Change

- The reduction in business land provided for in PC25 given "an abundance of business land in the general Warkworth area";
- The McDermott Consultants conclusion that there is a "need to be more flexible with business land provisions given the rapidly evolving nature of business and employment".

Our support for the zones proposed in the Turnstone Capital submission is explained below.

#### 4. Timing and aligning of residential and business development

The WSP confirms that Warkworth North remains targeted for early development. The business zones provided for in PC25 enable employment capacity to be expanded in parallel with residential development. Opening up new business investment opportunities alongside new residential development will help to ensure that the latter takes place.

This takes on some urgency. Market research by Bayleys<sup>3</sup> indicates low vacancy rates in March 2018 (industrial 2.6%, office 5,6%, and retail 7.1%, although the latter predated much of the uptake of space at the Grange Centre), suggesting a capacity-constrained economy. This limited capacity, in turn, has two adverse economic effects. First, it increases investment costs and, second, it reduces employment opportunities.

As outlined below, the adoption of a 69ha Business – Light Industrial Zone recommended by the Independent Hearings Panel on the Auckland Unitary Plan more than meets the need for industrial employment capacity into the foreseeable future. However, providing an abundance of industrial land is only a partial response to the need for more local jobs in an area planned for substantial growth.

#### 5. Is commuting the answer?

In the absence of non-industrial employment opportunities, many new residents will join the southbound commute from Warkworth to work. Some 44% of residents were recorded as commuting out of the town in 2013. <sup>4</sup> This is consistent with low vacancy rates. It may also reflect an imbalance in employment towards industry, and the need for a significant increase in investment outside traditional light industrial sectors and blue-collar jobs<sup>5</sup>.

Ideally, the WSP should help to lower the rate of outbound commuting to avoid overloading the motorway south. Indeed, it sets out strong arguments against outbound commuting (e.g., WSP, pages 19 and 47).

MarketBeat Winter 2018, Bayleys Research Letter, Warkworth Commercial & Industrial Report ...it's all about the future. Note: This refers to built capacity, not land developed.

Para 5.24, Statement of Planning Evidence to the Auckland Unitary Plan Independent Hearings Panel, Philip McDermott on behalf of Goatley Holdings and Stellan Trust , February 2016

McDermott Consultants (January 2019) Appendix 8 Proposed Plan Change Warkworth North, Appendix 8 McDermott) *Economic Assessment*, Section 3, especially Section 3.2 and 3.6

Table 1: Changing Expectations for Future Employment and Business Land, Warkworth

Date	Document	Author	Client	Provision for Employment Land
				Warkworth Total: 115ha;
Nov-15	Future Urban Land Supply Strategy, 2015	Auckland Council	Inform Unitary Plan	Warkworth North & North East: 3,270 Jobs (93ha at 35 jobs/ha);
				One Local Centre
Feb-16	Assessment of Warkworth's Industrial Land Requirement Statement of Evidence before the Auckland Unitary Plan Independent Hearings Panel	Philip McDermott, McDermott Consultants	Goatley Holding s & Stellan Trusts	Warkworth Total: 150-180ha business zones
Dec-16	Supporting Growth: Delivering Transport Networks, September 2016	Auckland Transport Alignment Project	Inform regional transport planning	Warkworth North: 104ha Potential Business (covering approximately areas 1, 13, 16, 28, 30)
7-Mar-17	Future Urban Land Supply Strategy Refresh	Auckland Councl	Update sequencing and timing of future land developoment, amended to reflect chancges on the	No change to business land; Warkworth North: Local Centre deleted
9-Oct-17	Statement of Evidence of Fairgray, Env Court AKL 00075	Market Economics	For Auckland Council	Warkworth Total: Up to 46ha Light Industrial
16-Oct-17	Draft Warkworth Business Land Assessment	Market Economics	For Auckland Council	Warkworth Total: 57ha Light Industrial
Jun-18	Business Land Topic report, Warkworth Structure Plan, June 2018	Auckland Council	Planning Committee, Auckland Council	<b>Warkworth Tota</b> l: Around 57ha under highest scenario
12-Jun-18	Warkworth Business Land Assessment, June 2018	Market Economics	For Auckland Council	Warkworth Total: Light & Heavy Industry up to 57ha; General Business up to 4ha; Mixed use up to 3ha; Centres, up to 4.5ha
Jan-19	Warkworth North Proposed Plan Change Economic Assessment	McDermott Consultants	For Turnstone Capital, Proposed Plan Change (As submitted)	Warkworth North: Additional - LIZ 13ha, GBZ 6ha, Total 19ha Neighbourhood Centre 0.3ha
23-Jan-19	Draft Review of Dwelling and Employment Yields Warkworth Draft Structure Plan	Market Economics	For Auckland Council	<b>Warkworth Total</b> : LIZ 52.5 ha - 1,035 jobs; Heavy Industry 37.4ha, 706 jobs; Residential Areas - 3,653 jobs
Jun-19	Final Warkworth Structure Plan	Auckland Council	Final, Published	Warkworth Total :61.9ha LIZ, 2.9ha HIZ Warkworth North: 24.5ha Light Industry

Any measures to lower outbound commuting need to take account of the pressure for additional Warkworth-based jobs from the surrounding labour catchments. The 2013 Census indicated that 25% of jobs in Warkworth were filled by residents from south of the town, 30% from the east, and 10% from the north<sup>6</sup>. The pressure from these areas has no doubt continued. Collectively, there has been more residential growth in the hinterland<sup>7</sup> than in Warkworth itself in the recent past (Table 2).

Table 2: Dwelling Consents Issued in and Around Warkworth, 2010-2019

	March Years			
	2009-14	2015-19	2009-14	2015-19
East	332	458	67%	54%
North	149	370	30%	43%
South	12	26	2%	3%
<b>Total Hinterland</b>	493	854	100%	100%
Warkworth	210	306		

Notes: Data missing for second quarter 2018

See Footnote 5 for definitions of catchments

Source: Statistics NZ

Over the last ten years, there were around 830 more residential consents issued in the hinterland (as defined in Footnote 1, below) than in Warkworth. The number of consents issued in the hinterland was 73% higher in the second five years than the first, compared with Warkworth, where they were 46% higher in the second 5 years.

Some, 60% of hinterland growth occurred east of Warkworth, with the bulk of the balance to the north. Planned road investment will enhance connection with these catchments (and probably boost residential growth within them)<sup>8</sup>. Consequently, we expect inbound commuting pressure on Warkworth from the Hinterland to increase over next twenty years.

We conclude that it is important to provide employment opportunities that recognise the costs of outbound commuting and the role of Warkworth as an economic hub for the north of Auckland.

#### 6. Workforce Growth in the Warkworth Structure Plan

We disagree with the methodology reported in the WSP for estimating future job needs. The estimated increase in labour supply appears to be based on a ratio of jobs to households across Warkworth. This leads to the assumption that the marginal participation rate (relating to the <u>additional</u> households) will be substantially lower than the 1.39 persons

Statement of Planning Evidence to the Auckland Unitary Plan Independent Hearings Panel, Philip McDermott on behalf of Goatley Holdings and Stellan Trust, February 2016

East: Cape Rodney South, Leigh, Omaha, Matakana, Snells Beach, Algies Bay; South: Mahurangi, Tauhoa- Puhoi; North: Cape Rodney, Wellsford.

Currently, no north facing ramps are planned for Puhoi so accessibility to the southern hinterland will not change significantly.

prevailing at the moment, at just 0.66 jobs/dwelling. The result is "around 5,000 jobs" required (WSP p.47)<sup>9</sup>. No reason is given for this substantial disparity.

In contrast, PC25 (Appendix 8) addresses the employment needs of the additional workforce associated with the uptake of residential capacity. It considers the demographic influences on labour supply, including likely household size, allowing that a significant share of new residents can be assumed to be working age adults. It aligns household character with the different forms of dwelling provided for in PC25 (Sections 2.2, 2.3 and Appendix 1). While recognising that retirement households will continue to contribute to the population gains, the experience with rapid settlement growth is that it is generally characterised by a large working age component.

The result is an estimate of between 1.0 and 1.25 working residents per additional dwelling, leading, in tur, to estimates of between 7,500 and 9,000 more people seeking employment when the Future Urban Zone is fully developed.

#### 7. Catering for an Expanded Workforce

#### **Meeting Household Demand**

Some provision is made for business dependent on expanding household consumption as Warkworth grows. This is based on the consumption profile (defined in terms of average spend on retail, hospitality, automotive, and other services) of an additional 12,500 households in Warkworth and the surrounding catchment by 2043. This leads to an estimate of demand for an additional 72,000m<sup>2</sup> gross floor area, or between 10ha and 13ha<sup>10</sup>.

This analysis assumes that traditional retailing will continue to expand (by 60%) despite the changes taking place in the distribution of comparison goods, in particular. Even more significant is the expectation in the projections that only a little over half of the expanded demand will be met by locally based shops. While the Market Economics analysis suggests a marginal propensity to shop locally equivalent to of 53% new households compared with its estimate of 44% of all households in 2016<sup>11</sup>, the expectation remains that outbound travel for purchasing goods and services will increase substantially with population growth. This is consistent an expectation of a higher level of outbound commuting.

This seems inconsistent with the policy expectations of the plan, which favours greater local self-sufficiency in the interests of reducing transport demand and enhancing social outcomes. The risk is that the analysis as it stands leads to an underestimation of likely demand for land for uses oriented towards the consumption needs of households. This undermines the WSP assumption that most of this employment will grow around existing centres.

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<sup>&</sup>lt;sup>9</sup> Attachment 1, But see WSP p. 47where the marginal ratio s 1.66

Market Economics (13 June 2018) Warkworth Business Land Assessment, Section 5), Appendix 1 in Auckland Council (June 2018) Business Land Topic report, Warkworth Structure Plan, pp10-12 and Appendix -

Market Economics, op.cit., Tables 5.4 and 5.5.

In terms of the town centre, in particular, it states that "the 9ha of Mixed Use zoning around the town centre ... predominantly occupied by older housing stock ... could be redeveloped into higher density residential and office/retail space. There is also some undeveloped capacity within the area zoned Town Centre" (p40). Together with the likelihood that more rather than less land than projected will eventually be required, and the significant urban design issues raised with respect to retaining the quality and character of the town centre and likely traffic impacts suggests that unduly limiting the provision of commercial land will fail to deliver the outcomes sought by way of capacity and quality of development.

#### **Business Land**

The Market Economics report (p12) estimates 4,430 additional jobs required at full development, the WSP estimates capacity for an estimated 4,992 additional jobs. Both appear to depend on a large share of these jobs being located within residential zones, 75% in the case of the WSP (Table 3). In the apparent absence of analysis of the nature of future employment, the WSP assumes that the high share of jobs in industry will be maintained, even as the number of households increases four- or five-fold<sup>12</sup>. The WSP provides for another 65ha of light and heavy industrial land by 2028, equivalent to around 1,160 jobs.<sup>13</sup>

**Table 3: Additional Employment Capacity, Warkworth Structure Plan** 

Sequence*	Local	N'hood	Light	Heavy	Busines	Residntl	Total
2022	0	20	447	0	470	1,080	1,550
2028	19	10	7	706	740	2,070	2,810
2033	0	0	0	0	-	540	540
2038	0	0	0	0	-	30	30
Total	19	30	454	706	1,210	3,720	4,930
Share	0%	1%	9%	14%	25%	75%	100%

Source: WSP, Appendix 3

On this basis, and with minimum provision for commercial centres (30 jobs spread across three new neighbourhood centres and 19 in one new local centre over the period), there is an implicit expectation in the WSP that any increase in non-industrial jobs not accommodated in residential areas will take place in the town centre.

It is our view that the WSP should support and enable more balanced employment growth given that Warkworth is already highly dependent on industrial employment, and that this should be reflected in the land use provisions for PC25. Providing for greater diversification calls for capacity for mixed business activities outside industrial areas. Industry alone will not facilitate or encourage the diverse investment required to maintain high levels of local employment, nor cater for the diverse occupations and skills that can reasonably be expected in a substantially increased population.

WSP, Appendix 3. At a little over 17 jobs/ha it adopts a low yield raising questions about the suitability of the land for industry.

Market Economics (January 2019), p10; Warkworth Structure Plan, Appendix 3

#### 8. Business land Use Provision in the WSP

There are two highly unlikely land use expectations contained in the WSP.

#### **Residential Land**

First, there is an assumption contained in the WSP employment yield estimates (Appendix 3) that a very large share of new employment will locate in residential areas (Table 3). Apart from the externality issues this raises (with respect to traffic and noise, for example), there are no grounds for expecting 75% of employment growth associated with residential gains to be housed in residential areas.

It is useful to compare this expectation, as set out in Appendix 3, with the 2013 Census. According to the Census (and an estimate made for 2016), only 8.2% of the Warkworth workforce worked from home (down from 9.2% in the 2001 Census). Home-based employment has lagged labour force growth. In addition, the rapid growth of co-working in shared, mainly commercial premises could well supplant home-based work as the dominant response to remote working opportunities. Co-working could easily be favoured in Warkworth given its distance from the CBD, and would be a source of demand for office and workspace capacity in neighbourhood and local centres.

In addition, if we were to assume (generously) that <u>all</u> education and residential care jobs are in residential zones, Business Directory figures suggest another 16% of Warkworth jobs (around 400) located in residential areas in 2018. Together with people working from home, these would make up less than 25% of employment. This share is likely to be high and highly unlikely to double, let alone triple, over the next 20 years, as implied by the WSP, especially in the face of increasing dwelling density.

We conclude that most of the (presumably non-industrial) jobs the WSP allocates to residential zones will instead require suitably zoned commercial – not industrial – land.

#### **Industrial Land**

Second, the provision for industrial land in the WSP is excessive. While Warkworth already has high dependence on manufacturing for local employment opportunities, industry alone will not cater for the diversity of occupations and skills that might be expected in a substantially increased population, nor for the diverse investment that will be required to maintain high levels of local employment.

Statistics New Zealand, Census of Population, Statement of Planning Evidence to the Auckland Unitary Plan Independent Hearings Panel, Philip McDermott on behalf of Goatley Holdings and Stellan Trust, February 2016

The Census recorded a 35% increase in the Warkworth resident workforce from 2001 to 2013, and a 22% increase in the number working from home.

Falling premise size, enhanced technologies, and changing work practices mean that as coworking expands, so premises are more likely to be established outside the traditional major centres. See: www.dropbox.com/s/jjor71mecwqbxdy/2019%20Complete%20Coworking%20Forecast.pdf?dl=0

Securing a jobs:employee ratio of 1:1 in Warkworth North would require capacity for around 2,600 jobs based on the estimates prepared for PC25<sup>17</sup>, with around 1,300 associated with the area covered by PC25. If we assume that one third of these (860) are industrial jobs and that another 25% (650) locate in residential areas<sup>18</sup>, non-industrial employment land would be required to accommodate around 1,100 jobs in Warkworth North, and about half of those in PC25.

Accommodating 860 industrial jobs would be no issue in the existing live zoned Business – Light Industrial Zone which, we suggest, has capacity for over 2,000 jobs (Table 4). The WSP simply adds capacity for another 470 jobs on top of this, albeit at much lower densities given the topography of the land involved.

Once 37.4ha of Business – Heavy Industry is added in (scheduled by the WSP for 2028), the additional capacity supplied could cater for 3,300 jobs, or around 3.7 times current industrial employment (930 in February 2018). This might be absorbed by around 2055 if a compound growth rate of 4.2% is sustained<sup>19</sup>, which we consider *extremely* unlikely

Source	Zone	На	Jobs/Ha	Total
IHP	LIZ Current	69.0	30	2,070
WSP	LIZ, 2022, Area 30	24.5	18	440
WSP	LIZ, 2028, Area 31	2.9	25	70
WSP	HIZ, 2028, Area 32	37.4	19	710
		133.8	25	3,290

**Table 4:Planned Capacity for Industrial Employment** 

Regardless of the actual rate of growth achieved, or the densities of development, these figures confirm that the WSP provides for a substantial over-supply of industrial land. Moreover, they suggest that little consideration has been given to the possible nature of investment and occupational prospects and possibilities in a substantially expanded town. In contrast, the land use mix promoted by PC25 acknowledges and responds to changes taking place in the economy, skills, and the organisation of work. While not knowing precisely what form these changes might take, it is important that they can be adaptable in the face of a changing local population and enhance the prospects for a transformation of the Warkworth economy from both the rapid expansion planned and the significant transport investments underway or planned.

McDermott Consultants (January 2019) Appendix 8 Proposed Plan Change Warkworth North, Appendix 8 McDermott) *Economic Assessment*. Tables 2 and 3, accompanying text, and Appendix 1 set out the demographic rationale and assumptions for these figures.

Both assumptions are considered on the high side; i.e., resulting in a <u>low</u> estimate of non-industrial jobs requiring business-zoned land.

This is the rate recorded in the industrial categories in the Business Directory, 2000-2019, boosted by exceptional growth after the 2008-9 Global Financial Crisis.

#### 9. Catering for the Non-Industrial Workforce

Land use expectations for PC25 are influenced by the possible nature as well as magnitude of workforce growth and the planning principle adopted by Auckland Council that the Structure Plan should provide "new local employment areas so people can work locally in Warkworth" (WSP, p46).

The very limited provision of additional commercial business land in the WSP (6,000sqm in 2022 and 3,000sqm 2028 in three neighbourhood centres and 1ha in a local centre in 2028, respectively) assumes that the structure of activity will remain largely unchanged. This is likely to have the following consequences:

- (1) Reduced participation as residents have difficulty finding suitable local employment (outside of industry);
- (2) Increased long-distance commuting by Warkworth and hinterland residents, compounding congestion south of Orewa;
- (3) Fewer local services that might support both community and business expansion;
- (4) Ongoing pressure to convert areas of unutilised land zoned for industry to other uses.

As a result, constrained local employment growth is likely to lower the uptake of housing capacity and will frustrate the objectives of the WSP and the Auckland Unitary Plan.

#### 10. The Nature of Future Employment

While the AUP rules provide some flexibility in industrial zones, they are limited and do not reflect, for example, the growth in office-based activity and final demand services that underpin the development of the wider Auckland economy over recent decades. They do not reflect the rapid changes production, distribution and consumption services generally.

Section 3, Appendix 8 of the WSP explored labour market and employment trends and prospects as they relate to Warkworth, including changing work practices.

The analysis acknowledges the uncertainty the Warkworth's economy faces. Despite identifying a positive outlook for Warkworth's industry (p26) we foresee no prospects for the full uptake of the amount of industrial land provided in the WSP within the next 30 to 40 years, or even well beyond.

Rather, the analysis notes that:

- ... a large share of employment growth will be associated with non- industrial uses, including personal, household, business, and community services;
- Disruptive technologies, volatile domestic and international markets, and new business models make it difficult to forecast in detail the nature and needs of medium- (five to ten years) and long-term (ten years plus) investment and employment; and
- Flexibility of land use will enable the community to respond effectively to and initiate new investment and employment opportunities despite this uncertainty.

Over-emphasis on industrial land simply highlights the issues facing the economy:

- A dearth of local business and professional services acts against growth in sectors that use such services, including industry;
- Much of Warkworth's industry (and employment in it) is vulnerable to [a] the cyclical nature of construction; and [b] the fortunes of a few significant local employers, reinforcing the need to allow the economy to diversify;
- Retailing faces transformational challenges, the nature of which is not yet clear, but which raise questions over the capacity of traditional stores to sustain job growth;
- Service investment is likely to be the major driver of new jobs for some time to come, including services to households and families, to business and employment, to the community, and to individuals; and
- Entrepreneurship and innovation can play a significant part in shaping new jobs, many of which may fall between production, logistics, and service delivery, making it difficult to determine with any precision future land use needs;

One conclusion, given the difficulty of forecasting future employment, is the need for flexible investment paths if employment growth is to be sustained. Traditional industrial zones limit flexibility and do not easily accommodate emerging trends – the integration of production, warehousing, wholesaling, and distribution, for example; the increase in coworking sites; the convergence of factory, laboratory, and office-based production; the emergence of totally new sectors and activities; and the disappearance (through technical integration, product or process redundancy, or off-shoring) of others.

Based on these observations and the 69ha of vacant land already zoned for light industry, PC25 does not add to the industrial land pool. Rather, it seeks to provide flexibility and diversification in uses that might:

- Complement and support manufacturing;
- Reflect the need for growth in the immediate neighbourhood, the wider Warkworth North area, and the surrounding hinterland;
- Recognize and respond to the rapidly evolving nature of work;
- Provide varied local employment opportunities; and
- Facilitate innovation and entrepreneurship.

It also takes account of the nodal advantages offered by the intersection of the Great North Road (current SH1), the Northern Motorway extension (and future SH1), and the planned link road to the settlements east of Warkworth, from Leigh through to Snells Beach.

The zones advanced in proposed PC25 – General Business and a Local Centre – reflect these requirements and influences. However, it is proposed in this submission to replace the Business - General Business Zone with a more flexible zone, Business – Mixed Use. As well as providing wider scope for activities, this offers a more satisfactory transitional zone for urban design purposes, while reflecting the increasingly fuzzy boundary between industrial

and non-industrial activities. It also recognises the likelihood that the sorts of large format activities that might be favoured by the location are likely to be catered for in the Light Industrial Zone to the east of SH1 and north of the Warkworth Showgrounds.

#### 11. The Proposed Business Zones

# • The Business – Local Centre Zone Area 5.7ha, approximately 290 jobs (at 50/ha)

Based upon the analysis of sector, workplace, and vocation gaps and opportunities undertaken in support of PC25, it is important to support residential growth "with the capacity to accommodate a range of commercial investment while meeting neighbourhood and local retail needs".

The proposed Business - Local Centre zone will achieve this enabling a wide range of final demand activities (retailing, hospitality, personal services, education and care services, and personal business services ) to an immediate catchment that can be defined north of Hill St(serviced by Albert Rd), Warkworth North, and North East. Its household service and retail roles will be two-fold, providing neighbourhood goods and services through a network of local roads, walkways, and cycleways; and complementing this with higher order goods and services in response to enhanced accessibility to a much wider semi-rural hinterland with the pending road connections.

A Local Centre also provides a base for local business services (law, accountancy, training, placement, testing, and consultancy), meeting the needs of an expanding industrial sector anticipated north of the Showgrounds, supporting new investment and entrepreneurship, and a range of small office-based services. In this way it should be able to sustain a range of vocational (education, training, placement) and employment activities. In the proposed location, it will also offer potential for the development of community facilities that will complement the planned open space, reinforcing its role as a social hub for the community.

# Business – Mixed Use 16.3ha, approximately 490 jobs (at 30/ha).

The Auckland Unitary Plan provides for the Business - Mixed Use Zone around centres and along corridors and as a transition area between residential and business zones centre zones, and to areas "where there is a need for a compatible mix of residential and business activities" (H13.1 Business- Mixed Use Zone). It favours small scale activity but offers design and functionality within an attractive environment.

In terms of employment diversity, the main objectives relate to design, compatibility with residential use, and not compromising the centre zones. Flexibility, though, is also fostered through the wide range of permitted uses. These include: hospitality - visitor accommodation, entertainment, food and beverage including drive-through facilities; community facilities, including care centres, education and healthcare, arts and recreation, and marae; and activities that support manufacturing and services, including light industrial support services, laboratories, repairs and maintenance, warehousing and storage.

#### 12. Conclusion

The provision for business land advanced in this submission will help mitigate the prospect of oversupply of industrial land, while also increasing opportunities for diverse investment. It will complement the current industrial focus of Warkworth land supply. It will offset any imbalance or vulnerability that this focus creates in the face of uncertainty over mediumand long-term economic development. And, it will provide the variety of investment and employment opportunities that substantial urban expansion demands at a time of rapid and largely unpredictable change in the drivers of economic growth, the nature of work, and a growing social and environmental imperative to limit commuting.

Philip McDermott

McDermott Consultants Ltd

3 July 2019

Fraser Colegrave

Insight Economic Ltd

# Submission no 23 **B&A**

# **MEMORANDUM**

Urban & Environmenta

Date:	24	June	2019
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Re: Comparison of land uses Turnstone proposal vs Council Adopted WW Structure Plan

Discipline	Turnstone	Council	Summary
Economic	<ul> <li>Business - Mixed Use provides a variety of employment types.</li> <li>Enables employment to be provided / employment land developed in conjunction with residential land in a balanced way.</li> <li>Joint statement indicates that the WSP business land zoning pattern will in fact potentially result in the outcomes the WSP is trying to avoid. (page 4).</li> <li>Local Centre enables a greater variety of employment choices and greater opportunity for activities that support the industrial land on the northern side of SH1.</li> <li>Local Centre will support a greater area than just the new residential. It will serve existing development to the north of Hill street accessible via Albert Road.</li> </ul>	<ul> <li>Over supply of Light Industry zoned land in Warkworth.</li> <li>This will lead to inefficient development of urban land and provide a limited and inequitable provision of employment options.</li> <li>Neighbourhood centre is limited in the types of community facilities that are enabled and the size of a Neighbourhood Centre will not achieve a community hub centred around the planned open space areas.</li> </ul>	Most optimal outcome is reflected in the Turnstone submission.
Urban Design	<ul> <li>Residential uses abutting Falls Roads provides consistent streetscape, legibility and residential character.</li> <li>Business – Mixed Use is preferable transitional zoning enabling a mix of residential and compatible business uses.</li> </ul>	SP notes that "careful urban design solutions will be needed to ensure that permeability through this new urban area is maintained for pedestrian and cyclists	Most optimal outcome is reflected in the Turnstone submission.

### **MEMORANDUM**

and that the road frontage is activated • Residential is preferable to industrial for pedestrian safety as wider crossings etc and attractive on both side of the road<sup>1</sup>" • SP - page 89 suggests a Precinct to associated with industrial sites. • Business – Mixed Use provides direction for manage the interface if industrial sites future uses of existing industrial sites if those with residential development on the WLR to facilitate good urban design outcomes. become redundant in the future due to higher value land uses. • Local Centre provides greater opportunity for community facilities that will create a focal point around planned open space areas. This will provide an opportunity for a vibrant centre to be created as a community hub. Most optimal outcome is **Transport** Industrial would require access direct onto the WLR provides a good separation between reflected WLR with heavy transport when the other side the Light Industrial extension proposed in the of the road will be residential. and the residential planned to the north. Turnstone submission. • WLR likely to be a Limited Access Road (LAR) • Any refinement / shift in the alignment of the WLR will have flow on effects for the same as the MLR. Limited access therefore means road intersections. These will then be extent of the proposed industrial zoning. intersection used by heavy transport associated with the industrial and the Residential areas planned to the north and also the Business Centre. Civil Engineering No limitations. No limitations. Council technical guidelines and standards acceptable ensure

<sup>1</sup> Adopted WW SP, page 48

No constraints to the proposed zoning.

With respect to residential zoning a higher intensity

zoning is often warranted to justify increased

Geotechnical

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• Page 49 of the SP states that "New industrial areas are required to be located

on relatively flat land, have efficient

outcomes will be achieved.

Most optimal outcome is

reflected in the Turnstone

submission.

# Submission no 23 B&A

**Urban & Environmental** 

# **MEMORANDUM**

	development costs and also enables a greater flexibility in design to get more optimal land use outcomes.	access to freight routes, and be efficiently served by infrastructure. Their location needs to also consider reverse sensitivity effects by not locating close to sensitive activities (e.g. high density residential, schools) and not enabling sensitive activities to establish adjacent to industrial areas"	
Ecological	<ul> <li>Residential and a Centre will have lesser potential adverse effects on water quality associated with runoff and water treatment devices, even with SMAF 1, than the proposed Business – Light Industry.</li> <li>The zone alterations proposed by Turnstone Capital with respect to the Auckland Council Proposed Warkworth North Plan Change (i.e. Single House Zone (SHZ) to Mixed House Urban (MHU) and Business Light Industry (BLI) to Business Mixed Use (BMU)) would have negligible additional influence on the adverse ecological effects anticipated for the development of these areas. The terrestrial ecological values in these areas are currently very low and potential effects of the zone changes to MHU are likely to be similar to those of SHZ.</li> <li>The current freshwater values are, in general, moderate in both proposed zone alteration areas and although the land-use proposed (MHU) may result in increased development intensity, the objectives of the zone are the same for that of the SHZ; "Restrict the maximum impervious area</li> </ul>	Not proposing any higher level of treatment or stormwater outcome. Hardstand areas typically associated with Industrial have greater adverse effects on water quality, especially adjacent to the river.	Optimal outcome would be to encourage existing industry to move further away from the river to improve water quality.  In addition, the area of open space proposed between the centre and watercourse would offer an 'ecological buffer' and reduce impervious surfaces.  Most optimal outcome is reflected in the Turnstone submission.

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# **MEMORANDUM**

	on a site in order to manage the amount of stormwater runoff generated by a development and ensure that adverse effects on water quality, quantity and amenity values are avoided or mitigated".  • The anticipated terrestrial adverse ecological effects associated with BMU, will potentially be less than those associated with BLI, simply due to type of activities conducted and the potential effects (noise, vibration, contaminants, impervious surfaces, etc) on the environment.  • The maximum impervious area per site remains the same (60%). Like the SHZ, with appropriate water management (SMAF 1) the adverse effects on the environment as a result of MHU development can be appropriately mitigated. The anticipated adverse freshwater ecological effects associated with BMU, will be potentially be less that those associated with BLI, simply due to type of activities conducted and the potential effects (contaminants, impervious surfaces, etc) on the environment.		
Arboricultural	No issues		
Soil Contamination	No issues		
Cultural	No known issues		
Planning	<ul> <li>Business – Mixed Use provides a more appropriate zoning, than Business – Light Industry to residential land uses from a reverse sensitivity perspective.</li> </ul>	<ul> <li>SP states that the WLR will be about 30 metres wide and "will act as a buffer, providing physical separation between the industrial land and the residential land</li> </ul>	Optimal outcome would be to encourage the existing industrial to move away from existing and

# Submission no 23 B&A

### **MEMORANDUM**

Urban & Environmental

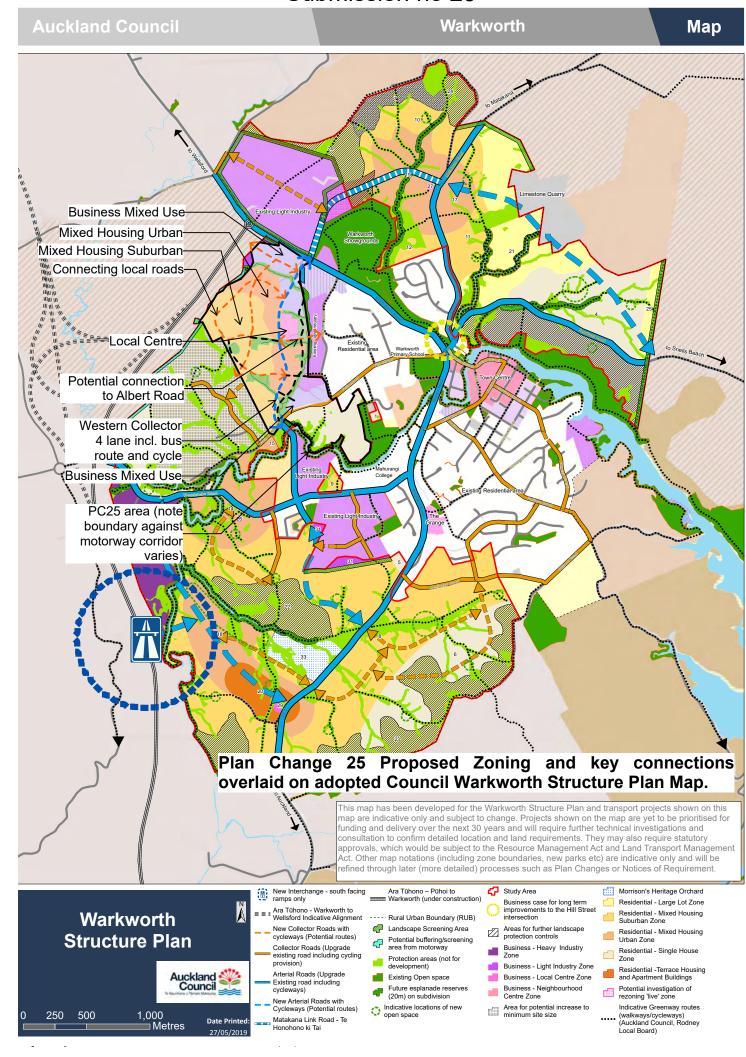
- A Local Centre provides greater opportunity for a community hub close to public transport and a greater variety of employment options. It can also provide some opportunity for appropriate support activities to the live zoned industrial land to the north of the State Highway.
- Residential Mixed Housing Urban better achieves the objectives and policies of the RPS relating to Urban Growth and Form.

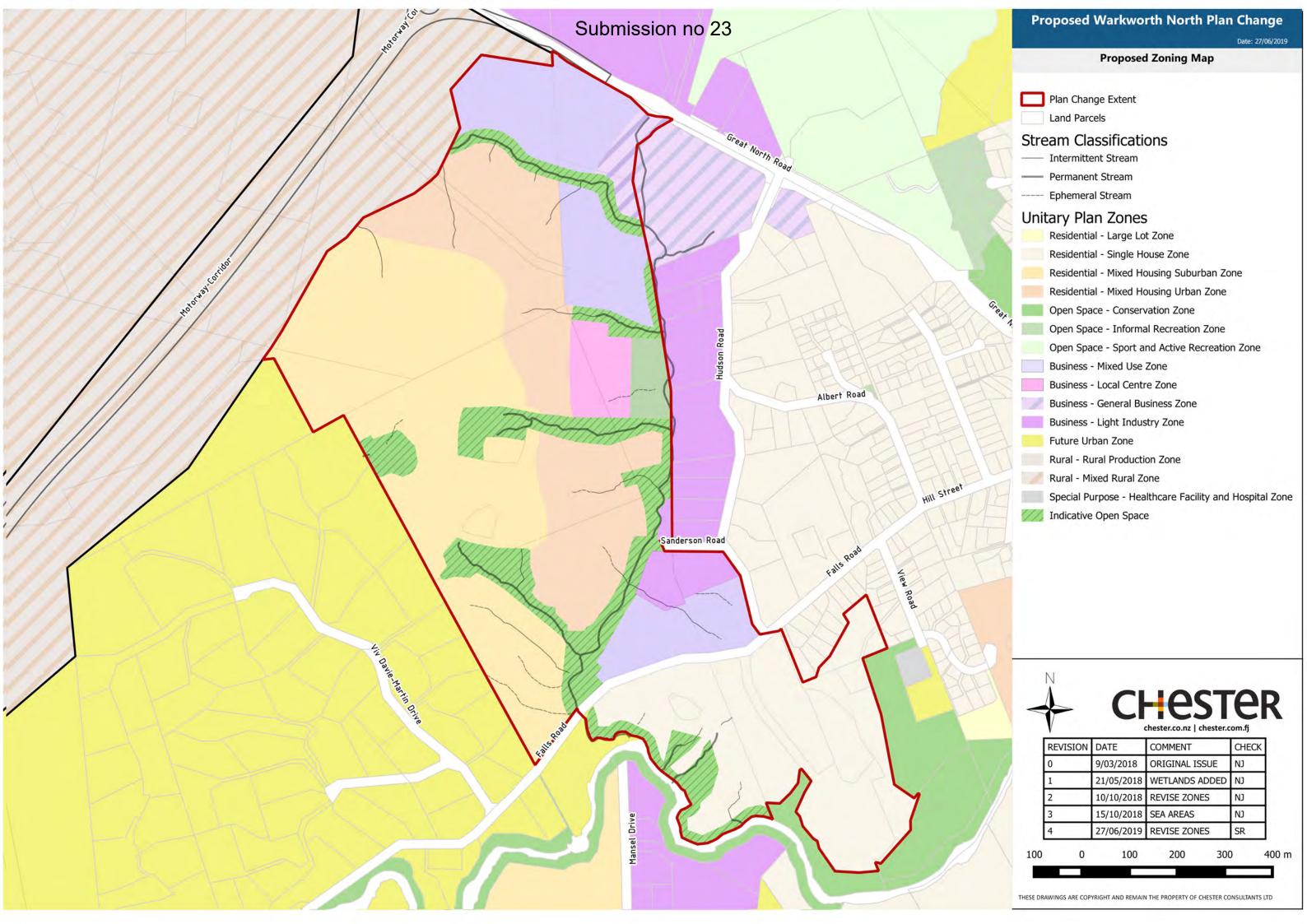
- uses on the other side of the road to prevent conflicts between these uses".
- Residential Single House will not achieve optimal urban outcomes because the provisions do not encourage quality urban design outcomes to the same extent that Residential – Mixed Housing zones do.

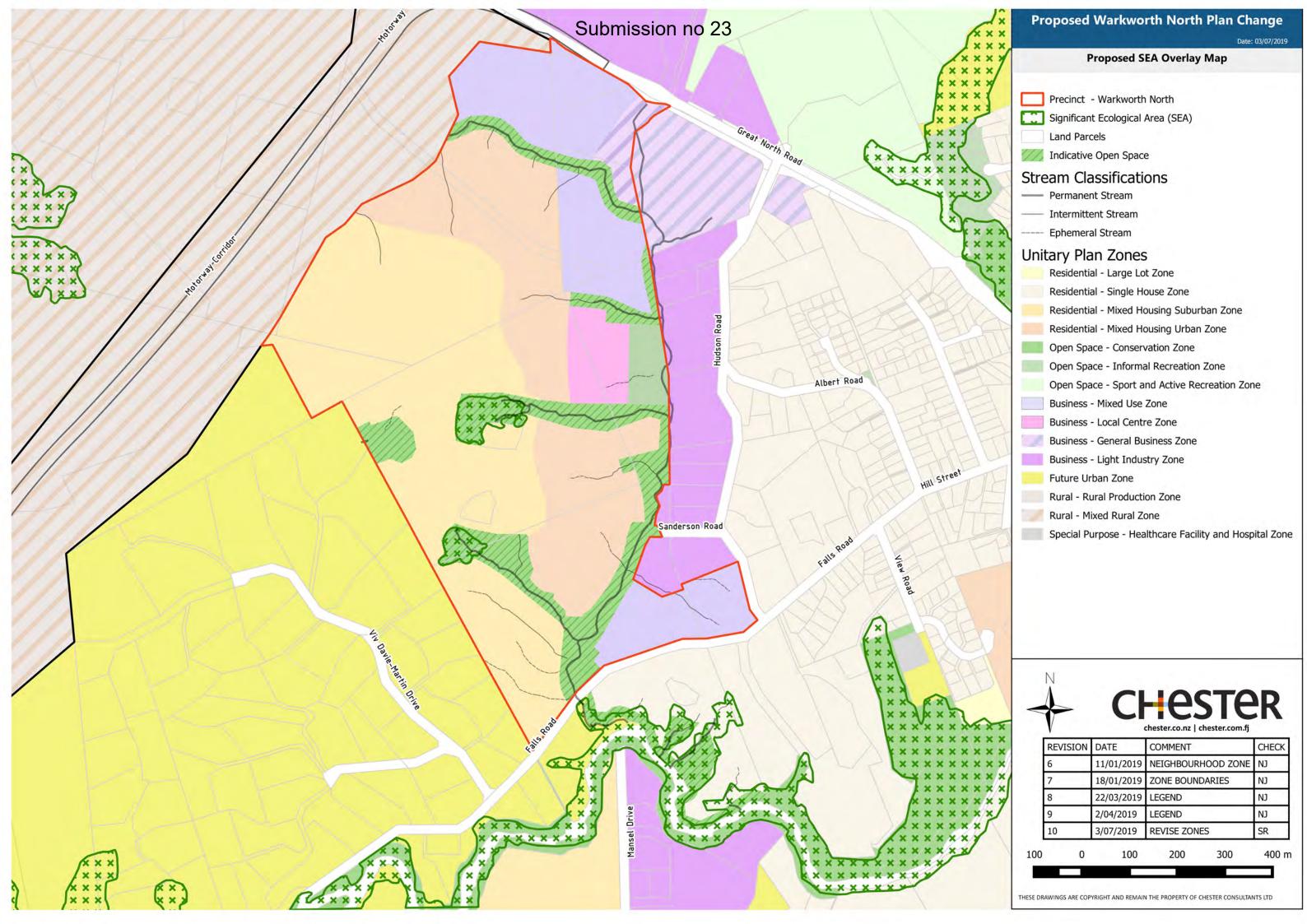
future planned residential areas.

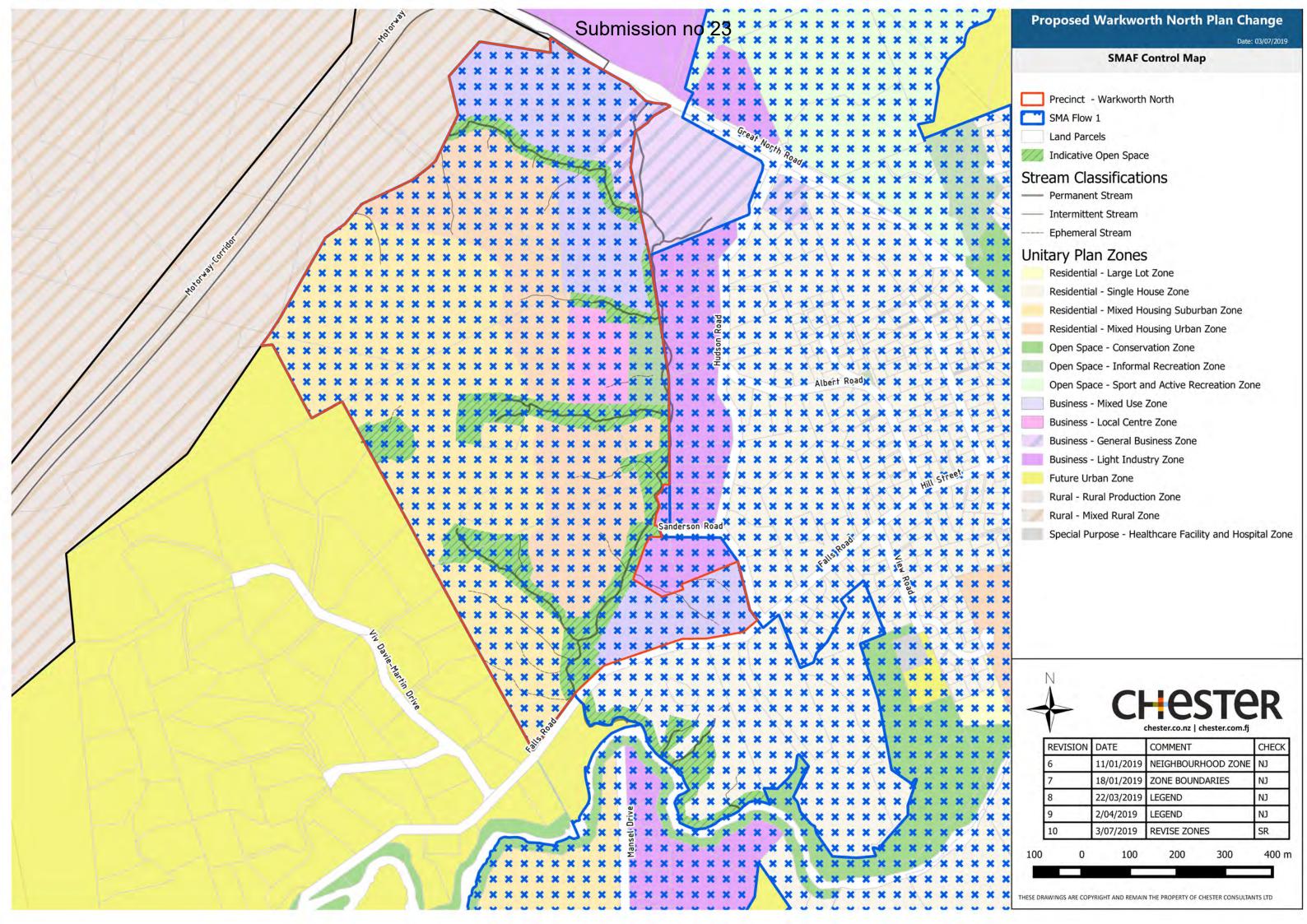
Long term this would avoid reverse sensitive and less optimal urban design outcomes. The seam of existing and future industrial in this location effectively sits amongst an existing future residential area. The industrial land is located at the valley bottom with residential land on the slopes overlooking either side.

Most optimal outcome is reflected in the Turnstone submission.









#### WARKWORTH NORTH PRECINCT

#### **I1. Warkworth North Precinct**

#### **I1.1. Precinct Description**

The zoning of land within the Warkworth North Precinct and Stubbs Farm Development Area – Sub precinct is Residential – Mixed Housing Suburban, Residential – Mixed Housing Urban, Business – Light Industry; Business – Mixed Use, Business – General Business, Business-Local Centre and Open Space Informal Recreation zone.

The Warkworth North Precinct is located to the north of Falls Road and extends north to the motorway designation, west to the Viv Davie Martin Drive development and adjoins the existing Hudson Road Industrial area and the Business – General Business zoned land to the east. The Precinct covers approximately 95 hectares of land.

A Sub – precinct is proposed over the Stubbs Farm Development Area to secure the outcomes for watercourses including related mitigation and also to guide development of the Business – Local Centre. The Sub-precinct covers approximately 43 hectares.

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

#### I1.2. Objectives [rp/dp]

- (1) To achieve high quality urban design outcomes through:
  - a. providing key road connections securing an east west link to connect with the Mansel Drive extension;
  - b. providing an integrated stormwater management solution;
  - c. minimising loss of, or reduction in ecological values, and enhancing retained ecological values to achieve overall effects on ecological values that are less than minor.
  - d. retaining and enhancing areas of open space that also assist in providing opportunities for recreation; as well as pedestrian and cycleway connectivity;
  - e. providing a Local Centre to provide frequent retail and service needs for the local community and a range of employment options;
  - f. Providing a balance of employment land and places for people to live with a choice of living types and environments.

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

#### I1.3. Policies [rp/dp]

- (1) Residential Mixed Housing zones are provided to achieve quality urban design outcomes and a range of living options the respond to the environmental characteristics of the area.
- (2) Locate zones to reflect opportunities for different types of living environments; higher density closer to transport routes and the Local Centre, with close proximity to walking, cycle and public transport connections; reduced density further from transport links and the proposed Neighbourhood Centre.
- (3) Provide an indicative route for the Western Link to secure this option should it be required and provide indicative connections to the wider urban area beyond the Sub- precinct and require them to be provided at the time of development to the extent these are required to service future development.
- (4) Provide an indicative network of open space areas to protect existing ecological values; provide for areas of public open space, as well as walkway and cycleway connectivity.
- (5) Provide for the retention of watercourses except where Precinct plan 1 Warkworth North Precinct identifies that there will be stream loss and implement appropriate mitigation measures onsite to offset any adverse effects as indicated on Precinct plans 2 Stormwater Catchment Management plans.
- (6) Enhance streams identified for enhancement using techniques such as boulder clusters; spur dikes, vanes and other rock deflectors; rock riffles; cobble or substrate; cobble floodways; root wads or large wooden debris; vegetated floodways; live siltation; erosion control blankets; living walls and culverts designed to enable fish passage.
- (7) Provide detailed design at resource consent stage for the Local Centre demonstrating how the design will:
  - a. connect to adjoining open space and riparian areas as well as the road network:
  - achieve a high-quality built form that engages and activates with adjoining roads and public spaces;
  - c. provide for accessible and versatile spaces; as well as demonstrating that the design is in accordance with best practise including CPTED principles.

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

#### I1.4. Activity table [/rp/dp]

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IX1.4.1 below.

Activity Table IX.4.1 specifies the activity status of regional / district land use / and activities in, on, under or over the beds of lakes, rivers, streams and wetlands; activities in the Warkworth North Precinct pursuant to section(s) 9(2) / 9(3) / 11 / 13 of the Resource Management Act 1991.

**Table I0.4.1 Activity table** 

Activity		Activity status	
		Warkworth North Precinct	Sub- precinct A
Roadi	ng Infrastructure [dp]		
(A1)	Subdivision or development adjacent to the indicative Western Link Road, unless an alternative road alignment has been approved by resource consent and is constructed, or being constructed.	RD	RD
(A2)	Subdivision or development of land including, or adjacent to 'future road connections' indicated on the Warkworth North Precinct Plan.	RD	RD
Stream			
(A4)	Protection of streams and wetlands as indicated on the Warkworth North Precinct Plan.	Р	P
(A5)	Enhancement of streams as indicated on the Warkworth North Precinct Plan and in accordance with the 'Additional Enhancement Opportunities' identified in Policy I1.3 (6).	Р	P
(A6)	Stream loss other than that shown on the Warkworth North Precinct Plan.	NC	NC
Local			
(A7)	Subdivsion or development within the Local Centre zone achieving the outcomes specified in Policy I1.3 (7)	RD	RD
(A8)	Subdivsion or development within the Local Centre zone that does not achieve the outcomes specified in Policy I1.3 (7)	NC	NC

#### 11.5. Notification

(1) An application for resource consent for a controlled activity listed in Activity Table IX.4.1 above will be considered without public or limited notification or

- the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991.
- (2) Any application for resource consent for the following activity / any of the following activities and/or an activity that infringes the following standard(s) will be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:
  - (a) Standard I1.6.1 Western Link Road
  - (b) Standard I1.6.3 Local Centre
- (3) Any application for resource consent for an activity listed in Activity Table IX.4.1 and which is not listed in IX.5(1) or IX.5(2) above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (4) When deciding 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).

#### I1.6. Standards

- (1) Unless specified in Standard I1.6(2) below, all relevant overlay, Auckland-wide and zone standards apply to all activities listed in Activity Table IX.4.1 above.
- (2) The following Auckland-wide standards do not apply to activities (A4), (A5), and (A6) listed in Activity Table IX.4.1 above:
  - (a) E3 (A49) New reclamation or drainage, including filling over a piped stream.
- (3) Activities listed in Activity Table IX.4.1 must comply with Standards IX.6.1 IX.6.3.

#### I1.6.1. Standard - Western Link Road

#### Purpose:

- To provide road connectivity that will assist in securing an East West link for Warkworth.
- (1) The Western Link shall be constructed in accordance with the Western Link cross-section – Precinct plan 3; and shall be proportionally funded between Auckland Transport and the land developer, for the portion of land development occurring at the time of road construction.

#### I1.6.2. Standard - Streams

Purpose:

- To achieve stream enhancement works that improve ecological values and water quality now and into the future.
- (1) Stream enhancement shall be undertaken in accordance with the best practice guidelines including TP148 Auckland Council Riparian Zone Management; Guidance for Water Sensitive Design (GD04) 8.1 Riparian Buffers and Planting and Auckland Council's Strategy for Urban Ngahere (Forest).

#### 11.6.3. Standards for Business - Local Centre

#### Purpose:

- To achieve a versatile, accessible and high-quality Local Centre that provides positively for the needs to the existing and planned local community.
- (1) A pedestrian connection shall be provided to the eastern side of the Mahurangi river tributary as indicated on the Precinct Plan.
- (2) Pedestrian connections shall be provided to the adjoining open space areas.

#### 11.7. Assessment - controlled activities

There are no controlled activities in this precinct.

#### 11.8. Assessment - restricted discretionary activities

#### 11.8.1. Matters of discretion

The Council will reserve 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) Roading infrastructure:
  - (a) Necessity of the connection to service existing and future land uses; and
  - (b) Practical and effective connectivity to adjacent land for existing and future land uses; and
  - (c) Appropriateness of construction standard to fulfil the transport function of the road.

#### (2) Local Centre:

- (a) Quality of built development and its ability to provide versatile internal and external spaces;
- (b) Provision of practical, safe, quality and functional connections to adjoining open space and riparian areas;
- (c) Extent to which built development is designed to positively activate and engage with adjoining roads and public spaces.

- (d) Provision of a safe useable environment.
- (e) Landscape design.
- (f) Allocation of land uses to service the needs of the local community.

#### 11.8.2. 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) assessment criteria for Roading infrastructure;
  - (a) A road network shall be developed that responds to the transportation needs of Warkworth North and the wider area now and into the future which may include the preferred Western Link collector route.
  - (a) The extent to which roading connections are required and can be provided to adjacent land areas as indicated on Precinct plan 1 – Warkworth North Precinct, to ensure a connected urban environment.
- (2) assessment criteria for Business Local Centre:
  - (a) The design of the Local Centre shall achieve an integrated and functional design that reflects a high quality of architectural design and best practise urban design principles.
  - (b) The quality of design shall provide a safe useable environment that reflects urban design best practise including CPTED principles.
  - (c) Soft landscaping and hard landscape elements shall enhance and reflect local character such as the values of the Mahurangi river, riparian corridors and the bush backdrop of the Dome hills.
  - (d) The extent to which land use activities complement adjoining land uses and assist in maintaining or enhancing connectivity and relationship to adjacent open space areas.

#### **I1.9. Special information requirements**

An application for subdivision or development in the Local Centre in accordance with Rule I0.4.1(A6) activity must be accompanied by:

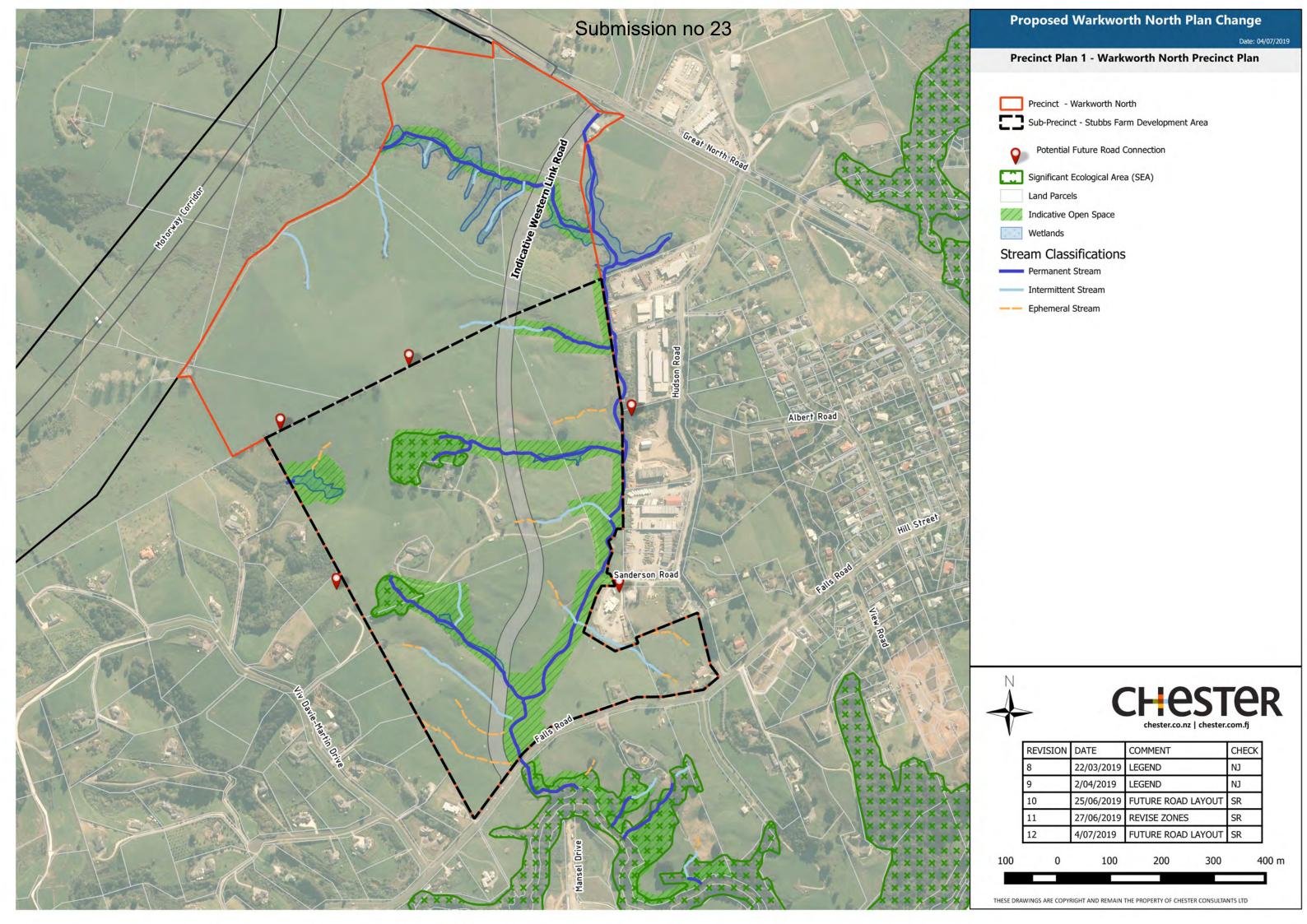
(1) An urban design assessment demonstrating how the development meets the matters stated in Policy I1.3 (7)

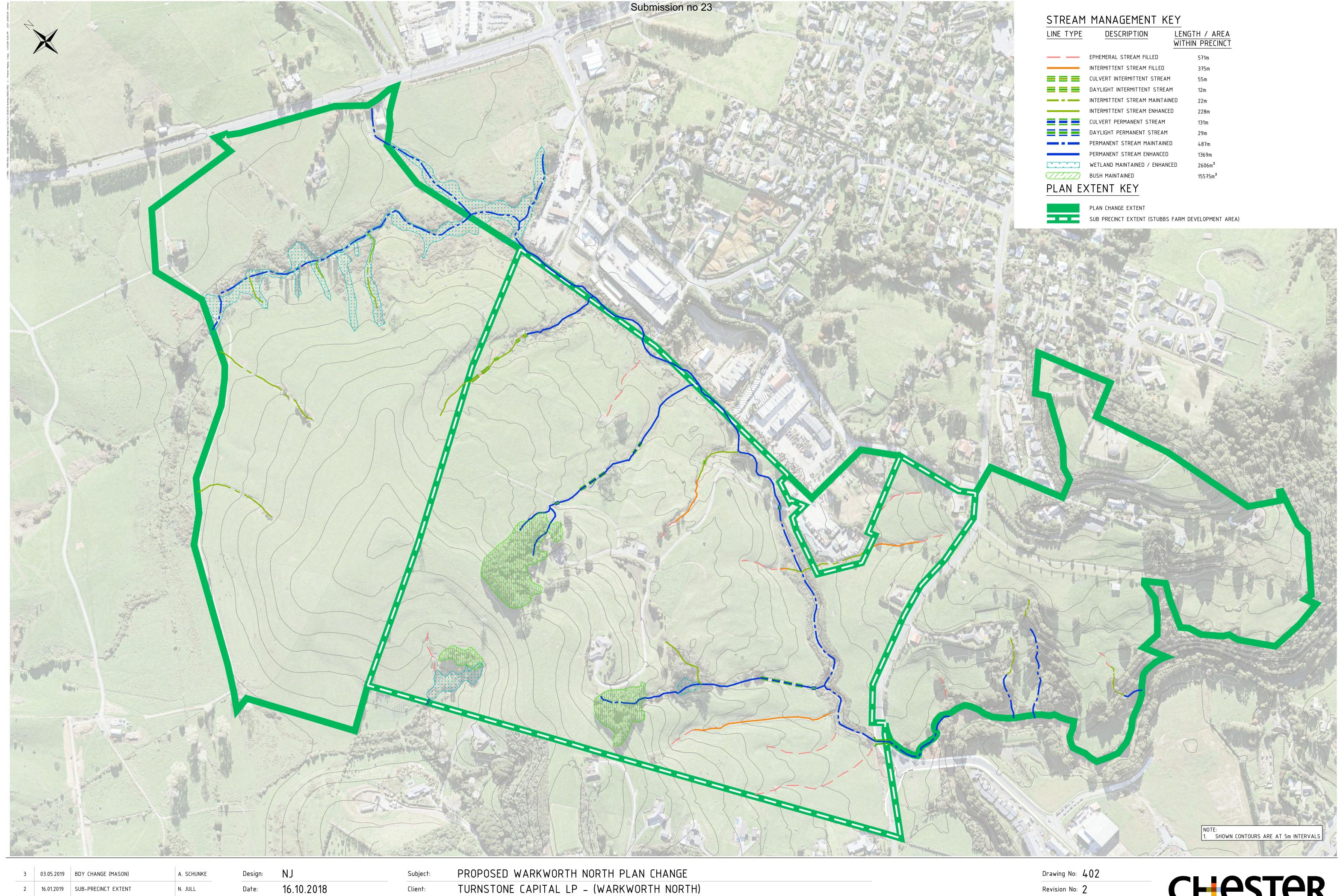
#### 11.10. Precinct plans

11.10.1 1 Name: Precinct plan 1 – Warkworth North Precinct Plan

I1.10.2 Name: Precinct plan 2 – Warkworth North Stormwater Catchment Management Plans

I1.10.3 Name: Precinct plan 3 – Western Link Cross-section





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1 16.10.2018 TITLES UPDATED

REV DATE AMENDMENTS

N. JULL

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SR

11875

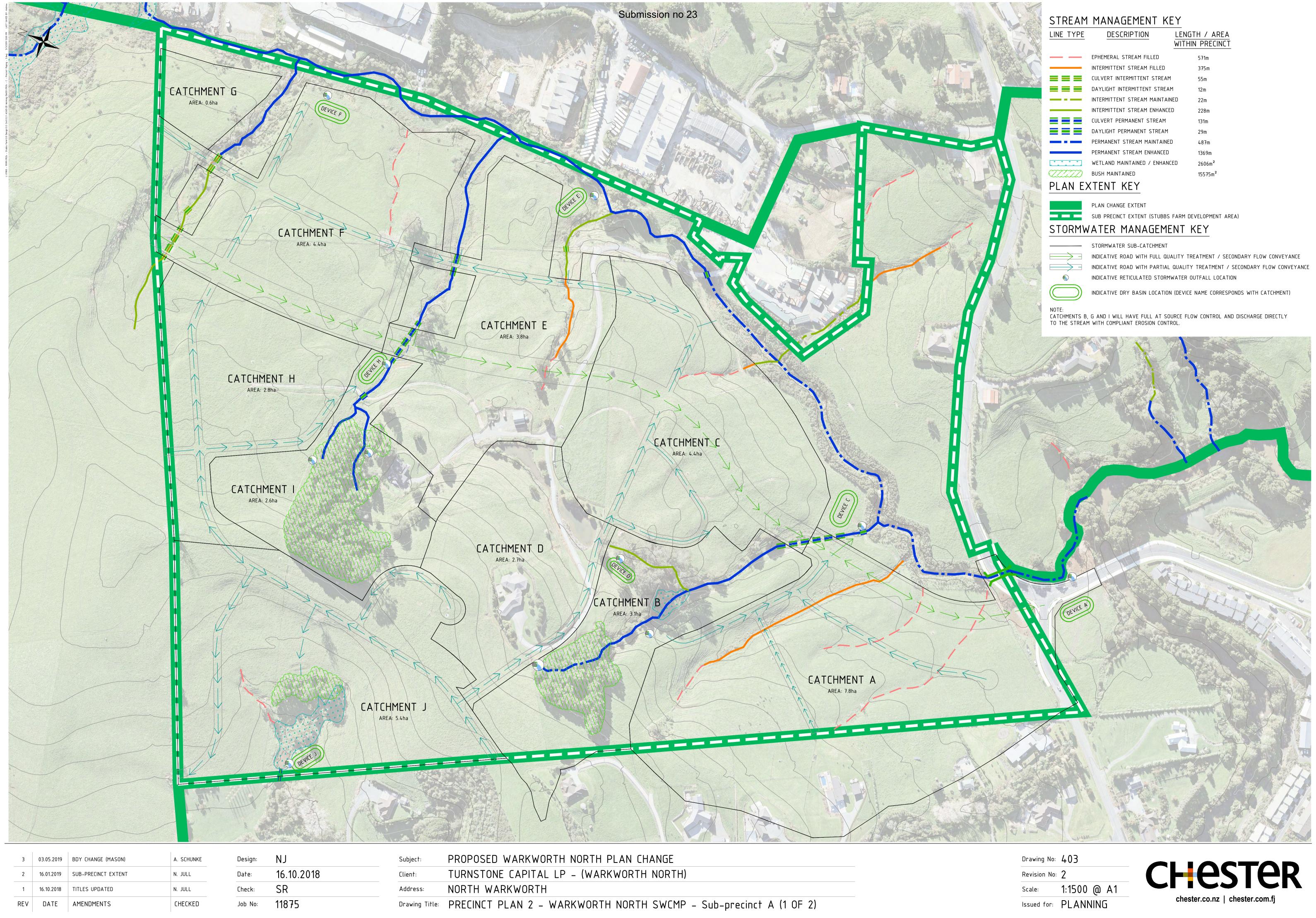
NORTH WARKWORTH

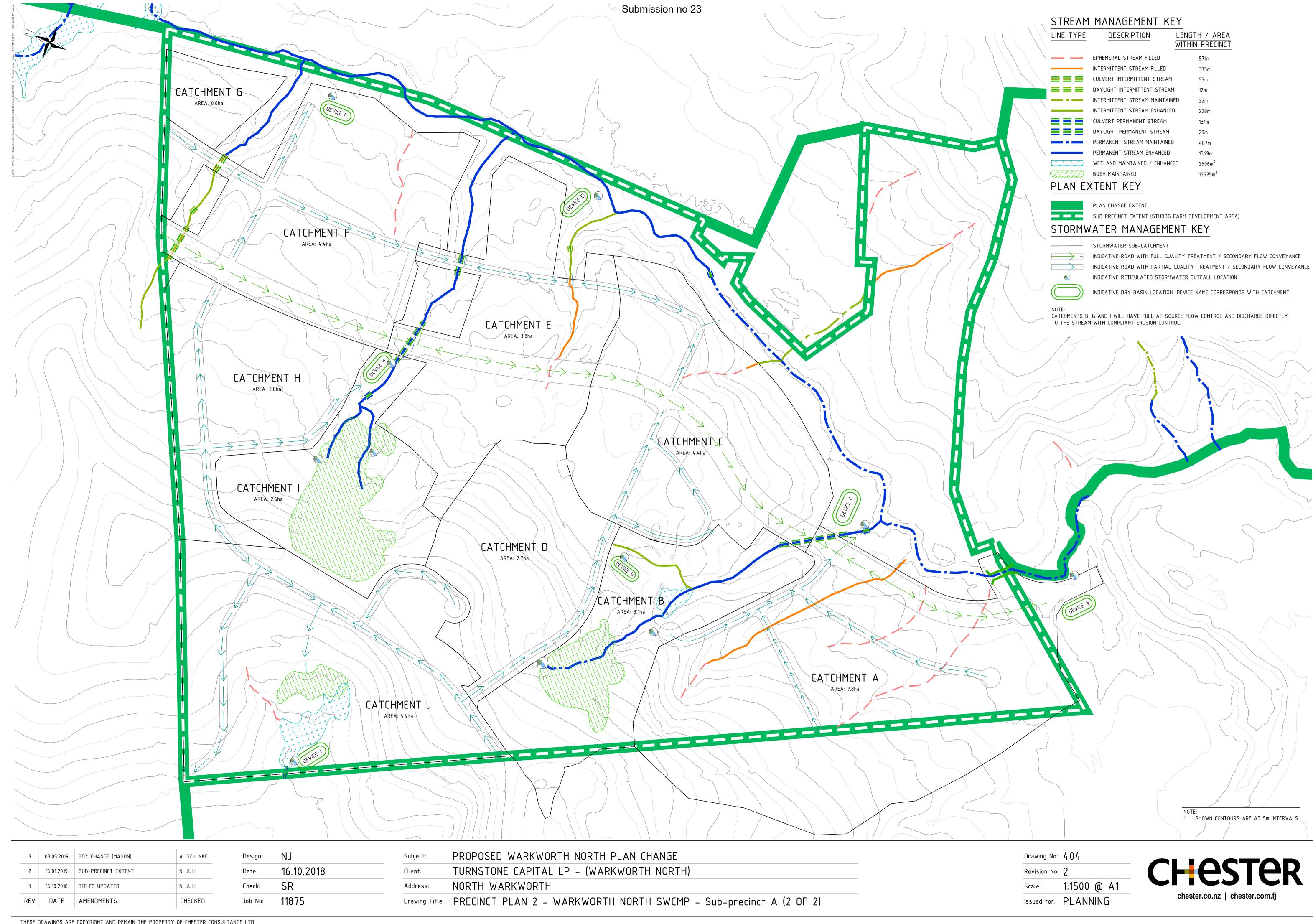
Drawing Title: PRECINCT PLAN 2: WARKWORTH NORTH SWCMP - STREAMS

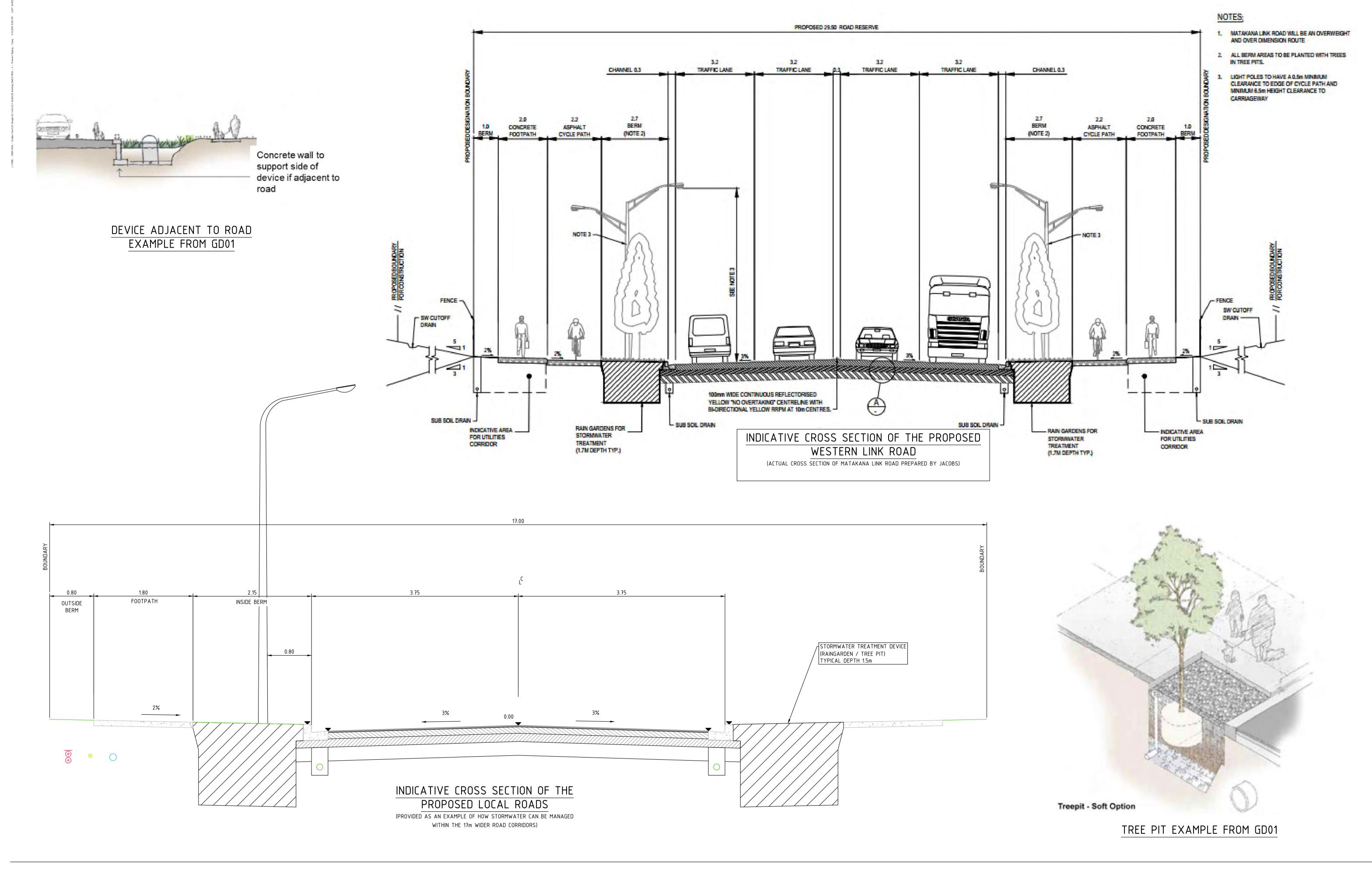
Address:

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3	03.05.2019	BDY CHANGE (MASON)	A. SCHUNKE	Design:	NJ
2	16.01.2019	SUB-PRECINCT EXTENT	N. JULL	Date:	16.10.2018
1	16.10.2018	TITLES UPDATED	N. JULL	Check:	SR
RE	V DATE	AMENDMENTS	CHECKED	Job No:	11875

PROPOSED WARKWORTH NORTH PLAN CHANGE

Client: TURNSTONE CAPITAL LP – (WARKWORTH NORTH)

Address: NORTH WARKWORTH

Drawing Title: PRECINCT PLAN 3 - ROAD SECTIONS AND ROAD STORMWATER MANAGMENT

Drawing No: 405

Revision No: 2

Scale: NTS

Issued for: PLANNING

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From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz

**Sent:** Friday, 5 July 2019 2:01 PM

**To:** Unitary Plan

**Subject:** Unitary Plan Publicly Notified Submission - PPC 25 - Roger Lewis Williams

Attachments: WALG Submission PPC 25 Warkworth North 3-6-2019.pdf

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Roger Lewis Williams

Organisation name: Warkworth Area Liaison Group

Agent's full name:

Email address: ropeworth@gmail.com

Contact phone number: 09 4259127

Postal address: 65 Alnwick Street,

Warkworth 0910

#### Submission details

#### This is a submission to:

Plan modification number: PPC 25

Plan modification name: Warkworth North

#### My submission relates to

Rule or rules:

Traffic Modelling, Staging and Environmental considerations

Property address: Warkworth North

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Transport model used in incorrect and needs to be revised Staging will cause major traffic problems until the Western Link Road is complete PPC 25 has better environmental outcomes for the tributary of the Mahurangi and for walkways than the Warkworth Structure Plan (Adopted).

I or we seek the following decision by council: Accept the plan modification with amendments

Details of amendments: See supporting documents

Submission date: 5 July 2019

Supporting documents

WALG Submission PPC 25 Warkworth North 3-6-2019.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

#### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- · Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Private Plan change 25 Warkworth North (Draft 3-6-19)

Submission by Roger Williams FENZ on behalf of the Warkworth Area Liaison Group.

#### **Overall Comment**

The submission has been well prepared and we generally support the PPC Structure Plan proposed however

- 1. The Intergrated Transport Assessment, as submitted, is based on suspect traffic model Saturn Model 11.4i prepared by Auckland Transport and NZTA.
- 2. The Western Link Road does not appear for funding for design or construction on the Regional Land Transport Fund
- 3. The traffic during construction has not been considered. The effect of staging will have a negative effect on the local road network until the WLR is constructed.
- 4. It is necessary to design for Public Transport on the WLR to service the Transport Interchange (Park and Ride), schools, sports facilities and the Warkworth CBD. Parking is already a problem in the Warkworth and we should be catering for those under 18 and over 80 and encouraging single or no car families.

#### Intergrated Transport Management Assessment

The model used incorrectly assesses traffic growth on -

- 1. A household population of 2.14 persons per household. This is unrealistic as it is based on the Statistics NZ Census of 2013 representing an aged population whereas the establishment of Warkworth as a satellite town as a new town will have a young population with 2.5 to 2.7 persons per household.
- 2. The traffic assessment does not adequately consider the growth of the Hinterland and in particular the growth of Matakana, Omaha, Snells Beach and Algies Bay.
- 3. It does not consider the changing demographics of Omaha and Snells Beach and Algies Bay which currently have a high percentage of holiday homes. With the improved roading network provided by new Puhoi to Warkworth motorway many of these homes will become permanent homes with the residents working from home or within Warkworth and coming to Warkworth for schools, shopping, business and banking, and health services and for building supplies.
- 4. The model is based on traffic only when the houses are complete and occupied.

  Development itself generates traffic approximately 5 times greater than the final residential traffic. We therefore contend that the model shows traffic growth 4 or 5 years later than will actually occur.
- 5. The Traffic Model has incorrectly modelled the Hill Street Intersection. It fails to model Elizabeth Street and the State Highway Intersection as a combined intersection but rather assumes a simple separate intersections with unimpeded queuing. The efficiency of the Sandspit/Matakana leg is less than 50% of the model assumption due to the presence of traffic entering and leaving Queens Street.
- 6. Our assessments of traffic flows are typically 40% higher than given by the Saturn 11.4i Model.

The errors in the model need to be corrected now. These may well show that the Western Collector road is needed early by traffic using the motorway connection to the north of the area being

24.1

considered rather than the State Highway 1 connection to the south of Warkworth which is unlikely to be constructed until 2030. It may show that the WLR should be completed to 4 lanes from day one rather than as a 2 lane road as proposed in the PPC Structure Plan.

#### Staging of the Growth Cells

The Staging of the growth is from south to north means that the Western Link Road may not completed until the development of the PPC area itself is almost complete.

This means that the majority of development traffic and residential traffic will use Hudson Road or the Hill Street intersection during development of the area.

The PPC construction is likely to coincide with development of the Stockyards Retail Development, the Presbyterian Hall and Social complex and the industrial developments in Morrison Roads. This puts pressure on Mansell Drive as well as Hudson Road and Hill street. All these roads are very substandard and are already close to capacity. Traffic using Hill street will have to pass through the centre of the Warkworth Primary School Campus. Until the Western Link Road is complete this situation is unacceptable.

24.3 Traffic predictions need to be upgraded in line with the staging.

#### **Transport Summary**

We content that the development should not proceed until the Western Link Road is completed.

24.4 It would be highly desirable to build the WLR as a 4 lane road from day one to minimise the cost and disruption of widening from 2 lanes to 4 lanes.

#### Environmental issues.

- 24.5 It is noted that the Warkworth Structure Plan has industrial areas on both sides of the stream leading to the Mahurangi River whereas the PPC has industrial devlopment on one side only. PPC 25 therefore has better outcomes for the stream and its immediate environment and also allows for better development of Walkways and Cycleways than the Warkworth Structure Plan (as adopted).
  - The Warkworth Area Liaison Group (WALG) wishes to speak at the hearings.