
I hereby give notice that a joint hearing by commissioners will be held on:

Date: Monday 11 to Thursday 14 March and
Monday 18 to Thursday 21 March 2024
Time: 9.30am
Meeting Room: Stevenson room
Venue: The Franklin Centre, 12 Massey Avenue,
Pukekohe, Auckland

HEARING REPORT – VOLUME TWO

8 NOTICES OF REQUIREMENTS FOR AUCKLAND COUNCIL AND 1 NOTICE OF REQUIREMENT FOR WAIKATO DISTRICT COUNCIL FOR THE PUKEKOHE TRANSPORT NETWORK

NORs 1,3,4,5,6 & 7 (SUBMISSIONS) TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE

COMMISSIONERS

Chairperson

Dave Serjeant

Commissioners

Nigel Mark-Brown

Basil Morrison

Bevan Donovan

**KAITOHUTOHU WHAKAWĀTANGA HEARINGS
ADVISOR**

Telephone: 09 890 8056 or 021 325 837

Email: bevan.donovan@aucklandcouncil.govt.nz

Website: www.aucklandcouncil.govt.nz

Note: The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the requiring authority or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the requiring authority or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual procedure for a hearing is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The Requiring Authority** (the applicant) will be called upon to present their case. The Requiring Authority may be represented by legal counsel or consultants and may call witnesses in support of the application. After the Requiring Authority has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The **requiring authority** or their representative then has the right to summarise the application and reply to matters raised. Hearing panel members may ask further questions. The requiring authority's reply may be provided in writing after the hearing has adjourned.
- **The chairperson** will outline the next steps in the process and adjourn or close the hearing.
- **The hearing panel** will make a recommendation to the Requiring Authority. The Requiring Authority then has 30 working days to make a decision and inform council of that decision. You will be informed in writing of the Requiring Authority's decision, the reasons for it and what your appeal rights are.

Note: The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

**EIGHT NOTIFIED NOTICES OF REQUIREMENTS TO THE AUCKLAND COUNCIL
UNITARY PLAN AND ONE NOTIFIED NOTICE OF REQUIREMENT TO THE WAIKATO
DISTRICT PLAN BY TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE**

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Karen Bell, Planner

Reporting on NORs 1, 3, 4, 5, 6 & 7. These are part of eight Notice of Requirements (Auckland Council) and one Notice of Requirement (Waikato District Council) for the Pukekohe Transport Network.

REQUIRING AUTHORITY: TE TUPU NGĀTAHI – SUPPORTING GROWTH ALLIANCE

NOR1 - DRURY WEST ARTERIAL

Notice of requirement lodged by Auckland Transport for a designation for a new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury.

NOR2 – PUKEKOHE LINK

Notice of requirement lodged by Waka Kotahi NZ Transport Agency for a new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

NOR3 – PAERATA CONNECTIONS

Notice of requirement lodged by Auckland Transport for two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

NOR4 – PUKEKOHE NORTH-EAST ARTERIAL

Notice of requirement lodged by Auckland Transport for a new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

NOR5 – PUKEKOHE SOUTH-EAST ARTERIAL

Notice of requirement lodged by Auckland Transport to upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

NOR6 – PUKEKOHE SOUTH-WEST UPGRADE

Notice of requirement lodged by Auckland Transport to upgrade of specific intersections and the regrade of specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

NOR7 – PUKEKOHE NORTH-WEST UPGRADE

Notice of requirement lodged by Auckland Transport to upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

NOR8 (AUCKLAND COUNCIL) – MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE

Notice of requirement lodged by Waka Kotahi for an upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

NOR8 (WAIKATO DISTRICT COUNCIL) – MILL ROAD AND PUKEKOHE EAST ROAD UPGRADE

Notice of requirement lodged by Waka Kotahi NZ Transport Agency to designate land, under the Resource Management Act 1991 (RMA), for an upgrade of Mill Road (Bombay) in the east for additional vehicle lanes, a shared path and an upgrade of Pukekohe East Road, Pukekohe.

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ATTACHMENT ONE

COPIES OF SUBMISSIONS (NORs1,3,4,5,6 & 7)

Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) **during detailed design** where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:


Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

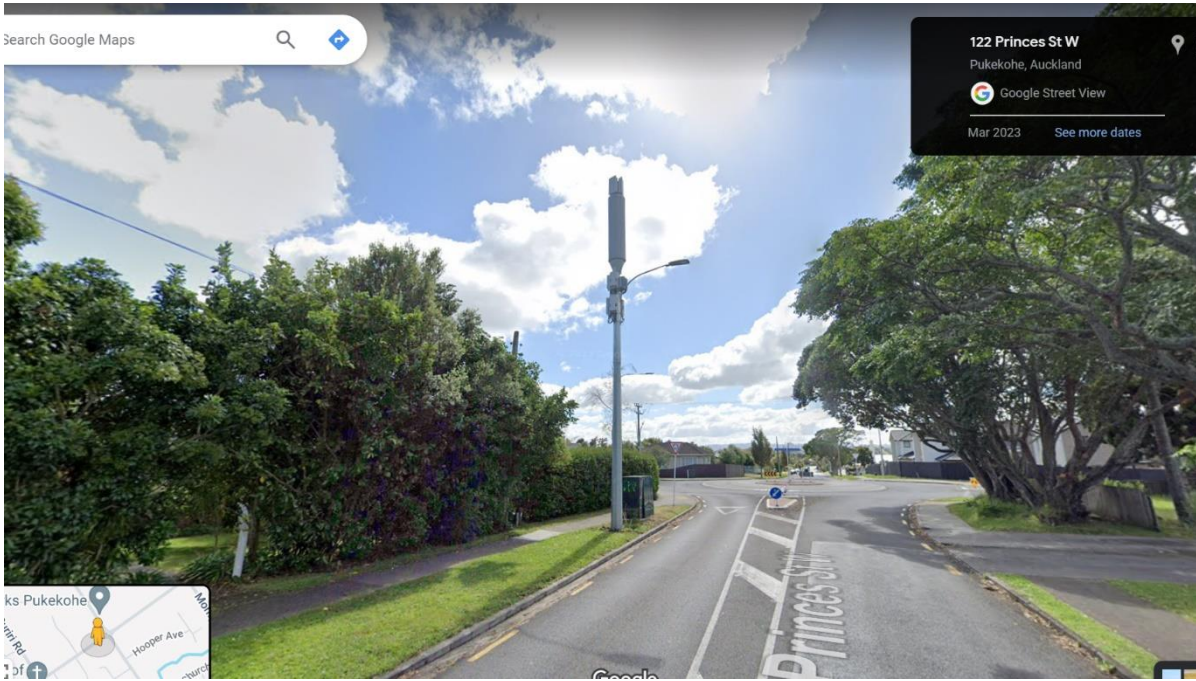
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

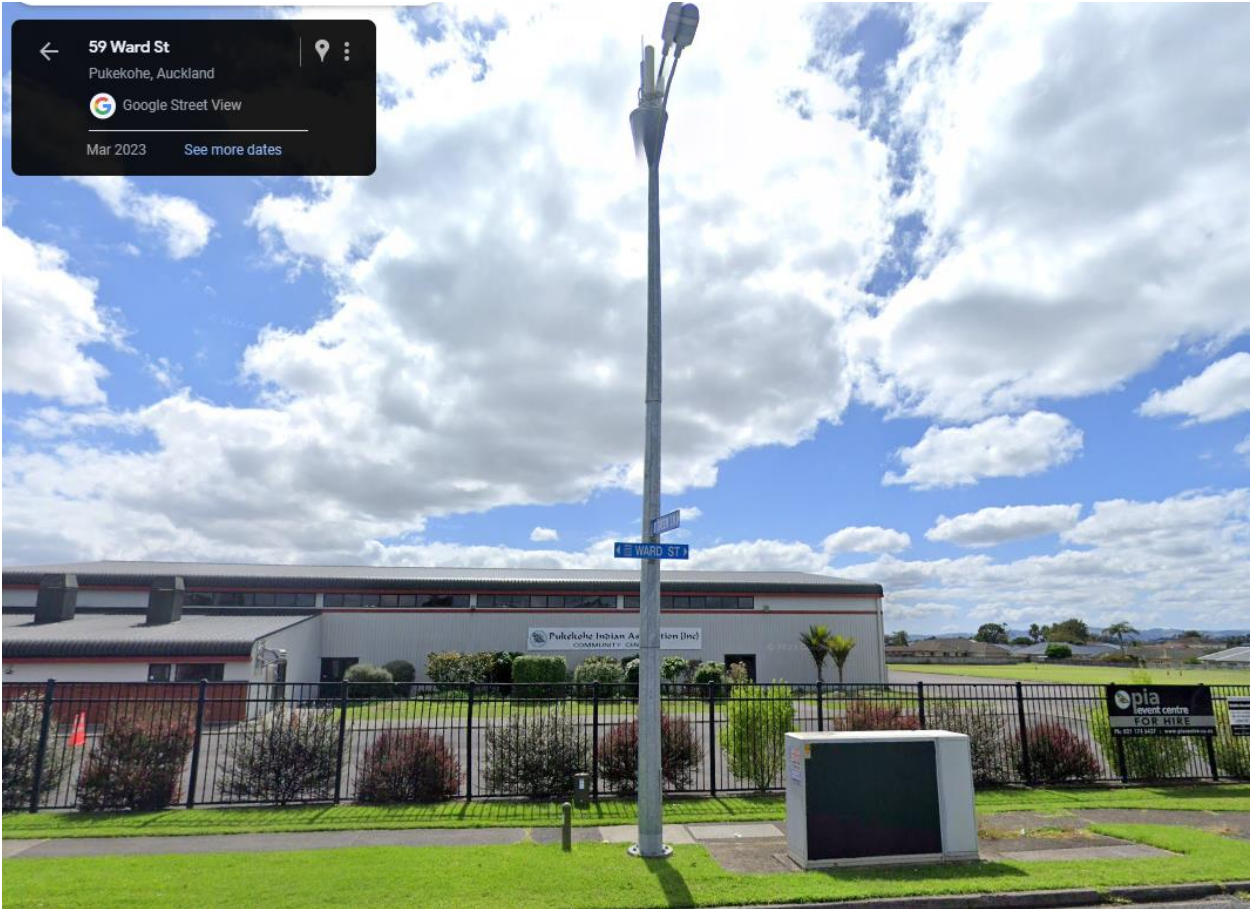
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

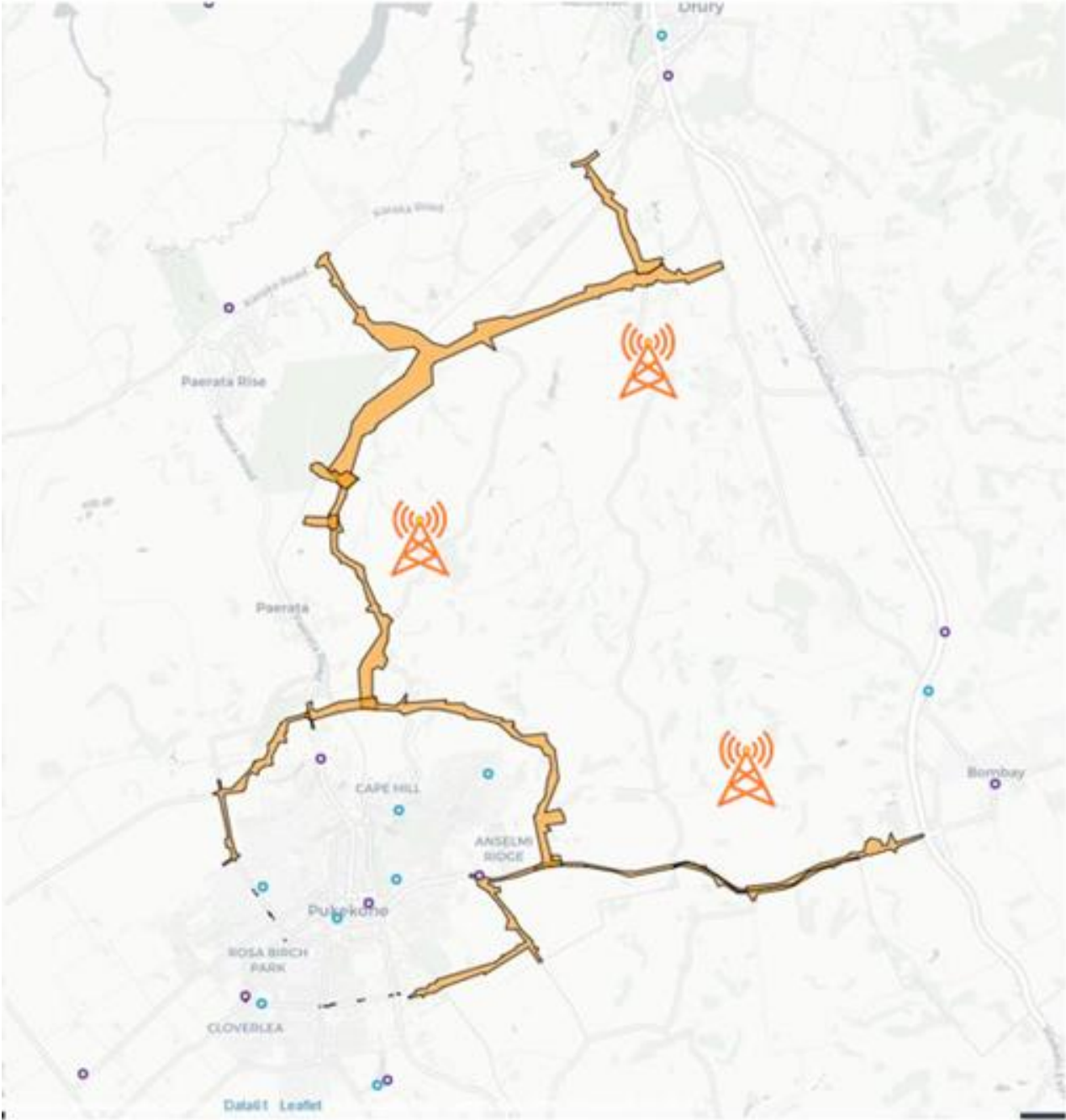


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Katie Wright

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

Fisher & Paykel Healthcare Limited

Address for service of Submitter

15 Maurice Paykel Place, East Tāmaki, Auckland 2013

Telephone:

21797932

Email:

katie.wright@fphcare.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 1: Drury West Arterial

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

Refer to attached submission.

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

Refer to attached submission.

(continue on a separate sheet if necessary)

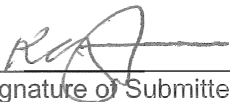
I seek the following recommendation or decision from the Council *(give precise details including the general nature of any conditions sought).*

As set out in the attached submission.

I wish to be heard in support of my submission

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

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



Signature of Submitter

(or person authorised to sign on behalf of submitter)

11/13/2023

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Submission on Pukekohe NOR 1: Drury West Arterial

To: Auckland Council

SUBMITTER DETAILS

Name of Submitter: Fisher & Paykel Healthcare Limited (F&P)

1. F&P makes this submission on a notice of requirement lodged by Auckland Transport for a designation for a new transport corridor with active mode facilities in Drury West, entitled Pukekohe: Drury West Arterial (Project).
2. F&P wishes to be heard in support of its submission.
3. If any other submitters make a similar submission, F&P will consider presenting a joint case with them at the hearing.
4. F&P could not gain advantage in trade competition through this submission.

Overview of F&P

5. F&P has an interest in the Project that is greater than the interest that the general public has.
6. F&P is a leading designer, manufacturer and marketer of healthcare products and systems for use in acute and chronic respiratory care, surgery and the treatment of obstructive sleep apnea.
7. F&P's direct subsidiary is the owner of a significant landholding (105 hectares) in close proximity to the proposed location of the Project, which F&P intends to develop as a research and development and manufacturing campus over the next 30-40 years. This site is located at 300-458 Karaka Road, Drury (Site), which is approximately 500m to the west of the proposed new intersection with Karaka Road under the Project.
8. F&P's development of the Site will generate a significant number of employment opportunities and visitors to the Site, which will result in a large number of persons travelling to and from the Site every day.
9. The Project will give rise to positive effects that will directly affect F&P, given its proximity to the Site.

Scope of submission

10. The submission relates to the Project as a whole.
11. F&P supports the Project, as it will:
 - a. support the future urbanisation and development of Drury West;
 - b. provide existing and future residents and employees with improved walking and cycling connections with Karaka Road and the planned Drury West Railway Station; and
 - c. improve connections with and accessibility to the planned Drury West Railway Station.

Relief sought

12. F&P seeks that the Project be approved by Auckland Council.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:968] Notice of Requirement online submission - Pam Butler Senior RMA Advisor KiwiRail
Date: Monday, 13 November 2023 10:01:12 pm
Attachments: [KiwiRail submission\(s\) Pukekohe package NoRs 1-5_20231113215103.734.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Pam Butler Senior RMA Advisor KiwiRail

Organisation name: KiwiRail Holdings Limited

Full name of your agent: KiwiRail Holdings Limited

Email address: Pam.butler@kiwirail.co.nz

Contact phone number: 0275708571

Postal address:
Private Bag 92138
Auckland 1142

Auckland 1142

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 1 Drury West Arterial

The specific provisions that my submission relates to are:
Railway designations in Sth Auckland

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
see attached

I or we seek the following recommendation or decision from Auckland Council:
Recommend approval subject to proposed conditions

Submission date: 13 November 2023

Supporting documents
KiwiRail submission(s) Pukekohe package NoRs 1-5_20231113215103.734.pdf

Attend a hearing

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

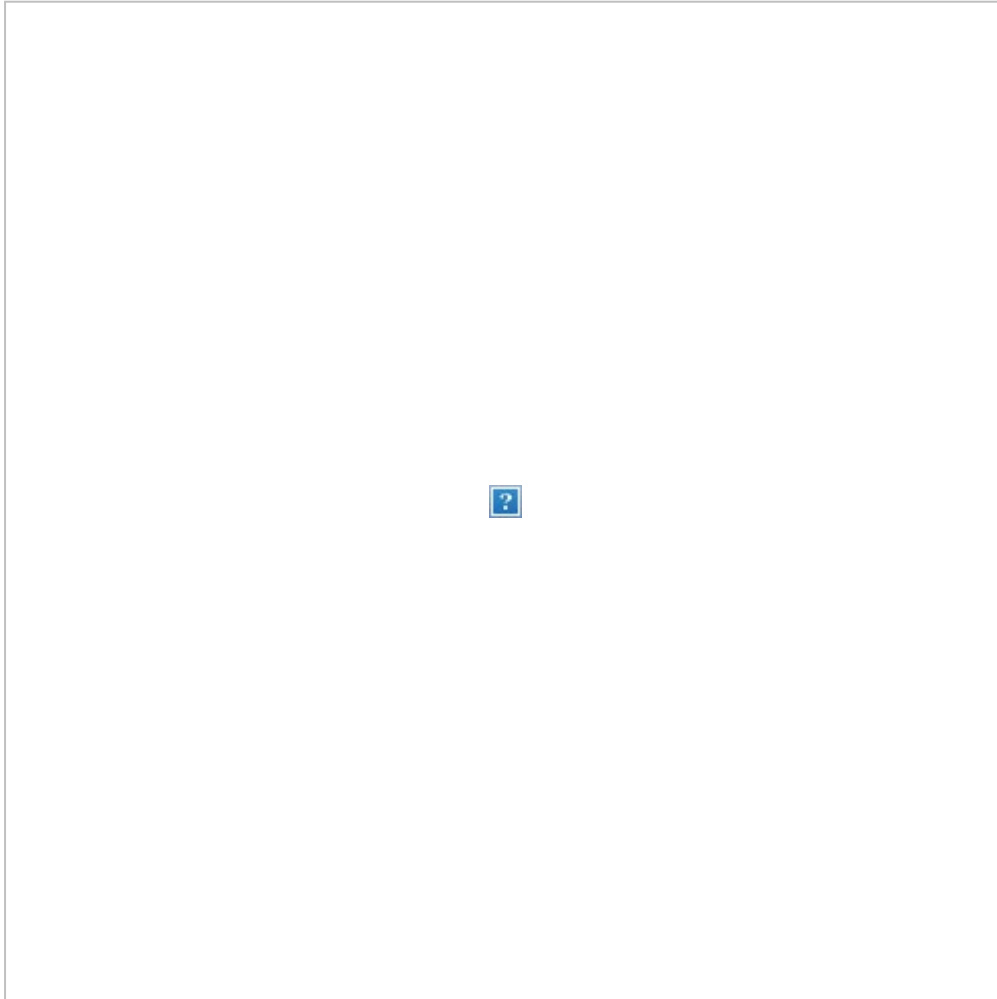
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

13 November, 2023

Reason for submission

KiwiRail is the State Owned Enterprise responsible for the management and operation of the national railway and Interislander ferry services. In many places, the rail network has been in place for over 100 years and remains crucially important to the economic and social development of the areas it services. The rail network serves two functions as a metropolitan public transport service in Auckland and Wellington primarily, and a route for freight and other services nationally.

The land upon which the rail network operates is owned by the New Zealand Railways Corporation and leased to KiwiRail. KiwiRail owns the rail infrastructure (including rails, sleepers, sidings, and depots) and is a railway operator for the purposes of the Railways Act 2005. It is also the licensed Access Provider under the Railways Act, which provides KiwiRail broad powers to safely control and restrict the use of railway assets and entry onto railway land.

KiwiRail Holdings Limited (KiwiRail) is working closely with Auckland Transport (AT) and Waka Kotahi (WK) to develop the strategic transport network to support Auckland's growth areas, particularly in the south. KiwiRail owns and maintains Auckland's Metro track network and is currently well into delivering major southern projects including electrification between Papakura and Pukekohe and, three new Drury stations (Drury, Ngākōroa and Paerātā), and will shortly embark on work to add capacity to the NIMT (North Island Main Trunk).

A functioning and efficient freight network is critical to the productivity of the nation's supply chain. KiwiRail also operates New Zealand's rail freight network and tourism passenger rail services between Auckland and Wellington and the Te Huia Hamilton – Auckland passenger service, which began in April 2021. Further interregional passenger growth is predicted. KiwiRail therefore has a significant interest in planning to enable the efficient flow of imports, exports, and domestic goods within and through the region. Freight tonnage is forecast to treble to, from and through the region over the next 25 years.

KiwiRail is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks (RTN), Active Mode Corridors (AMC) and road /highway networks which facilitate mode transfer and enable future urban growth.

The proposed Notices of Requirement (NoRs) cross designations for which KiwiRail is the requiring authority. Of key interest to KiwiRail is the intersection of the proposed designations with the existing rail corridor. These locations are shown on Table One overleaf.



Table One: Affected KiwiRail locations summary

NoR ¹	Affected KiwiRail site	Purpose and corridor impacts
Drury West Arterial NoR 1 (AT)	Designation 6302, NIMT, Burt Road	Proposed bridge as part of new transport corridor
	Drury West / Ngaakooroa Station; extends south from Ngaakooroa Rail Station	Tie in and upgrade the proposed station access way to provide for bus priority lanes. This arterial will connect the FUZ south of SH22 (State Highway 22) with the new rail station.
Drury – Pukekohe Link NoR 2 (Waka Kotahi)	Designation 6302, crosses the NIMT to connect to SH22	SH22 connection.
	Designation 6311 Paerata Interchange	Paerata Interchange and Accessway: Provides a connection to the Paerata Rail Station from Sim Road (south) proposed to be upgraded by NoR 2.
Paerata Connections NoR 3 (AT)	Designation 6310, Paerata Station	
	Designation 6311 Paerata Interchange	
Paerata Connections NoR 3 (AT)	Designation 6302, NIMT (end of Sim Road)	Paerata Interchange and Accessway: Sim Road segment.
	Designation 6302, crosses the NIMT at Paerata (near Butcher Road)	Proposed bridge as part of new transport corridor.
Pukekohe North-East Arterial NoR 4 (AT)	Designation 6302, crosses the NIMT in Pukekohe (south)	To connect to Svendsen Road / Wrightson Way.

As KiwiRail is the Requiring Authority for the earlier designation/s, approval under s177 of the Resource Management Act 1991 (RMA) is required for the secondary requiring authority to undertake works within the railway corridor. KiwiRail acknowledges that the NoR AEE(s) identify that further engagement with KiwiRail will continue as the Project is developed. KiwiRail expects that as part of that process the necessary approvals will be sought in due course.

The importance of planning for the future growth of both RTN and post CRL (City Rail Link) metro rail services and enabling the growing demand for freight movements and interregional rail services to, and through Auckland has emerged as a result of the work undertaken to date as part of the preparation of these NoRs.

Aligned with its broader national role, KiwiRail, AT, Auckland Council and WK are starting to plan for future rail investment to - remove capacity constraints, raise future passenger and freight levels of service to drive increases in rail mode share, and enable greater network reliability and resilience by improving maintenance options (without having to close lines for extended periods).

¹ NoR's 6, 7 and 8 are some distance from railway assets.

Specific areas that are of greatest interest to KiwiRail and around which further detail will be required prior to granting any s177 approval, include:

- a) That KiwiRail's strategy for growing the capacity and resilience of the NIMT through the provision of additional tracks is acknowledged and accommodated as far as possible in the development and design of the Project
- b) NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design
- c) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability.

Several of these initial issues are set out in Table Two below.

Table Two: NoR created constraint and suggested approach.

• NoR	Issue	• Resolution
1	Allows for an increase of track and rail maintenance access however limited flexibility for changes in rail design standards and further development	Ongoing dialogue and engagement before detailed design starts
2	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
3	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
4	No evident issues. Cuts near the Mission Bush corridor can be managed to protect for growth. However, the form that the bridge takes for this span and the impact of the structure on the current and future rail infrastructure will need to be agreed.	Ongoing dialogue and engagement before detailed design starts

<p>5</p>	<p>The proposed road bridge over the NIMT and Station Road is shown as a long single span which may not be practically feasible. There is a risk a central pier (or piers) is required and depending on the location may hinder future rail options</p> <p>There have been new high-speed crossovers installed as part of P2P just south of the new overbridge. There is potential that a 3rd and 4th track may be added to the NIMT from Pukekohe to these cross overs as part of the southern approach to the eventual Pukekohe to Papakura 4 tracking.</p> <p>Electrification of the rail network to Hamilton is a strong likelihood. Depending on the extent and proximity of any additional cross overs in a southern cluster, they may drive higher than normal OLE (Overhead Line Equipment) clearances under new road bridge.</p>	<p>Ongoing dialogue and engagement before detailed design starts</p> <p>Clarify potential location of Station Rd bridge support piers</p> <p>Ongoing dialogue and engagement before detailed design starts</p> <p>Future corridor OLE equipment clearance under full width of span needs to be clarified</p>
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Relief sought

KiwiRail generally supports NoR applications One to Five and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the applicant's proposed conditions, including in particular

- Condition 5 (All NoRs)– Network Utility Operators (s176 approval) to carry out routine works
- Condition 10 (All NoRs) - (Land Integration Process LIP)) which enables developers and agencies to seek the latest information to enable better planning and integration with the NoRs. It is suggested that the condition be altered at (c) (i) to add the word 'available 'before 'designs' as there will be a limit about what information is available for the various packages during the designation term. For example, at preliminary design, 50% design, approved, or final design.
- Condition 11 UDLMP (Condition 11 for NoR 5) – to enable integration of the Project's permanent works into the surrounding landscape and urban context, of which KiwiRail's new stations will form part.
- Condition 26 (all NoRs) Network Utility Management Plan (NUMP) setting out a framework for protecting, relocating and working in proximity to existing network utilities.

13 November 2023

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission to the **AUCKLAND COUNCIL** by **MCKEAN FAMILY TRUST** in support to Pukekohe: Drury West Arterial (NoR 1) lodged by **AUCKLAND TRANSPORT** to designate land for the Pukekohe Transport Network

SUBMISSION BY THE MCKEAN FAMILY TRUST IN RELATION TO TWO NOTICES OF REQUIREMENT ISSUED BY AUCKLAND AND WAKA KOTAHI / NZ TRANSPORT AGENCY RELATING TO TRANSPORTATION PROPOSALS IN THE DRURY-PUKEKOHE AREA

To: AUCKLAND COUNCIL

1. This submission is lodged in by **MCKEAN FAMILY TRUST** ("MFT" or "Submitter") in respect of two notices of requirement ("NOR") issued by **AUCKLAND TRANSPORT** ("AT") and **WAKA KOTAHI NZ TRANSPORT AGENCY** ("WK") for designations to authorise the works sought to be authorised by:
 - (a) NoR 1 – the Drury West Arterial, being a new transport corridor with active mode facilities.
 - (b) NoR 2 – the Pukekohe Link, a new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.
2. The Submitter is:
 - (a) Not a trade competitor in terms of section 308B of the Resource Management Act 1991; and
 - (b) Is potentially adversely affected by the works sought to be authorised by the NOR.
3. MFT does not oppose the proposed works in principle; it simply seeks to ensure that the conditions imposed on the resulting designations are adequate to protect MFT's interests from both a residential amenity and commercial perspective.
4. To that extent, this submission relates to any parts of the NORs that have the potential to have temporary (construction) or permanent adverse effects on MFT's property at 826 Runciman Road ("Property"). In that regard, we note that:

- (a) The key trustee, Ms Rae McKean, resides at that address and wishes to be confident that the works proposed will not affect her residential amenity or enjoyment of life.
 - (b) Ms McKean is the managing director of Read Pacific Limited, which company distributes educational literature throughout the South Pacific. That business is based at the Property, which has facilities that require efficient access by commercial vehicles - it would create significant difficulties for the RPL business if undue disruption / delays on the local transport network were to arise.
5. The potential adverse effects that the Submitter wishes to ensure are adequately addressed relate to:
- (a) Noise and vibration effects during construction;
 - (b) Long-term / operational noise effects;
 - (c) Transport effects during construction; and
 - (d) Landscape and visual effects during construction and after development.
6. MFT has assessed potential adverse effects by reference to the technical assessment supporting the AEEs for the eight NORS:
- (a) Assessment of Construction Noise and Vibration Effects undertaken by Marshall Day Acoustics and AECOM dated September 2023;
 - (b) Assessment of Operational Noise Effects undertaken by Marshall Day Acoustics and AECOM dated September 2023;
 - (c) Assessment of Landscape and Visual Effects undertaken by Isthmus Group Ltd dated 13 September 2023; and
 - (d) Assessment of Transport Effects undertaken by Beca and AECOM dated September 2023.

MFT requests the following recommendations from Auckland Council

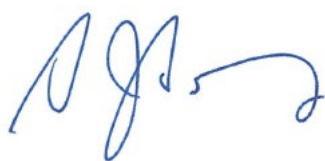
7. If the analysis in those reports is accurate and dependable, it is accepted that effects on the Submitter will be acceptable. The Submitter nevertheless requests that the conditions of consent ensure, as a minimum, the following:
- (a) Noise effects during construction will not exceed 70 dB LAeq;
 - (b) Vibration effects during construction do not exceed the limit of 5 mm/s PPV (Peak Particle Velocity);
 - (c) The long-term operational noise effects will be adequately mitigated where required to ensure the Property does not exceed a dB LAeq(24h) of 47, in accordance with the Operational Noise Assessment; and
 - (d) The landscape and visual effects at the time of the construction and operation, is not inconsistent with the Future Urban Zone and the appropriate mitigation measures will be implemented.
8. It is also requested that when the Construction Traffic Management Plan ("CTMP") is prepared prior to construction and that MFT is notified when this

has been prepared to ensure the transport effects do not adversely affect the Property.

9. The Submitter is hoping that constructive conversations may be held with Auckland Council and AT to ensure the above is achieved.
10. The Submitter:
 - (a) Wishes to be heard in support of this submission (if necessary); and
 - (b) Does not wish to present a joint case with any other submitter given the discrete nature of the issues arising.

Dated 13 November 2023

MCKEAN FAMILY TRUST, by its solicitors
and duly authorised agents, Berry Simons



S J Berry

Address for service:

McKean Family Trust
C/- Berry Simons
PO Box 3144
Auckland 1140

Telephone: (09) 969 2300

Facsimile: (09) 969 2304

Email: anika@berrysimons

Contact person: Anika Norton

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

-
- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

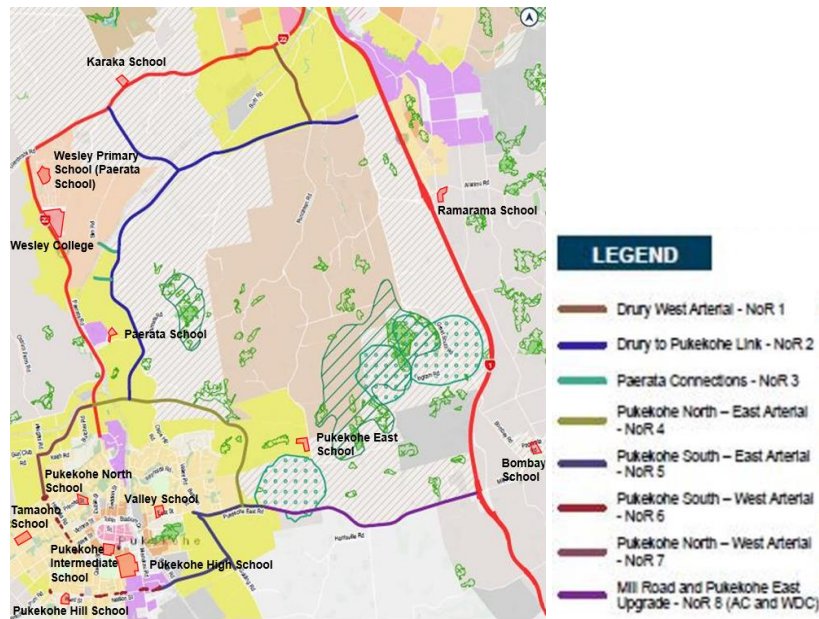


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
Underlined and strikethrough – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) <u>The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</u></p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

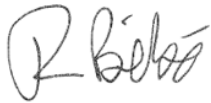
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:


Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

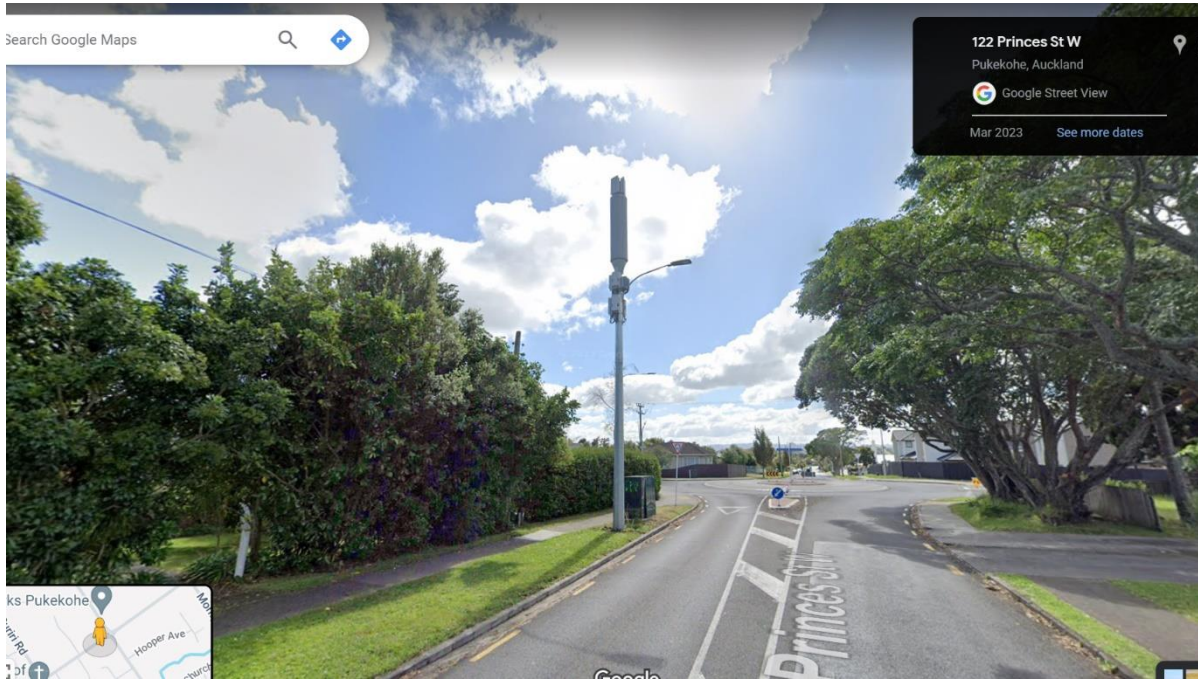
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

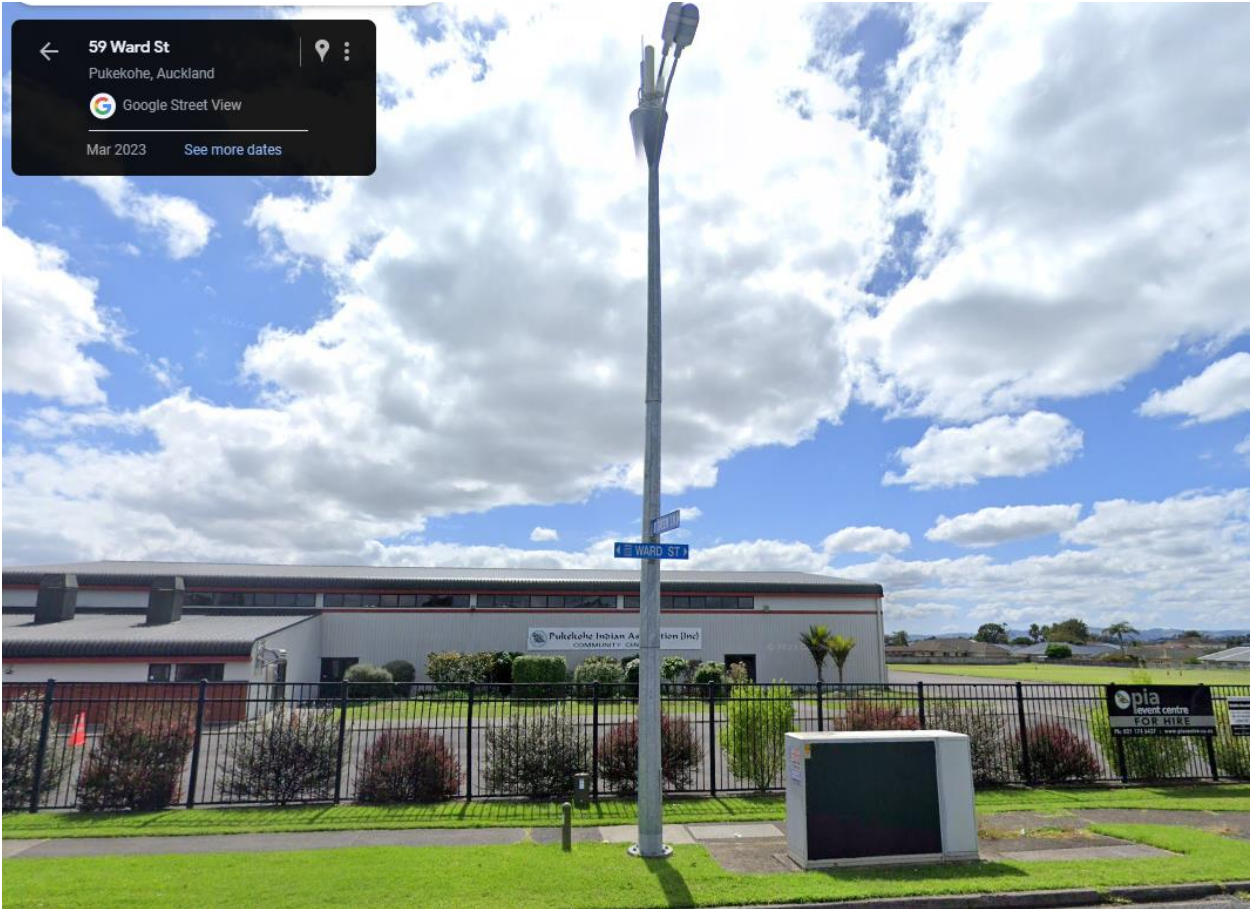
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

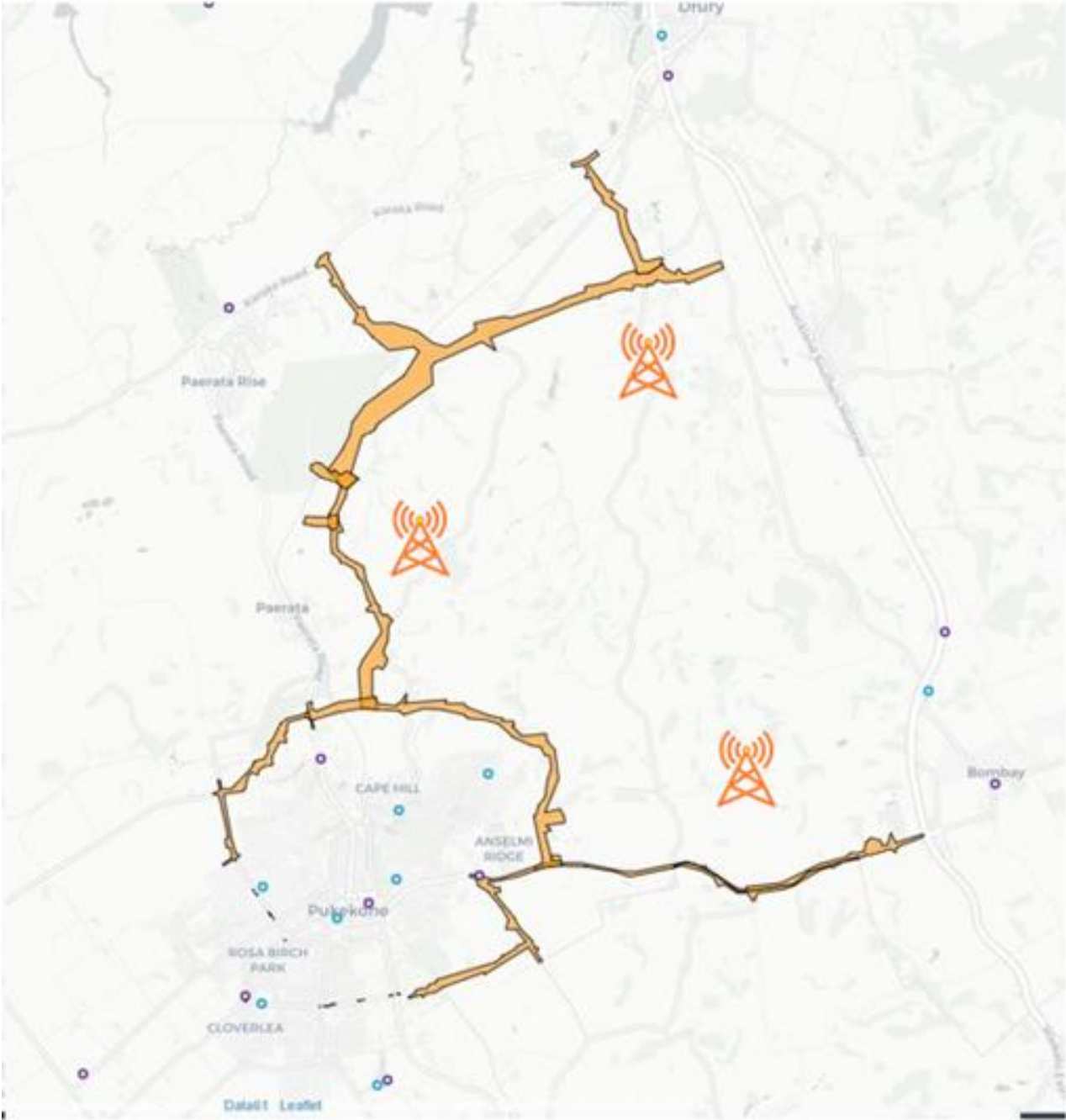


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:956] Notice of Requirement online submission - Zhaoyang Xin
Date: Monday, 13 November 2023 3:16:24 pm
Attachments: [Infrastructure+New+Zealand+Meeting+Aucklands+Growth+Challenge+Report.pdf](#)
[Figure 4-2 indicative masterplan in relation to the Paerata Station.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Zhaoyang Xin

Organisation name: YWMP Limited

Full name of your agent:

Email address: stevexin9@gmail.com

Contact phone number: 0291269590

Postal address:
G05/428 Dominion Road
Mt Eden
Auckland 1024

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 3 Paerata Connections

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:

These two transport connections between sim road and SH22 through the Paerata station improve the transportation efficiency and traffic safety.

I or we seek the following recommendation or decision from Auckland Council:

To resolve the housing crisis, the high density is just one of tools or options. Taking into considerations NZ very limited construction material supply capacity for the high density buildings(apartments or terrace house) and very challenging storm water management in the existing areas due to its original urban planning, it indeed spend much more consulting time/coordination works with neighbours / council. In the meantime, it will cost much more costs and much longer to deliver these apartments or terrace house in these mature urban areas. Finally, it could not address the key housing crisis immediately and efficiently. Therefore, the satellite city plan shall be initiated and considered. In 2017, Paerata was identified as the best choice of satellite city (please see attached); Even if a small reduction in greenfield land previously indicated for future urban development, around 800 hectares indicated in FDS of Auckland, Auckland population increases sharply after the pandemic, therefore council should consider to absorb new transportation hub area into the urban, like land area in Paerata. there is no natural hazard and the 3 waters solution are easily be managed. This area should be planned as the urban area of transit-oriented development "TOD", please see the Kiwi Rail's "Figure 4-2: Indicative Masterplan of the surrounding planned urban environment in relation to the proposed Station" in the page 16 of "Paeraataa 520509-3000-PLN-NN-0010"

Submission date: 13 November 2023

Supporting documents

[Infrastructure+New+Zealand+Meeting+Aucklands+Growth+Challenge+Report.pdf](#)

Figure 4-2 indicative masterplan in relation to the Paerata Station.pdf

Attend a hearing

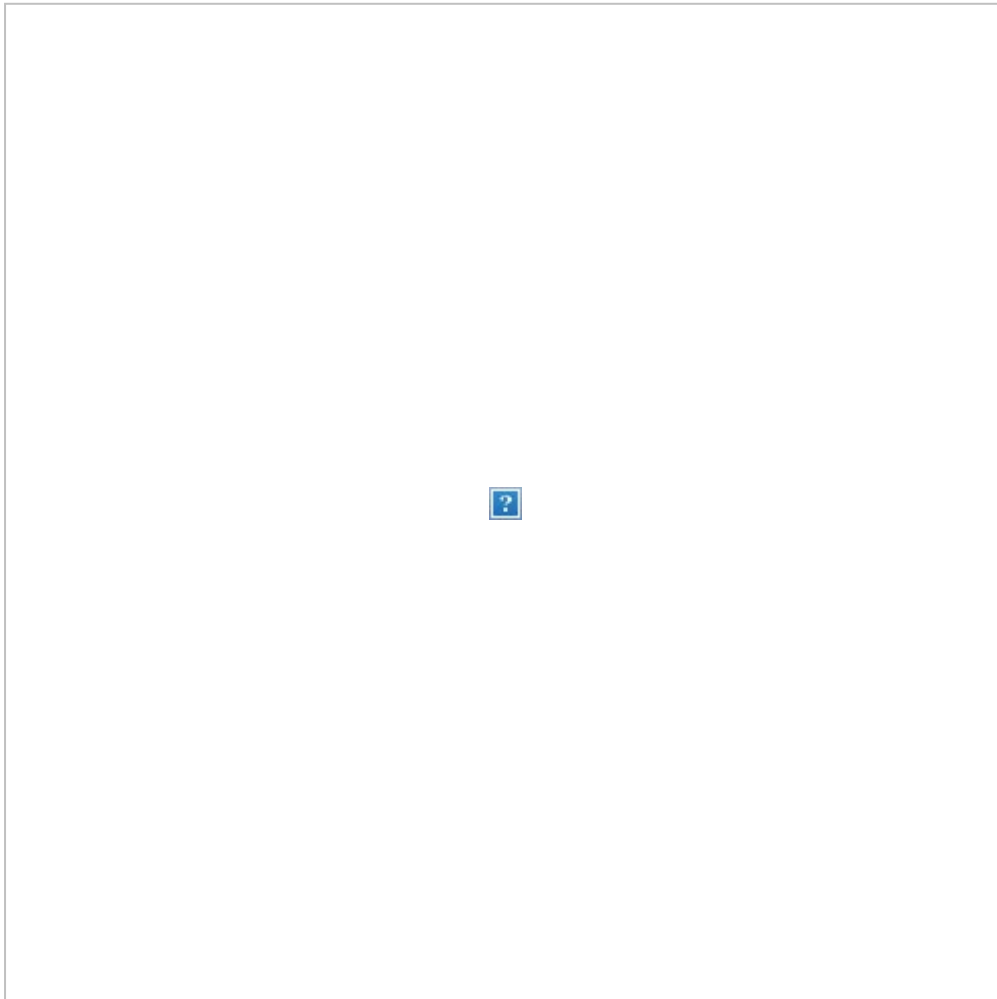
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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Meeting Auckland's Growth Challenge: The Innovation City

Discussion Document

OCTOBER 2017



Infrastructure
New Zealand

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Executive Summary

Auckland is confronted with a three-sided growth challenge. There are not enough homes, there is growing traffic congestion and solving either problem is becoming increasingly unaffordable.

Rapid population growth is exacerbating pressures, but it is not the root cause of Auckland's growth challenge.

The allocations of housing and employment growth in the Unitary Plan are misaligned with Auckland's infrastructure services. The Independent Panel on the Unitary Plan assumed infrastructure could be provided to meet growth. Transport modelling shows that it cannot. Growth is everywhere and nowhere and lumpy infrastructure investment cannot keep up.

This discussion document proposes a different approach.

The Approach

We test the costs and feasibility of delivering an additional 30,000 homes and jobs, over and above current plans, built around rapid transit on undeveloped land. Homes closer to jobs will reduce regional travel. Transit oriented development will facilitate access to high capacity services. Raw land provides the opportunity to capture value to fund public infrastructure and build quickly.

We examine five locations around Auckland with sufficient land to support a city of 100,000 residents. We compare the costs of servicing these areas with infrastructure and examine whether housing can be delivered affordably.

We find Dairy Flat-Silverdale to be the most expensive location to grow. High land costs, water challenges and the prospect of extremely expensive transport upgrades suggest this area is not capable of accommodating planned growth, let alone an additional city. Growth and investment in the north should be deprioritised.

Kumeu south is more suitable. Recent motorway investments can support more growth, but public transport is inadequate. The new busway will be under immense pressure by the 2040s. A rail upgrade is expensive and will not provide sufficient speed and convenience. High and rising land prices reduce the capacity for value capture.

In unzoned Clevedon, land is cheap, but the area is off the infrastructure radar. High and uncertain transport costs and stormwater and flooding susceptibility discount the Clevedon valley.

Growth Should be Targeted in the South

The south represents Auckland's opportunity to grow the city affordably and efficiently.

Land around the rail line through Paerata is the most cost-effective location to add 30,000 homes. Karaka is competitive at higher levels. Paerata is up to \$150 million cheaper to service with water, fibre and energy infrastructure than other greenfield locations. On a per dwelling basis, this cost is relatively minor (around \$22,000), but at the regional level has a major impact on infrastructure providers.

Paerata's proximity to rail and SH1 lowers the substantial risks and uncertainties around future transport needs. We estimate regional road and water investment as low as \$700 million could be sufficient to add 30,000 dwellings to current Paerata plans. This is less than the estimated \$1 billion of development contributions the city would generate. All other locations we examine would likely cost more to service than the Auckland Council would receive in funding. Growth can pay for itself, if it is well planned.

The cost of local infrastructure and development for the satellite is greater. Almost \$3 billion would be required to cover fees and to service Paerata city with local roads, parks and water services. This is twice the estimated cost of all regional infrastructure and adds \$77,000 on average to every dwelling.

When development contributions are added to a conventional development today, the cost of servicing raw land rises above \$100,000 per dwelling. This is not only high and likely impacting housing supply, it does not reflect the large variations in the cost of servicing different greenfield locations.

Paerata's land is still cheap, but rising quickly. If bought at today's prices, an average section of raw land would cost \$17,000. Three years ago, it cost \$10,000. Land in Dairy Flat is over twice the price, rising faster and sections are smaller so land aggregation more difficult. If authorities can move before the market in Paerata, land value can be captured and used to offset infrastructure costs.

If authorities pursue a conventional approach, unserviced sections valued at less than \$20,000 today could be expected to rise to over \$360,000 post-development. Property owners would have to invest \$100,000 in residential development to realise this gain, leaving an almost \$250,000 difference between the total cost of development and the resale value of a section. Over a development of 30,000 homes, it translates to \$7 billion of increased value.

Part of this figure represents the cost of risk and reflects successful urban development. Part of it reflects public activities across zoning and infrastructure which are undervalued by a flawed approach to growth management.

Land can be accessed at its raw value and used to deliver affordable growth for homeowners and infrastructure providers. Integrated urban development at scale combined with emerging legislation will enable an Urban Development Agency to buy land, collaborate with land owners and realise land value.

Building at scale will facilitate a much-needed shift to prefabricated housing. Prefab is faster and cheaper than conventional building and requires less skilled labour. Procuring housing in large tranches will give the supply industry the confidence to invest in factory production of housing.

Assuming a shift to prefab and access to raw land, the average cost to deliver a completed home in the satellite, including land, development, infrastructure and dwelling construction would be \$450,000 (including a 15 per cent allowance for GST). This is the risk free cost of delivering a home in Paerata city.

Median home prices in Auckland today are \$825,000. After providing a margin for risk, the wide apparent difference between the cost of delivering a home in Paerata and current prices suggests integrated urban development at scale is cost effective.

A New Approach to Growth in Auckland

In addition to enabling land value to be captured, development in Paerata offers a number of strategic advantages. It is close to industrial land at Drury and proximate to key employment centres at Manukau and Auckland airport, as well as the productive Waikato and Bay of Plenty growth regions. Water, power and aggregate supplies come from the south and, most importantly, Paerata is located on the railway line. Scale development in this location provides a unique opportunity to leverage the capacity of rail as the alternative transport mode for Auckland.

Paerata's strategic location and Auckland's urgent need for affordable housing close to employment indicates there is an opportunity to go further.

The southern rail line between Pukekohe and the Auckland CBD needs investment. Strategic prioritisation of Paerata as a growth city would generate sufficient land value uplift to fund a \$2 billion duplication of the North Island Main Trunk Line.

Four rail lines between Papakura and Westfield, including grade separation from general traffic, would allow non-stop services from Paerata to the CBD. Rail freight services could be separated from commuter services, removing constraints on KiwiRail activities. Traffic congestion and risk taking at level crossings would reduce. Tens of thousands of homes would be within 30 minutes of central Auckland.

Growth could be extended north into Karaka to combine with a strategic link across the Pahurehure inlet. The new corridor would duplicate SH1 and provide direct access to SH20, the airport and Manukau. Light rail from the airport could connect with rail at Paerata, providing competitive rapid transit options to major employment centres at the airport, Manukau, Mt Wellington, Penrose, Newmarket and the city.

Integrated development could accommodate a new city to the south of not just one hundred thousand residents but four or five hundred thousand residents.

Wholesale changes to the Unitary Plan are not required. The Rural Urban Boundary has provision for local expansion to make way for growth. Coordinated public investment aligned with planning processes and combined with affordable housing can shape urban form, without dictating it.

Auckland must start using growth to catalyse the investments the city wants, not letting growth determine the investments it has to make.

Central government must play its part. Disproportionately high risk in relation to reward sits with the Auckland Council and developers, while too little remains with central government and the original land owners. A satellite city at Paerata will return \$3-4 billion in GST alone, but less than \$100 million in rates.

Planning for growth at scale around rapid transit allows more efficient use of land and is cheaper than retrofitting established urban areas. It will deliver benefits in the form of more affordable housing for the people who live in Paerata and in the form of lower congestion and infrastructure charges for wider residents.

But it is the ability to identify and isolate land at its raw price which provides the greatest opportunity. Auckland's existing growth paradigm transfers the value of public investment to land values without a concomitant requirement to deliver housing at pace. More infrastructure investment is required to deliver fewer houses and weak supply reinforces high prices.

The integrated planning and infrastructure approach of the satellite model enables infrastructure providers to share the benefit they create. Investment can be funded and affordable homes can be delivered.

The Time is Now

There is no time to waste. Auckland has 40,000 households living with family, in garages and on the street. The number is growing by 20 a day.

Property investors know the system is not working. They know the city will grow and they know there is money to be made betting on future zoning. Speculation is driving up the cost of land every week and reducing the ability to leverage land values to deliver affordable housing.

Investing in the Future

Planning for growth and masterplanning for quality opens the door for even bigger possibilities.

Technology is changing every aspect of cities. Connected networks, the internet of things and automation are the infrastructure of tomorrow. Incremental development does not support the trends and opportunities we know are coming to urban environments.

A brand new satellite city can be digitally enabled from the roads on the ground to the tallest buildings. People can communicate with vehicles, vehicles with networks, networks with operators and operators with people.

Incorporating new opportunities in design, engineering and sustainability, a new city can be made more efficient and more resilient. Streets can be configured to support autonomous vehicles. Low impact design can maximise existing land and water features to reduce impacts on the environment. Enhanced corridors and planned provision for services can protect Auckland's essential services.

The Innovation City

Leveraging public investments in research, education and health in a digitally enabled city will drive investment in high-skilled, high-income employment. Paerata can become the centre of a new southern city of 500,000 or more with technology, innovation and prosperity at its heart.

The Innovation City will deliver better jobs, better networks, stronger communities and desirable urban living.

Auckland's Growth Challenge

Auckland has a
three-dimensional growth problem:

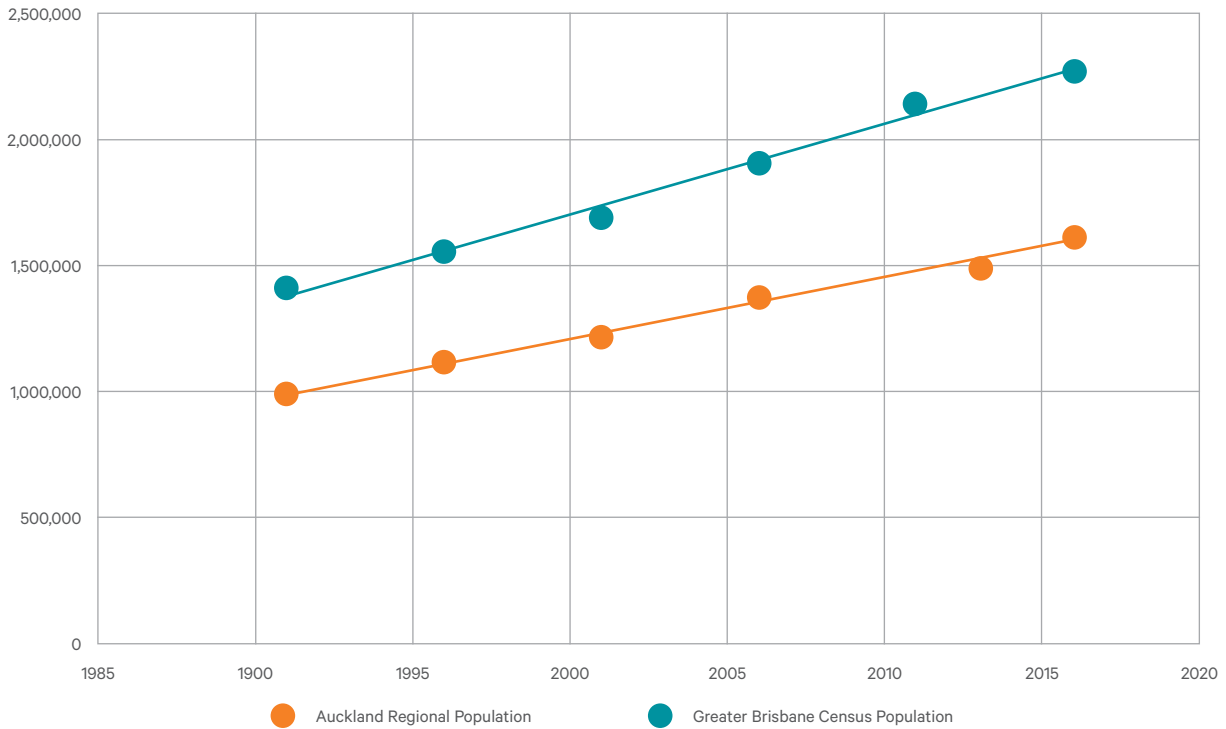
- 1 Not enough homes
are being built;
- 2 Serious congestion
is getting worse;
- 3 Funding growth is
increasingly difficult.

In 2016, Infrastructure New Zealand (then the New Zealand Council for Infrastructure Development) investigated the second of the three big challenges. The report *Transport Solutions for a Growing City* found that how the region was responding to growth was more significant than the scale of growth in relation to network performance.

Auckland's population growth rate has been high in recent times, but has remained constant overall since the early 1990s (Figure 1). These levels are not out of step with faster growing cities globally, many of whom demonstrate lesser transport deterioration.¹

¹ The Auckland region's growth rate of 1.9 per cent per annum since 1996 is well below South East Queensland's 2.4 per cent average growth between 2003 and 2013, for example, and Brisbane performs much more strongly in terms of congestion, see <http://www.qgso.qld.gov.au/products/reports/pop-growth-highlights-trends-reg-qld/pop-growth-highlights-trends-reg-qld-2015.pdf> and Austroads, Congestion and Reliability Review, December 2016.

Figure 1: Auckland regional population vs Greater Brisbane²



Transport Solutions found that the allocations of growth assumed through the Unitary Plan are misaligned with transport infrastructure. It is this misalignment which is exacerbating transport pressures and increasing the need for additional investment. Specifically:

- Densification is permitted in a number of areas with poor transport connectivity, increasing demand for private vehicle trips and fuelling congestion.
- Redevelopment is impeded in a number of areas receiving large rapid transit investment, making public transport less attractive as an alternative.
- Greenfield housing growth is spread across the region but employment is concentrated in the centre and south, necessitating long journeys on constrained corridors.

Comprehensive analysis by the collective of New Zealand’s leading transport bodies, via the Auckland Transport Alignment Project (ATAP), has shown that no investment programme can meet the growth allocations broadly set out in the Unitary Plan. Only by suppressing demand can congestion can be improved, but even this requires some \$6 billion of urgent investment beyond what is currently funded.

The Independent Hearings Panel on The Auckland Unitary Plan assumed infrastructure could be delivered to areas it identified for growth. Transport modelling has since shown this assumption to be misplaced. Government assistance to Watercare through the Housing Infrastructure Fund and Crown Infrastructure Partners indicates the problem is not limited to transport.

A new approach to growth is required which delivers more homes:

1. Rapidly,
2. Affordably, and
3. In a way which does not exacerbate transport pressures.

² Statistics New Zealand, Australian Bureau of Statistics.

A New Approach: Integrated Urban Development at Scale

The Housing Challenge is Large, Not Insurmountable

Auckland can deliver the homes and infrastructure it needs. Population growth is currently at record levels, but should not be expected to remain this high. Figure 1 displays a much more consistent growth profile over the long term than has been evident in the last decade. If Auckland continues along this long term growth trajectory, rather than the extreme levels seen recently, which is more likely, the regional population will be approximately 2.3 million in 2040.

A 2040 population of 2.3 million is 700,000 residents greater than today's population – an average growth rate of 30,000 people per annum over the next 23 years. At existing levels of around 3 persons per dwelling, Auckland under this scenario requires 10,000 new homes each year.

In addition, Auckland must deliver a further 40,000 new homes to address the backlog identified by both the Auckland Council and the Auckland Independent Hearings Panel on the Unitary Plan. Clearing this backlog within a decade will require 4,000 additional homes per annum over that period.

Delivering 14,000 homes per annum over the next decade will be challenging, but not impossible. With a population of under 1 million the Texas city of Austin issued almost 12,000 building permits in 2013.³ Brisbane and Perth, with populations 30–40 per cent greater than Auckland, both consistently issued around 20,000 residential building permits per annum over the early 21st century.⁴ Each city has managed to keep housing significantly more affordable than Auckland.

³ <http://www.civildashboards.com/city/austin-tx-16000US4805000/#>

⁴ <http://blog.corelogic.com.au/2014/09/july-2014-building-approvals-data/>

Congestion Can be Reduced

Auckland's population of around 1.6 million is not large by global standards. Comparative congestion metrics suggest that the city's travel time delay is consistent with much larger cities, including Manchester, New York and Melbourne.⁵ It is significantly worse than higher performing cities, even those facing rapid growth.

Auckland's own congestion monitoring shows that performance can be improved. Between 2006 and 2013, travel time delay and variability on Auckland's strategic network improved. Lower population and economic growth through the Global Financial Crisis was one contributor, but so was effective investment. The combination of both, specifically, supportive land use change (in this case via slower housing and employment growth) and measured policy delivered benefits. Aligning new housing and employment activity with a fit-for-purpose investment programme will reduce pressure on transport networks.

Growth Can be Affordable

Integrating growth with infrastructure so that new homes and jobs arise where services have capacity will reduce costs. The major opportunity to grow affordably, however, is by channelling land value improvement from zoning and services to infrastructure funding.

Land outside a zoned and infrastructure enabled location has been shown to be around one-tenth that which is development ready.⁶ Conventional planning and development approaches do not tie value improvement from zoning or infrastructure to the provision of these services. Nor does service provision require development on any fixed timeframe. This disaggregated approach to planning, infrastructure and development has seen Auckland land values rise from around 40 per cent of the value of a home to over 60 per cent at the same time as property values have doubled.⁷

Capturing land value is not easy under existing practice, but emerging Urban Development Agency legislation does provide an avenue. Establishment of a public body with some combination of land acquisition, planning, rating and infrastructure authority would make value capture much more viable.

Integrated Development at Scale

Infrastructure New Zealand wanted to investigate a short and medium term response to Auckland's urgent housing, transport and affordability challenges. Specifically, we wanted to test a scenario which:

1. Delivered a large number of homes rapidly, and
2. Delivered them in a way and location which supported regional connectivity, and
3. Delivered them affordably for both infrastructure providers and new home owners.

The combination of these factors led us to the concept of integrated development at scale. Scale is required because a large volume of housing is required and because larger building contracts can support innovation, standardisation and prefabrication. These factors are needed to increase productivity and deliver homes in a tight labour market at an affordable price.⁸

Integrating transport with development is necessary to optimise transport assets and limit regional travel demand. Timing and sequencing transport investment with development reduces the lag between infrastructure delivery and capacity utilisation. Masterplanning employment, housing and transport reduces pressure on regional movements. Collocating growth with rapid transit (transit oriented design) makes public transport more competitive for regional movements which must occur.

Integrated development is also needed to solve the affordability challenge. Zoning, infrastructure and services unlock land value. Tying zoning to service provision so that land value increases are allocated to infrastructure providers is necessary to fund growth infrastructure.

⁵ TomTom
⁶ Productivity Commission, Housing Affordability Inquiry: Final report, 2012.
⁷ Productivity Commission, Using Land for Housing, September 2016.
⁸ Productivity Commission, Housing Affordability Inquiry: Final report, 2012; Productivity Partnership, Construction Productivity in Canterbury, <http://www.mbie.govt.nz/publications-research/research/construction-sector-productivity/canterbury-rebuild-construction-productivity-in-canterbury.pdf>

Brown or Greenfields?

An early question confronting us was whether integrated transport and development at scale should be tested in a brown or greenfields environment. We opted for greenfields for three reasons. First, it is difficult outside of the advanced Tamaki project to find land holdings of a size which can support scale redevelopment in Auckland.

Second, brownfields redevelopment is more politically and technologically challenging. Addressing local concerns and operating within an established urban environment is complex and meeting expectations is likely to slow housing development and increase complexity.

Third, the higher cost of land in brownfield environments reduces the ability to leverage land value to fund transport and deliver more affordable housing.

The Option Tested: a Satellite City for 100,000

Following our evaluation, we concluded that testing a single major urban development in a greenfield location would best satisfy the need for more homes, quickly, affordably and consistently with transport services.

By focusing growth in a single, albeit large, undeveloped site, Auckland could sequence, target and align development and infrastructure. Raw land values could most easily be leveraged to align infrastructure costs with benefits and enable housing to be delivered at uninflated costs. The absence of major established communities would facilitate rapid delivery of both infrastructure and development and would be most feasible from a political and social perspective.

We decided we would investigate a development of roughly 100,000 residents. This is approximate to the 40,000 homes that Auckland needs to house its population. We opted for a slightly lower figure of 30,000 homes, to more neatly fit a third share each of high, medium and low density housing. To facilitate shorter journeys and lessen the impact of commuting, we decided we would also seek an outcome with one job per household – 30,000 jobs. We use the terms “city of 100,000” and “city of 30,000 homes and 30,000 jobs” interchangeably, noting a slightly larger number of homes would likely be required to house 100,000 residents.

For a development of this size, we concluded we would require a greenfield site of at least 2000 hectares. A city of 100,000 inside 2000ha would be comparably dense by Australasian standards (approximately two times more persons per hectare than metropolitan Auckland today and twice as dense as existing growth plans for Dairy Flat-Silverdale), but would support existing council policy to limit urban expansion.

The first phase of our study involved the identification of developable land around Auckland capable of accommodating a city of this size.

Identifying Innovation City Locations

The first step in planning integrated development at scale was to identify an appropriate location. Our objective was to narrow feasible locations down to a small number of priority sites which we could then investigate and compare. We followed a two-step process which, first, pinpointed all those areas with physical capacity for a new city and, second, narrowed options to those locations with the best transport potential.

We performed a desktop survey of all locations within 50km of the Auckland CBD with at least 2000ha of flat or rolling agricultural land. We excluded environmentally sensitive areas, elite soils and land which is undulating and therefore more expensive to develop. We did not take into consideration ownership, infrastructure feasibility or market attractiveness through this phase.

This process highlighted 14 separate locations around the region, including five in the north, two in the west, two in the east and five in the south.⁹ Two of the southern locations were situated outside the Auckland region. We also included in our analysis land around Wellsford which, at 65 km, is located beyond our 50km limit, but is also an existing Auckland centre and therefore of potential interest.

The 14 locations are identified below. Orange circles denote locations we discarded. Blue denotes areas we took forward for further investigation.

⁹ We chose to divide the southern area between Pukekohe and urban Auckland up into three distinct locations (Clarks Beach, Karaka and Paerata). We decided to exclude the area east of Drury which, although large enough, is already being readied for development and is so close to the urban area as to make independent development difficult. It should be noted that, unlike other parts of Auckland, there are limited geographical features separating the entire area north of Waiuku-Pukekohe-Bombay.

Map 1 and 2: Large developable land holdings in Auckland: North and West



Map 3: Large developable land holdings in Auckland: South and East



Phase 1 suggested there was much more developable land around Auckland capable of accommodating major growth than we had initially expected. It was evident, furthermore, that land sufficient to accommodate a major new city existed in each of the north, south, east and west of the region. This raised the possibility of a sample study in each “corner” of Auckland, enabling a potentially valuable comparison of different infrastructure and development challenges by sub-region. Our initial preference to sample between one and three priority locations was expanded to include one site north, south, east and west of the Auckland urban area.

Phase 2 involved a high level assessment of the comparative feasibility of providing transport services to the 14 locations identified in Phase 1.

North

Analysis of the north quickly indicated that more distant locations around Wellsford, Matakana, Warkworth and Waitoki presented no clear advantages to a development at Dairy Flat-Silverdale, which was closer to the Auckland CBD and to transport infrastructure. We did note, however, that lower land values in these areas could potentially offset higher investment needs. We decided to investigate Wellsford, Matakana, Warkworth and Waitoki only if Dairy Flat emerged as the preferred location in Phase 3.

West

Fewer options were present in the west, with only an area along the rail line south of Kumeu and land around Helensville large enough to accommodate a city of the study’s size. The proximity of the area around Taupaki to the city and rail made it a clear priority.

East

Like the west, the east contained relatively few development options, with both identified sites part of the larger Clevedon valley. Although there is likely some amenity value gained if development is focused around the Clevedon coast, we did not consider this benefit to outweigh the added cost of providing transport and other services some 5-10km further from the Auckland metropolitan area.

South

Auckland’s south provides the greatest availability of land. Virtually the entire area north of (and excluding) Pukekohe’s elite soils is developable – some 20,000 hectares. In addition, there are other significant land holdings in the deeper south. Located further from central Auckland and less accessible, Clarks Beach, Aka Aka and Pokeno were rejected in favour of options closer to the CBD.

The obvious locations to locate a satellite city in the south are Paerata and Karaka. Paerata is located close to rail and motorway infrastructure and is already planned for growth (some is already under development). However, with a connection across the narrow Pahurehure inlet, Karaka would become significantly closer to Auckland. Karaka also possesses the benefit of not being zoned for future growth and therefore should be lower cost.

Including both Paerata and Karaka in the study provided the opportunity to investigate land values across zoned and unzoned land. Lower cost land increases the potential to capture land value for investment in infrastructure. We elected to take forward both Karaka and Paerata.

Map 4: Preferred sites for investigation and Unitary Plan zonings: Dairy Flat-Silverdale and South Kumeu



Map 5: Preferred sites for investigation and Unitary Plan zonings: Clevedon, Karaka and Paerata



Costing a Satellite: Infrastructure

To find out which part of Auckland provides the most cost-effective location for a major new development, we wanted to understand the relative costs of growth in each area.

We contacted key infrastructure providers and asked them to estimate the capital cost on their service of an additional 100,000 residents in each of the five locations. We asked providers to assume that the Unitary Plan provisions remain otherwise unchanged and that growth was additional to existing plans.

The numbers in this section should not be interpreted as being the total cost of providing for 100,000 people, but of 100,000 more over and above existing plans. All information in this section is indicative and reflective of average past experience, rather than the specific requirements of projects themselves. Risks regarding consenting, funding and sequencing have not been part of the assessment.

Water, Energy and Telecommunications Requirements

We approached key utility providers and asked them to provide a high level estimate of what assets and investment would be required to service a city comprising 30,000 homes and 30,000 jobs in each of the five locations. The total costs are set out in Table 1.

Table 1: Infrastructure costs in different parts of Auckland¹⁰

Agency	Service	Dairy Flat-Silverdale	Kumeu south	Clevedon	Paerata	Karaka
Watercare	Wastewater	\$185m	\$160m	\$230m	\$170m	\$150m
	Water supply	\$115m	\$65m	\$1m	\$0	\$75m
Transpower	Electricity transmission	\$46m	\$51m	\$30m	\$18m	\$25m
Vector Counties Power	Electricity distribution	\$210m	\$242m	\$237m	\$225m*	\$225m*
Vector	Gas	\$61m	\$61m	\$61m	\$61m	\$61m
Chorus	Fibre	\$185m	\$185m	\$185m	\$185m	\$185m
Total		\$802m	\$764m	\$744m	\$659m	\$721m

Several key findings are evident in the information provided. Firstly, there is a significant cost difference from development in different parts of Auckland. Up to \$150 million can be saved across water and energy services simply by growing closer to where existing and planned assets are located.

Secondly, infrastructure providers are not all affected by growth decisions equally. Chorus is not as exposed to capacity constraints (at least at the scale tested) as other providers. Impacts on Watercare, Vector and Transpower can be significant. For Watercare in particular, growth decisions can result in the deferral or bringing forward of investment decisions in the hundreds of millions of dollars. In light of Watercare’s ownership by the Auckland Council and consequent debt limitations, the location of growth is of critical importance.

Each of these providers is regulated and none has a mechanism to allocate additional costs to the development. Increased costs are spread over all customers. For Vector, a partially privatised entity, higher costs are absorbed by shareholders. For Transpower, a national provider, higher costs are spread across all of New Zealand. Increased costs are only converted into higher charges with the approval of the regulator. Less profit or deferred investment elsewhere are the result.

Third, while the impact on infrastructure providers can be significant, these costs appear relatively insignificant in proportion to home prices. Spreading the total costs in each area across 30,000 households results in a maximum spend of \$27,000 per dwelling in Dairy Flat-Silverdale and a minimum of \$22,000 in Paerata.

Finally, the combination of the above three findings reveals a potential conflict. The large cost carried by an individual infrastructure company from a strategic growth decision is not shared by a home owner or developer. It may thus be in the infrastructure provider’s interest to resist, defer or deprioritise spending on a development, when the cost difference to a developer is very minor. Any mechanism which allows and encourages the developer to meet these higher costs could have a major impact on an infrastructure provider’s ability to meet demand and a developer’s access to critical services.

The Paerata area was found to be the most cost effective location from a water, energy and telecommunications delivery perspective. The second cheapest location is Karaka, followed by Clevedon, indicating that new growth in the south is generally more cost effective than in other locations, before transport costs are considered.

¹⁰ Information provided by relevant providers, except where indicated by *. Counties Power have not investigated additional growth scenarios but expects costs to be equivalent to Vector. Vector mid-range estimates used. Mobile services not included. Provision is fully private and costs vary according to brown or greenfield, but not location.

Transport

The engagement of Auckland Transport and New Zealand Transport Agency officials in ongoing future growth area work restricted our ability to use the same approach for transport as with other network services. Infrastructure New Zealand developed transport networks for the purposes of comparison in each of the five locations. Networks are based wherever possible on those developed through the *Supporting Growth* initiative – Auckland’s future urban area transport planning process – and have evolved in discussions with participants in growth processes.

The clear limitations of this approach mean that there is significant uncertainty around transport costs. Consequently, we include in this section a risk assessment by location. Our priority was to ensure networks were broadly comparable.

In the Dairy Flat-Silverdale and Paerata locations, Supporting Growth networks have largely determined the shape and form of our comparative networks. In both locations, our major assumption is that the city could co-locate with and beside existing planned development. We assume road corridors remain the same, but increase their capacity.

In currently unplanned locations (principally Kumeu South, Clevedon and Karaka), we had to develop new network plans. We then tested these assumptions with transport planning experts to refine them and ensure they were broadly comparable with the professionally developed networks.

Our starting assumption was that each location must be served with rapid transit, an expressway linked to the strategic road network and be serviced by regional arterials (situated approximately 2km apart). Existing road corridors were used where possible (though in practice this may not always be desirable) and local roads were not included in this phase. The assumptions we used to develop networks in each of the locations are included in Appendix 1 at the end of this document.

Transport assessment of each location includes a direct, location specific transport cost and a wider regional risk assessment. This is to recognise that growth of 100,000 people in any location will carry significant regional travel implications and these have the potential to be very costly. We highlight the risk of these costs and provide indicative costs for improvements. All estimates are informed by ATAP modelling 2016 and assume Supporting Growth package delivery.¹¹

We identified the following networks and costs in each of the five locations:

Dairy Flat-Silverdale

The Auckland Independent Hearings Panel on the Unitary Plan identified approximately 4000ha of future urban area land in Silverdale and Dairy Flat. This land is earmarked for just under 30,000 homes so is comparable from a residential perspective to our satellite proposal, but across twice the land area. Our assumption for a satellite in the north is that an additional 100,000 residents can be accommodated broadly within the already planned growth area.

The presence of rapid transit, a motorway and extensive arterial network met the key requirements of our transport assumptions. We decided as a starting point to transfer across the exact Silverdale-Dairy Flat network from the *Supporting Future Growth* study, with one modification. We assumed regional arterial network demand would be doubled, increasing the average cost from \$20 million per km to \$35m per km. The Supporting Growth network and high level costs are included below.¹²

There are approximately 55km of arterials planned for the northern growth area. Using the mid-range estimate from Table 2, arterials are anticipated to cost \$1128 million. The cost of adding a lane to these roads is, using the assumptions set out in Appendix 1, \$15 million additional per km, or \$800 million in total.

- **Our baseline transport cost of an additional 30,000 homes and jobs in the north is \$800 million.**

¹¹ ATAP, Evaluation report, 2016.

Regional transport feasibility of Dairy Flat-Silverdale

We assess the overall risk that the above transport plan for a Silverdale-Dairy Flat satellite will require substantial additional regional investment as *high*.

A complicating factor for transport assumptions to, from and through the Silverdale-Dairy Flat growth area is that ATAP analysis clearly shows growth in the north is difficult to service. Under all ATAP scenarios modelled in 2016, except the indicative package, demand for travel to and from the north was severely constrained. Only with the application of pricing combined with an additional harbour crossing, improved mass transit and motorway widening was access to the north adequately supported.

These additions, however, are not included in the Supporting Growth programme. In total they add some \$10 billion to the cost of major transport infrastructure in the north and represent almost one-third of all Auckland's transport capital investment assumed by ATAP.¹³ It is true that these services will serve residents in the existing metropolitan area and further north, but the addition of the 30,000 dwellings in the Supporting Growth programme appears to trigger the need for exponentially higher transport expenditure. It must be assumed that the addition of another 30,000 homes assumed through this study would make this investment unavoidable (and in fact bring it forward).

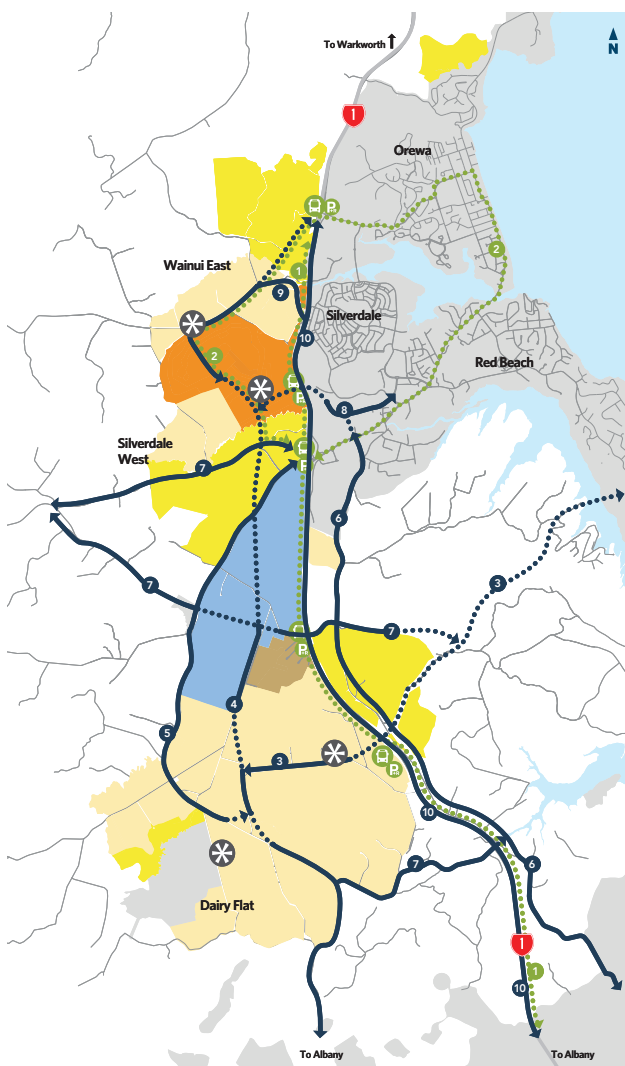
- **We consider in our regional risk appraisal a \$10 billion additional investment programme to service a satellite in the north.**

The operation of the SH1 corridor as a wider infrastructure corridor potentially carries costs for other assets. All rail options in a 2016 Aurecon study¹⁴ of mass transit options assumed trains use the busway alignment for at least a part of the journey. This may create an issue for any services running under the busway, most notably a high voltage transmission cable carrying electricity to the north. Accessing the cable will be more difficult if rail replaces the busway as rail services cannot be rerouted. Removal, re-consenting and reconstruction of the cable is expensive, likely costing in the hundreds of millions of dollars.

- **We highlight the potential impact on other services from changes to the busway, but do not include them in our estimates.**

Table 2: Supporting Growth high and low estimates for greenfield growth in Dairy Flat-Silverdale.¹²

North	\$2,743	\$3,535
Improvements to SH1	\$345	\$457
Alternative Strategic Links	\$220	\$299
Rapid Transit & Public Transport Improvement	\$1,167	\$1,535
Arterial Roads North	\$263	\$339
Arterial Roads South	\$749	\$905



¹² Transport estimates are based on a number of general assumptions. No geotechnical assessment, surveys or full engineering assessment was undertaken for this stage of the Business Case.

¹³ ATAP, Evaluation report.

¹⁴ Aurecon, Rapid Transit Study: Summary, July 2016.



Kumeu South

The area along the rail line south of Kumeu has not been identified as an area for future growth in the Unitary Plan. Supporting Growth network improvements have been identified for adjacent growth areas around Whenuapai, Red Hills and Kumeu. We developed a hypothetical transport network for Kumeu South building off these planned improvements and using the assumptions laid out in Appendix 1.

Orange lines illustrate the existing intention of authorities to support growth in Westgate, Kumeu and Huapai. Blue lines represent Infrastructure NZ hypothetical transport infrastructure necessary to support an additional city of 100,000 people, located broadly along the rail line. Blue solid lines represent arterial roads and the dotted line an upgraded western rail line. The blue square represents an interchange and the blue dots rail stations.

In total, around 15km of regional arterials and an interchange with the new motorway are assumed. Arterials are more tightly located under this option than in other areas, but the area serviced slightly smaller. We retain the same estimates as that used in Supporting Growth of around \$20 million per km. An interchange is costed at \$20 million.

- **Using the price assumptions set out in Appendix 1, road infrastructure in Kumeu South is estimated to cost \$320 million.**

A new busway to the north west is planned to run to the north of the hypothetical Kumeu South city. One option could be that the busway heads south to provide the rapid transit solution to the area, but we have assumed growth at this scale will necessitate extension of electrified rail from Swanson. KiwiRail estimates the cost of double-tracking, electrification and tunnel (or diversionary) works between Swanson and Kumeu at around \$200 million. Rail stations through this study are assumed to cost \$30 million and a slightly higher figure of \$50 million is assumed for the transport hub.

- **Including enabling works, two new rail stations, an integrated busway-rail hub, we estimate the cost of rapid transit for Kumeu South at \$340 million.**

Regional transport feasibility of Kumeu South

We assess the overall risk that the above transport plan for a Kumeu South satellite will require substantial additional regional investment as *high*.

Total transport network spending to service a city in the north west is comparatively low. This is due to the large amount of infrastructure either present or planned. An additional strength of Kumeu, and the wider north west, is that future modelling by ATAP indicates SH16 does have broadly sufficient capacity to 2046 if road pricing is introduced.

The weakness of the Kumeu South option is uncertainty around public transport. The ability to integrate rail with a busway at the junction of a realigned SH 16 adds resilience and flexibility, but it is not clear whether the busway will have capacity. ATAP modelling, under all scenarios including the indicative package, highlighted severe public transport capacity constraints by 2046 between the north west and CBD. Significant investment appears necessary to support existing, let alone additional, growth in the north-west.

Expansion of rail may assist with capacity constraints, but it is still not clear how viable rail is as a solution. Rail services from Swanson to the CBD currently take 55 minutes. Rail from South Kumeu would take approximately 70 minutes. Triple tracking the western line, which would not be sufficient to provide non-stop services to central Auckland, is estimated at around \$2-3 billion.¹⁵ Providing a fourth track to enable non-stop services and to radically cut commuting time will cost materially more.

A major further uncertainty concerns level crossings. There are 17 road crossings between Swanson and the CBD and a further eight (six of which are private) between Swanson and Kumeu. With increased train frequencies following the opening of the City Rail Link (CRL), these crossings will have a growing impact on traffic congestion. Worsening congestion will incentivise risk taking at level crossings, leading to safety issues. Grade separating road and rail carries a large cost and is disruptive.

- **We consider a cost of \$3 billion to four-track rail to a Kumeu South satellite.**

¹⁵ <http://www.stuff.co.nz/auckland/local-news/northland/78592378/kiwirail-delivers-a-reality-check-at-grow-northland-rail-meeting-in-whangarei>

Map 7: Infrastructure NZ indicative transport plan for Clevedon



Clevedon

Clevedon is not identified for future growth and has no motorway nor rapid transit access. The lack of existing corridors requires greater assumptions about the location and form of trunk infrastructure. Infrastructure New Zealand has provided an indicative outline of one potential network using the requirements for strategic road and rapid transit connectivity outlined in Appendix 1.

The orange lines indicate planned investments expected to support growth in the south-east. The Infrastructure New Zealand indicative network to support a city of 100,000 is illustrated in blue. The three blue dots represent busway stations and the blue square an interchange.

An expressway connecting the planned upgrade of Mill Rd to Clevedon is 10km in length and provides two lanes in each direction. It includes an interchange at Mill Rd. A further 23km of regional arterials are included. Using the estimates in Appendix 1, we cost the expressway at \$50 million per km, arterials at \$20 million per km and an interchange at \$20 million.

- **Our estimate for the Clevedon satellite road network is \$1 billion.**

Rapid transit is assumed to be provided via a busway along the expressway. The option costed runs from the current Clevedon village to Mill Rd and includes a busway along the new Mill Rd corridor to central Manukau. In total it is approximately 18km in length and costed at \$50 million per km.

- **Assuming an 18 km grade separated busway service with three stations, public transport to the area would cost \$960 million.**

Regional transport feasibility of Clevedon

We assess the overall risk that the above transport plan for a Clevedon satellite will require substantial additional regional investment as *high*.

Clevedon is a large land area generally unimpeded by existing activities. There are multiple options for transport within the area, including strategic links to the north and south. However, the connection of those links to the wider transport network is highly uncertain.

It is unlikely that the Mill Rd upgrade as presently envisaged would be capable of supporting travel demand to and from the satellite. The conversion of Mill Rd to a full motorway interchanging around Manukau may be required. As well as being expensive, such a project would be difficult to consent and a number of homes would be affected.

A more substantive risk with Clevedon is that it may trigger the need for major road investment. The satellite would be heavily dependent upon SH1, which is under extreme pressure by the 2040s under all modelled scenarios. Travel demand pressure would increase into and through Flat Bush and the eastern suburbs. An eastern motorway linking the CBD, Pakuranga and Clevedon may be required for a Clevedon satellite to proceed. This solution was costed at around \$10 billion by ATAP.

- **We note the risk that Clevedon development creates a need for a major motorway solution, but do not include it in our analysis.**

For the purposes of comparison, we assume an additional lane in each direction is provided along the Mill Rd-Redoubt Rd corridor between Popes Rd and Manukau. This much capacity intersecting at the junction of SH1 and SH20 suggests a full motorway and interchange would be required. Including the costs of consenting and property purchase, this solution would be costly.

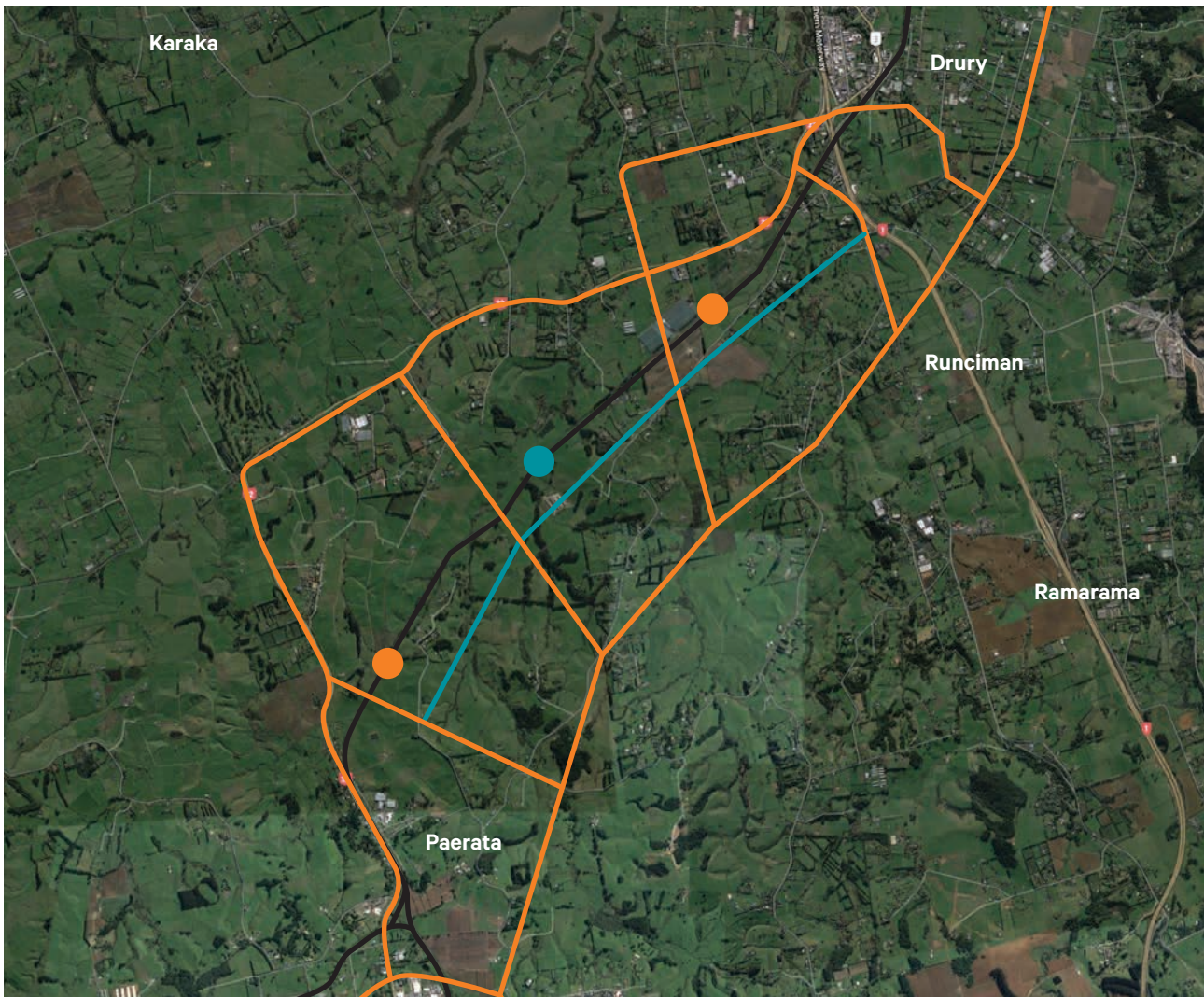
- **We consider a \$1 billion motorway upgrade linking the SH1 and SH20 interchange with Clevedon.**

Rapid transit services are equally uncertain. We have assumed a busway connecting to Manukau, but it is likely that more would be required. A rail trip from Manukau to the CBD takes 38 minutes today and passes through the eastern line, missing key employment nodes in Penrose and Newmarket. Journey times from a Clevedon satellite to the central city, including transfers would exceed 1 hour, potentially by a significant margin.

One advantage of introducing dynamic road pricing is that, if motorway speeds can be guaranteed, busway lanes would become unnecessary. Clevedon could potentially link directly to the CBD via bus.

- **We note that public transport options to Clevedon may be inadequate, but we do not estimate the costs of additions.**

Map 8: Infrastructure NZ indicative transport plan for Paerata



Paerata

The land to Auckland's south contains a very large amount of raw developable land. Infrastructure New Zealand identified land closest to rail south-west of Drury for the hypothetical city. This area includes a mix of live-zoned, future urban and land which is not zoned for development under the Unitary Plan. A comprehensive transport plan has been developed through the Supporting Growth programme.

We adopted a similar approach to a hypothetical Paerata city transport network as with Dairy Flat-Silverdale. We assumed existing planned corridors would proceed, but that densities would increase. Higher densities increase total demand, so we assume arterials in the Paerata area would include an additional lane in each direction. The planned investments and potential additions are outlined in Map 8.

Orange lines and dots indicate investments which are planned to support expected growth between Paerata and Drury. The blue line and dot indicate Infrastructure NZ additions to support an additional 100,000 residents.

There are approximately 13km of regional arterials servicing Paerata in the Supporting Growth network. This excludes the strategic Mill Rd to Pukekohe corridor and SH22 between Drury and Paerata. The cost of adding a lane to this network is \$200 million.

SH22 is earmarked for safety improvements which include some four-laning of the predominantly two-lane corridor. We assume that half of the 12km corridor will be converted to four lanes under existing plans and that a Paerata satellite will necessitate four-laning of the remaining 6km. The cost of this work is \$90 million.

The only new road corridor we identify runs adjacent to the rail line. We include this because the Paerata road network is less dense than in other planned areas in the north and north-west. This road is 6km long and, assuming two lanes in each direction, would cost around \$200 million.

- **Total road upgrades assumed for Paerata cost \$500 million.**

The Supporting Growth programme provides for major public transport improvements between Papakura and Pukekohe. Rail electrification and three more stations (two of which are located in the Paerata area and the third at Drury) are planned. The only entirely new public transport addition we include to support growth of Paerata city is a rail station on currently unzoned land.

- **The cost of public transport improvements for a Paerata satellite is \$30 million.**

Regional transport feasibility of Paerata

We assess the overall risk that the above transport plan for a Paerata satellite will require substantial additional regional investment as *medium*.

Situating a city between Paerata and Drury would likely require comparatively little investment not already featured in official plans. The location is close to SH1 and a new strategic connection linking to Mill Rd. Papakura is 51 minutes from Britomart, meaning rail services in the area will provide direct services to the CBD in around 1 hour. Full end-to-end travel by rail from the area to the CBD will be competitive with private vehicles at busy times, assuming stops at all stations.

Growth at Paerata would add to pressures which are already significant along SH1. However, the new strategic connection to Mill Rd, the ability to access SH20 and the weighting of employment south of Penrose mitigate the significance of this impact.

In comparison to the increased demand placed on the western line by Kumeu South, the southern rail line is more readily upgradable. There are only four road crossings between Papakura and the CBD. In addition, there are well-developed plans to triple-track sections of the line.

We asked KiwiRail whether triple-tracking could enable non-stop rail services between a hypothetical Paerata city and the CBD. KiwiRail advised the four-tracking would be required. This would come with the added benefit of separating rail freight and commuter services. KiwiRail estimates the cost of four-tracking between Papakura and Westfield at around \$1.5 billion (including work like a third trunk line Westfield to Wiri which may proceed sooner). Four lanes exist north of Westfield, though along separate lines. Non-stop services would need to integrate with normal services beyond Westfield.

- **Including grade separation between Pukekohe and the CBD, we sensitivity test an additional \$2 billion rail cost from development at Paerata.**

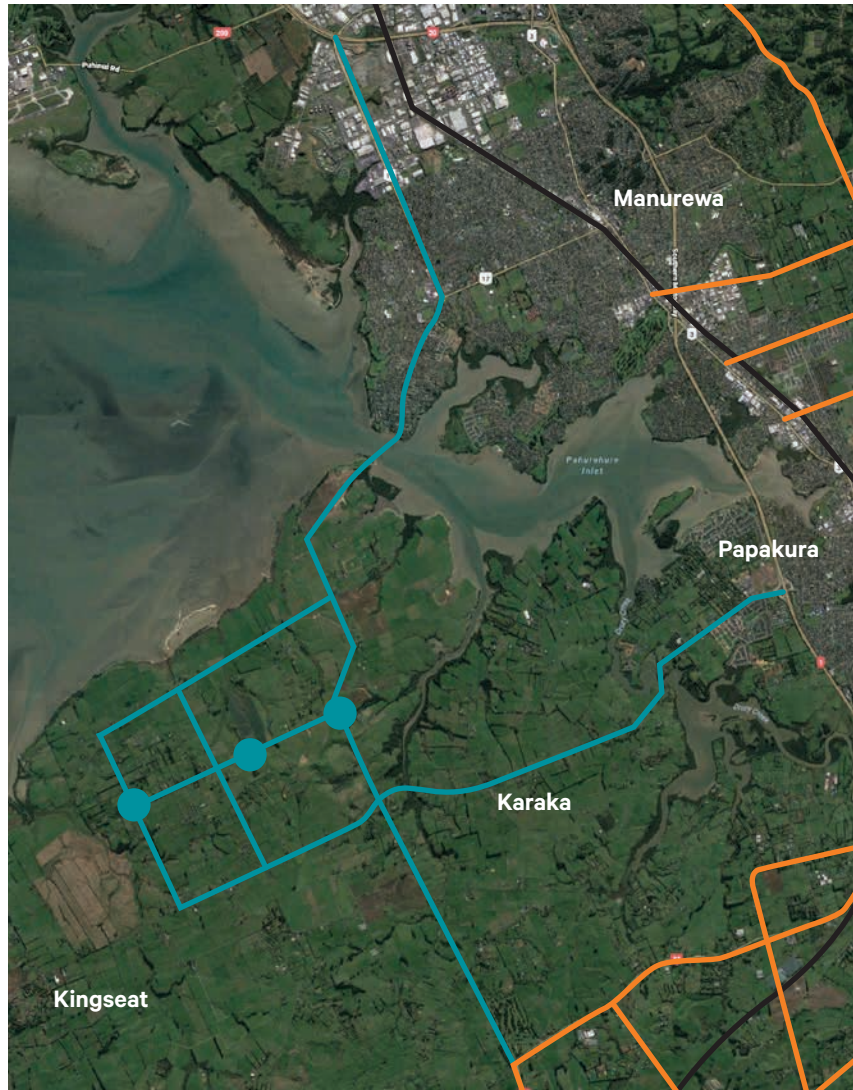
Karaka

The Independent Hearings Panel on the Unitary Plan considered at length rezoning land west of Hingaia. Land around Karaka was determined to be the most feasible unplanned location for development, but the Panel highlighted infrastructural challenges in electing not to shift the rural urban boundary.¹⁶ The network proposed below has been developed to overcome constraints identified by the Panel.

Orange lines indicate roads identified in future growth plans. Blue lines denote new roads and blue dots busway stations linked to the north.

The absence of existing plans in the area presents a wide range of options for planning transport. We have opted for a network premised on development broadly along the coast for market attractiveness reasons. Other options include development in a more north-south orientation, or shifted further east or west.

The proposed network addresses both leading transport concerns of the Unitary Plan hearings panel. Specifically, connectivity is provided across the Pahurehure inlet and Linwood Rd is upgraded to four-lanes. The Linwood Rd upgrade is 7.5km in length and, using the assumptions set out in Appendix 1, costed at \$260 million. The new corridor linking Weymouth to and through Karaka Rd has been costed by Auckland Transport at approximately \$1 billion.¹⁷ It is a four lane expressway and includes appropriate intersections and/or interchanges.



- **Including regional arterials of 17km, the estimated total cost of road upgrades to support a Karaka satellite is \$1.6 billion.**

The Pahurehure link does not include rapid transit. We assumed a busway linking the new city to the airport and Manukau centre, noting that under a dynamic road pricing scenario where travel speeds are guaranteed, bus lanes may not be required. An alternative could see light rail delivered. The requirement for a complex structure (across the Pahurehure inlet) makes estimating the cost of a busway difficult. The length of a busway from Manukau through the proposed Karaka satellite is 17km and from the airport 20km.

- **Including three stations, we estimate the cost of a busway at \$1060 million, and total rapid transit costs of \$1200 million, making some additional provision for crossing the inlet.**

¹⁶ Auckland Unitary Plan Independent Hearings Panel, Annexure 6 Changes to Rural Urban Boundary and Rezoning, July 2016, pp. 2-13.

¹⁷ Auckland Unitary Plan Independent Hearings Panel, Annexure 6 Changes to Rural Urban Boundary and Rezoning, 339667 July 2016, pp. 2-13.

Regional transport feasibility of Karaka

We assess the overall risk that the above transport plan for a Karaka satellite will require substantial additional regional investment as *low*.

A city at Karaka linked across the Pahurehure inlet opens up access to both SH1 and SH20. This offers the most flexibility and resilience of any satellite location with respect to road access. Consenting the crossing of the Pahurehure inlet is the greatest risk. A number of homes will be impacted, potentially requiring a tunnel. A tunnel option would cost significantly more.

- **We sensitivity test a 3km tunnel across the Pahurehure inlet between Karaka and Roscommon Rd costing an additional \$500 million.**

Public transport options are broad, though less clear. Bus services interchanging with rail at Manukau would provide CBD access in around an hour. The proposed extension of light rail from the CBD to the airport opens the possibility of an extension to Karaka as an alternative. Travel times from Karaka to the CBD would likely exceed an hour. Under a scenario with non-stop rail services between Paerata and the CBD, a busway to the south of the satellite may be viable.

- **We note the potential for light rail to Karaka and the opportunity for access to the CBD with four-tracking rail services, but do not include these in our cost comparison.**

Table 3: Cost comparison for transport services to satellite locations

Investment in addition to planned (Supporting Growth)	Silverdale Dairy Flat	Kumeu South	Clevedon	Paerata	Karaka
Road arterials	\$800m	\$320m	\$460m	\$500m	\$600m
Expressways			\$500m		\$1,000m
Rapid transit		\$340m	\$960m	\$30m	\$1200m
Total city investment	\$800m	\$660m	\$1,920m	\$530m	\$2,800m
Direct transport cost per dwelling	\$27,000	\$22,000	\$64,000	\$18,000	\$73,000
Risk of regional capacity constraints	High	High	High	Medium	Low
Regional road additions	\$5,000m	none	\$1,000m	none	\$500m
Regional rapid transit additions	\$5,000m	\$3,000m	none	\$2,000m	none
Total transport	\$10,800m	\$3660m	\$2920m	\$2530m	\$3300m
Total city and regional impact per dwelling	\$360,000	\$122,000	\$97,000	\$84,000	\$110,000

Key Transport Findings

Of the direct networks (i.e. assumed improvements needed within the satellite location) we tested to service an additional 30,000 homes and 30,000 jobs in the five locations, Paerata performed the best in terms of cost. Kumeu South and Dairy Flat-Silverdale were similar, given the high level nature of the exercise, but the ability to leverage existing commitments to electrify and enhance rail to Pukekohe gives Paerata an advantage over other locations.

Additionally, regional strategic risks are less evident in Paerata (and Karaka) than elsewhere. Rail performed well through ATAP modelling to 2046. Busways in the north and north-west did not. It is likely that an additional 100,000 residents in and around Paerata could be supported with only a comparatively small investment in new stations.

If growth did necessitate an upgrade of the rail line to the CBD, particularly for safety reasons, Paerata still performed well in comparison to other locations. The estimate of \$2 billion to four-track rail to Westfield is at the higher end. The \$3 billion estimate to four-track the western line is at the more conservative end. An upgrade of the southern line would, moreover, allow the separation of freight and commuter services, greater assisting KiwiRail activities between Auckland, Hamilton and Tauranga.

If port operations in Auckland were shifted to Whangarei and an upgrade of rail to Northport was effected, four-tracking the western line may be required with or without a Kumeu satellite. In this case, South Kumeu would become feasible.

In the north, assumptions are heavily impacted by the trigger points for converting the busway to rail (or delivering rail in addition to the busway) and constructing a new harbour crossing. If these very large investments are inevitable with or without additional growth in Dairy Flat-Silverdale, then the north may be feasible. If concentrating investment to accelerate growth in these locations creates the need for these investments, the north is unviable.

Clevedon and Karaka had the highest direct transport costs. Karaka's trigger points for large additional strategic investment appear less of a concern. Clevedon trigger points are very uncertain and potentially very high. Our \$1 billion estimate is conservative and assumes a comparatively small link between Mill Rd and the SH1/SH16 intersection. Further additions expanding the motorway into Clevedon or, more likely, north to employment centres around East Tamaki are a discernible risk.

In our assessment Karaka carried the lowest likelihood of major investment beyond that identified as necessary, but had the highest basic requirements. This dynamic suggests that growth of the magnitude considered (30,000 homes and jobs) is better placed elsewhere in the region, but that growth of much higher scales could be feasible in the area.

Local Infrastructure and Land Development

Local infrastructure includes the local roads, footpaths, parks and water, wastewater and stormwater assets needed for growth. Typically, these costs are picked up by the developer and are included in the price of a new home.

We asked leading engineering and design consultancy Harrison Grierson to provide some typical costings on local infrastructure costs for a city of 30,000 homes and 30,000 jobs. We were interested in the scale of these costs, whether there were differences around the region and what difference scale made. Harrison Grierson did not identify intrinsic cost differences around the region. The data set out in Table 4 is indicative of development costs for hypothetically identical pieces of land in each of the five locations.

Table 4: Local infrastructure costs for developing a city of 100,000



SATELLITE CITY PROJECT
SUMMARY OF INDICITIVE
CIVIL CONSTRUCTION COSTS

No of dwellings
10,000
10,000
10,000
30,000

	Reference Number:	Date:	
		10/04/2017	
	Population	100,000	% of land area
Residential (10,000 dwellings; Low density 15/ha - Average 450m ²)	667 ha		34.7%
Residential (10,000 dwellings; 25/ha - Med density ave 325m ²)	400 ha		20.8%
Residential (10,000 dwellings; 40/ha - High density ave 175m ²)	250 ha		13.0%
Total Residential including; lots, local roads and pocket parks A	1,317 ha		68.6%
Commercial/Retail (ASSUME AVERAGE 75x30=2,500m ² LOTS)	225 ha		11.7%
Stormwater and recreation reserves	154 ha		8.0%
Collector Roads (25m wide 42km long)	104 ha		5.4%
Primary Schools (allow 3ha each @ 1/5,000 population)	60 ha		3.1%
Primary Schools (allow 9ha each @ 1/15,000 population)	60 ha		3.1%
	TOTAL B	603 ha	
	TOTAL	1,919 ha	100.0%

Civil Construction Costs	Typical Rates 2017/ha	Typical Rates 2017/lot	Civil Costs
RESIDENTIAL LOT DEVELOPMENT (LOTS, LOCAL ROADS, POCKET PARKS)			
100 PRELIMINARY AND GENERAL (5%)	65,124	2,754	82,627,083
200 DAYWORKS (5% of Item 300)	6,500	285	375,616
300 CLEARING, EROSION & SEDIMENT CONTROL & EARTHWORKS	130,000	5,706	171,166,667
400 LOCAL ROAD AND ACCESSWAY CONSTRUCTION	375,949	16,500	495,000,000
SIGNALIZED INTERSECTIONS	22,785	1,000	30,000,000
500 STREET AND ACCESSWAY LANDSCAPING	36,456	1,600	48,000,000
POCKET PARK PLANTING	20,000	878	26,333,333
600 STORMWATER	159,494	7,000	210,000,000
STORMWATER TREATMENT (ROAD RAINGARDENS)	54,684	2,400	72,000,000
STORMWATER TREATMENT (WETLANDS OR PONDS) 1 per 20Ha @ \$800K EACH	87,389	1,756	52,666,667
700 SANITARY SEWERS	82,025	3,600	108,000,000
Pump stations 1 per 20ha @ \$750,000	37,500	1,646	49,375,000
800 WATER RETICULATION	37,595	1,650	49,500,000
900 UTILITY SERVICES - ROAD DUCTING & STREETLIGHTS	121,899	5,350	160,500,000
Power, Gas and Comms connection charges	136,709	6,000	180,000,000
SUB TOTAL SECTION A	1,374,109	58,124	1,735,544,366
PLUS CONTINGENCY SUM @ 15%	206,116	8,719	260,331,655
Total Sum A	\$1,580,225	\$66,843	\$1,995,876,021
Other Costs			
Professional Design Fees (Planning, engineering and survey)	170,886	7,500	225,000,000
Concept/Masterplan design	28,986	100	3,000,000
Other professional services (geotech, traffic, ecological)	91,304	315	9,450,000
Council processing fees and charges	6,200	272	8,163,333
Council Development contributions	729,114	32,000	960,000,000
LINZ fees, as built + LT Fees	35,316	1,550	46,500,000
Total Sum B	\$1,061,806	\$41,737	\$1,252,113,333
Total A + B	\$2,642,031	\$108,580	\$3,247,989,354
COMMERCIAL/RETAIL/SCHOOLS (LOTS, COLLECTOR ROADS, STORMWATER & RECREATION RESERVES)			
100 PRELIMINARY AND GENERAL (5%)	16,800		10,124,800
200 DAYWORKS (5% of Item 300)	5,250		3,164,000
300 CLEARING, EROSION & SEDIMENT CONTROL & EARTHWORKS	105,000		63,280,000
400 COLLECTOR ROADS	155,000		93,413,333
SIGNALIZED INTERSECTIONS	66,667		15,000,000
500 STREET LANDSCAPING	35,000		12,075,000
RECREATION RESERVES	12,000		7,232,000
600 STORMWATER	135,000		81,267,089
STORMWATER TREATMENT (WETLANDS OR PONDS) 1 per 20Ha @ \$800K EACH	59,602		35,920,000
700 SANITARY SEWER	65,000		22,425,000
Pump stations 1 per 20ha @ \$750,000	14,000		8,437,500
800 WATER RETICULATION	19,500		11,752,000
900 UTILITY SERVICES - INCLUDING STREETLIGHTS	75,000		33,637,500
Power, Gas and Comms connections	8,960	6,000	5,400,000
SUB TOTAL SECTION C	772,779		403,128,222
PLUS CONTINGENCY SUM @ 15%	115,917		60,469,233
Total Sum C	\$888,696		\$463,597,456
Other Costs			
Professional Design Fees (Planning, engineering and survey) (8% of item C)	71,096		37,087,796
Concept/Masterplan design	25,000		15,066,667
Other professional services (geotech, traffic, ecological) (2% of item C)	17,774		9,271,949
Council processing fees and charges	6,200		3,736,533
Council Development contributions	37,334	25,000	22,500,000
LINZ fees, as built + LT Fees	2,987	2,000	1,800,000
Total Sum D	\$160,390		\$89,462,946
Total C + D	\$1,049,086		\$553,060,401
TOTAL DEVELOPMENT CIVIL COSTS A + B + C + D	\$1,980,401		\$3,801,049,755

Table 4 indicates that the total cost of local services for the city is around \$4 billion. The average cost per dwelling is almost \$110,000. Local infrastructure makes up around 60 per cent of the cost. The remaining 40 per cent is comprised of planning, design and council charges, the majority of which are development contributions (i.e. charges for regional infrastructure). To deliver a city of 100,000, almost \$1 billion of development contributions (including Watercare's growth charges) would be required from residential developers before houses could be sold and the costs recuperated.

The scale of development contributions is imposing, but also unreflective of the actual costs of regional infrastructure. Development contribution charges do not differ by location.¹⁸ Infrastructure costs do. In a location like Paerata, development contributions are likely to be too high, while in a location like Clevedon they are likely to be too low.

¹⁸ They do differentiate between brownfield and greenfield, but not the location of greenfield.

Total Infrastructure Costs by Satellite Location

The sum of regional infrastructure data, including direct transport costs, and development information provided by Harrison Grierson is included in Table 5 below. To avoid double-counting, development costs have been revised to remove regional infrastructure costs included in our wider assessment.

Table 5: Total infrastructure costs by satellite location

	Silverdale Dairy Flat	Kumeu South	Clevedon	Paerata	Karaka
Water, telco, energy	\$802m	\$764m	\$744m	\$659m	\$721m
Transport - direct	\$800m	\$700m	\$1500m	\$500m	\$2800m
Development (excl. DCs)¹⁹	\$2800m	\$2800m	\$2800m	\$2800m	\$2800m
Total: satellite	\$4400m	\$4300m	\$5000m	\$4000m	\$6300m
Total per dwelling²⁰	\$130,000	\$125,000	\$150,000	\$115,000	\$210,000
Transport risk assessment	High	High	High	Medium	Low
Transport risk assessment	\$10,000m	\$3000m	\$1000m	\$2000m	\$500m

Table 5 shows that Paerata performs the best in terms of overall servicing cost, at the scales tested. Around \$115,000 is required to develop and service a home in a hypothetical Paerata satellite. Karaka and, to a lesser extent, Clevedon demonstrated direct costs materially higher than other locations.

Paerata carries the additional advantage that the risk of transport investment substantially greater than that assumed in our study is comparatively low. Only Karaka was considered to have a lower risk that development in the location would trigger much higher transport investment needs.

If growth in the north creates a need for \$10 billion of investment in rail and a new harbour crossing, the per dwelling cost to service a satellite rises from \$130,000 to over \$400,000. If \$3 billion of rail improvements are needed to service Kumeu South, per dwelling infrastructure costs rise from \$125,000 to \$225,000. Clevedon costs including a comparatively modest \$1 billion motorway upgrade rise from \$150,000 to \$185,000 and up to \$500,000 per dwelling with a new motorway corridor.

Paerata, by comparison, would only see per dwelling service costs rise from \$115,000 to \$185,000 with a major rail upgrade. Parts of this upgrade have, furthermore, wide political support to proceed regardless of the location of future growth.

Taking into consideration potential regional strategic transport impacts, only Karaka is competitive with Paerata. Karaka's lower risk reflects the need to deliver new strategic links as part of its basic package. These add significant cost in the first instance, but, once delivered, may defer the need for high future investment, even with growth significantly beyond 100,000 residents.

¹⁹ Development contributions cover the cost of council water and transport infrastructure, as well as several other council activities, including reserves. We have removed development contributions as an item, noting that in practice some additional charges would be required to cover other council activities.

²⁰ The sum of infrastructure, including transport, and a \$2.3 billion development cost (\$3.8 billion minus commercial development costs of \$550 million and residential development levies of \$960 million), divided by 30,000 homes. Numbers rounded to nearest \$5000.

Land Values

Paerata was found to be the cheapest location to situate a satellite city.

We wanted to understand how significantly land prices varied across potential satellite city locations. If land is sufficiently more affordable in another location, it may be more cost effective to target scale development there, in spite of higher servicing costs.

In this section we examine land costs in the five areas. We analyse data to understand where in Auckland is most likely to result in affordable housing close to transport.

Land Cost

Using Core Logic's land information directory, we collated approximately 2000 hectares of property in each of the five potential locations. We looked at the size of land holding as well as the cost of property in each zone. The properties included in this phase of the analysis are set out in Map 10, 11, 12, 13 & 14.

Limitations on Core Logic data retrieval mean a maximum of 400 properties can be analysed at one time. The small size of property holdings in Dairy Flat (and to a lesser extent South Kumeu) restricted analysis of all properties in satellite zones. To obtain data for at least 2000ha of land around Dairy Flat, two blocks of land were collated and analysed. Summary property data is set out in Table 6.

²¹ All data sourced from Core Logic.

Map 10, 11, 12, 13 & 14: Land information in the five satellite locations²¹

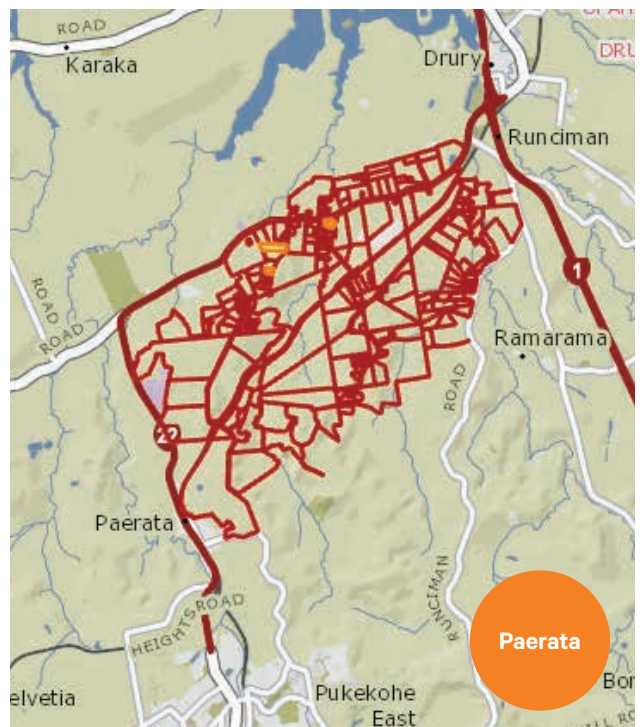
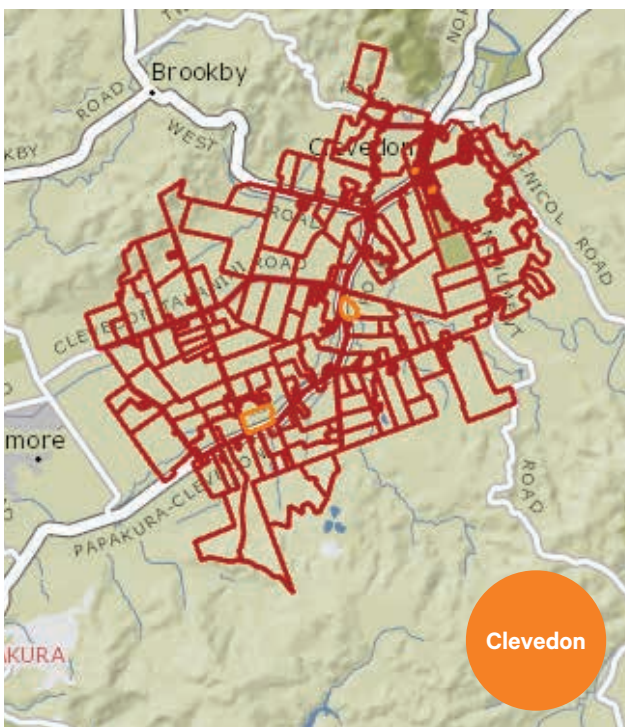
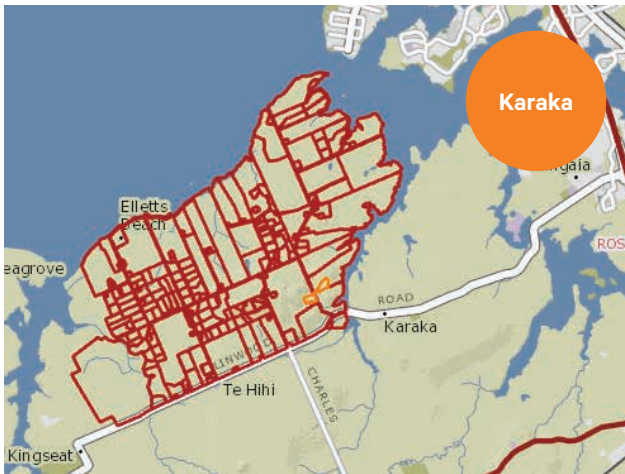
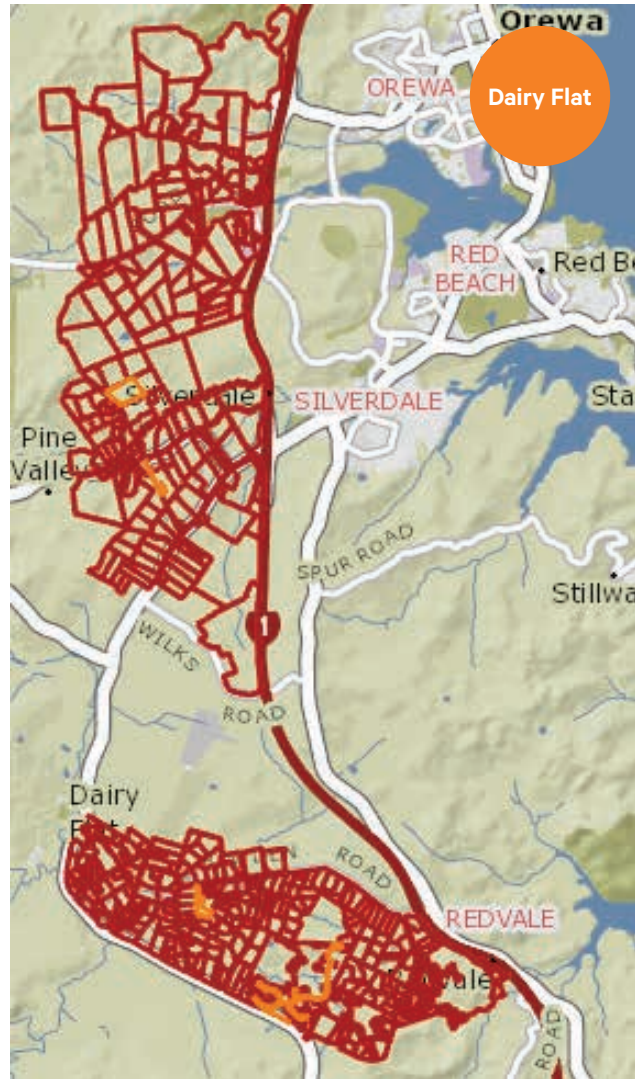
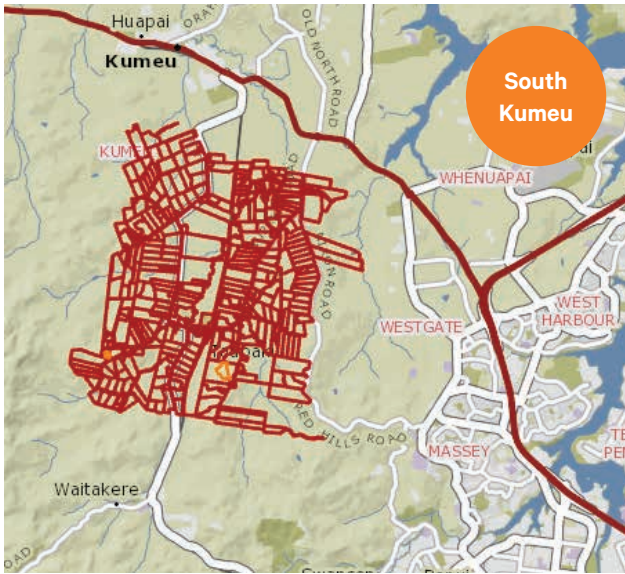


Table 6: Properties and total value in each location

	Dairy Flat	South Kumeu	Clevedon	Paerata	Karaka
Total area analysed	2289ha	1934ha	2209ha	2348ha	2503ha
Total number of properties	590	387	278	318	214
Average land holding	3.9ha	5.0ha	7.9ha	7.4ha	11.7ha
Total capital value 2014	\$997m	\$470m	\$397m	\$465m	\$414m
Total land value 2014	\$672m	\$293m	\$292m	\$286m	\$298m
Average capital cost/ha 2014	\$435,000	\$243,000	\$179,000	\$198,000	\$166,000
Average land cost/ha 2014	\$293,000	\$151,000	\$132,000	\$122,000	\$119,000
Property value inflation est. 2014-2017	+69%	+78%	+36%	+61%	+42%

Table 6 shows that land holdings are on average largest in Karaka, by some margin. Land holdings in Dairy Flat-Silverdale are the smallest, though larger holdings are present in the north of the area.

Smaller land holdings are correlated with higher property prices. This is because each section tends to have a home and the value of homes is factored into the overall property value. Dairy Flat-Silverdale is the most expensive place to redevelop. Capital and land values are around double other areas in the study, based on 2014 Auckland Council estimates (the most recent). Karaka has the lowest capital and land costs, closely followed by Paerata and Clevedon.

The age of property value information poses a problem. In light of rapid recent property value increases, price data is now out of date. It should be expected that Unitary Plan decisions, in particular, have and are having a significant impact on property prices, particularly in Paerata and Dairy Flat-Silverdale.

To understand the scale of this impact, we identified properties which have been sold in the past year and compared their sale price to the official capital value. The number of properties sold since June 1, 2016 ranged from 11 in Paerata to 30 in Dairy Flat-Silverdale. We removed the highest and lowest selling property in proportion to 2014 capital value to remove outliers that may distort raw price information. The average increase in property (i.e. capital) value is recorded in the final row.

Sale price information suggests the greatest price inflation since 2014 has been in Kumeu South, followed by Dairy Flat-Silverdale and Paerata. A property sold in Kumeu South in the last year sold, on average, at 78 per cent above the 2014 capital value. Inflation has been lowest in Clevedon, followed by Karaka. It is not clear why Kumeu South's price rise has been so rapid, given the lack of any upzoning through the Unitary Plan. It may reflect improved transport connectivity, proximity to a new town centre or be distorted by a comparatively small sample size (15 properties comprise the sales data set).

Analysing property information from the five satellite locations suggests land in Dairy-Flat Silverdale is now very expensive. A developer looking to convert property into new dwellings would expect to pay around \$735,000 per hectare or three times more than for land in Karaka and Clevedon. Prices are, furthermore, increasing faster (Table 6).

Table 7: Land and infrastructure costs in the five satellite locations

	Dairy Flat-Silverdale	Kumeu South	Clevedon	Paerata	Karaka
Infrastructure costs²²	\$1600m	\$1500m	\$2200m	\$1200m	\$2900m
Infrastructure cost per/ha	\$800,000	\$750,000	\$1,100,000	\$600,000	\$1,450,000
Property value/ha 2014	\$435,000	\$243,000	\$179,000	\$198,000	\$166,000
Property value/ha est. 2017	\$735,000	\$433,000	\$243,000	\$319,000	\$236,000
Total infrastructure and property cost 2017/ha	\$1,535,000	\$1,183,000	\$1,343,000	\$919,000	\$1,686,000

A further finding from Table 7 is that land is cheaper in Karaka and Clevedon, but the saving on land value is small in relation to additional infrastructure costs. Approaching \$100,000 can be removed from a hectare of development in Clevedon or Karaka due to lower property values. Increased infrastructure costs of between \$500,000 and \$800,000 are much more significant. Only in Dairy Flat-Silverdale are property prices becoming so high as to be comparative with average direct infrastructure costs.

²² Comprising regional transport, water, energy and telecommunications, excludes development costs.

The Preferred Location for a Satellite City: Paerata

Aggregating the total costs of developing land, including trunk and local infrastructure and land costs, we found that Paerata was the cheapest location to add 100,000 people. This is largely a result of low water supply costs, due to Paerata's situation along the Waikato pipeline, and the ability to leverage planned transport investments. The location of the rail line and the potential to expand the rail corridor at a comparatively low price to provide non-stop services to the CBD is a significant advantage for Paerata.

Paerata also benefits from competitively priced land and large lots. While prices are rising rapidly, available data suggests they are still significantly cheaper than Dairy Flat and Kumeu South. The lower price to acquire or redevelop land makes it easier to develop affordable housing and/or use land value appreciation to subsidise infrastructure costs. Larger lots make land aggregation and stakeholder engagement easier.

Cheaper Karaka land is insufficient to offset infrastructure costs - at assumed growth levels

From a land cost perspective, Karaka was the cheapest, but the higher price of developing up to 2000 hectares there does not outweigh the additional costs of infrastructure, at the scale tested. Applying the observed inflation estimate of 61 per cent to property values in Paerata takes the average per hectare cost of buying land to \$319,000 per hectare and \$640 million over a 2000 hectare development. This compares to under \$240,000 per hectare and \$480 million in Karaka, assuming inflation of 42 per cent since 2014.

Across a 2000ha development, acquiring or otherwise repurposing land for development would carry an additional \$160 million cost in Paerata over and above Karaka. This is a significant figure, but is not sufficient to offset the additional infrastructure costs of adding 100,000 people to Karaka (of around \$800-900 million in direct infrastructure costs).

Karaka's vast area in combination with cheap land and lower regional infrastructure trigger points mean that under a different test scenario it could become a priority growth area, in spite of high infrastructure costs. If higher growth levels are assumed (for example, 60,000 homes over 4000 hectares), better utilisation of Karaka strategic infrastructure and lower land costs would make it a more feasible growth location than Dairy Flat-Silverdale, Kumeu South or Clevedon.

Conclusion

Development in Dairy Flat-Silverdale is very expensive

High land and infrastructure costs and low trigger points for major additional investment suggest that new growth should not be encouraged in the north. Both public transport and motorway modelling indicates that significant investment above and beyond what is currently committed through the Supporting Growth programme is needed just to meet expected demand. The addition of 100,000 residents would require rail and motorway investments which make growth in the north very expensive.

Evidence suggests not only that the north cannot accommodate 100,000 additional residents, but that current growth expectations should be dialled back. Slower growth may avoid the need for multi-billion dollar investment in a new rail corridor and state highway capacity. Land costs of between two and three times other peripheral locations in Auckland indicate land acquirement will add \$400 million to \$800 million to the underlying cost of a 2000ha development.

Kumeu south land is uncompetitive

Infrastructure costs to develop a city of 100,000 in Kumeu south are mid-range. However, very high apparent property price inflation in recent years suggests it may be difficult to develop affordably. Updating property costs by applying a price inflator of 78 per cent, indicates land per hectare in the area is now around \$430,000. This is over \$100,000 per hectare more than Paerata, with the added complication that land holdings are smaller, making land aggregation and redevelopment more difficult.

Clevedon transport solutions are expensive and uncertain

Lower property inflation in recent years makes Clevedon more attractive for development, but this benefit is insufficient to offset high transport costs. Clevedon's location away from established infrastructure and uncertainties about how strategic transport services link to regional networks are major issues. In light of flooding risk, Clevedon has to demonstrate major land cost or infrastructure efficiencies to justify development prioritisation, which it does not.

We determined that Paerata best suited the aims of the study to investigate an integrated development, aligned with transport and leveraging land value. We progressed Paerata to the next stage to investigate more detailed city information.

Paerata City: Employment and Construction

The final stage of costing up a mock satellite city was to understand construction. This process included understanding employment needs in Paerata, including potential public investments which could catalyse employment growth, and estimating the cost of housing.

Employment

From the outset, a baseline assumption for the satellite city project was that at least as many jobs would be provided for as homes. This is a critical component of the transport strategy, which is to limit as far as possible trips to and from the CBD through Auckland's capacity-constrained core.

Existing growth plans for Auckland's south assume 42,000 homes and 19,000 jobs.²³ We wanted to identify at least 11,000 more jobs which could be added if the city was integrated and delivered as a single development.

We analysed a range of public investment opportunities which are or would likely become necessary if a city developed around Paerata. The following activities and theme around science, health and education emerged.

²³ Supporting Growth.

1. Paerata Hospital

The health agency responsible for the wider south Auckland area is Counties-Manukau DHB. Its major facility is located at Middlemore in Mangere east, some 20km north of Paerata. The facility's location was determined in the 1940s with some structures on the site dating from this era. The site is proximate to rail but not the strategic road network, which is critical to emergency services.

Manukau DHB does not have plans for a replacement of the Middlemore site, but does own a significant amount of land in Manukau, some 15km north of Paerata. Further development of the superclinic site is possible and is expected, but would further consolidate medical facilities in the DHB to the very northern portion of the serviced area.

A new major medical facility for Counties-Manukau DHB is therefore viable under a Paerata city growth scenario. In terms of employment, Middlemore directly employs 4100 staff (full time equivalents). Available studies of the economic impact of hospitals suggest direct hospital employment is only around 55 per cent of all employment generated by hospitals. Indirect employment accounts for the remaining 45 per cent.²⁴ Around 7500 jobs are likely created by Middlemore, the great majority of which would move to Paerata under this scenario.

An alternative is that Middlemore remains the DHB's principal medical facility, but a new facility is opened in Paerata. Counties Manukau DHB would sell its surplus land (or a UDA redevelop it) in Manukau and focus new investment on the new Paerata hospital. A smaller facility, equivalent to the 400-bed Dunedin hospital would employ approximately 3000 staff. Including indirect employment, this option would create around 5500 new jobs.

2. Paerata University

Auckland tertiary education facilities are predominantly provided in and around the Auckland CBD. The concentration of students and staff at the University of Auckland and AUT CBD sites is a major generator of transport demand and congestion. Establishment of a major new university in Paerata would significantly reduce pressures on Auckland's transport network.

There has not been an entirely new university established in New Zealand since the University of Waikato in 1964. More recent additions to university status have either been off-shoots of existing universities (Lincoln University separated from the University of Canterbury in 1990) or expansions of existing facilities (AIT became AUT in 2000).

Universities New Zealand identifies a ratio of one university to 500,000 population as in line with international norms.²⁵ This is consistent with where New Zealand is at currently, but not where New Zealand or Auckland will be in a decade. A new university should be expected somewhere in New Zealand within the next two decades and Auckland's primary growth location is the most feasible location for this facility.

Auckland University is New Zealand's largest university and is not likely to be replicated outside of Auckland's CBD. AUT provides a wider range of educational options than the University of Auckland and actively targets students from southern Auckland.²⁶ AUT currently employs around 2500 staff and has an enrolment of nearly 30,000.

Research by BERL suggests that AUT also provides a much wider employment impact than direct numbers show. A total economy-wide impact of 4300 jobs (FTEs) is created via the operation of AUT.²⁷ Not all these jobs would be created in and around Paerata with the presence of a Paerata University, but the initiative would generate significant employment.

²⁴ See, for example, IBRC, *Economic Impact of the New Reid Hospital*, February 2006; and Hospital Council of Northern and Central California, *Economic and Health Impact of Hospitals*, 2016.

²⁵ <http://www.universitiesnz.ac.nz/about-university-sector/key-facts>

²⁶ AUT, Annual report, 2015.

²⁷ AUT, Annual report, 2015.

Residential Construction

3. Te Papa North

Discussions about a new Te Papa museum exhibition and storage facility in Manukau have accelerated in recent years.²⁸ With an annual operating spending of \$3 million per annum, a facility of this scale will not significantly lift employment if located in Paerata. However, it could sit at the heart of a wider science, cultural and educational strategy for the city.

In combination, the hospital, university and museum would set Paerata up as a new hub for learning and innovation in Auckland's south. The objective would be to catalyse additional private sector investment in services linked to the three main public investments. For example, at Barangaroo in Sydney, the developer has successfully targeted financial services with larger floor plates consistent with the model deployed in Canary Wharf, London. Masterplanning for Paerata would specifically cater for wider industry capable of leveraging off the three key public investments.

Total employment added

Including a major hospital, university and museum in Paerata city could be expected to add between 9000 and 12,000 jobs in Auckland's south. This estimate includes supporting activities, but does not include private employment catalysed by the presence of a science, health and innovation hub.

The largest individual cost of a development is the construction of homes. New Zealand's home construction market is dominated by small, independent contractors specialising in bespoke homes. A major advantage of the integrated urban development at scale model is the potential to support greater use of modern home construction techniques. Housing procured in sufficiently large blocks will provide the opportunity to move to prefabricated construction.

Prefabrication

Prefabrication, or prefab, refers to the off-site manufacture and assembly of building components. It is a wide term incorporating the manufacture of discrete parts of a structure, such as panels, right through to the near complete assembly of a home in a factory.

Prefabrication

Prefab is critical for two reasons. Firstly, home construction costs are comparably high in New Zealand and prefab represents a major opportunity to bring these costs down. In 2012, the Productivity Commission estimated that New Zealand new home build costs were 15-25 per cent higher than in Australia.²⁹ This estimate was based on a detached home build of \$1650 per m2, which is very low by today's standard. Construction costs for a "typical" 160-180m2 standalone dwelling in Auckland are now around \$2000m2.³⁰

Research by Massey University has shown that prefab can significantly reduce construction costs. In a 2015 case study of Auckland construction projects, researchers identified a 20 per cent cost saving on housing initiatives using prefab.³¹ Not all studies have shown equivalent cost savings, but some related work on commercial property found a strong link between the amount of prefab used and a project's cost performance. Specifically, the higher proportion of prefab, the greater the savings.³²

Secondly, prefab is required to resource the number of homes which need to be built. It is doubtful that Auckland can build a city using conventional construction approaches. Labour is currently stretched building just 7000 homes a year, well short of the 14,000 required. Upward pressure on wages created by construction of Paerata city will undermine affordability without major productivity improvements.

²⁸ <http://www.stuff.co.nz/dominion-post/news/72833407/te-papas-planned-auckland-offshoot-is-put-on-ice>

²⁹ Productivity Commission, *Housing Affordability Report*, March 2012, pg. 179.

³⁰ Rawlinsons.

³¹ Shahzad, W.M, Mbachu, J. and Domingo, N., *Marginal Productivity Gained Through Prefabrication: Case Studies of Building Projects in Auckland*, 2015.

³² Shahzad, W.M, Mbachu, J. and Domingo, N., *Prefab content versus cost and time savings in construction projects: A regression analysis*, 2014.

The 2016 Massey study showed that prefab was able to halve the time needed to deliver housing initiatives. The assembly of homes off site is not only advantageous in terms of time and productivity, it is less dependent upon high demand skills. Panels and other housing components manufactured off site do not require skilled labour and faster assembly on site reduces the time commitments of builders, plumbers, electricians and other skilled labour.

In addition, there is evidence to show that prefabricated homes tend to be higher quality. Greater energy efficiency, higher sustainability ratings and less wastage are typical benefits. Savings on procurement can also be expected where prefab leads to wider sourcing of materials and products.³³

Estimating housing costs

A major driver for development at scale is to enable and support a shift to prefabrication. Small housing developments do not provide the certainty needed to invest in more productive processes. Procuring housing in large tranches will give the market greater confidence to invest in plant and machinery needed for offsite manufacturing.

Using representative per metre costs for building at high, medium and low density in Auckland today, Table 8 provides a guide to the overall value proposition of prefab at scale.

Table 8: Indicative savings from procuring housing at scale with prefab

	Low	Medium	High	Total Satellite City
Sample description	160-180m2 detached	120-140m2 duplex	60-70m2 apartment	
Indicative build cost 2017	\$2000m2	\$2500m2	\$4000m2	
Cost to build one unit	\$340,000	\$325,000	\$260,000	
Cost to build 10,000 units	\$3.4 billion	\$3.25 billion	\$2.6 billion	\$9.25 billion
Prefab saving 10%	\$3.06 billion	\$2.925 billion	\$2.34 billion	\$8.325 billion
Prefab saving 20%	\$2.7 billion	\$2.6 billion	\$2.08 billion	\$7.4 billion

Table 8 indicates that to construct a typical low density home in Auckland today costs around \$340,000, excluding development costs, land and fees. Scaling that build up to 10,000 units as per the assumption of the satellite city, the total cost of constructing low density housing using conventional building practices is likely to cost around \$3.4 billion. Including the \$3.25 billion to construct medium density and \$2.6 billion to construct high density, the total cost to build homes in Paerata city using conventional practices is around \$9.25 billion.

Constructing the same low density home using prefab is likely to cost \$270,000, assuming a 20 per cent saving. A 20 per cent saving on medium density is consistent with observations,³⁴ and would remove around \$65,000 from the cost of a duplex. A 20 per cent saving on high density housing would reduce the cost of a 65m2 apartment by around \$50,000, though evidence suggests a 10 per cent saving may be more realistic.³⁵

We include in our overall cost of Paerata city, residential construction of \$7640 million. It assumes a 20 per cent cost saving is made on low and medium density dwellings and a 10 per cent saving on high density.

³³ Buckett, NR., *Building Better – Advanced Residential Construction Techniques for New Zealand*, BRANZ, 2013.

³⁴ Shahzad, W.M, Mbachu, J. and Domingo, N., *Marginal Productivity Gained Through Prefabrication: Case Studies of Building Projects in Auckland*, 2015.

³⁵ See, for example, <http://www.prefabnz.com/Downloads/Assets/3841/1/>

Total Construction Costs for Paerata City

In this section we combine the total costs of developing and construction Paerata city (including commercial property development, but excluding commercial property construction). Only capital costs are included.

Paerata hospital

Using Dunedin's new hospital as a guide, a new major hospital facility serving up to 200,000 residents can be expected to cost approximately \$1.2-\$1.4 billion. We use \$1.3 billion as a mid-range estimate.

Paerata University

Costing construction of a new university is particularly difficult give the length of time since New Zealand last build a major tertiary education facility. AUT's 2016 annual report records \$809 million of plant, equipment and property. We have used an estimate of \$1 billion for a new university.

Te Papa North

Te Papa North has an estimated capital cost of \$40 million.

Wider Education Infrastructure

Like hospitals, schools are funded out of central government taxes. We do not include the cost of critical school infrastructure in our final cost estimate, but given the scale of investment it is important to include schools in the overall assessment.

Primary school aged children typically comprise 9 per cent of a local population and secondary aged children 7 per cent. Across a city of 100,000, we therefore assume 9000 primary students and 7000 secondary.

Assuming a standard primary school roll of 700 students, Paerata city would require 13 primary schools. A typical primary school cost is approximately \$15 million, resulting in a total cost of around \$200 million.

Assuming a standard secondary school roll of 1000 students (noting Auckland secondary schools are in practice likely to be larger), Paerata city would require seven secondary schools. A typical secondary school cost is around \$30 million, resulting in a total cost of around \$200 million.

School infrastructure for a city of 100,000 is therefore likely to cost the Government approximately \$400 million.

Infrastructure and Development

Drawing on the information above, we estimate the cost of delivering infrastructure to Paerata city at \$1.2 billion. Land development is a further \$4 billion.

Housing

Assuming 20 per cent cost savings on low and medium density home construction and a 10 per cent saving on high density, the total indicative cost of prefab housing across the satellite is \$7.64 billion. This is a saving of around \$1.6 billion from a conventional approach.

Conclusion

Aggregated information on the cost of delivering Paerata city is included in Table 9 below.

Table 9: Total capital costs of delivering Paerata City

	Total	Average cost per dwelling (excl. GST)	Per dwelling assumptions and notes
Water, telco, energy	\$660m	\$22,000	
Transport	\$500m	\$17,000	Direct costs only
Land development (excl. DCs)	\$2800m	\$77,000	Excludes commercial development costs
Land 2017 (cost to buy 2000ha today)	\$640m	\$21,000	Includes commercial land and schools
Residential construction	\$7640m	\$255,000	Average across all housing. Assumes cost saving via shift to prefab housing
Total development	\$12,240m	\$392,000	
Residential development excl. telco, energy		\$375,000	Assumes regional fibre, electricity and gas network costs covered by provider and commercial development self funded
Schools	\$400m		
University	\$1000m		
Hospital	\$1300m		
Museum	\$40m		
Total additional	\$2740m		
Total city	\$14,980m		

The total cost of all development in a city of 30,000 homes and 30,000 jobs is estimated to be \$15 billion. This includes the largest public investments, but excludes smaller items which collectively will add significant cost, such as justice, emergency services and community facilities. It also excludes some fully private activities, most notably mobile services. Operating costs are also excluded.

Fifteen per cent of costs we examine are attributed to public sector seed investments to catalyse employment and wider growth in the area. Around half of all costs are driven by residential construction and 30 per cent by infrastructure and development.

Table 9 reveals that regional infrastructure is a comparatively small component of an overall house price (\$39,000 or less than 10 per cent). At its raw cost before zoning and infrastructure, land is also a small overall proportion (5 per cent). Much more significant are local infrastructure and land development costs, at around 20 per cent of the total. If rail improvements were triggered by a Paerata city and attributed exclusively to the development, transport costs would rise from \$17,000 to \$83,000 per dwelling.

Construction of the home itself is clearly the most expensive component, at 65 per cent of the total. Without the assumed efficiency saving from shifting to prefab, the average home construction price in our example would rise around \$50,000 to just over \$300,000.

Adding the complete costs of development, we estimate that the average cost to deliver a home in Paerata city would be \$392,000. This assumes that development profit and land value increases are not captured by those parties. This is equivalent to the risk-free cost if the Government owned the land and developed the property itself. Including a GST charge on the final product, the cost of a dwelling rises to \$450,000.

Infrastructure charges include telecommunications and energy costs of \$500 million across the development. Normally these are absorbed by the provider and repaid via monthly account charges. Removing this item reduces an average dwelling cost by \$17,000 and takes the average total cost to \$375,000 (\$430,000 including GST).

Case study comparison: A conventional approach in Dairy Flat-Silverdale

We estimate the cost of delivering an integrated city development in Paerata at \$392,000 (excluding GST). Using data from the Dairy Flat-Silverdale location, this cost increases by around \$80,000. This is an increase of around 20 per cent.

Most of this cost (\$55,000) is driven by assumptions around a standard build vs prefab. Excluding residential housing construction, Dairy Flat-Silverdale delivers an average home at \$27,000 above Paerata costs.

Table 10: Development costs in Dairy Flat-Silverdale.

Dairy Flat-Silverdale comparator	All	Average cost per dwelling
Water, telco, energy	\$800m	\$27,000
Transport	\$800m	\$27,000
Land development (excl. DCs)	\$2800m	\$77,000
Land 2017	\$1000m	\$33,000
Residential construction	\$9250m	\$310,000
Total cost	\$14,150m	\$474,000
Total including GST	\$16,270m	\$545,000



Funding Tools

The \$375,000 cost to deliver a home in a hypothetical Paerata city includes no provision for profit. The next phase of the project was to understand the value created by the city. We look at both the direct tax revenue captured by central government, property tax revenue collected by local government and the potential value uplift generated when a complete dwelling is sold on the open market. We do not examine commercial property potential.

GST Generated by Paerata City

Assuming all elements of the Paerata city concept were delivered at cost, totalling \$15 billion, the Government would receive \$2.25 billion in GST. If residential property was sold on the open market and the value of the development increased by just around \$10 billion, in line with Karaka Lakes and Pokeno, the Government would receive a further \$1.5 billion in GST.

A GST take of between \$3 and \$4 billion is equivalent to all land and development costs across the full 2000 hectare development. If GST was tied to development, central government could, conceptually, fund all infrastructure and development itself, allowing homes to be sold at their average construction build cost of \$255,000 (plus GST).

In practice, GST is a general tax used to fund, among other things, schools, which are included in the overall development costs but not attributed to total home costs. Allocating GST to the activity which generates it would be a major shift with wider ramifications, not only for other housing developments by other Government responsibilities. Nevertheless, the exercise shows that growth is strongly net positive from a central government revenue perspective and that taxes generated from housing are affecting affordability.

Rates

The Auckland Council levies rates on property in Auckland. Currently, rates sit at around \$3000 per annum for an average residential property. An average rate of \$3000 would levy \$90 million per annum. Factoring in rates the council already obtains from the area and the desirability of targeting the more affordable end of the residential market, a net rates increase of \$60 million may be expected.

A revenue stream of \$60 million is sufficient to repay a debt of over \$1 billion over 30 years, assuming an interest rate of 4 per cent. The cost of Paerata city's roads and water infrastructure above and beyond that already in planning documents was estimated at around \$700 million. The council provides other services, for example parks and community facilities, but these are unlikely to exceed the servicing capacity of a \$60 million rates increase. Furthermore, half of road investment can be expected to be funded through the National Land Transport Fund and water services are ultimately self-funding.

This suggests that well-planned growth does not deliver a net cost to the Auckland Council before operating and maintenance costs are considered. Estimating whole of life costs is outside the scope of this study, but in a location like Paerata it is likely that the council's whole of life obligations can be met. In a location like Dairy Flat-Silverdale, it is likely that the council would receive less in rates than it would cost to service new growth in the area over the long term.

As previously noted, the council's principal challenge is financing investment without exceeding debt ratios highlighted by ratings agencies. If Auckland Council infrastructure responsibilities were undertaken by the development, for example, if land value improvement was used to raise debt and repay network or "trunk" service investment on behalf of the council, Paerata land owners would require a rates rebate. This would ensure that Paerata residents were not subsidising other developments across Auckland which did receive council funding.

Estimating the appropriate rebate to a fully funded development is difficult. The Auckland Council provides a wide range of services which are not easily disaggregated into growth and non-growth investments by location. The overall impact would, however, be minor in relation to wider taxation.

Value Capture

The increase in land value from zoning, infrastructure and successful development typically provides the margin of profit to a developer or land owner. Under existing practice, public authorities do not specifically target this margin, but in some cases it can provide a significant capital windfall to property owners. This section looks at what scale of value uplift might be reasonably expected in a Paerata city.

There are no perfect comparators to understand the future potential value of residential development. To provide insight we have therefore used two different, but broadly comparable initiatives currently underway near Paerata. The first is Karaka Lakes, 5km north of Paerata. It is closer to Auckland and is a higher end development. It is used as the upper benchmark for what properties delivered in Paerata could be sold for on the open market.

The second location is Pokeno, 12km south of Paerata. It is in the Waikato region, so falls under a different planning and governance jurisdiction, but is a housing satellite for Auckland workers. It generally provides a more affordable housing option and is used as the lower benchmark for potential housing value in Paerata.

We analyse developed land across the two comparators, separating their land and capital values. We then apply an average land value increase to account for higher density development enabled in Paerata by colocation with rapid transit and employment.

Map 15 & 16: The Karaka Lakes development



Karaka Lakes

The closest major urban development to Paerata currently underway is in the Hingaia area, 5km to the north. It is also located adjacent to SH1, but has no proximate rail access. We used Core Logic to source data on housing underway and recently sold. The properties used in our analysis and its location in relation to Paerata are shown in Map 15 & 16.

We analysed the property information of 364 properties covering 18.5 hectares of a 30 hectare site. The development includes a mix of medium and low density housing and is less dense than what has been assumed across a full Paerata satellite city. The average lot size is around 520m².

The total 2014 capital value of the 364 properties analysed is \$272 million, or \$740,000 per property. Homes are larger than those considered in the Paerata concept, averaging around 200m². Land value across the properties analysed was \$123 million, equating to \$6 million per hectare. Land across Karaka Lakes comprises 45 per cent of all value and improvements 55 per cent.

There have been 62 property sales in 2017 and the average sale price has been 40 per cent above capital value. Adding this improvement across the development increases the total value of property to \$380 million and the average property value to \$1,050,000.

If capital value improvement consistent with 2017 sales is attributed entirely to land value (i.e. that no alterations have been made to existing homes), the value of land across the 18.5 hectares of housing is now \$227 million, or \$12.5 million per hectare. The average property value is now 60 per cent land and 40 per cent improvements.

Map 17 & 18: The Pokeno development



Pokeno

The second location we tested against was Pokeno. It is around 12km south of Paerata and has similar access to SH1. There is a proximate rail line, but no rail commuter services. We used Core Logic to source data on housing underway and recently sold. The properties used in our analysis and its location in relation to Paerata are shown in Map 17 & 18.

We analysed 308 residential properties, 27 of which had no dwelling. Residential land comprised 21 hectares of the 35 hectare site examined. There is no medium or high density housing on the development. The average site is around 670m².

The total 2014 capital value of the development is \$162 million, comprised of \$60 million of land and \$103 million of improvements. Excluding vacant sites, the average home size is around 200m² with an average capital value of \$530,000. On a per hectare basis, property in Pokeno has a capital value of \$7.9 million and a land value of \$2.9 million. Land comprises 37 per cent of all value in Pokeno and improvements 63 per cent.

There have been 15 home sales in 2017. The average sale price has been 34 per cent above capital value. Adding this value across the development increases the total capital value to \$220 million and the average home value to \$700,000.

Allocating the value of observed capital value improvement to land value across the 21 hectares of residential property results in a current land value estimate of \$5.6 million per hectare.

Karaka Lakes, Pokeno and Paerata today compared

Table 11 presents property information for Karaka Lakes, Pokeno and Paerata. Using existing 2014 estimates of land value, it shows that a completed hectare of residential land in Karaka Lakes (\$6 million) is valued at 49 times that of the same amount of land in Paerata. In Pokeno (\$2.9 million) the equivalent figure is 24 times higher. Analysis of 2017 data suggests similar ratios of 46 times Karaka Lakes land value and 23 times Pokeno.

Table 11: Properties and total value in each location

	Karaka Lakes		Pokeno		Paerata	
	2014	2017	2014	2017	2014	2017
Housing area investigated (ha)	30		35		2348	
Residential property (ha)	18.5		21		n/a	
Number of residential properties	364		308		318	
Housing typology	Low/Medium		Low		Rural/lifestyle	
Average lot size (m2)	520		670		7400	
Total capital value (\$m)	\$270	\$375	\$160	\$220	\$465	\$750
Total land value (\$m)	\$120	\$225	\$60	\$115	\$286	\$570
Capital value per property (\$000)	\$740	\$1035	\$530	\$700	\$1460	\$2356
Land value per property (\$000)	\$330	\$625	\$190	\$370	\$901	\$1794
Capital value per hectare (\$m)	\$14.5	\$20.5	\$7.9	\$10.5	\$0.198	\$0.319
Land value per hectare (\$m)	\$6.5	\$12.5	\$2.9	\$5.6	\$0.122	\$0.243

Although developed land may be up to 50 times higher than in an undeveloped area like Paerata, the focus on residential property in Karaka Lakes and Pokeno distorts the comparison. Not all of Paerata could ever be completely converted to housing lots. A significant amount of additional land is needed to support dwellings. This not only includes the roads and pocket parks, but schools and other facilities. (However, for a property owner whose land is fully on land rezoned for housing, the potential is for land value increases in the vicinity of 50 times original value.)

The Paerata Land Value Opportunity

Table 11 shows that the value of land used for housing in Karaka Lakes is approximately \$12.5 million today and in Pokeno \$5.6 million. The mid-point estimate for Paerata residential land is therefore \$9 million per hectare. We use this as our average estimate for post-development low density housing in Paerata city. In practice, the smaller sections assumed in Paerata would increase land value, but we also anticipate targeting a more affordable market.

Higher density development increases the underlying value of land. In Karaka Lakes, land value per hectare of the 37 sections under 300m² reveals a per hectare land value in 2014 of \$11.3 million. This is almost double the \$6 million average value of land across the whole area examined.

In Hobsonville, a more advanced development again and featuring high, medium and low density, land value differences are less pronounced. Existing 2014 land value per hectare for high density property is \$21 million. It is \$12.5 million for medium density and \$10 million per hectare for low density.

There is no high density development in the developments we examined at Karaka Lakes and Pokeno, and only a small portion of medium density. We decided to use the identified land value ratios in Hobsonville as a guide to estimating the value of medium and high density residential land in Paerata. We applied a factor of 1.25 to estimate medium density land value and a factor of 2 to estimate high density. The findings are set out in Table 12 below.

Table 12: Estimating residential property uplift potential for Paerata city

	Paerata residential land value			
	Low	Medium (low x 1.25)	High (low x 2)	Total
Land value per hectare	\$9m	\$11.25m	\$18m	
Average lot size	450m ²	325m ²	175m ²	
Average land value per lot	\$400,000	\$365,000	\$315,000	
Total land consumed	450ha	325ha	175ha	1000ha
Total value land	\$4050m	\$3656m	\$3150m	\$10,890m

Ten thousand low density units averaging 450m² would consume 450 hectares but require in total 667 hectares, including roads, parks and other supporting services (Harrison Grierson). Its total value would be \$4.05 billion and section values would be \$400,000.

Allocating an average of 325m² per lot for medium density housing would consume a total of 325 hectares, or 400 including supporting local services. Assuming a land value factor of 1.25 above low density value, this land would be worth \$3.656 billion.

An average 175m² per high density dwelling would consume 175 hectares in Paerata, or 250 hectares including local services. Using a multiple of two times low density value, this land once developed would be worth \$3.15 billion, using 2017 estimates.

Altogether, we estimate that developing existing Paerata land into 10,000 each of high, medium and low density dwellings would result in a total residential land value in today's prices of \$10.9 billion. This is over \$10 billion higher than the \$640 million estimate of 2000 hectares of property today, but would only cover 1317 hectares, including roads, parks and other services needed to support housing.

Including schools, collector roads and stormwater land identified by Harrison Grierson, the total land consumed would be 1574 hectares. To buy 1574 hectares in Paerata today would cost approximately \$500 million. The post development land value of \$10.9 billion is \$10.4 billion and almost 22 times greater.

To realise this uplift, infrastructure and development costs of \$3.5 billion (excluding commercial development costs) would be required, resulting in a net uplift of approximately \$6.9 billion. This is the value created above and beyond costs from infrastructure, zoning and successful development.

Paerata house prices

By combining projected land value with development costs it is possible to estimate the retail price of housing in Paerata, assuming market rates. A post development land value of \$10.9 billion would see average land value per property rise from \$21,000 (\$17,000 across just the 1574 hectares of housing-related land) to \$360,000. It would cost \$117,000 to achieve this value (or \$99,000 excluding energy and telecommunications). The net value improvement of land after zoning, infrastructure and development would on this basis average \$246,000 per property.

Land values at this level infer that an average home in Paerata would sell for \$615,000 (excluding GST), comprised of land worth \$360,000 and improvements of \$255,000. This is closer to the price of housing in Pokeno than in Karaka, which reflects smaller average dwellings (given assumptions around high and medium density).

Table 13: Estimated home values in Paerata city 2017 prices

Density	Land	Home	Total
Low	\$400,000	\$272,000	\$672,000
Medium	\$365,000	\$260,000	\$625,000
High	\$315,000	\$234,000	\$549,000
Average	\$360,000	\$255,000	\$615,000

Conclusion

The principal beneficiaries of development are central government and property owners. Local government, home owners and developers who are not land owners benefit to a lesser degree. Indeed, once risk and other factors are included they may in fact be disincentivised from participating in development-related activities (including buying a home).

GST related to development of 30,000 homes would be significant, but “capturing” it for development would be a major shift. It would not, furthermore, necessarily lead to more homes or more affordable housing. What GST does do is provide an incentive and return on investment for the Government to facilitate development. The Government can, and arguably has an interest in, assuming development risk on the basis that it will benefit from tax revenue. This would allow housing to be delivered close to cost.

However, unless land can be accessed at its pre-development value and the subsequent uplift tied to the activities which enable it, there is little chance housing can be provided at price points which are affordable on Auckland incomes. The difference in price between the average cost to deliver a completed home (\$375,000) and what an average completed home would sell for on the assumptions above is almost \$250,000.

Delivering Paerata City

A net land value improvement from development of around \$250,000 per dwelling and \$7 billion over a 30,000 home city is significant. A portion reflects the fair risk associated with residential development and the success of the schemes examined. The remainder is value resulting from public activities, principally zoning and infrastructure, in a context of housing undersupply.

This chapter looks at the models which could be employed to capture and leverage this value to support more housing, faster and in a way which lessens pressure on infrastructure services.

It is beyond the scope of this study to consider what proportion of land value improvement is the result of public and which is the result of private (i.e. developer) activities. What can be said is that if public authorities were to take on a greater role in urban development, such as proposed through new UDA legislation, up to \$250,000 per property could be realised in value uplift. This is after infrastructure has been paid for and assumes land at its raw value can be accessed.

Funding and Delivery Models for Paerata City

The options for delivering a new city for 100,000 residents in Paerata can be reduced down to several basic alternatives. City development must be led by either central government, local government or the property owners in the affected area (including a party acting on their behalf). Funding can be sourced from taxes or user charges, included either in the capital cost of a new home or in rates over the longer term.

The main conceptual options are outlined below, noting that in practice hybrids of each of the options would be likely:

1. Central Government “Hard” UDA Model

Under this model, central government would take the lead in delivering the Paerata satellite. Emerging legislation suggests that it would be represented by an urban development agency (UDA).

The UDA would acquire land for the city in order to capture value uplift (differentiating this model from the “soft UDA” position where land remains with existing owners). The UDA would work with the Auckland Council to arrange zoning, approvals and infrastructure. It could manage the entire development process through to home sale itself. Alternatively, the UDA could sell rezoned, infrastructure-enabled land at its improved value to developers, moderating the price depending on public objectives.

Funding and financing

The UDA would finance all related infrastructure and development using the Crown’s balance sheet, removing the responsibility from the Auckland Council and property owners.

Central government has a wide range of funding options. Most obviously, it can fund new development out of the consolidated account or through Crown debt. Crown revenue can be expected to increase as homes and jobs are delivered, so there is a link between the funder and the beneficiary of this approach. However, the Government has resisted reassuming this responsibility, having delegated it principally to local authorities. Funding via this route would carry significant implications for existing developments across the country.

Alternatively, the Government could finance development using its balance sheet, but require repayment. The UDA would have two options under this approach. It could repay the Crown as and when properties are developed and sold. Or, assuming legislative change or collaboration with the Auckland Council, it could apply some form of property tax to the area which would be repaid by property owners over the long term. Both options would ultimately shift the cost of development onto homeowners.

Although payment would sit with homeowners, risk would be retained by the Crown. Higher home fees and taxes which which disincentivised property purchase would carry costs in the form of underutilised assets and lower residential and commercial property prices. Likewise, a very successful development could either materialise as lower property prices and faster home construction, or higher prices for the Crown.

2. Paerata Local Authority Model

Risk allocation

The Crown would assume overall risk relating to development of the city and uptake of housing. Construction risk would sit with individual contractors to the Crown. This is the most risky option for the Crown of the models examined.

Feasibility assessment

A hard UDA approach is the simplest and, potentially, fastest means to deliver integrated development at scale. Funding and financing arrangements would be streamlined and the Crown would automatically capture all land value uplift. There would be no issues with land banking or price gouging and efficiencies could be recycled into more affordable housing.

However, project management and demand risks would be accepted by a new Crown organisation without necessarily the skills, experience or decision making frameworks to execute. New Zealand taxpayers would be liable for project issues.

Key to the success of this model is purchasing land at its raw cost. To prevent existing land owners from leveraging their position to drive property values higher or slowing overall development, the Government would need to possess and to exercise compulsory acquisition. Assuming these powers are applicable, such a response is likely to result in significant opposition across an area as large as 2000ha.

The Auckland Council's debt limitations prevent the easy application of a UDA option without balance sheet assistance from the Crown. These limitations also make a public-private partnership (PPP) between the Auckland Council and a private partner very unlikely. Thus, the only identified local-led development option is for a local entity with rating powers and balance sheet independence from the Auckland Council.

There are two options possible under existing law. A district council or a unitary authority could be established for Paerata and charged with leading the development. With comparatively minor changes to existing law, a strengthened local board with rating powers may also be an option, if debt can be removed from council accounts. Other options, principally those where rating powers are transferred to independent parties working in collaboration with the council are considered under the "soft" UDA model below.

Any local authority permutation would represent a fundamental shift in local governance nationally. Significant questions surround the establishment of such an entity and what impact it would have on the Auckland Council. For simplicity, we assume for this model a Paerata city council with responsibility for city planning, trunk water and local road transport.

The potential advantage of this approach would be to generate competition in a growth location for residents. If an environment could be created where councils desired and competed for growth, then investment prioritisation would be influenced not only by demands from existing ratepayers, but also new residents. How councils balanced that demand would determine how attractive they were.

Funding and financing

Local authorities only have rates as a funding tool. The Paerata City Council model would thus entail the council raising debt against the rateable value of property in the area. Debt would be repaid by property owners. As and when property values increase in relation to rezoning and infrastructure provision, rates would also increase, providing the means to repay debt.

Risk allocation

Project management and demand risk would sit with the new entity and its "shareholders" - Paerata ratepayers. Neither central government nor Auckland Council would in general be liable.

Feasibility

This option is unlikely. Revising Auckland governance less than a decade after a major restructure would be problematic. Auckland Council unitary authority status would be compromised unless the new entity also became a unitary authority. Complexity would surround the allocation of responsibilities and funding for regional infrastructure.

3. Market-led “Soft” UDA Model

Much wider changes to statute and existing practice would be required to engender positive competition across local government. Further funding tools or reallocations of central government funding are needed to make growth attractive to councils. This discussion is much wider than the question of a satellite city in Auckland.

Auckland Council debt to revenue would increase if ratepayers joined the new local authority, unless debt was also transferred. This would transfer debt challenges over to the new council, rather than remove them. It is not clear whether a new council established to deliver the city could manage the scale of debt and risk. Conventional growth management is performed incrementally. Under this approach, a new council with limited residents would be required to deliver major infrastructure. Current structures are not well-suited to this approach.

A new council would be required to develop a series of statutory documents, including RMA plans, a Long Term Plan and others. It would also inherit other local authority responsibilities. Planning and engagement fatigue would likely slow delivery of the city. Recent analysis of the Waiheke and Rodney local governance restructure proposals indicated that rates would need to increase by around 40 per cent in order to re-establish district or unitary authorities.³⁶

The final party capable of leading development of a new city, and thereby accepting overall risk, is the collection of existing property owners in Paerata. The need for zoning, approvals and infrastructure collaboration would still require interface with public bodies. This approach assumes a UDA owned by central or local government, or both, would partner with property owners and deliver public functions.

There is no large scale public acquisition of land for redevelopment assumed under this approach. Responsibilities for infrastructure and development could be retained or shared across either the UDA or property owners. In return for prioritised zoning and approvals, land owners would be required to meet agreed targets, such as minimum housing targets or more affordable housing.

Funding and financing

With little public land acquisition, the value of zoning and other public activities will be incorporated into privately owned land. Public authorities will have three basic choices. First, they can accept “repayment” in the form of delivery targets. For example, instead of being repaid, they could require faster or more affordable housing.

Second, the UDA could require payment on point of sale, or by a fixed date. Development contributions would be cancelled and the actual costs of public infrastructure and other services would be factored into the sale price of homes and sections sold to a schedule. Public authorities would finance public investment and property owners would finance local development and construction. Homes not completed on time would still be liable for repayment of public services, incentivising delivery.

Third, assuming strengthened powers, the UDA could levy a long term targeted rate to repay its costs (and potentially some of those of the developers). The rate would be applied to land in proportion to its developable value and repayment would be the responsibility of those land owners. The much higher cost of holding land with zoning and services would incentivise the land owner to develop and on-sell property. This model may allow greater Auckland Council participation.

Risk allocation

Construction and delivery risks would be shared between the UDA and property owners. In theory, developed property demand risk would sit with property owners. In practice, the UDA may be required to share this risk.

Under an approach where property owners are contracted to deliver the city and repay the UDA for its services at point of resale, property owners take demand risk. The UDA would be contractually bound to deliver trunk services and approvals according to the agreed schedule. Property owners would be bound to develop land as and when those services become enabled. Property owners would sell developed property at market rates.

³⁶ Morrison Low, Auckland Reorganisation Process: Auckland Options Assessment, August 2017.

4. Urban Development PPP

If targeted rates, rather than contracted outputs, were applied, project risk allocation would be similar, but the UDA may give up some of its ability to prescribe development outputs. The UDA's focus would be on repayment for its activities rather than delivery of the city. Property owners could hold land as long as they were prepared to incur increasing targeted rates. Development and demand risk would remain with property owners.

Feasibility

This approach is closest to existing practice. Its principal point of difference is that, in return for priority public investment, the UDA would require property owners to carry significantly more risk than they do currently.

Its comparative advantage is the relatively small impact on property rights. The UDA would exercise tools other than land acquisition to ensure development in accordance with the timeframes and vision of the city.

Its principal weakness is that too much risk may be transferred and progress stalls. It is not clear that property owners in an area most suitable for Paerata City will be interested in development within the timeframes required. Reaching agreement across several hundred land owners could be slow; there is likely to be some disagreement over the appropriate spread of density and development typology across the area. In return for participating, property owners may require incentives which undermine affordability.

Some land owners in Paerata already possess land which is either live zoned or zoned future urban. The marginal benefit of receiving priority public investment or upzoning may be insufficient to induce them to take on the significant risk of developing land to an agreed schedule.

The final delivery model which could be used to deliver a city in Paerata is a public private partnership (PPP). The PPP approach would seek to allocate risk across the development to the party best able to manage that risk. From a risk allocation perspective it would sit between the hard and soft UDA approaches. An overriding objective of this approach would be to attract scale and expertise into the delivery of a successful city.

Under this model, the Crown (or a UDA majority owned by the Crown) would acquire land and open a tender for the right to co-plan, finance, develop, build, sell and lease property on that land. The winning consortium would establish a special purpose vehicle (SPV) to oversee the development in accordance with outcomes prescribed by the public partner.

The SPV would be comprised of development, construction, real estate and financial experts. Paerata property owners would have the choice of co-owning the SPV, their land representing equity investment. Other investment partners would be secured to enable the development to proceed. A main contractor and other partners would be appointed to develop land and deliver homes and infrastructure.

Central and local government would likely use a UDA or UDA-type model (for example, Crown Infrastructure Partners) to interface with the SPV. Depending on the allocation of risk, Auckland Council could play a larger role in this option than is possible under other options.

The broad objective of this approach would be to use land value uplift to fund the SPV's activities, which would include the majority of infrastructure and development costs. Carrying the bulk of risk pertaining to property resale, the SPV would lead masterplanning and development sequencing.

The public partner would take responsibility for non-commercial activities, including the processing of approvals and zoning, consistent with the masterplan. Basic outcomes, such as minimum thresholds for new home delivery and affordability, would be contracted by the public partner. There would also be the opportunity to expand these outcomes to include more aspirational targets, for example, a minimum number of local residents employed locally and maximum travel time delay at peak times.

Funding and financing

The SPV would arrange private financing for the development, including trunk infrastructure. Its repayment mechanism would be from the resale of attractive commercial and residential property. Development costs would be included in the sale of new homes and other property.

Depending on the arrangement, the Crown may include in the agreement bonus payments for achieving public objectives. There would be no property tax or development contributions above and beyond general Auckland Council rates.

Risk allocation

The SPV and public partner would agree risk allocation through the contract. Conceptually, risk would be assumed by the party best able to manage that risk. Thus, the public partner would accept the risk of acquiring land and providing the zoning and approvals for that land to be developed. It would interface with the wider public to generate support for the development.

Project construction and delivery risks would largely sit with the private partner. Demand risk may be shared, depending on the market's assessment of risk. Where a private partner is contracted to achieve either delivery targets or wider outcomes, payments from the public partner become more likely. Payment could be in the free provision of land. The private partner would have the ability to buy and sell land, though not acquire it.

Feasibility

The model would be unprecedented and executing it correctly would carry its own risk. It is unlikely that a single PPP would be viable for a development of the size assumed. Several PPPs, or a PPP as part of a UDA-guided development is more realistic.

It is not clear how existing property owners would react to the contracting of an independent private entity to oversee development. Forced acquisition of property for transfer to a private consortium could be politically challenging. Existing property owners are unlikely to be aware of the risks involved in a PPP, making their participation challenging.

The agreement between the public and private partners would be complex. The private partner would operate, at least for a fixed term, all infrastructure it financed and delivered. It would not necessarily deliver trunk infrastructure which could be accessed by other developments. Doing so would incur a charge, creating counter-incentives for good regional planning if the contract is weak.

The Right Model for the Job

In practice, hybrids and combinations of the above conceptual models would be needed to deliver a city for 100,000. The exact composition would depend on the outcomes and objectives set by public authorities and the expectations of existing property owners. Public authorities can deliver faster, more affordable housing but only if they are prepared to take on significant development risk. Risk can be lowered by transferring responsibilities to other parties, but the value upside and ability to control development will be reduced.

- **Faster, cheaper housing**

If lower cost housing and faster delivery are the priorities, a model more heavily weighted towards a hard UDA would be effective. If the Government (as the likely majority owner of a UDA) determined that its risk was compensated for via GST and other taxes and was otherwise not factored into home prices, a hard UDA option could deliver homes at an average cost of \$375,000.

Under this scenario, the Government could choose to sell homes at market rates of around \$635,000 (excluding GST). Increasing supply may reduce this price over the longer term, but the difference between current prices and cost would provide the Government with significant headroom.

Alternatively, the Government could deliver a portion of public or social housing in the city at below \$375,000 average price and recoup its costs on market sales. At \$635,000 per unit, the \$12.2 billion development cost of the city could be recouped with around 20,000 home sales. This would deliver 10,000 “free” homes for use as social or public housing.

A variation on this approach could see the UDA finance infrastructure and/or development. Homes would be sold for the cost of a house and land, or from \$276,000. A targeted rate on the development area would repay the debt. The model would assist first home buyers who did not have a large deposit. The public sector’s lower cost of borrowing may allow a marginally cheaper whole of life home cost, but administrative costs would likely make the difference nominal.

If the Government was unwilling to take on the significant risks of delivering a successful urban development, it could transfer these risks to experienced developers or land owners. Still owning the land, the UDA would sell development rights, raising or lowering the cost of land to ensure a steady flow of properties onto the market. The price of housing and the UDA’s return on investment would reflect market conditions.

Fully costed market homes under this model would be sold at between \$375,000 and \$635,000, average price per unit at current prices and excluding GST, depending on the state of the housing market.

- **Lower risk**

If speed of housing delivery was less important than keeping risks manageable, a UDA partnering with property owners would be attractive. By shifting development risk to land owners, the UDA and its public stakeholders would largely give up the value improvement potential, but cost recovery could be guaranteed. Taxes would be set at levels which funded public costs, homes would be sold at the pricing discretion of the land owner and developer. The speed of housing delivery would be influenced by market trends.

Replacing general development contributions with a targeted rate introduced at agreed points in time would change the risk exposure of land owners and developers. A targeted rate of \$110 per month per property would be required to repay transport and water network costs of \$700 million over 30 years. This assumes public sector borrowing rates of around 4 per cent (i.e. a UDA’s cost of borrowing).

A bond programme established to shift development debt off public sector balance sheets would demand a higher interest rate. At a 6 per cent interest rate, the rate would rise to \$140 per month, or around \$1700 per annum. This may not be sufficient to incentivise development at pace and could lead to land banking.

Homes under this model would be sold at market rates. It would not be economic for land owners to deliver average housing at less than \$350,000, assuming a targeted rate funds network infrastructure and risk is not valued.

Conclusion

- **Balancing risk with speed**

If the Government wanted development expertise, but also wanted to retain some value uplift, and placed a premium on rapid housing supply, it could contract expertise through a PPP. Outputs, including price and minimum delivery targets, would be specified in the contract.

The costs of establishing the PPP would be high, due to complex tendering and contract negotiation, but a midground could be reached balancing risks and outputs. A likely model would include market development with an agreed number of affordable homes.

Home prices would depend on the contract. To fund the private partner's activities, the minimum home price would need to exceed \$375,000, but conditions could be applied to the upper limit so that more or faster affordable housing was delivered.

Land value can be captured. By changing the model used to identify, plan, zone and invest in growth, public authorities can access land at its raw cost to deliver more infrastructure, more housing or more affordable housing. Raw value can be accessed either by acquiring land directly or by attaching the costs of public activities to zoning and approval processes in agreement with land owners.

However, the estimated value uplift of \$250,000 per dwelling is sufficiently large that more may be required. Auckland's housing deficit is 40,000 units. A Paerata satellite of 30,000 homes built at speed would improve access to housing, but not for everyone. Demand in excess of supply is likely to keep prices elevated. Average home prices are likely to be sold close to the \$615,000+GST price point, when there is headroom to deliver them for less, while still retaining a margin for development risk.

The Paerata city case study suggests urban development at scale is efficient, feasible and can meet growth needs effectively. The opportunity before Auckland is to expand the response to meet growth the city's growth needs.

The Innovation City

A new satellite city around Paerata makes sense. Targeting urban development at scale along the rail line is more economical than in other greenfield locations around Auckland. Infrastructure costs less and cheap developable land is still available.

Master-planning for density is more cost-effective than retrofitting developed areas and consumes less land than low density urban expansion. Development can proceed at pace. Communities can be planned around all travel modes.

The location of tens of thousands of new jobs and homes in Paerata will not only help to meet Auckland's large growth needs. It will deliver growth in a way which supports existing infrastructure services. Growth can be targeted around services with the capacity to accommodate more demand, taking pressure off other parts of the city.

But it is the ability to identify and isolate land at its raw price which provides the greatest opportunity. Auckland's existing growth paradigm transfers the value of public investment to land values without a concomitant requirement to deliver housing at pace. More infrastructure investment is required to deliver fewer houses and weak supply reinforces high prices.

The integrated planning and infrastructure approach of the satellite model enables infrastructure providers to share the benefit they create. Investment can be funded and affordable homes can be delivered.

The Time is Now

There is no time to waste. Auckland has 40,000 households living with family, in garages and on the street. The number is growing by 20 a day.

Property investors know the system is not working. They know the city will grow and they know there is money to be made betting on future zoning. Speculation is driving up the cost of land every week and reducing the ability to leverage land values to deliver affordable housing.

The benefit provided by the Waterview Connection will be lasting, but it cannot accommodate another half-million people across urban Auckland. Within a decade the city will be congested throughout the day. No transport package can meet the demands of the Unitary Plan. Growth must be moved to different locations across Auckland and supported with regional transport urgently.

The Opportunity is Much Greater

Analysis of Paerata land and infrastructure plans suggests that a satellite model can deliver homes and infrastructure at prices below market levels. The \$250,000 per dwelling difference between the costs of housing at scale and comparable real estate prices provides scope for more housing, faster and at no net cost to public providers.

Extending a Paerata satellite city into Karaka could provide for Auckland's growth needs to the end of the century. An area the size of the Auckland isthmus, sits just 7km south of the Auckland International Airport.

A connection across the Pahurehure inlet could be Auckland's next Harbour bridge. A combined light rail-motorway corridor linking the airport to Manukau, Karaka and Paerata could service Auckland's collective growth for decades. Non-stop rail to the CBD will put the entire area within one hour of Auckland's major employment centres.

Analysis showed that at 30,000 dwellings Karaka was uneconomic to grow, but there is room for 300,000 dwellings north of, and separate from, Pukekohe's elite soils. Integrated development at this scale can fund investment and enable housing a fraction of today's cost.

Investing in the Future

Planning for growth and master-planning for quality opens the door for even bigger possibilities.

Technology is changing every aspect of cities. Connected networks, the internet of things and automation are the infrastructure of tomorrow. Incremental development does not support the trends and opportunities we know are coming to urban environments.

A brand new satellite city can be digitally enabled from the roads on the ground to the tallest buildings. People can communicate with vehicles, vehicles with networks, networks with operators and operators with people.

Incorporating new opportunities in design, engineering and sustainability, a new city can be made more efficient and more resilient. Streets can be configured to support autonomous vehicles. Low impact design can maximise existing land and water features to reduce impacts on the environment. Enhanced corridors and planned provision for services can protect Auckland's essential services.

The Innovation City

Leveraging public investments in research, education and health in a digitally enabled city will drive investment in high-skilled, high-income employment. Paerata can become the centre of a new southern city of 500,000 or more with technology, innovation and prosperity at its heart.

The Innovation City will deliver better jobs, better networks, stronger communities and desirable urban living.

Appendix 1: Assumptions Used to Inform Transport Networks

The following assumptions were used to inform transport networks in the five satellite locations:

Location of services:

- Each satellite must be oriented around rapid transit connected to the CBD.
- Each satellite must be connected to an expressway or motorway linked to the regional motorway network
- Existing plans, corridors and networks are used wherever possible.
- Road networks will be set out in a grid, where possible, and arterials spaced approximately 2km apart.
- Rapid transit stations will be located approximately 2 km apart.

Cost estimate assumptions:

- Expressways (two lanes in each direction) = \$50m per km
- Greenfield interchanges = \$20m each
- Brownfield interchanges = \$50m each
- Standard road arterials (one lane in each direction) = \$20m per km
- Additional road arterial lane (in each direction) = \$15 m per km
- Four-lane arterials (two lanes in each direction) = \$35m per km
- Busways = \$50m per km
- Busway stations = \$20m each
- Rail stations = \$30m each
- Local road requirements and costs are included in the section covering land development.









Infrastructure
New Zealand

Infrastructure New Zealand

Phone: +64 9 377 5570

Email: info@infrastructure.org.nz

PO Box 7244, Wellesley Street, Auckland 1141, New Zealand

www.infrastructure.org.nz

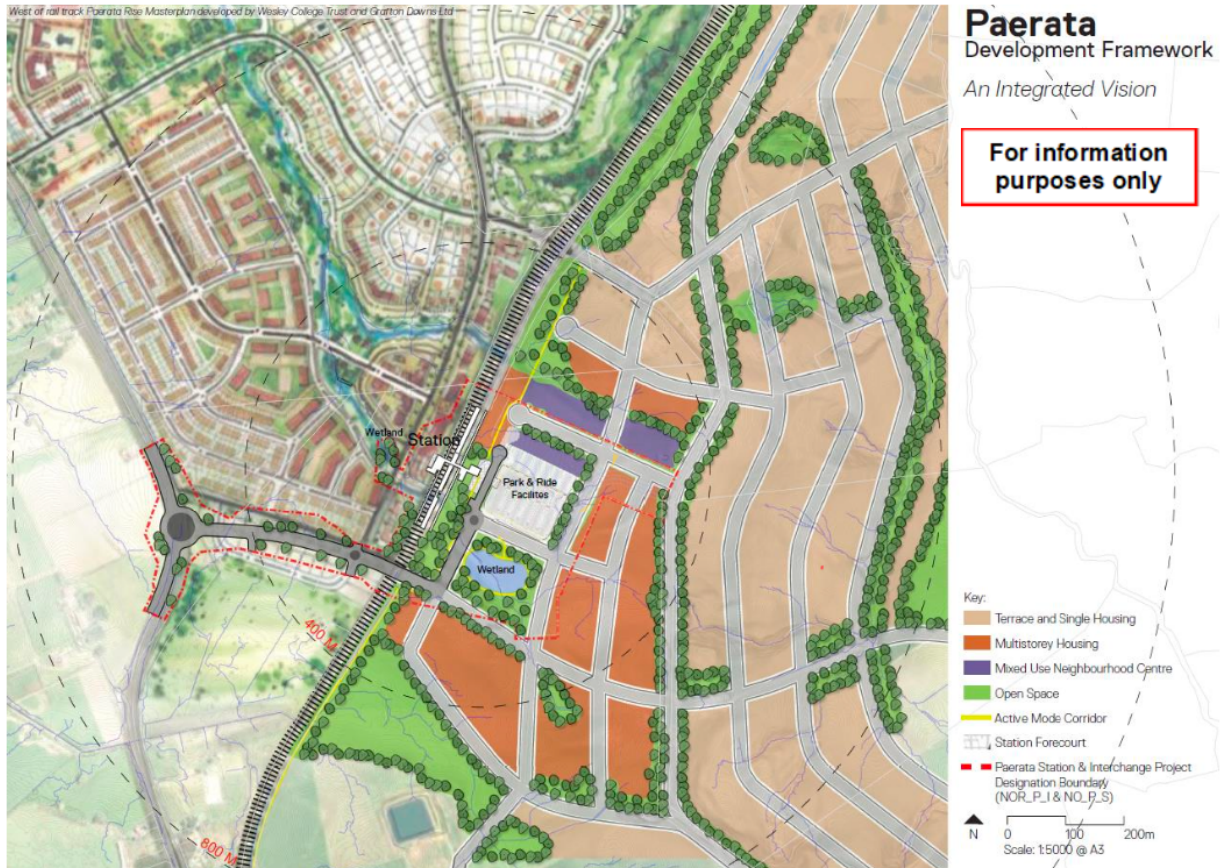


Figure 4-2: Indicative Masterplan of the surrounding planned urban environment in relation to the proposed Station, with the Grafton Downs development 'Paerata Rise' on the west of the railway line

Paerātā / Paeraataa Railway Station will enable the Pukekohe area to become a transit-oriented development (TOD) by providing future residents multi-modal access to and from the wider regional hubs, particularly between Auckland, Hamilton and Tauranga. An integrated transport network was signalled by the Pukekohe-Paerata Structure Plan to support the future planned urban environment surrounding the proposed Station. The immediate indicative transport connections connecting the proposed Station and the future planned urban environment will likely be new connector roads, new arterial roads, indicative walking and cycling facilities to support the anticipated new urban population in the Paerata area. An indicative transport network demonstrating how the Station will provide for access and connectivity to the surrounding future planned urban environment is shown in Figure 4-3 below. Access between the Paerātā / Paeraataa Railway Station and the new Paerata Centre is critical in establishing a strong local identity, reinforcing wayfinding and supporting walkability from the surrounding catchments. The indicative Transport Network Plan below has been produced by the Requiring Authority for information purposes only to show the possible integration on how the design of subsequent stages where they involve works materially affecting movement in and around the station with the surrounding existing and future planned urban environment (to the extent known by the Requiring Authority at the time of submission of this Outline Plan application for Stage One works). It is noted that the proposed design and development of the land surrounding the Project are to be determined, proposed and finalised by the landowners and/or developers of that land, which may be different to those shown on the indicative Transport Network Plan. The indicative Transport Network Plan has not been produced with the landowners' and/or developers' input.

It is also noted that the subsequent stages of the Project, referred to as Stage Two works in this document, will be subject to future Outline Plan of Works application which include a preparation of an updated ULDMP for the Outline Plan application.

The existing Pukekohe Town Centre is and will remain as the primary commercial centre and focal point for the Pukekohe area, which is located approximately 2.5 kilometres south of the Paerātā / Paeraataa Railway Station.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:966] Notice of Requirement online submission - Pam Butler Senior RMA Advisor KiwiRail
Date: Monday, 13 November 2023 10:01:10 pm
Attachments: [KiwiRail submission\(s\) Pukekohe package NoRs 1-5_20231113214554.227.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Pam Butler Senior RMA Advisor KiwiRail

Organisation name: KiwiRail Holdings Limited

Full name of your agent: KiwiRail Holdings Limited

Email address: Pam.butler@kiwirail.co.nz

Contact phone number: 0275708571

Postal address:
Private Bag 92138
Auckland 1142

Auckland 1142

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 3 Paerata Connections

The specific provisions that my submission relates to are:
Railway designations in Sth Auckland

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
see attached

I or we seek the following recommendation or decision from Auckland Council:
Recommend approval subject to proposed conditions

Submission date: 13 November 2023

Supporting documents
KiwiRail submission(s) Pukekohe package NoRs 1-5_20231113214554.227.pdf

Attend a hearing

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

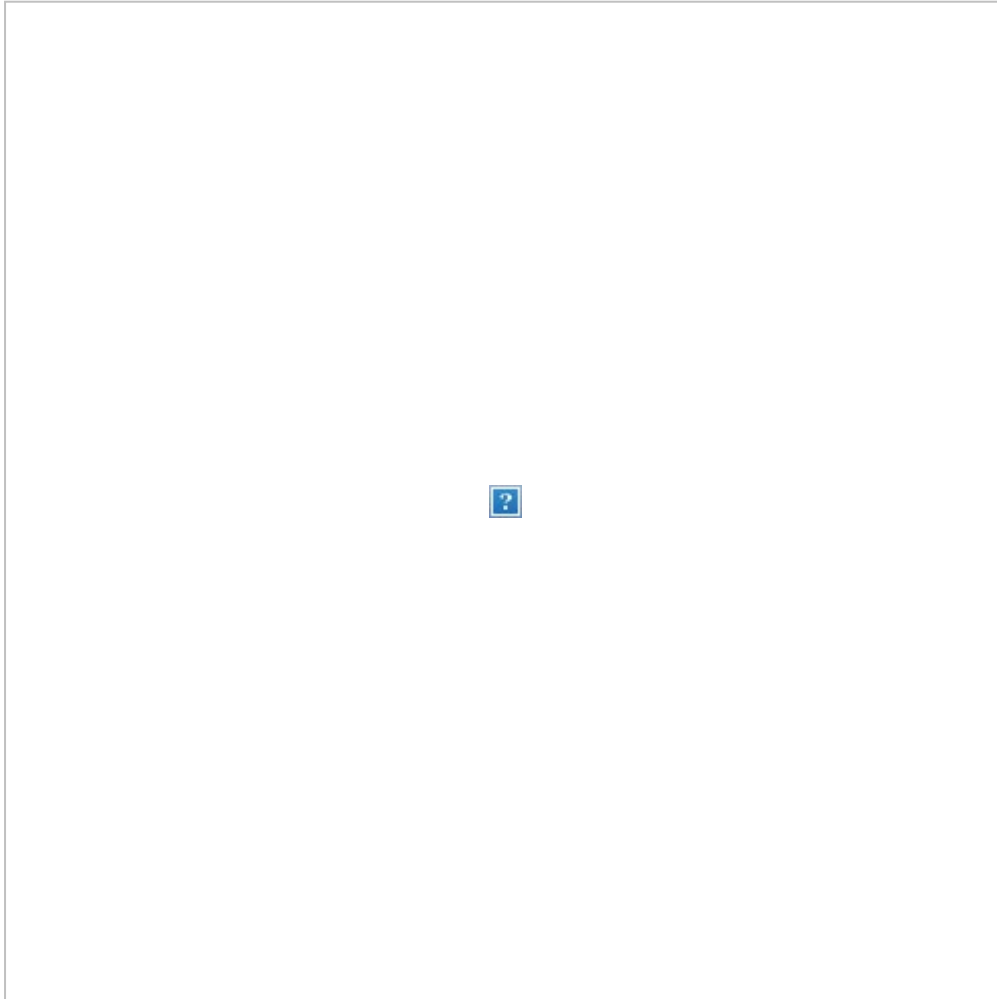
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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13 November, 2023

Reason for submission

KiwiRail is the State Owned Enterprise responsible for the management and operation of the national railway and Interislander ferry services. In many places, the rail network has been in place for over 100 years and remains crucially important to the economic and social development of the areas it services. The rail network serves two functions as a metropolitan public transport service in Auckland and Wellington primarily, and a route for freight and other services nationally.

The land upon which the rail network operates is owned by the New Zealand Railways Corporation and leased to KiwiRail. KiwiRail owns the rail infrastructure (including rails, sleepers, sidings, and depots) and is a railway operator for the purposes of the Railways Act 2005. It is also the licensed Access Provider under the Railways Act, which provides KiwiRail broad powers to safely control and restrict the use of railway assets and entry onto railway land.

KiwiRail Holdings Limited (KiwiRail) is working closely with Auckland Transport (AT) and Waka Kotahi (WK) to develop the strategic transport network to support Auckland's growth areas, particularly in the south. KiwiRail owns and maintains Auckland's Metro track network and is currently well into delivering major southern projects including electrification between Papakura and Pukekohe and, three new Drury stations (Drury, Ngākōroa and Paerātā), and will shortly embark on work to add capacity to the NIMT (North Island Main Trunk).

A functioning and efficient freight network is critical to the productivity of the nation's supply chain. KiwiRail also operates New Zealand's rail freight network and tourism passenger rail services between Auckland and Wellington and the Te Huia Hamilton – Auckland passenger service, which began in April 2021. Further interregional passenger growth is predicted. KiwiRail therefore has a significant interest in planning to enable the efficient flow of imports, exports, and domestic goods within and through the region. Freight tonnage is forecast to treble to, from and through the region over the next 25 years.

KiwiRail is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks (RTN), Active Mode Corridors (AMC) and road /highway networks which facilitate mode transfer and enable future urban growth.

The proposed Notices of Requirement (NoRs) cross designations for which KiwiRail is the requiring authority. Of key interest to KiwiRail is the intersection of the proposed designations with the existing rail corridor. These locations are shown on Table One overleaf.



Table One: Affected KiwiRail locations summary

NoR ¹	Affected KiwiRail site	Purpose and corridor impacts
Drury West Arterial NoR 1 (AT)	Designation 6302, NIMT, Burt Road	Proposed bridge as part of new transport corridor
	Drury West / Ngaakooroa Station; extends south from Ngaakooroa Rail Station	Tie in and upgrade the proposed station access way to provide for bus priority lanes. This arterial will connect the FUZ south of SH22 (State Highway 22) with the new rail station.
Drury – Pukekohe Link NoR 2 (Waka Kotahi)	Designation 6302, crosses the NIMT to connect to SH22	SH22 connection.
	Designation 6311 Paerata Interchange	Paerata Interchange and Accessway: Provides a connection to the Paerata Rail Station from Sim Road (south) proposed to be upgraded by NoR 2.
Paerata Connections NoR 3 (AT)	Designation 6310, Paerata Station	
	Designation 6311 Paerata Interchange	
	Designation 6302, NIMT (end of Sim Road)	Paerata Interchange and Accessway: Sim Road segment.
Pukekohe North-East Arterial NoR 4 (AT)	Designation 6302, crosses the NIMT at Paerata (near Butcher Road)	Proposed bridge as part of new transport corridor.
Pukekohe South-East Arterial NoR 5 (AT)	Designation 6302, crosses the NIMT in Pukekohe (south)	To connect to Svendsen Road / Wrightson Way.

As KiwiRail is the Requiring Authority for the earlier designation/s, approval under s177 of the Resource Management Act 1991 (RMA) is required for the secondary requiring authority to undertake works within the railway corridor. KiwiRail acknowledges that the NoR AEE(s) identify that further engagement with KiwiRail will continue as the Project is developed. KiwiRail expects that as part of that process the necessary approvals will be sought in due course.

The importance of planning for the future growth of both RTN and post CRL (City Rail Link) metro rail services and enabling the growing demand for freight movements and interregional rail services to, and through Auckland has emerged as a result of the work undertaken to date as part of the preparation of these NoRs.

Aligned with its broader national role, KiwiRail, AT, Auckland Council and WK are starting to plan for future rail investment to - remove capacity constraints, raise future passenger and freight levels of service to drive increases in rail mode share, and enable greater network reliability and resilience by improving maintenance options (without having to close lines for extended periods).

¹ NoR's 6, 7 and 8 are some distance from railway assets.

Specific areas that are of greatest interest to KiwiRail and around which further detail will be required prior to granting any s177 approval, include:

- a) That KiwiRail's strategy for growing the capacity and resilience of the NIMT through the provision of additional tracks is acknowledged and accommodated as far as possible in the development and design of the Project
- b) NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design
- c) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability.

Several of these initial issues are set out in Table Two below.

Table Two: NoR created constraint and suggested approach.

• NoR	Issue	• Resolution
1	Allows for an increase of track and rail maintenance access however limited flexibility for changes in rail design standards and further development	Ongoing dialogue and engagement before detailed design starts
2	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
3	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
4	No evident issues. Cuts near the Mission Bush corridor can be managed to protect for growth. However, the form that the bridge takes for this span and the impact of the structure on the current and future rail infrastructure will need to be agreed.	Ongoing dialogue and engagement before detailed design starts

<p>5</p>	<p>The proposed road bridge over the NIMT and Station Road is shown as a long single span which may not be practically feasible. There is a risk a central pier (or piers) is required and depending on the location may hinder future rail options</p> <p>There have been new high-speed crossovers installed as part of P2P just south of the new overbridge. There is potential that a 3rd and 4th track may be added to the NIMT from Pukekohe to these cross overs as part of the southern approach to the eventual Pukekohe to Papakura 4 tracking.</p> <p>Electrification of the rail network to Hamilton is a strong likelihood. Depending on the extent and proximity of any additional cross overs in a southern cluster, they may drive higher than normal OLE (Overhead Line Equipment) clearances under new road bridge.</p>	<p>Ongoing dialogue and engagement before detailed design starts</p> <p>Clarify potential location of Station Rd bridge support piers</p> <p>Ongoing dialogue and engagement before detailed design starts</p> <p>Future corridor OLE equipment clearance under full width of span needs to be clarified</p>
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Relief sought

KiwiRail generally supports NoR applications One to Five and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the applicant's proposed conditions, including in particular

- Condition 5 (All NoRs)– Network Utility Operators (s176 approval) to carry out routine works
- Condition 10 (All NoRs) - (Land Integration Process LIP)) which enables developers and agencies to seek the latest information to enable better planning and integration with the NoRs. It is suggested that the condition be altered at (c) (i) to add the word 'available' before 'designs' as there will be a limit about what information is available for the various packages during the designation term. For example, at preliminary design, 50% design, approved, or final design.
- Condition 11 UDLMP (Condition 11 for NoR 5) – to enable integration of the Project's permanent works into the surrounding landscape and urban context, of which KiwiRail's new stations will form part.
- Condition 26 (all NoRs) Network Utility Management Plan (NUMP) setting out a framework for protecting, relocating and working in proximity to existing network utilities.

13 November 2023

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "Water Supply and Wastewater Network Bylaw 2015" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

-
- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("SCEMP") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("CTMP"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("RMA") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("AUP:OP").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

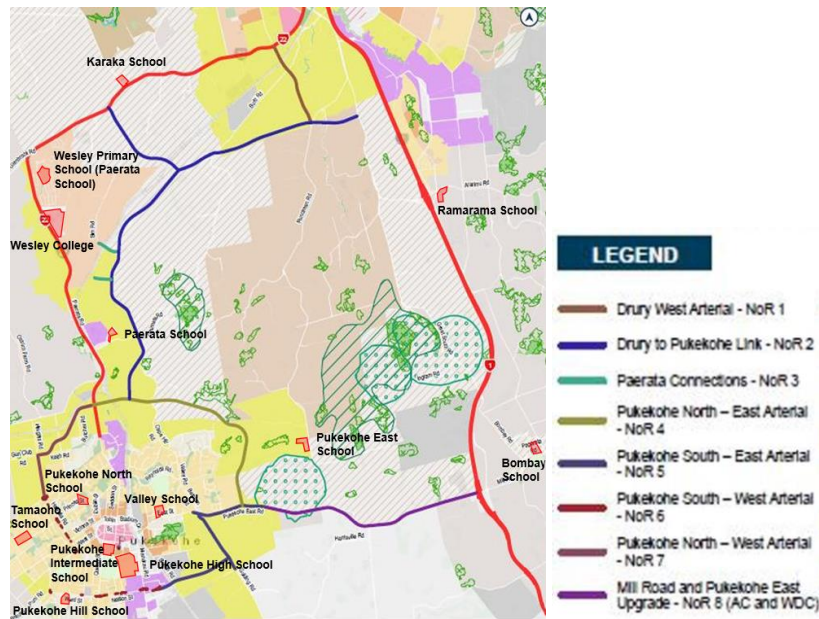


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

-
- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
<u>Underlined and strikethrough</u> – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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Submission on:
Notice of Requirement: NoR 2 Drury to Pukekohe Link (Waka Kotahi) AND
Notice of Requirement: NoR 3 Paerata Connections (Auckland Transport)

To: Attention: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300

unitaryplan@aucklandcouncil.govt.nz

Submitter: Paerata 5 Farms Limited ("P5FL")

Address for Service: Attn: Henry Chiang
henry@belmontparkestate.co.nz
28 Allen Johnston Place, Saint Johns, Auckland, 1072 ,
New Zealand

Introduction:

1. This is a submission on:
 - (a) The Notice of Requirement (NoR) lodged by Waka Kotahi (NoR 2) being the Pukekohe Transport Network: Drury to Pukekohe Link.
 - (b) The NoR lodged by Auckland Transport (NoR 3) being the Paerata Connections.
2. As the NoR's are interlinked this submission addresses both NoR's.
3. The submitter could not gain an advantage in trade competition through this submission.
4. Paerata 5 Farms Limited is the owner of 412 Sim Road, which is land on which part of the NoR applies. The land is leased to Karaka Contracting Limited, who uses the land for their dairy farming business.
5. P5FL is also authorised to submit on behalf of the owner of 328 Sim Road, and this submission applies to both titles referred to as the "P5FL land".

Paerata Growth Area Background

6. The Paerata area is a green field Auckland city expansion area, confirmed through the Auckland Unitary Plan ("AUP") process to provide for the expanding population of Auckland. Further technical work was undertaken by Auckland Council in its preparation of the Pukekohe Area Plan, which has now also been superseded by the Pukekohe-Paerata Structure Plan which was adopted by Auckland Council Planning Committee on the 6th August 2019. This document states that land use and transport need to be integrated, and that technical investigation and landowner engagement is required before future transport projects can be confirmed.
7. The Structure Plan meets the AUP Appendix 1 Structure Plan guidelines (which is needed for any re-zoning proposal).
8. This document identifies 328 and 412 Sim Road land as being suitable and "earmarked" for high density residential housing. The National Policy Statement Urban Development suggests that "high density" at this location should be Terraced Housing and Apartment Building zone in relation to how the Auckland Unitary Plan is proposed to address development around the train station.

Masterplanning

9. As 328 and 412 Sim Road is zoned future urban, it does not yet have a final masterplan however, Transurban are in the process of preparing an overarching structure for the site including key movement corridors and open space networks and are working towards a more detailed masterplan to guide rezoning and future development of the site.

KiwiRail Designations

10. In early 2022 KiwiRail confirmed its designations for land associated with the Paerata Rail Station. These are Designations 6310 and 6311 and their overlap with the submitter's landholding is identified in the plan in **Attachment A**. These are in addition to, and overlap designation 6302.
11. As part of the submissions to the KiwiRail NoR's, P5FL identified its significant concerns that the overall design and conditions package had been developed in isolation to the other elements of a successful urban environment and without regard to the imminent urban environment, which could have significant impact on the resulting design and function of the surrounding land.

12. While the KiwiRail conditions and decision making “assured” P5FL that quality outcomes would be achieved, it is the direct experience of P5FL that despite assurances and conditions, very little regard for the imminent urban environment of P5FL's landholding is occurring. These direct experiences create a high degree of concern that similar style conditions and concepts have been presented by Auckland Transport/Waka Kotahi in respect of the future road alignments (NoRs).

Support/Oppose and Reasons for submission:

13. The submitter **opposes** the NoR for the following reasons (which are also indicated on the plan in **Attachment A**):
- (a) The NoR does not connect with the KiwiRail layout / approved designations and appears to rely on KiwiRail amending and/or relinquishing part of their operative designation. Any amendment to the KiwiRail designation should have occurred prior to notification of the NoR. Furthermore, there is a significant disconnect between the KiwiRail concept plan (attached to the designation) in terms of layout and the proposed NoR's. Alignment between KiwiRail and the Supporting Growth (Waka Kotahi and Auckland Transport) projects should have been resolved prior to notification, and we seek this is appropriately addressed.
 - (b) The NoR and the Assessment of Alternatives criteria is flawed as it does not appropriately account for the following matters relating to FUZ land in comparison to rural land:
 - (i) the future land use integration of FUZ land with the land take/design of the road network;
 - (ii) the opportunity cost for future housing targets of acquiring FUZ land compared to rural zoned land (i.e the efficient use of future urban zoned land);
 - (iii) additional costs to FUZ landowners to match or resolve proposed design levels.
 - (c) The NoR and the Assessment of Alternatives insufficiently justifies:
 - (i) The necessity for the two east-west road (three if considering the KiwiRail designation) connections to the west through the submitter's landholding and associated loss of FUZ zoned developable land.

- (ii) An unnecessary duplication of east-west corridors about the Paerata station. Only one east-west arterial connection to/alongside the Paerata station is required (as per the Structure Plan), providing sufficient capacity that achieves the efficient, effective and safe movement of vehicles and people while providing for urban growth at a key location.
- (d) The concept design for the road layout/roundabout and NoR land take area is fundamentally flawed. For example:
- (i) The land take and associated primary concept design appears to only cater for single lane roads but the roundabouts are dual lane.
 - (ii) No provision has been made for public transport stops, integration.
 - (iii) No provision has been made for potential road future connections for development with the P5FL land. Consideration of road connections into the P5FL landholding should be considered as part of the design, noting the topography of the corridor and status of Sim Road as a future Arterial Road would present engineering constraints that should be considered now, along with the impacts to the development potential of the FUZ P5FL land. Suggested locations for these intersections are identified on **Attachment A**.
 - (iv) The northern roundabout (adjacent to the P5FL land) creates a portion of “no mans land” between the P5FL land and the finished design of the roundabout. The roundabout could have been relocated to avoid this and/or the “no mans land” should be transferred to P5FL to be integrated into the overall masterplanning and development of the P5FL landholding.
 - (v) The horizontal and vertical alignment of the roads could be modified to reduce land take in the more valuable FUZ land, and reduce the amount of fill required within the FUZ and rural land. For example the design could be lowered in sections (particularly for Sim Road). This needs consideration with NoR 3 and the issue identified with its proposed levels.
 - (vi) The alignment is an underutilisation of the existing Sim Road/land resource and has not appropriately taken into account the future uses of the existing Sim Road (i.e what will happen to the land).

- (e) There is no appropriate stormwater solution for the arterial road network. The NoR material contains insufficient detail on the proposed stormwater solutions for treatment and attenuation including final location of devices and the overland flow from these devices. The locations of the devices do not have consideration of future roading connections to the P5FL landholding and their elevated position in relation to the lower land to the West of Sim Road will require appropriate geotechnical consideration for slope stability. Future lot owners are at risk of stormwater bunds failing or spillways engaging and flooding occurring – there seems to be no allowance for easements or any other legal mechanism to allow for passage of this water between the devices, through the P5FL land and to the outlet on the downstream side of the site. The NoR also should have sought integration (or combining) with the KiwiRail designation and the associated stormwater solutions for those projects and works to ensure a more efficient use of infrastructure and land.

- (f) There is insufficient geotechnical information to support the design and designation extents and potential stability effects. The additional earth loads proposed by the fill embankments on both sides of Sim Road may require stability works such as shear keys, underfill drainage and walls which extend past the current designation.

- (g) The 20 year lapse date sterilises the development of the P5FL landholding. As identified previously, the land is earmarked to be rezoned and the rezoning should be enabled to aligned to meet the required growth capacity. There was an expectation that this land would have been rezoned by now (through the FULS strategy), but this has been delayed by Council. The NoR is significantly larger than the road boundary in order to enable construction of the roads, and this has the potential to create a disconnect between the timing of development and the implementation of the road network should the growth capacity of the P5FL site be required to come online sooner than the 20 year lapse date, and thus jeopardises the ability to enable subdivision and development designs on the P5FL site which aims to create a successful and high quality integrated urban environment.

- (h) The concept design and NoR boundary/location will not enable a high quality urban environment to develop on the P5FL landholding. For example:
 - (i) The vertical alignment of NoR 3 at the KiwiRail designation (for the train station) results in an inappropriate fill batter which will not enable quality design outcomes including connections or integration with the surrounding land without significant earthworks and fill requirements. An alternative solution may be to have a larger batter (with a flatter gradient) to result in a suitable outcome.
 - (ii) The design contours, and specifically the amount of fill area will essentially force the future development of the P5FL to also fill to tie into and match the levels. The interface of the arterials with the adjoining P5FL land should be reassessed and design levels appropriately integrated.
 - (iii) No provision has been made for potential road future connections for development with the P5FL land. Specifically, the northern portion of the land P5FL land will be boarded on three sides by arterial roads and the railway on the western side, with no alternative for access. Similarly, the remainder of the P5FL land holding requires at least one and ideally two additional access location off Sim Road (on the two horizontal curves outside 393 Sim Road and 447 Sim Road), and provision should be made to connect to the west linkage accessing the train station.
 - (iv) There is no certainty as to the integration in levels and final designs between the KiwiRail designation and the future arterial roads.
 - (v) There is no certainty on what interface is expected between urban development and the arterial roads.

14. The submitter **opposes** the conditions as they do not address concerns of the submitter (outlined above) and in addition for following reasons:

- (a) Given P5FL experience with KiwiRail's designation implementation it has little confidence in reliance on future management plans to achieve a quality built environment or the ability of P5FL to have "meaningful" input into the final design. The concept design should be amended first to respond to the concerns of the submitter.

- (b) The SCEMP does not include any provision for affected landowner input into the management plans or any resolution process for where the concerns of the landowner are not being adequately addressed by the outline plan of works/management plans.
- (c) The ULDMP should be utilised as a tool for refinement and implementation of a design which is already of a standard which will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan.
- (d) The ULDMP requires stakeholders to be invited to participate in the detailed design 6 months prior to the start of detailed design. There is no obligation for this participation to continue through the detailed design.
- (e) ULDMP should also include an independent process for any disagreement in the design outcomes (as listed in clause (f) of the ULDMP condition) or achievement of the ULDMP objective outcomes (as listed in clause (b) of the ULDMP condition).
- (f) The project should not enable any increase in flood hazard (even by 50mm) on any sites.
 - (i) This creates an unacceptable hazard for which future developers and landowners will have to bear the costs of future technical work to mitigate the flood risk;
 - (ii) Any new flood risk will devalue land by creating a "hazard" on sites where no such hazard existed.

15. P5FL consider that the NoR:

- (a) Has not adequately considered alternative sites, routes and methods for undertaking the proposed works;
- (b) Does not promote the sustainable management of natural and physical resources and is contrary to Part 2 of the RMA, including that:
 - (i) Potential adverse effects are not appropriately addressed; and
 - (ii) The social, economic and cultural well-being of the community in the Auckland Region is jeopardised through the inefficient use Future Urban Zoned land;

Relief sought:

16. P5FL seeks that the Council recommend that the NoR:

(a) Be declined; **OR**

(b) that NoR is **amended** to respond to the concerns of the submitter

Hearing:

17. The submitter wishes to be heard in support of its submission.

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

Henry Chiang (for Paerata 5 Farms Limited)

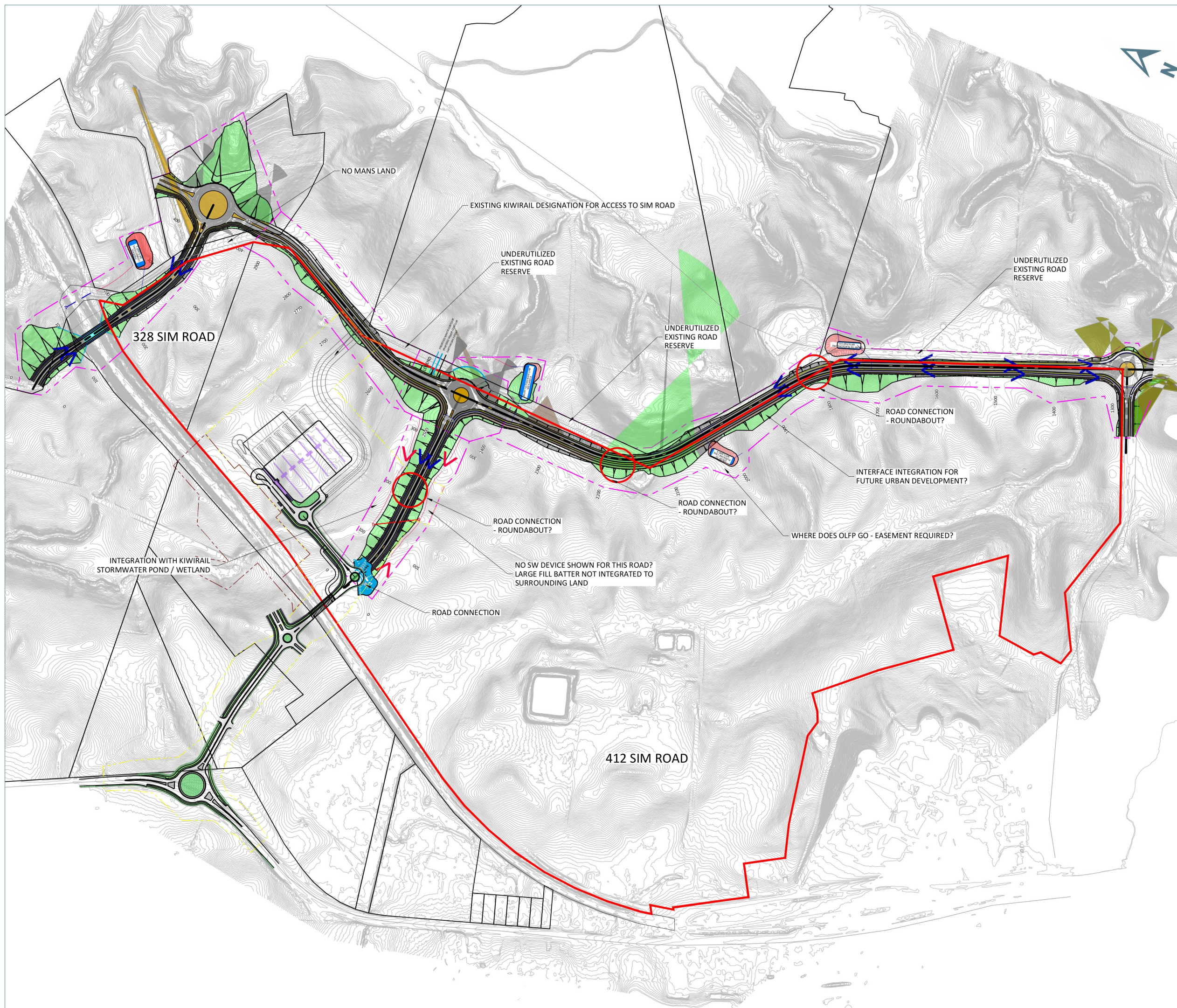
henry@belmontparkestate.co.nz

Phone: 021 067 2589

Address: 28 Allen Johnston Place, Saint Johns, Auckland, 1072 , New Zealand

13 November 2023

Attachment A:



NOTES:

- 1. DRAWING INCLUDES:
 - 1.1. GIS CONTOURS
 - 1.2. KIWI RAIL DESIGNATIONS AND CURRENT DESIGN OF ACCESS ROADS AND PARKING
 - 1.3. NZTA NOR # 2 AND # 3.

CIVILPLAN CONSULTANTS

Level 9, Laidlaw House, 20 Amersham Way, Manukau, Auckland. Phone: 09 222 2445

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PROJECT TITLE:
**PAERATA 5 FARMS LIMITED
 328 AND 412 SIM ROAD
 PUKEKOHE
 ####**

SHEET TITLE:
**NZTA NOR 2 AND 3 LAYOUT
 OVERLAY WITH COMMENTS**

SCALE: (A1/A3) **1:3000 / 1:6000**
 SCALE BAR: 0 60 120 180 240 300m

ISSUE STATUS: **DRAFT@13.11.2023**

PROJECT NUMBER: **2342-01** DRAWING NUMBER: **SK03-1** REV: **-**

REVISION DETAILS: **195** REVISION DATE: **dd.mm.yyyy**

DRAWN: - CHECKED: -

13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

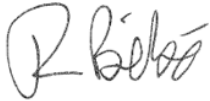
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

From: [Gerald Baptist](#)
To: [Unitary Plan](#)
Subject: submission Pukekohe North-East Arterial(NoR 4)
Date: Thursday, 9 November 2023 8:42:58 PM

Hi
Re Property GAM Baptist
1173 Paerata Road
RD1
Pukekohe 2676

there are 2 considerations/submissions I would like to make.

1/ there will be more traffic driving pass in both directions, we need safe and clear view access from the driveway to SH22.

2/ stream Mainatince, With rain the stream comes a torrent within an hour, more water will be dirverted to the stream ,how is this being managed and what is the stream beautification going to be?

Yours faithfully
Gerald Baptist

Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:


Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

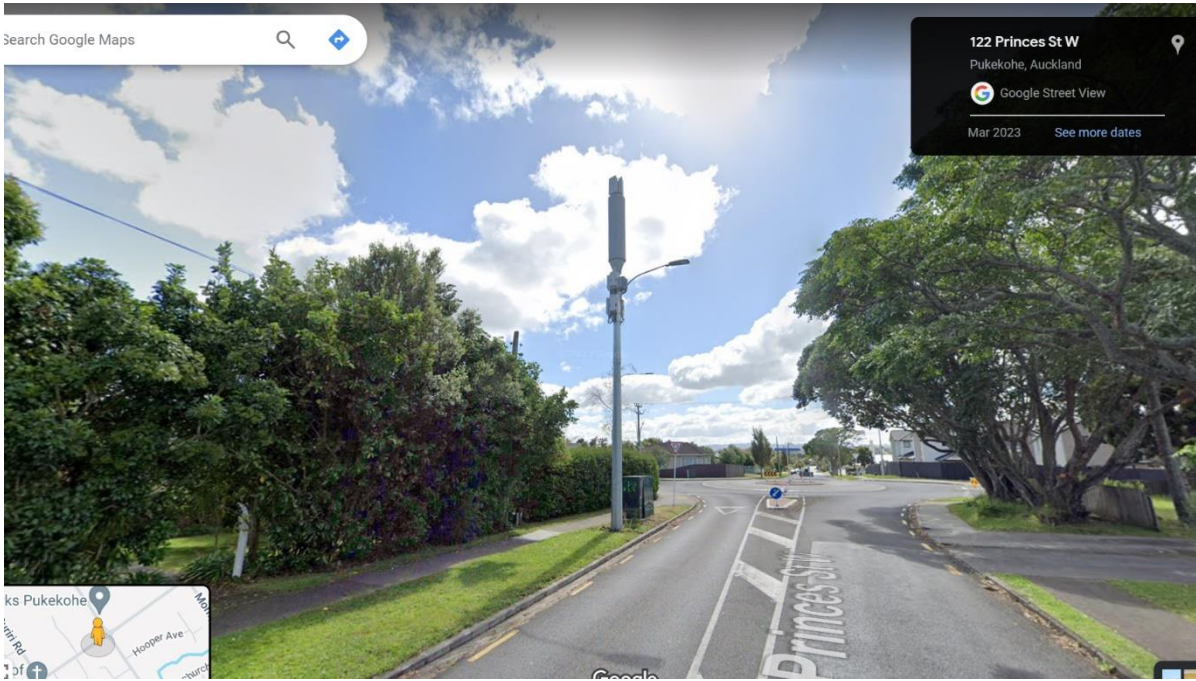
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

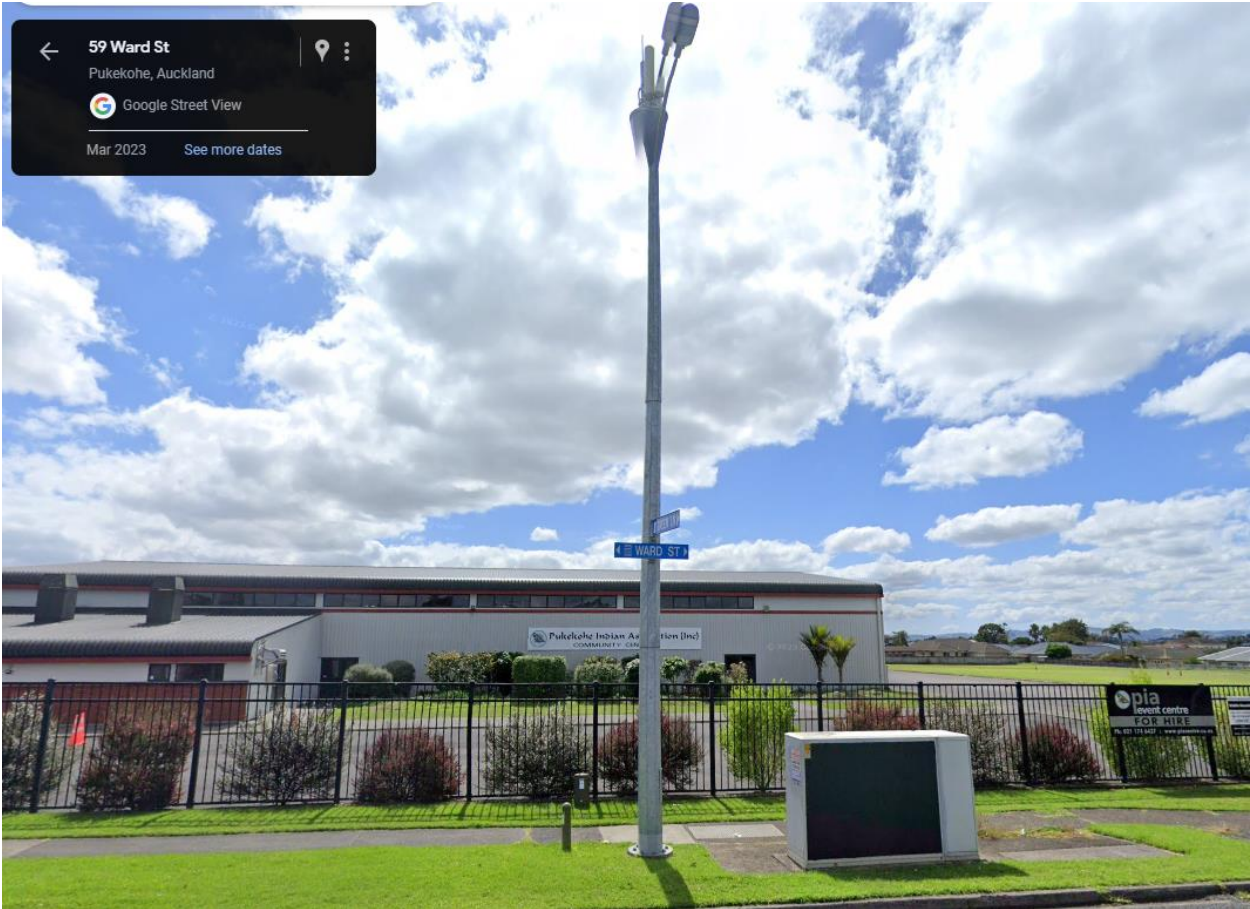
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

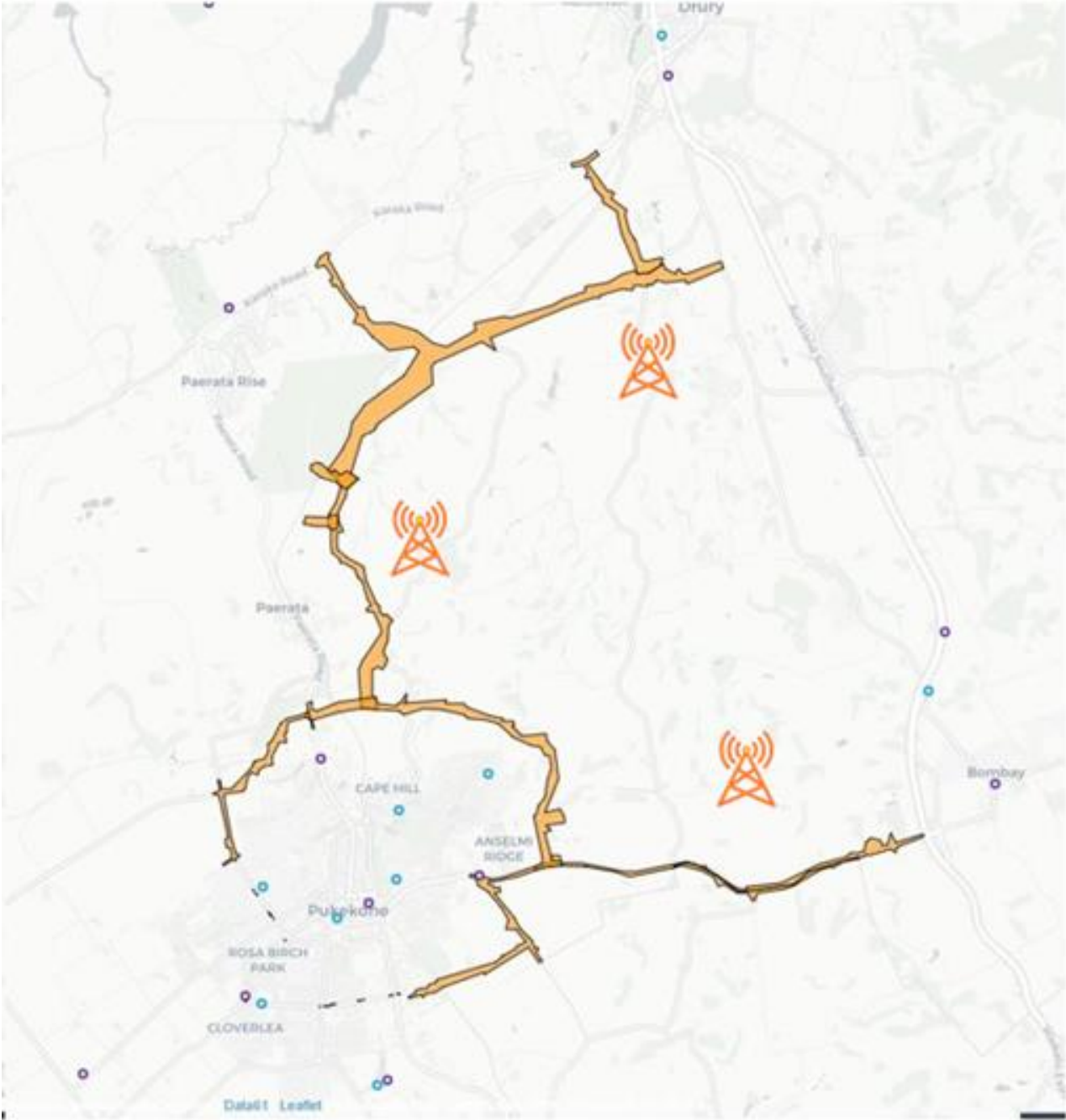


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:946] Notice of Requirement online submission - Stephen Smith
Date: Monday, 13 November 2023 10:01:19 AM
Attachments: [Final Scheme Plan.pdf](#)
[Final Scheme Plan_20231113094747.207.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Stephen Smith

Organisation name:

Full name of your agent: Scott Wilkinson Planning (Robert Scott)

Email address: robert@scottwilkinson.co.nz

Contact phone number: 021619617

Postal address:
70A Lisle Farm Drive
Pukekohe
Auckland 2125

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 4 Pukekohe North-East Arterial

The specific provisions that my submission relates to are:

The submitter lives at 70A and 70B Lisle Farm Drive (Lot 1 and Lot 2 DP 143272) (Site). The Proposed Notice of Requirement (NoR) passes through the submitter's site. (see attached site plan). The submitter is in the process of preparing a private plan change from Future Urban Zone (FUZ) to a live residential zoning. The plan change request will be lodged with the Council prior to Christmas 2023.

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:

The submitter has engaged with Supporting Growth Alliance (SGA) and Auckland Transport (AT). Prior to the lodgement of the NoR. Both parties worked co-operatively on identifying the most efficient route through the site that achieves the following outcomes: 1. The route is an efficient transportation route that allows enables potential access into the site; 2. the route minimises the need for large volumes of earthworks; 3. The route protects significant riparian ecological values associated with the adjoining stream and associated gullies on the site. The submitter would have preferred a route further to the east but accepts that the proposed route is acceptable. The submitter would not be opposed to any alternative route that moves further to the east. However, the submitter opposes any route that moves closer to the west. It is the expectation of the submitter that the plan change request will be approved and operative well before the road is built, given the proposed lapse date of 20 years being sought. The submitter seeks that the Requiring Authority recognise that this land is likely to be live zoned prior to the work commencing and seeks confirmation that it will work co-operatively with the submitter to not oppose (in principle) the residential rezoning of the land and the resulting subdivision and development to be approved.

I or we seek the following recommendation or decision from Auckland Council:

The submitter supports the location of the proposed route through the site provided that the route either: 1. Remains in its current location; or 2. Moves no further westwards within the site. The submitter also seeks: 1. That at least one connection is provided to the proposed arterial road from

the site; 2. That the Requiring Authority recognises that the site is in the process of being live zoned for residential subdivision and development; and 3. That the Requiring Authority work co-operatively with the submitter to enable the rezoning, subdivision and development of the land.

Submission date: 13 November 2023

Supporting documents

Final Scheme Plan.pdf

Final Scheme Plan_20231113094747.207.pdf

Attend a hearing

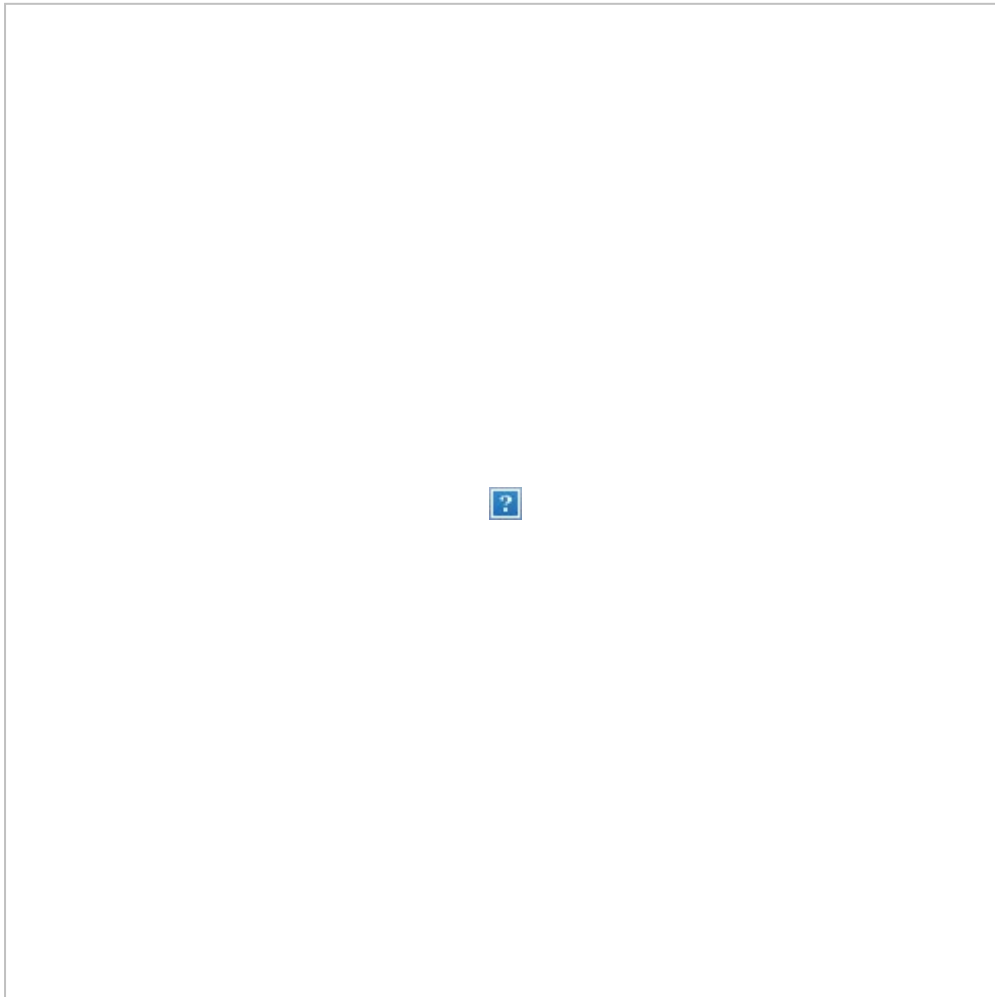
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



CAUTION: This email message and any attachments contain information that may be confidential and may be

I/We confirm that this proposal has been examined by me/us and agree to the use and reproduction of this plan for the purpose of obtaining a resource consent

Applicant's Approval

Approved for submission by: Birch Surveyors Ltd

KEY

- Proposed Lot Boundaries
- Road Boundaries
- Abuttal Boundaries
- Major Contours (5m)
- Minor Contours (1m)
- Proposed Open Space Reserve to protect wetland & streams (Designation to be agreed)
- Proposed Walking & Cycle Track (2m width)
- Existing Bush and Wetland
- Tree
- Existing Stream
- Indicative Draft Designation Boundary
- Road Corridor
- Bridge

NOTES:

- 1) Areas and measurements are approximate only and subject to final survey
- 2) Roads shown are legal
- 3) Datum is arbitrary and subject to final survey
- 4) This document shall be used only for the purpose for which it is supplied. No reproduction, copying, reuse, sale, hire, loan or gift of this document directly or indirectly is permitted without the prior written consent of Birch Surveyors Ltd
- 5) This document is subject to copyright

Total number of proposed private lots + 187
 Total number of public open air reserves = 3
 Combined total lots = 190



original size A3

	<p>2A Wesley Street Pukekohe 2120 PO Box 475 Pukekohe 2340</p> <p>Ph: 09 237 1111 pukekohe@birch.nz www.birch.nz</p>	<p>LOCAL AUTHORITY: AUCKLAND COUNCIL PLANNING MAP: AUCKLAND UNITARY PLAN ZONING: FUTURE URBAN ZONE ACTIVITY: - COMPRISED IN: NA84D/710, NA84D/711, NA103A/604 TOTAL AREA: 10.130 ha, 8.517 ha, 0.5378 ha REGISTERED OWNERS: STEPHEN SMITH, DIANNE SMITH</p>	<p>PROJECT NAME</p> <p>SMITH 79 LISLE FARM DRIVE PUKEKOHE</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Surveyed</td> <td>Date</td> <td>Project No.</td> </tr> <tr> <td>T.RHODES</td> <td>14/03/2019</td> <td>4553</td> </tr> <tr> <td>Designed</td> <td>Date</td> <td>Scale</td> </tr> <tr> <td>SWB</td> <td>10/2022</td> <td>Hz: 1:2000 @ A3</td> </tr> <tr> <td>Drawn</td> <td>Date</td> <td>REV. BY DATE COMMENT</td> </tr> <tr> <td>T.RHODES</td> <td>06/2023</td> <td>B TR 10/22 CONCEPT</td> </tr> <tr> <td>Approved</td> <td>Date</td> <td>B TR 05/23 ROADING/NEW LOTS</td> </tr> <tr> <td>SWB</td> <td>06/2023</td> <td>C TR 06/23 ROADING</td> </tr> <tr> <td></td> <td></td> <td>D TR 06/23 LOTS & ROADING</td> </tr> </table>	Surveyed	Date	Project No.	T.RHODES	14/03/2019	4553	Designed	Date	Scale	SWB	10/2022	Hz: 1:2000 @ A3	Drawn	Date	REV. BY DATE COMMENT	T.RHODES	06/2023	B TR 10/22 CONCEPT	Approved	Date	B TR 05/23 ROADING/NEW LOTS	SWB	06/2023	C TR 06/23 ROADING			D TR 06/23 LOTS & ROADING	<p>TITLE</p> <p>CONCEPT PLAN OF LOTS 1 & 2 DP 143272 & LOT 1 DP 169148</p> <p>Drawing Name: F:_CAD\CP 4553 D.dwg / SUBJECT TO FINAL SURVEY Rev. D</p>
Surveyed	Date	Project No.																														
T.RHODES	14/03/2019	4553																														
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Approved	Date	B TR 05/23 ROADING/NEW LOTS																														
SWB	06/2023	C TR 06/23 ROADING																														
		D TR 06/23 LOTS & ROADING																														

I/We confirm that this proposal has been examined by me/us and agree to the use and reproduction of this plan for the purpose of obtaining a resource consent

Applicants Approval

Approved for submission by: Birch Surveyors Ltd

KEY

- Proposed Lot Boundaries
- Road Boundaries
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- Major Contours (5m)
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- Existing Stream
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- Road Corridor
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NOTES:

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- 5) This document is subject to copyright

Total number of proposed private lots + 187
 Total number of public open air reserves = 3
 Combined total lots = 190



original size A3

		LOCAL AUTHORITY AUCKLAND COUNCIL	PROJECT NAME SMITH	Surveyed T.RHODES	Date 14/03/2019	Project No. 4553	TITLE CONCEPT PLAN OF LOTS 1 & 2 DP 143272 & LOT 1 DP 169148
		PLANNING MAP AUCKLAND UNITARY PLAN	79 LISLE FARM DRIVE PUKEKOHE	Designed SWB	Date 10/2022	Scale HZ: 1:2000 @ A3	
	2A Wesley Street Pukekohe 2120 PO Box 475 Pukekohe 2340 Ph: 09 237 1111 pukekohe@birch.nz www.birch.nz	ZONING FUTURE URBAN ZONE		Drawn T.RHODES	Date 06/2023	REV. BY DATE COMMENT	Drawing Name: F:\..CAD\CP 4553 D.dwg / SUBJECT TO FINAL SURVEY Rev. D
		ACTIVITY -			Approved SWB	Date 06/2023	

**SUBMISSION ON A REQUIREMENT FOR A DESIGNATION SUBJECT TO
FULL NOTIFICATION**

**FORM 21, SECTIONS 168A, 169, 181, 189A, 190 AND 195A OF THE
RESOURCE MANAGEMENT ACT 1991**

To: Auckland Council
Private Bag 92300
Auckland 1142

Attention: Planning Technician
unitaryplan@aucklandcouncil.govt.nz

Name of submitters: Pukekohe Industrial Park and Storage Limited (“**the Submitter**”)

Introduction

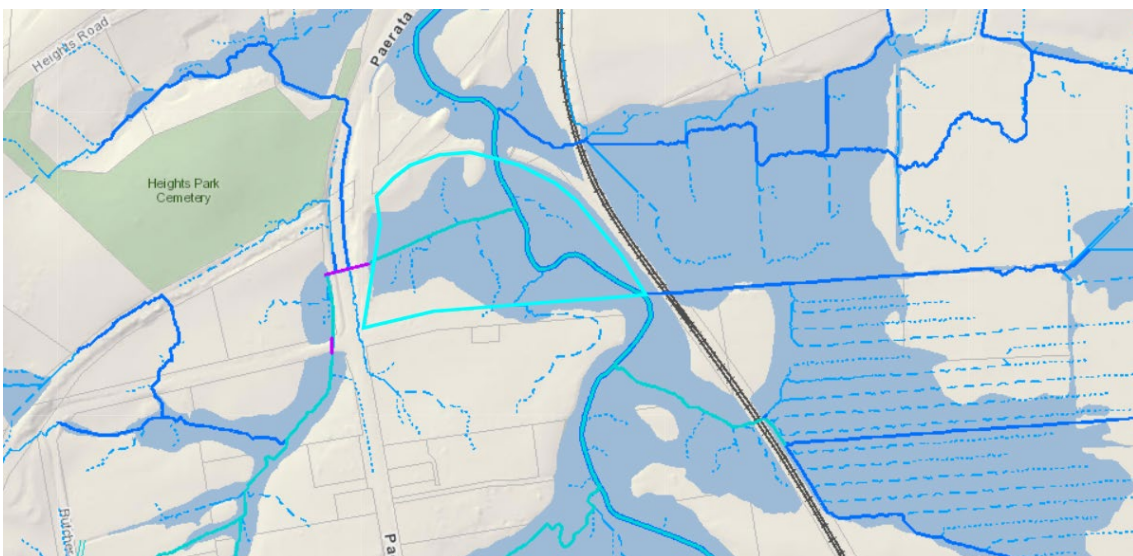
1. This is a submission on the Notice of Requirement requested by Auckland Transport as Requiring Authority for a new designation in relation to the construction, operation and maintenance of a new arterial transport corridor between Paerata Road (State Highway 22) and Pukekohe East Road, referred as the Pukekohe North-East Arterial (“**NOR 4**” or “**the Project**”), to the Auckland Unitary Plan (“**AUP**”).
2. The site affected is 1199 Paerata Road (SH22), Paerata, shown in blue in the images below. The boundary of the proposed designation affects the southern area of the site, including two accesses from Butchers Road.
3. The site is unique in shape and context. Semi-circle in shape, it is bound by Paerata Road to the west, Butcher Road to the south (a paper road comprised of gravel), the rail line to Glenbrook to the north, and the rail line to Pukekohe to the east. Further, the Whangapouri Creek severs the eastern third of the site from the western two-thirds.
4. The land on the eastern side of Whangapouri Creek is low-lying and subject to flooding from the Creek, and is undevelopable therefore. The land on the western side of Whangapouri Creek is low-lying alongside the Creek, but rises to the west creating a flat, relatively elevated area of land within the western half of the site. The flat areas are earmarked for future industrial development comprised of at-grade yard storage in the short-medium term (including an existing storage/lock-up building), and a more substantial industrial park and storage development in the long-term, following the future change in zoning from Future Urban to Light Industrial zone (as indicated by the Pukekohe-Paerata Structure Plan 2019).

5. A second farm drain conveying overland flow enters the western boundary and discharges into the Whangapouri Creek to the east, through the centre of the site.
6. The majority of the site is subject to a flood plain which the Submitter understands is caused by the downstream culvert beneath SH22 to the north being undersized, causing upstream flooding, including within the site.
7. These features are illustrated in Figures 1 and 2.

Figure 1 – Aerial photograph



Figure 2 – Natural hazard and stream features



8. A series of buildings are currently located within the western half of the site:
 - a) A rectangular building comprising a storage and lock-up activity (Council reference LUC60362575 – refer copy of approved consent at **Appendix 1**);
 - b) A secure covered area is located in the northwestern corner, for the use by the owner for ad-hoc activities as permitted in the Future Urban zone;
 - c) A residential dwelling and ancillary shed/garage structures are located in the south western corner; and
 - d) A shed is located centrally along the southern boundary.
9. The site is currently accessed by three vehicle crossings:
 - a) A crossing at the southern western corner of the site providing vehicle access to the residential dwelling directly from Paerata Road. This crossing is shortly to be removed in accordance with LUC60362575.
 - b) A two-way vehicle crossing at the western end of the site, providing access to/from Butcher Road, as approved by LUC60362575 for the purposes of serving the storage and lock up activities and the residential dwelling.
 - c) A one-way vehicle crossing also providing access to/from Butcher Road, only serving the standalone shed.
10. In the vicinity of the site, the Project comprises the construction of an arterial road in the general alignment of the Butchers Road paper road, adjoining the southern boundary of the site, as shown in 3 below. A portion of land is proposed to be leased during the construction period and/or taken permanently for the purpose of constructing, operating and maintaining the arterial road.

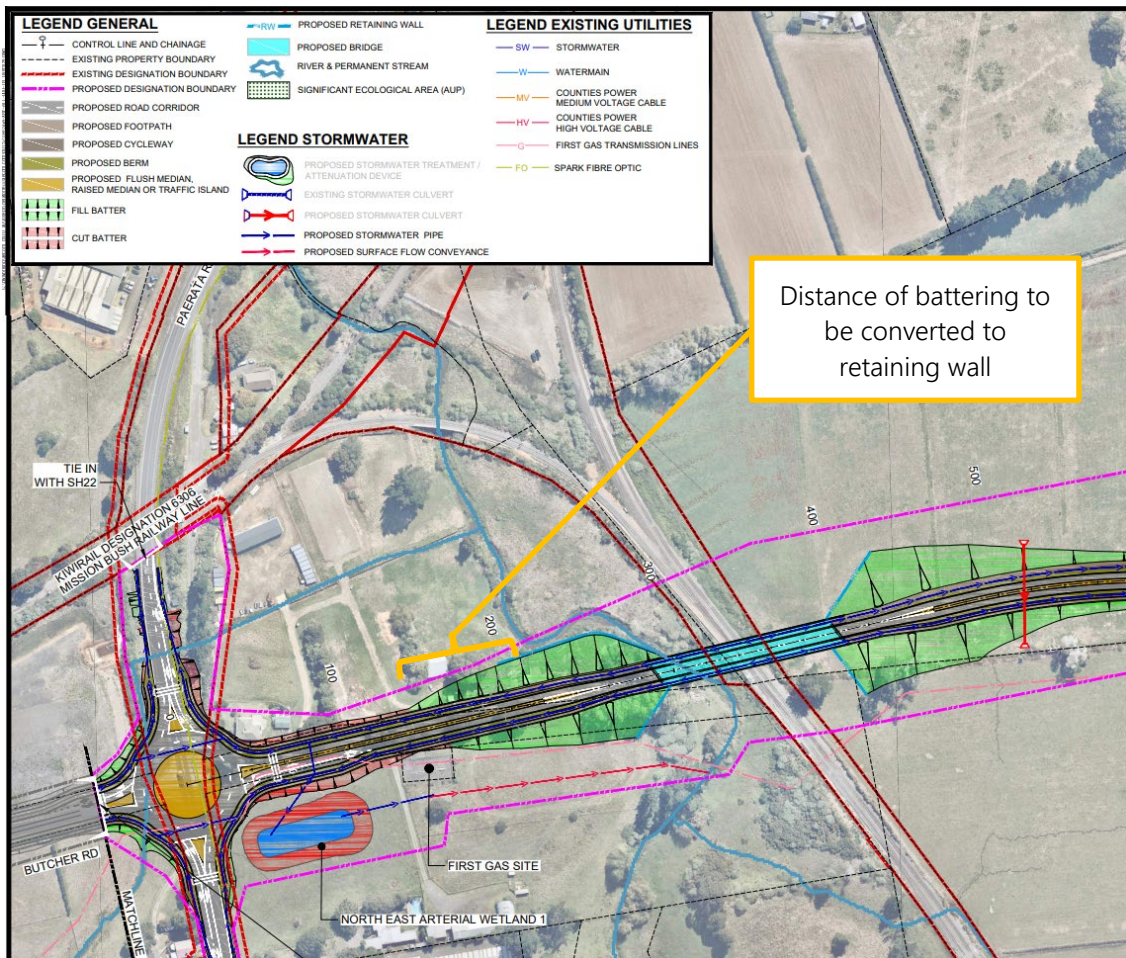
Reasons for Submission

11. The Submitter supports NOR 4 and its extent relative to the Submitter's property, albeit that support is conditional upon resolution of the matters set out as follows.
 - a) The construction of the road will prevent use of the existing and consented vehicle crossings.
 - i. Alternative temporary vehicle access, which is fit-for-purpose relative to the nature of activities occurring on the site at the time of the works, is required to be provided to the site at all times during the construction process, to be agreed with the owner and operators on the site.

ii. A two-way, fit-for-purpose vehicle crossing is required to be reinstated at the completion of construction, providing access for all sized vehicles that are required to access the site, in a central location along the southern boundary which is to be agreed with the owner and operators.

b) The extent of battering on the northern side of the proposed arterial road, where it is required to be elevated to traverse the stream and rail line, is excessive. While a portion of battering is acceptable, retaining should be used instead of battering at the lower / shallower part of the road, where retaining would not be cost prohibitive and would enable flat developable land to be 'handed back' to the owner upon the completion of construction. The extent of retaining that is sought by the Submitter is shown in Figure 3.

Figure 3 – Proposed extent of retaining on northern side of North-East Arterial



12. North East Arterial Wetland 1 is proposed to be located on the southern side of Butchers Road, which is supported by the Submitter in the proposed location.

13. There is little analysis of the potential flood effects arising within the site from the proposed extent of battering. The Submitter understands this is because the resultant flood effects will be experienced outside of the subject site. The Submitter would support such an outcome.
14. The Submitter otherwise supports NOR 4 as the delivery of the road will assist with unlocking growth in Future Urban zoned areas in Paerata and Pukekohe, subject to the changes to conditions set out below.

Conditions

15. The following concerns are expressed in relation to the proposed conditions:

- a) **Condition 6 Outline Plan** – sets out what management plans are required to be submitted with the Outline Plan. This list should include the SCEMP.
- b) **Condition 7 Management plans** – excludes SCEMPs and CNVMPs from being submitted as part of an Outline Plan. This reference should be deleted from Clause 7(a)(v) to provide transparency and accountability in respect of the consultation process.

It is illogical that only material changes to the SCEMP would be supplied to the Council when the Council would not have previously received a copy of that management plan. Clause 7(c) should be deleted.

- c) **Condition 8 SCEMP** – as currently worded, condition 8 lacks specificity as to how site specific issues raised through the course of this hearing are recorded and addressed by the requiring authority. Further consideration as to how this can be achieved through the SCEMP is required.
- d) **Condition 10 LIP** – the LIP condition simply requires the exchange of information by the Requiring Authority and the onus appears to be on the developer to inform themselves, to the extent that the Requiring Authority can provide information relative to their progress on each NOR and each Stage of Work. While helpful, it lacks the ‘two-way’ approach that would be better enabled through a management plan approach, which should also integrate with the SCEMP through cross-reference.
- e) **Condition 11 ULDMP** – it is unclear how the ULDMP will address the interface with the operational areas of commercial premises, including loading areas, internal circulation and carparking. Further direction is required within condition 11(f) to ensure that effects on the operation of commercial activities are appropriately managed. Further, the ULDMP should identify the changes that

have been made to the design following the consultation process that is required by the SCEMP – further integration between the documents is required.

- f) **Condition 12 Flood Hazard** – given the extent of the flood plain in and around the Submitter’s property and with reference to the conditions for the North West NORs -
 - i. Clause 12(a)(vii) should also refer to the 50%, 20%, 10% and 1% AEP rainfall events, not only the 1% AEP event.
 - ii. Clause 12(b) should reference the 10% and 1% AEP flood levels, not only the 100 year ARI flood level.
 - g) **Condition 13 Existing property access** – the provision of safe and fit-for-purpose access is critical to the Submitter, both in terms of temporary access during the construction phase, and permanent access at the completion of works. Appropriate design and location of access will differ between properties, such that reference to and integration with the SCEMP within condition 13 is necessary to ensure suitable consultation has been undertaken with landowners and occupiers, and that the access that is provided by the requiring authority responds to known issues and constraints at each individual property.
 - h) **Condition 17 CTMP** – clause 12(a)(vi) requires engagement with landowners and occupiers whose access is directly affected, and should reference site specific concerns identified through the SCEMP process.
16. With reference to the North West NOR rebuttal evidence, the following other condition is noticeably absent from the proposed list and is considered necessary to mitigate actual and potential adverse effects arising from NOR 4:
- i) A Network Integration Management Plan (“**NIMP**”) is required to coordinate and integrate between other projects, including but not limited to those designations that physically integrate with NOR 4 (being NOR 7 at its western end and NOR 5 at its south eastern end), and more broadly with other projects in the area. A copy of the NIMP should be supplied to Council with the respective Outline Plan application (at condition 5).
17. In respect of certification, all management plans should be submitted to Council for certification to ensure certainty, transparency and accountability. The Outline Plan process is not a certification process, as the Council is limited in what it can request and assess as part of the s176A process. Given the scope of works proposed it is important that Council has the ability to review any management plan for completeness, thus providing certainty that the relevant effects are being appropriately managed.

18. The Submitter reserves the right to provide further commentary in respect of conditions through evidence, as they may change throughout the course of the hearing process.

Relief Sought

19. The Submitters supports NOR 4 and its extent relative to the property at 1199 Paerata Road, subject to assurance that temporary and permanent, fit-for-purpose vehicle access will be provided to the site, and that the western end of battering is replaced with a retaining wall. Provision of access should be on the basis of transparent and fulsome engagement in respect of its design, location and what constitutes “fit-for-purpose” from the perspective of the owner and occupiers of the site.
20. The Submitter supports NOR 4 on the basis that no flood effects or change in flood levels will arise on the subject site, as stated in the Flood Assessment supplied by the Requiring Authority.
21. The Submitter supports the location of the North East Arterial Wetland 1 on the southern side of Butchers Road.
22. The Submitter seeks amendments to the proposed conditions as set out above, to suitably avoid, remedy and mitigate the potential adverse effects of development on the site, and any relief or other consequential amendments as are considered appropriate or necessary to address the matters outlined in this submission. The changes also seek to ensure appropriate integration between required management plans, Projects in the area, and engagement with key stakeholders, including owners and occupiers of affected land.
23. The Submitters wish to be heard in support of this submission.
24. If others make a similar submission, the Submitters would consider presenting a joint case with them at the hearing.

DATED at Auckland this

13th day of **November 2023**

Signature:

Ken Vincent and Andrew Vincent
Pukekohe Industrial Park and Storage
Limited

Address for Service:

Forme Planning Ltd
Suite 203, Achilles House
8 Commerce Street
Auckland 1010
hannah@formeplanning.co.nz

APPENDIX 1

COPY OF APPROVED CONSENT LUC60362575

Decision on an application for resource consent under the Resource Management Act 1991



Discretionary activity

Application number(s):	LUC60362575 (s9 land use consent)
Applicant:	Pukekohe Industrial Park & Storage Ltd
Site address:	1199 Paerata Rd, Pukekohe
Legal description:	Part Lot 30 DP 10637 and Allotment 307 Pukekohe District
Proposal:	

The proposal is to establish a single-level storage and lock-up facility of some 1080m² in floor area, at the northern area of the site, with associated parking/turning. As the property is zoned Future Urban, the proposed activity will essentially represent an interim (temporary) development, rather than a formal re-development, to provide an income for the owner until such time as the area becomes part of a plan change to re-zone the area.

Earthworks will be required to establish the building platform and access/parking areas – across an area of approximately 2,666m² and a volume of approximately 673.5m³ (the latter being cut and fill, contained within the site). Access will be provided via the existing driveway from Butcher Rd. The existing culvert across the farm drain remains unchanged as part of the access. 12 parking spaces and associated manoeuvring are proposed next to the new building. The entrance/vehicle crossing from Butcher Road to the site will be widened to 5.5m to ensure safe egress/ingress, and the initial section of Butcher Road will be widened to provide a passing bay.

The storage facility itself will comprise a shed-style building with a ‘rural’ appearance, with individual internal units provided for the storage of private goods. It is understood from communication with the owner/applicant during a site visit that the facility will require a part-time employee (approximately 2 or 3 hours on site daily). There is no proposal to connect the facility to the public wastewater supply given the nature of the activity and the distance to the main wastewater line. Instead, a composting toilet device will be provided.

Resource consent is required for the following reasons:

Land use consent (s9) – LUC60362575

Auckland Unitary Plan (Operative in part)

District land use (operative plan provisions)

Future Urban Zone

- To construct and use a building for the purpose of a storage and lock-up facility is a discretionary activity under rule H18.4.1(A2) and (A42)

Natural hazards and flooding

- A new structure and building within the 1 per cent annual exceedance probability (AEP) floodplain where a proposed building to accommodate a storage facility is to be constructed in the floodplain is a restricted discretionary activity pursuant to Rule E36.4.1(A37).

Land Disturbance – District

- To undertake general earthworks of 2,666m² in the Future Urban zone, is a restricted discretionary activity under rules E.12.4.1(A6).
- To undertake earthworks (including filling) within a 1% AEP Floodplain that: (a) (raises) ground levels more than 300mm, to a total fill volume up to 10m³; and (b) results in any adverse changes in flood hazards beyond the site, is a restricted discretionary activity under rule E12.6.1.11 and pursuant to rule C1.9 infringements.

The reasons for consent are considered together as a discretionary activity overall.

Decision

I have read the application, supporting documents, and the report and recommendations on the application for resource consent. I am satisfied that I have adequate information to consider the matters required by the Resource Management Act 1991 (RMA) and make a decision under delegated authority on the application.

Acting under delegated authority, under sections 104, 104B, and Part 2 of the RMA, the resource consent is **GRANTED**.

Reasons

The reasons for this decision are:

1. In accordance with an assessment under ss104(1)(a) and (ab) of the RMA, the actual and potential effects from the proposal will be acceptable as:
 - (a) The proposal will not impede the ability of the site to be used for future urban purposes because -
 - there is no requirement to connect to public infrastructure, and the proposed solution for wastewater is a composting toilet which is self-contained, does not require a discharge consent and has been approved by the council's wastewater specialist subject to conditions to ensure it is well-maintained and does not propose any risk to the health of the public
 - the building is of a moderate scale and it, along with the associated parking area, comprises a relatively small portion (approximately 1500m²) of the 4.56ha property
 - entry/egress utilises the existing access from Butcher Road, and will widen/form an existing metal track which leads to the proposed facility
 - the majority of the site will be left grassed/in pasture or land which is associated with the existing dwelling and farm/implement shed on the site. Overall, the

proposal will not preclude the remainder of the site to be used for rural/productive purposes, and the storage shed will only occupy approximately 1500m² of the overall site area (excluding access).

- (b) The proposal will not generate any reverse sensitivity effects on surrounding properties insofar as the topography and location adequately screen and separate it from the main road and surrounds. The facility is also located at a distance from the nearest residential sites. It is also noted that the nature of the activity itself (self-storage) means that the level of activity associated with the facility is sporadic and minimal.
- (c) Traffic effects will be less than minor due to the fact that the intersection of Paerata and Butcher Roads will be upgraded, and the first section of Butcher Rd will be widened with the provision of a passing bay. Existing access from Butcher Rd into the site will be utilised. Moreover, an anticipated number of movements per day is expected to be between 16-22, which is unlikely to have a noticeable effect of the safety and efficiency of either Paerata Rd, or Butcher Rd. Parking and manoeuvring within the site can be adequately and safely achieved.
- (d) The effects on rural character and amenity will be no more than minor, given the overall rural 'aesthetic' of the building, its position on the site, and the fact that it will be finished in a neutral colour palette. The noise effects of the proposal will to a large extent be mitigated by nature of the proposal itself and the hours of operation are limited to 7 am to 10 pm, seven days per week, with entry and exit by the users of the facility controlled by a key-card system. Appropriate operation conditions have been imposed in order to maintain rural amenity.
- (e) The site has a soil classification of LUC3. While proposal is not directly related to rural production, it is considered that the proposed storage facility will not completely preclude the use of the remainder of the site for productive activities if this is required, and nor will it completely extinguish the potential use of the whole site for productive activities, given that there is no subdivision proposed, and the activity is a temporary one until such time as the site's final zoning is determined through a plan change. Moreover, it is relevant to note that the productive capability of the land (LUC3) was addressed during both the Auckland Unitary Plan Hearings process, and the Structure Planning process, where the anticipated zoning of the land was recognised as Future Urban. The site's constraints (including flooding, stream location and the transport infrastructure designations) may limit the use of the site for productive purposes. Nonetheless, the proposal is of a nature that would not preclude rural production activities on the site again, or even currently, given that the proposed activities do not occupy the entire property.
- (f) While having altered the flow direction and flood storage capacity, the recent earthworks have not increased the floodplain area within the site or adjacent properties, and the change in water level on adjacent properties will either be negligible when compared to the existing maximum flow depth or within the required building code freeboard. The proposed earthworks to establish the storage facility and associated parking/turning areas will not alter the flood hazard beyond the site, and the risk to person and property within the site will be appropriately mitigated by the minimum freeboard for the building.

- (g) Earthworks associated with construction of the proposed facility will be mitigated through the implementation of sediment and erosion control methodology compliant with TP58. This will ensure that sediment entering the farm drain or the stream is prevented.
 - (h) In terms of positive effects, the proposal will provide for a reasonable use of the site (for self-storage purposes) while not excluding the potential use of the site for urban intensification in the future, or for some rural production purposes in the meantime.
 - (i) With reference to s104(1)(ab), there are no specific offsetting or environmental compensation measures proposed or agreed to by the applicant to ensure positive effects on the environment.
2. In accordance with an assessment under s104(1)(b) of the RMA, the proposal is consistent with the relevant statutory documents. In particular:

The Auckland Unitary Plan (Operative in Part) – the proposal is consistent with the following objectives and policies:

- a) Objectives E12.2(1) and Policies E12.3(1)-(6) regarding district earthworks as the proposed methodology for sediment control is considered to mitigate potential adverse effects on the freshwater environment and the application documents including the Engineering Plan set out methodologies and protocols to mitigate effects on the surrounding environment and adjacent properties and the implementation of these are included in conditions of consent.
- b) H18.2(1)-(4), and H18.3(1)-(6) because the development will be in keeping with rural character and amenity, provide a service which will support the rural (and wider) community, will not prematurely subdivide, develop or inappropriately use the property rendering its future rezoning to an urban zone difficult.

Overall, the proposal is not considered inappropriate for the rural zone. The proposed activity will provide support to the local area. The proposed hours of operation and traffic movement are considered appropriate, to be of a scale and intensity that will maintain the amenity and character of the rural environment. The amenity effects generated by the activity are considered acceptable and are similar in scale, character and intensity to those expected within the rural zone.

The proposal enhances the economy and the well-being of people and local communities are maintained or enhanced by social, cultural and economic non-residential activities, while the area's rural character and amenity is maintained or enhanced and is consistent with H19.2.5(3). As such, it is concluded that the proposal is not contrary the relevant objectives and policies under Chapter H19 of the AUP(OP).

- 3. In accordance with an assessment under s104(1)(c) of the RMA, no other matters are considered relevant.
- 4. In the context of this discretionary activity application for land use, where the objectives and policies of the relevant statutory documents were prepared having regard to Part 2 of the RMA, they capture all relevant planning considerations and contain a coherent set of policies designed to achieve clear environmental outcomes. They also provide a clear framework for

assessing all relevant potential effects and there is no need to go beyond these provisions and look to Part 2 in making this decision as an assessment against Part 2 would not add anything to the evaluative exercise.

5. Overall, the proposal is consistent with Part 2 of the Resource Management Act in that the activity will avoid or mitigate adverse effects on the environment, and provide for development in a manner that will enable people to provide for their social and economic wellbeing whilst managing land resources in an efficient manner.

Conditions

Under sections 108 and 108AA of the RMA, this consent is subject to the following conditions:

1. This consent shall be carried out in accordance with the documents and drawings and all supporting additional information submitted with the application, detailed below, and all referenced by the council as resource consent number LUC60362575
 - Application Form and Assessment of Environmental Effects prepared by Penny Anson, Forme Planning dated 27 August 2020.

Report title and reference	Author	Rev	Dated
AEE - Land use application for a storage and lock-up facility and associated earthworks in the Future Urban zone 1199 Paerata Road, Pukekohe	Penny Anson, Forme Planning		27 August 2020
Engineering & Infrastructure Report - Pukekohe Industrial Park and Storage Limited, 1199 Paerata Road, Pukekohe (REF A19389)	CKL		18 August 2020
1199 Paerata Rd – Transportation Assessment (REF A19389)	CKL		6 August 2020
1199 Paerata Rd – Flood Risk Assessment (REF A19389)	CKL	1- 18/08/2020	18 August 2020

Drawing title and reference	Author	Rev	Dated
Site Plan – Ref 8089	Madsen Lawrie Surveyors Limited		March 2020
Site Plan – Ref 8089	Madsen Lawrie Surveyors Limited		October 2019
Elevations and Floor Plan – Ref Job Sheet 2	KiwiMark Construction Ltd		27 November 2015
Earthworks Proposed Contours Plan – Ref A19389 DWG 200	CKL	A	10 July 2020
Earthworks Cut and Fill Plan - - Ref A19389 DWG 210	CKL	A	10 July 2020
Erosion and Sediment Control Plan – Ref A19389 DWG 220	CKL	B	10 July 2020
Erosion and Sediment Control Standard Details – Sheet 1 Ref A19389 DWG 230	CKL	A	10 July 2020

Accessway Layout Plan – Ref A19389 DWG 300	CKL	A	10 July 2020
Accessway Long Section – Ref A19389 DWG 310	CKL	A	10 July 2020
Drainage Layout Plan – Ref A19389 DWG 400	CKL	B	10 July 2020

Other additional information	Author	Rev	Dated
Rule Compliance Checklist	Penny Anson – Forme Planning		28 August 2020
Rule Compliance Checklist Addendum	Penny Anson – Forme Planning		13 November 2020
Sun-Mar Composting Toilet information	Ecoflow Water Management		Undated
Sun-Mar Composting Toilet Owner’s Manual	Sun-Mar		Undated
SUPPLEMENTARY INSTRUCTIONS FOR USING AND INSTALLING SUN-MAR TOILETS IN AUSTRALIA	Ecoflow Water Management	Ver.220216	Undated
Response to further information Ref: [#CKL A19389] 1199 Paerata Rd - LUC60362575 update 4.17pm)	Eugene Salmin – CKL		17 November 2020
Response to further information	Penny Anson – Forme Planning		6 October 2020
Response to further information	Michael Hall, CKL		29 September 2020

2. Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:
 - a. The consent is given effect to; or
 - b. The council extends the period after which the consent lapses.
3. The consent holder shall pay the council an initial consent compliance monitoring charge of \$680 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent.

Advice note:

The initial monitoring deposit is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc., all being work to ensure compliance with the resource consent(s). In order to recover actual and reasonable costs, monitoring of conditions, in excess of those covered by the deposit, shall be charged at the relevant hourly rate applicable at the time. The consent holder will be advised of the further monitoring charge. Only after all conditions of the resource consent(s) have been met, will the council issue a letter confirming compliance on request of the consent holder.

Specific conditions – land use consent LUC60362575

Pre-development conditions

Engineering Plan (EPA)

4. Prior to the commencement of any works, the consent-holder shall submit full detailed engineering design drawings, for the road-widening and intersection upgrade, for the approval of Council and Auckland Transport peer review.

The design shall include, but not be limited to, the following details:

- a) The first 10.0m of Butchers Road shall be widened to 5.5m and sealed. The intersection of Paerata Road with Butchers Road shall be upgraded to match the 5.5m width at the boundary of Butchers Road in accordance with ATCOP Standards.
- b) The passing bay shall be constructed as per the approved plans.
- c) That a Give Way sign shall be installed in accordance with ATCOP Standards on Butchers Road at the intersection with Paerata Road.

Advice Note: *The consent-holder should submit a Resolution report for approval by Auckland Transport Traffic Control Committee to legalise the proposed traffic control devices (Priority Give way intersection). A copy of the Resolution from Traffic Control Committee shall be submitted to the Council prior to the commencement the activity provided for by this consent approval.*

Further information on the resolution process can be found in the following the link: <https://at.govt.nz/about-us/working-with-at/traffic-and-parking-controls>

Construction Traffic Management Plan (CTMP)

5. Prior to carrying out these works, within the legal road corridor (boundary to boundary) and construction on the site, the Consent Holder shall submit to the approval of the Council, a construction Traffic Management Plan (CTMP). The CTMP shall be prepared in accordance with New Zealand Transport Authority's Code of Practice for Temporary Traffic Management and shall address the surrounding environment including pedestrian and bicycles traffic. No construction shall commence until the CTMP has been approved by the Council and all construction traffic shall always be managed in accordance with the approved CTMP.

Advice Note: *A CAR is required for open cut trenching and trenchless techniques for utility installations. The application for a CAR is to be made online to www.beforeudig.co.nz. The application form requires relevant background information including resource consent details, traffic management plans, and the locations and nature of the works. Please note that a CAR may take up to 15 days to process and construction hours may be restricted on Level 2 or 3 roads, as defined in the Code of Practice for Temporary Traffic Management (COPTTM) of NZTA. Application for a CAR is made online to www.beforeudig.co.nz. A charge may apply.*

Pre-start Meeting

6. Prior to the commencement of the construction and earthworks activity, the consent holder shall hold a pre-start meeting that:
- is located on the subject site
 - is scheduled not less than 5 days before the anticipated commencement of construction and earthworks
 - includes Monitoring officer, Development Engineer
 - includes representation from the contractors who will undertake the works

The following information shall be made available at the pre-start meeting:

- Timeframes for key stages of the works authorised under this consent
- Resource consent conditions
- Erosion and Sediment Control
- Construction Traffic Management Plan
- Engineering Plan Approval

Advice Note: *To arrange the pre-start meeting required by condition (5) please contact the Team Leader South Monitoring to arrange this meeting or email monitoring@aucklandcouncil.govt.nz. The conditions of consent should be discussed at this meeting. All information required by the council and listed in that condition should be provided 2 days prior to the meeting.*

7. The Team Leader South Monitoring shall be notified at least five (5) working days prior to earthwork and development activities commencing on the subject site.

Development in Progress Conditions

General sediment control conditions

8. All earthworks shall be managed to minimise any discharge of debris, soil, silt, sediment or sediment-laden water beyond the subject site to either land, stormwater drainage systems, watercourses or receiving waters. In the event that a discharge occurs, works shall cease immediately, and the discharge shall be mitigated and/or rectified to the satisfaction of Council.

Advice Note: *In accordance with the condition above, all earthworks shall be undertaken to ensure that all potential sediment discharges are appropriately managed. Such means and measures may include:*

- *Catchpit protection*
- *run-off diversions*
- *silt and sediment traps*
- *decanting earth bunds*

- *silt fences*

During excavation, the ingress and accumulation of surface run-off water and/or perched groundwater can be minimised by:

- *maintaining a waterproof cover over any excavation trenches and pits outside of working hours,*
- *diversion of surface water flow around the works area, and*
- *regular disposal of the water into an appropriate sediment control device, if ponding occurs within the excavation.*

Please note that the diversion of Stormwater and/or groundwater may require consent in accordance with Auckland Unitary Plan Operative in Part.

It is recommended that you discuss any potential measures with the council's monitoring officer who may be able to provide further guidance on the most appropriate approach to take. Please contact the Council's Team Leader Compliance Monitoring South on monitoring@aucklandcouncil.govt.nz for more details. Alternatively, please refer to "Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region (GD 05)".

9. There shall be no deposition of earth, mud, dirt or other debris on any public road resulting from earthworks activity on the subject site. In the event that such deposition does occur, it shall immediately be removed. In no instance shall roads or footpaths be washed down with water without appropriate erosion and sediment control measures in place to prevent contamination of the Stormwater drainage system, watercourses or receiving waters.

Advice Note: *In order to prevent sediment laden water entering waterways from the road, the following methods may be adopted to prevent or address discharges should they occur:*

- *provision of a stabilised entry and exit(s) point for vehicles*
- *provision of wheel wash facilities*
- *ceasing of vehicle movement until materials are removed*
- *cleaning of road surfaces using street-sweepers*
- *silt and sediment traps*

In no circumstances should the washing of deposited materials into drains be advised or otherwise condoned.

It is recommended that you discuss any potential measures with the council's Monitoring Inspector who may be able to provide further guidance on the most appropriate approach to take. Please contact the Council for more details. Alternatively, please refer to Auckland Regional Council, Technical Publication No. 90, and Erosion & Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region.

10. The operational effectiveness and efficiency of all erosion and sediment control measures specifically required as a condition of resource consent or by the approved Erosion and Sediment Control Plan shall be maintained throughout the duration of

earthworks activity, or until the site is permanently stabilised against erosion. A record of any maintenance work shall be kept and be supplied to the Council on request.

Advice Note: *As a guide, maintenance of the erosion and sediment control measures required by above condition should seek to ensure that the accumulated sediment be removed from sediment retention devices prior to reaching 20% storage live storage capacity. Sediment removed from treatment devices should be placed on stable ground where it cannot re-enter the device or be washed into any watercourse.*

Where maintenance work is required to ensure the effectiveness of these erosion and sediment control measures, the record should include the date, time and details on the nature of any maintenance. The site manager (or equivalent) will need to ensure regular inspections of these measures, and particularly within 24 hours after any rainstorm event. Where it is identified that erosion and sediment control measure have become ineffective and maintenance is required, the Council must be contacted.

11. There shall be no airborne or deposited dust beyond the subject site as a result of the earthworks and construction activity, which in the opinion of the Council, is noxious, offensive or objectionable.

Advice Note: *In accordance with above condition in order to manage dust on the site consideration should be given to adopting the following management techniques:*

- *stopping of works during high winds*
- *watering of haul roads, stockpiles and manoeuvring areas during dry periods*
- *installation and maintenance of wind fences and vegetated strips*
- *positioning of haul roads, manoeuvring areas and stockpiles or the staging of works (in relation to sensitive receptors such as dwellings)*

In assessing whether the effects are noxious, offensive or objectionable, the following factors will form important considerations:

- *The frequency of dust nuisance events*
- *The intensity of events, as indicated by dust quantity and the degree of nuisance*
- *The duration of each dust nuisance event*
- *The offensiveness of the discharge, having regard to the nature of the dust*
- *The location of the dust nuisance, having regard to the sensitivity of the receiving environment.*

It is recommended that potential measures are discussed with the council's monitoring officer who will guide you on the most appropriate approach to take. Please contact the Council for more details. Alternatively, please refer to the Ministry for the Environment publication "Good Practice Guide for Assessing and Managing the Environmental Effects of Dust Emissions".

Construction conditions

12. There shall be no obstruction of access to public, berms, private properties, public services/utilities, or public reserves resulting from the construction and earthworks activity within the site. All materials and equipment shall be stored within the subject site's boundaries.

Access and Parking

13. Prior to the operation of the activity within the specific area, all driveways shall be formed, metalled, and drained in general accordance with Council's current Engineering Standards and the approved plan referenced in Condition 1 and to the satisfaction of the Council.

The new vehicle crossing shall measure 5.5m at the boundary and be constructed as per GD20A of ATCOP Standards.

Advice note: A vehicle crossing permit is required to be obtained from Auckland Transport prior to the construction of the vehicle crossing on existing public roads. See Auckland Transport's website <https://at.govt.nz/about-us/working-on-the-road/vehicle-crossing-application/> for more information.

14. The 12 parking spaces and manoeuvring areas shall be formed, sealed/concreted in accordance with Council's Engineering Standards and the approved plans.
15. One of the accessible parking spaces shall be identified and marked in accordance with New Zealand Standards NZS4121-2001. Ramp access shall be provided.
16. The following shall be constructed/installed in accordance with of the ATCOP Standards and the approved plan.
 - Wheel stops shall be installed to all parking spaces.

This must be undertaken to the satisfaction of the Council.

17. That Sensor Lighting shall be provided to the exterior of the building subject to this consent and, comply with E24.6 of AUP and implemented to the satisfaction of the Council. Sensor Lighting shall thereafter be always maintained in good working order.

Avoid Damage to Roads

18. Unless specifically provided for by this consent approval, there shall be no damage to public roads, berms, edge of seal, shoulders, drains, reserves, or other public asset due to earthworks, construction activity and/or vehicle movements. If such damage does occur, the Council shall be notified within 24 hours of its discovery. The costs of rectifying such damage and/or shoulder widening and restoring the asset to its original condition shall be met by the consent holder.

Post-development Conditions

19. Prior to commencing any activity on site, the consent holder shall complete all road works as per the approved engineering plans in Condition (4) above.

20. The light reflectance value (LRV) of the approved building shall be less than 30% for exterior cladding, and less than 10% for the roof. Prior to the commencement of the construction, the colour of the building shall be submitted to the Council for approval.
21. The configuration of the approved indoor storage facility shall be limited to that shown on the application plans in condition (1) and be no more than 1,080m².
22. The approved storage facility shall be restricted to use between the hours of:
 - 7am to 10pm Monday to Sunday

The consented holder shall ensure the access by storage facility users to the approved facility are limited to only the security keypad gate and only within the restricted hours stated above.

23. Any rubbish bin/skips shall always be stored within the designated areas except when emptying. Any outdoor rubbish storage area shall be screened from public view to the satisfaction of Council.

Advice Note: *The consent-holder must ensure that any signage for the proposed facility complies with rules and standards of the AUP (OiP) and relevant Bylaw.*

Wastewater – Composting Toilet Device

24. In lieu of a municipal sewer connection for the site or of an authorised on-site wastewater treatment and land disposal system, toilet waste must be managed on the site via a composting toilet system.
25. To ensure the compost system is maintained in effective operating condition, the consent holder must ensure the key steps in the system maintenance regime (as supplied in the information contained in Condition (1) above) are understood by and are undertaken by all users and that users are aware of the contracting company to contact if there are any system problems and/or servicing requirements.
26. Unless an authorised land disposal system is installed and/or the site's sewer connection is in place, no visitors or public to the site shall be provided with access to the toilet system on the site.
27. The composting toilet system installed can be used by an equivalent of two people per day fulltime continuous use. To ensure efficient ongoing operation, the consent holder shall ensure that no more than an equivalent of two people, working fulltime, use the facilities on the site within any 24-hour period.
28. The consent holder must maintain in place a maintenance contract for at least annual checks and servicing of the compost toilet unit.

Advice Note: *The maintenance regime steps and whom to contact in the event of any system problems should be maintained readily available to all compost toilet users. This may be achieved by permanently maintaining the list of maintenance steps and contractor contact details on the wall of the compost toilet room. (Note these are listed in an email to Council from Eugene Salmin (CKL Planning) Email Comments, email titled 'RE: [#CKL A19389] 1199 Paerata Rd - LUC60362575 update', dated 17 November 2020 (4: 71pm) as referred to in Condition (1) above.*

29. Accumulated solid waste from the compost toilet unit, whether fully or poorly composted, must be removed from the site by an authorised waste removal contractor and discharged to authorised landfill or land elsewhere in accordance with the discharge consent controls applicable to that site.

Advice Note: *The discharge of solids waste to land on the site would not meet permitted activity standards, so unless a discharge consent is obtained, the solids may not be discharged to land on the site.*

Servicing for Wastewater Flows

Advice Note: *As there is no proposed conventional wastewater system on the site, there is no servicing available for wastewater flows from kitchen or basin facilities. Use of an outdoor tap or hose as a limited water source on an occasional basis would be acceptable provided no wastewater is generated and/or cleaning products or other contaminants are discharged to a stormwater connection, or to any water body located on the site.*

Advice notes

1. Any reference to number of days within this decision refers to working days as defined in s2 of the RMA.
2. For the purpose of compliance with the conditions of consent, “the council” refers to the council’s monitoring officer unless otherwise specified. Please email monitoring@aucklandcouncil.govt.nz to identify your allocated officer.
3. For more information on the resource consent process with Auckland Council see the council’s website: www.aucklandcouncil.govt.nz. General information on resource consents, including making an application to vary or cancel consent conditions can be found on the Ministry for the Environment’s website: www.mfe.govt.nz.
4. If you disagree with any of the above conditions, and/or disagree with the additional charges relating to the processing of the application(s), you have a right of objection pursuant to sections 357A and/or 357B of the Resource Management Act 1991. Any objection must be made in writing to the council within 15 working days of your receipt of this decision (for s357A) or receipt of the council invoice (for s357B).
5. The consent holder is responsible for obtaining all other necessary consents, permits, and licences, including those under the Building Act 2004, and the Heritage New Zealand Pouhere Taonga Act 2014. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007 and the Health and Safety at Work Act 2015), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004.

Delegated decision maker:

Name: Tommy Lai
Title: Team Leader, Resource Consents

Signed:

Bunny Cat

Date:

3 December 2020

Resource Consent Notice of Works Starting

Please email this form to monitoring@aucklandcouncil.govt.nz at least 5 days prior to work starting on your development or post it to the address at the bottom of the page.

Site address:				
AREA (please tick the box)	Auckland CBD <input type="checkbox"/>	Auckland Isthmus <input type="checkbox"/>	Hauraki Gulf Islands <input type="checkbox"/>	Waitakere <input type="checkbox"/>
Manukau <input type="checkbox"/>	Rodney <input type="checkbox"/>	North Shore <input type="checkbox"/>	Papakura <input type="checkbox"/>	Franklin <input type="checkbox"/>
Resource consent number:			Associated building consent:	
Expected start date of work:			Expected duration of work:	

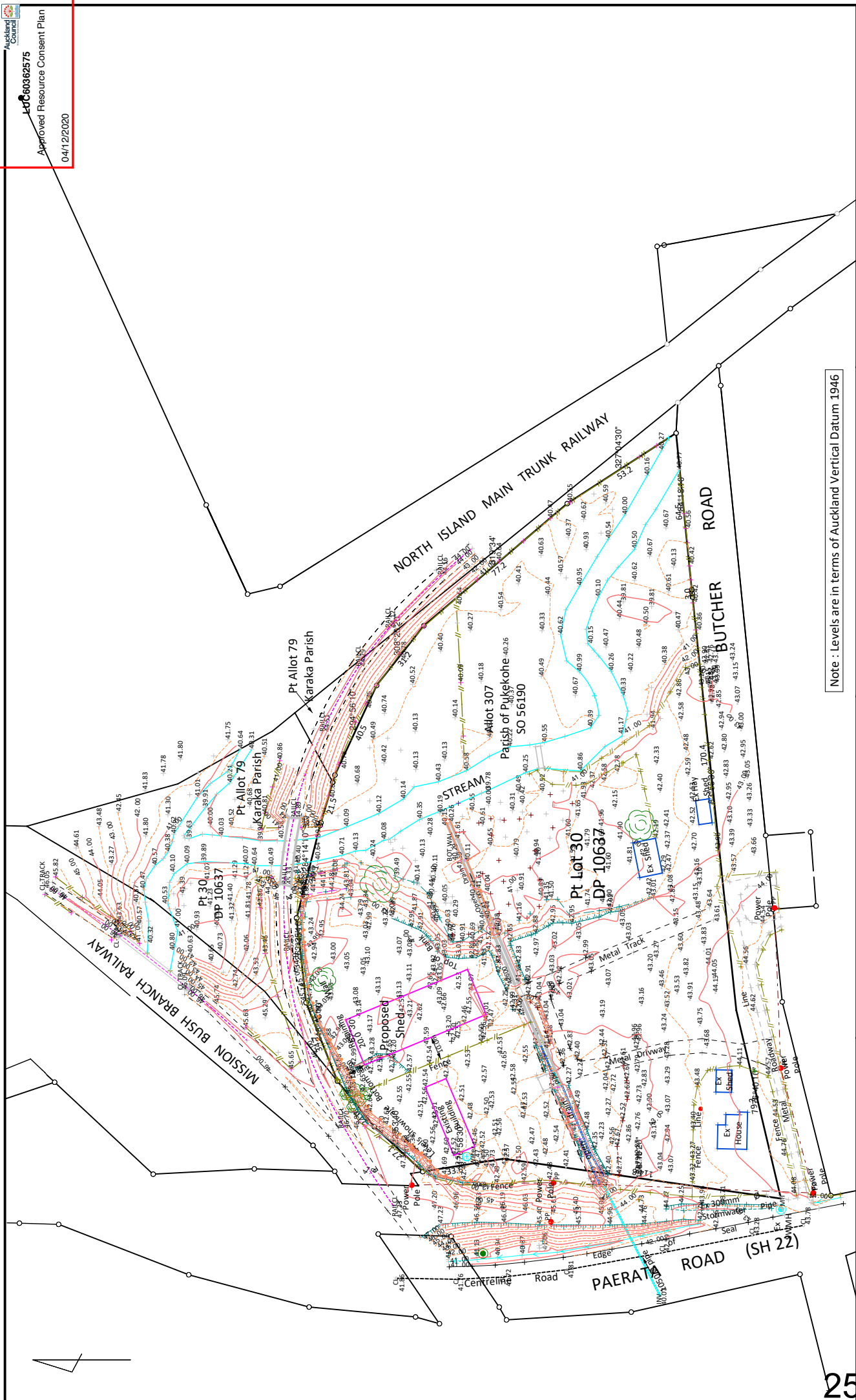
Primary contact	Name	Mobile / Landline	Address	Email address
Owner				
Project manager				
Builder				
Earthmover				
Arborist				
Other (specify)				

Signature: Owner / Project Manager (indicate which)	Date:
--	--------------

Once you have been contacted by the Monitoring Officer, all correspondence should be sent directly to them.

SAVE \$\$\$ minimise monitoring costs!

The council will review your property for start of works every three months from the date of issue of the resource consent and charge for the time spent. You can contact your Resource Consent Monitoring Officer on 09 301 0101 or via monitoring@aucklandcouncil.govt.nz to discuss a likely timetable of works before the inspection is carried out and to avoid incurring this cost.



Note : Levels are in terms of Auckland Vertical Datum 1946

File No:	8089
Surveyed:	
Drawn:	Mark Kewish (03/2020)
Approved:	David Lawrie (03/2020)
CAD Ref:	
Scale:	1 : 1000 (A2 Orig)
Council Ref:	
Sheet No:	
Revision:	
	of
	Sheets

Site Plan

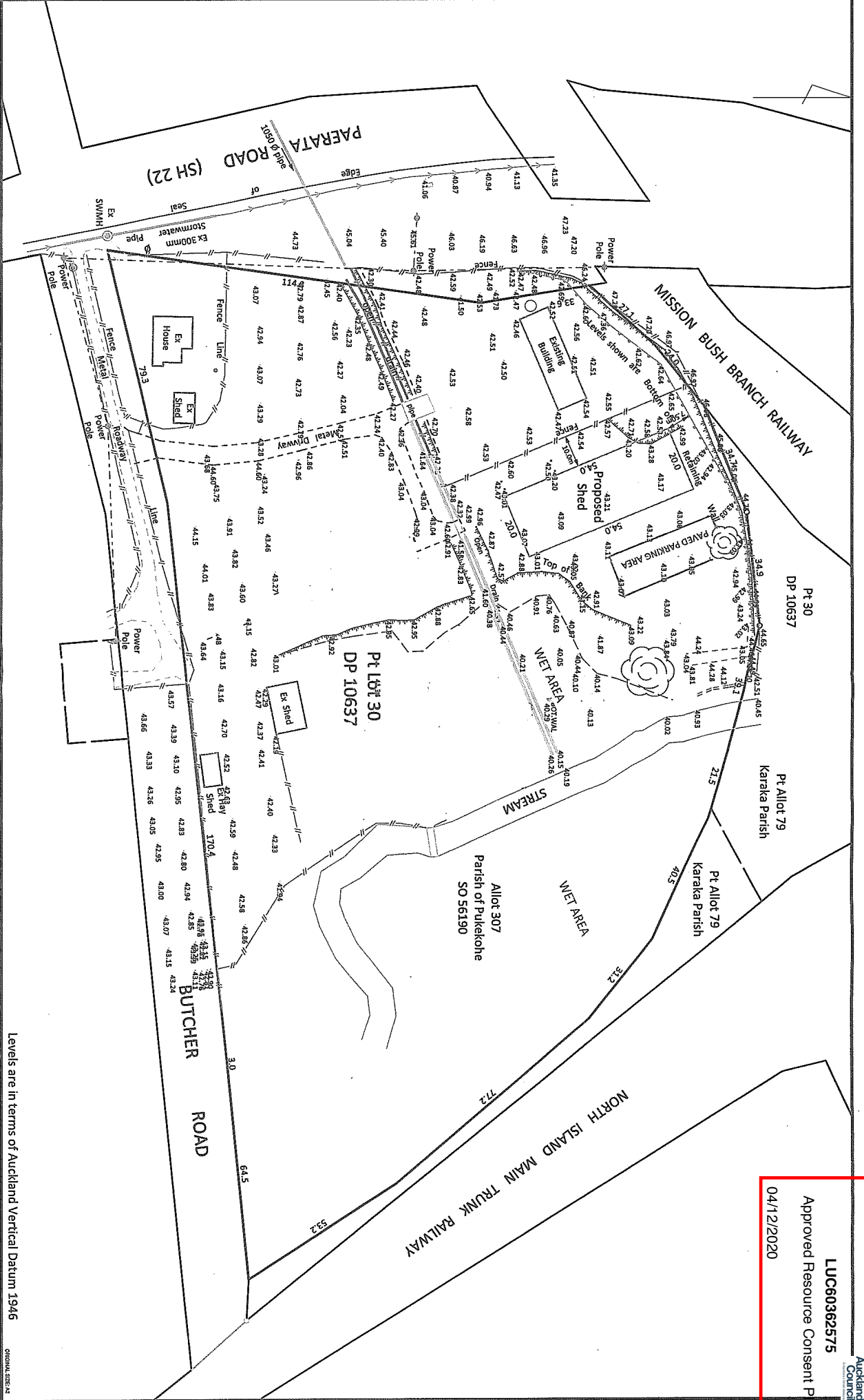
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Client:
Pukekohe Industrial Park and Storage Ltd

Job Title:
Site Plan Over Part Lot 30 DP 10637
(1199 Paerata Road, Pukekohe - RT NAs4A/145)

MADSEN LAWRIE SURVEYORS LTD.
14 HALL STREET, PUKEKOHE
Phone: 09 238 6369
web: www.madsen-lawrie.co.nz
email: office@madsen-lawrie.co.nz





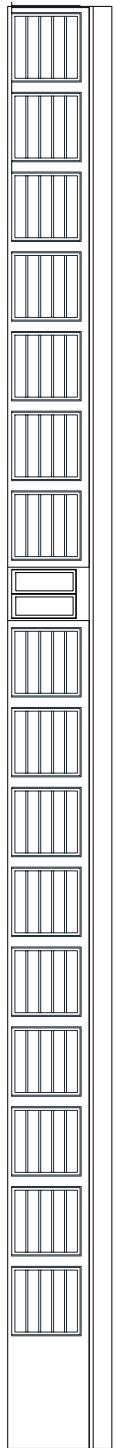
Levels are in terms of Auckland Vertical Datum 1946

MADSEN LAWRIE SURVEYORS LTD.
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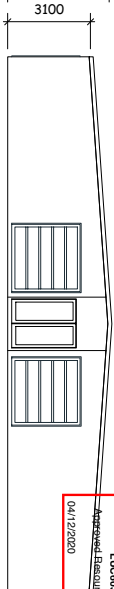
Site Plan Over Part Lot 30 DP 10637

(1199 Paerata Road, Pukekohe - CT N54A/145)

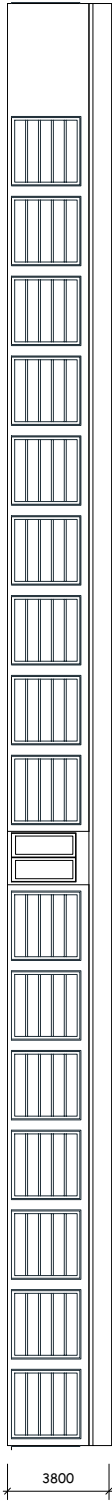
REVISION:	DATE:	BY:	CHECKED:
SCALE: 1 : 750	DATE: October 2019	FIG NO: 8089	SHEET NO: MK



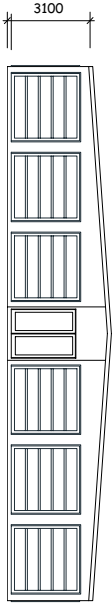
ELEVATION 2



ELEVATION 2

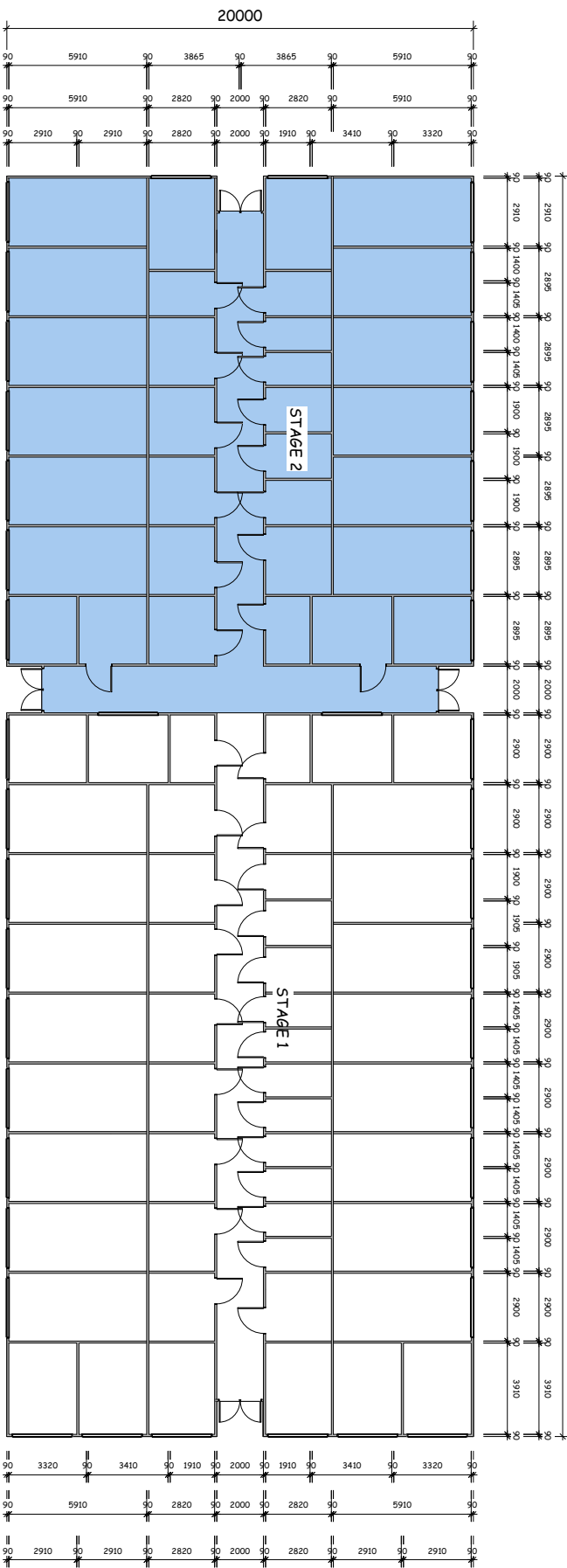


ELEVATION 3



ELEVATION 4

54000



- EXTERIOR FINISHES
- : Roofing shall be 'Pumdek', 'Karaka Colorsteel' finish to 4° pitch
 - : Cladding shall be 'Trinclad', 'Mist Green Colorsteel' finish with 0.5mm Colorsteel flat sheet between doors.
 - : Roller doors shall be 2.0m high x 2.0m wide 'Karaka Colorsteel' finish except where noted otherwise.
 - : Gutter shall be 'Paneldek', 175mm 'Karaka Colorsteel' finish.
 - : Downpipes shall be 150mm dia PVC.
 - : Durability Zone - ZONE C all materials & fixings shall comply with NZS 3604 Section 4
 - : Earthquake Zone - Zone 1
 - : Wind Zone - High



FLOOR PLAN (1:100 @ A1 or 1:200 @ A3)

Gross Roof Area = 1071m²



Planning | Surveying | Engineering | Environmental
Auckland Office:
 A: 25 Broadway, Newmarket
 P: 09 524 7029
Hamilton Office:
 100-102 Broadmead, Hamilton
 P: 07 848 8931
Te Awamunui Office:
 A: 103 Market Street, Te Awamunui
 P: 07 871 6144

PAERATA ROAD DEVELOPMENT
PUKEKOHE INDUSTRIAL PARK AND ST
1199 PAERATA ROAD, PUKEKOHE

EARTHWORKS
PROPOSED CONTOURS PLAN

Issue Description	Checked	Date	Scale:
A FOR RESOURCE CONSENT	PM	10.07.20	1:500
		Designed: ES	17.06.20
		Drawn: ES	19.06.20
		Checked: PM	10.07.20 (As Original)
		Job No: A19389	DWG No: 200
			Rev: A

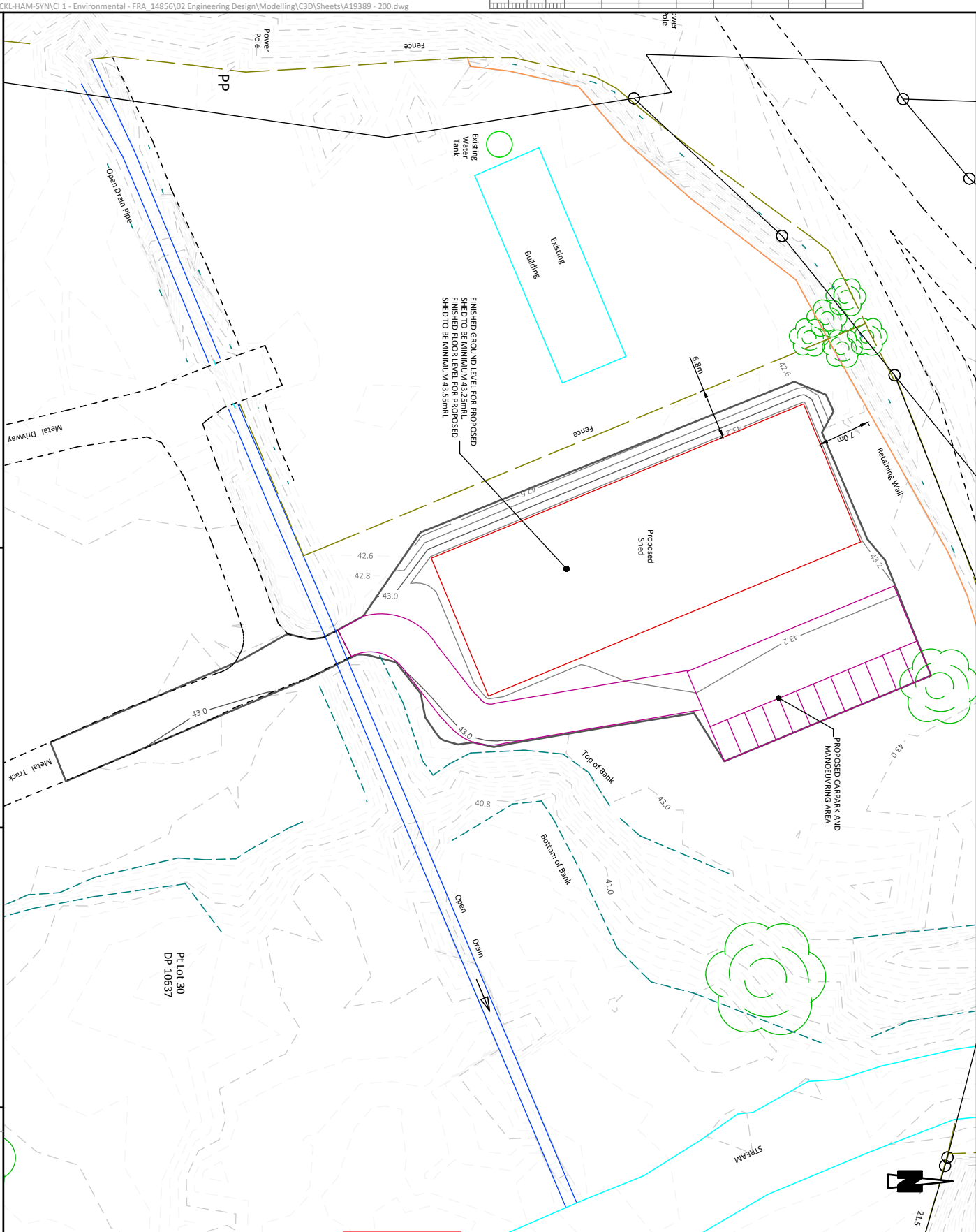
FOR CONSENT

04/12/2020

Approved Resource Consent Plan

LUC60362575





EARTHWORKS LEGEND:

— 43.0 —	PROPOSED CONTOURS - MAJOR (0.5m)
— 42.7 —	PROPOSED CONTOURS - MINOR (0.1m)
- - - 43.0 - - -	EXISTING CONTOURS - MAJOR (0.5m)
- - - 42.7 - - -	EXISTING CONTOURS - MINOR (0.1m)
—	PROPOSED EARTHWORKS BOUNDARY

- EARTHWORKS NOTES:**
- ALL WORKS TO COMPLY WITH THE RELEVANT LOCAL AUTHORITY STANDARDS.
 - ALL EROSION AND SEDIMENT CONTROL MEASURES MUST BE OPERATIONAL PRIOR TO ANY WORKS COMMENCING AND SHALL BE MAINTAINED THROUGHOUT THE PROJECT AND SHALL REMAIN IN PLACE UNTIL THE PROJECT IS COMPLETE AND SEDIMENT CONTROL GUIDE FOR LAND DISTURBING ACTIVITIES.
 - THE LOCATIONS OF ALL STOCKPILES ARE WHOLLY THE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE LOCATED CLEAR OF ALL EARTHWORKS OPERATIONS AND AWAY FROM GEO-TECHNICALLY UNSUITABLE LAND.
 - ALL SETOUT TO BE UNDERTAKEN BY THE CONTRACTOR.
 - IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO LOCATE ALL SERVICES PRIOR TO ANY EXCAVATION.
 - IT IS THE CONTRACTOR'S RESPONSIBILITY FOR HEALTH & SAFETY & SECURITY ON SITE. APPROPRIATE FENCING AND SIGNAGE SHALL BE ERRECTED AND MAINTAINED AT ALL TIMES TO KEEP THE GENERAL PUBLIC OFF SITE.



EARTHWORKS NOTES:

1. ALL WORKS TO COMPLY WITH THE RELEVANT LOCAL AUTHORITY STANDARDS.
2. ALL EROSION AND SEDIMENT CONTROL MEASURES MUST BE OPERATIONAL PRIOR TO ANY WORKS COMMENCING AND SHALL BE INSTALLED IN CONFORMANCE WITH ALL GOODS EROSION AND SEDIMENT CONTROL GUIDE FOR LAND DISTURBING ACTIVITIES.
3. THE LOCATIONS OF ALL STOCKPILES ARE WHOSE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE LOCATED CLEAR OF ALL EARTHWORKS AND SHALL BE PROTECTED FROM GEOTECHNICAL UNSTABLE LAND.
4. ALL SETOUT TO BE UNDERTAKEN BY THE CONTRACTOR.
5. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO LOCATE ALL SERVICES PRIOR TO ANY EXCAVATION.
6. IT IS THE CONTRACTORS RESPONSIBILITY FOR HEALTH & SAFETY & SECURITY ON SITE. APPROPRIATE FENCING AND SIGNAGE SHALL BE ERECTED AND MAINTAINED AT ALL TIMES TO KEEP THE GENERAL PUBLIC OFF SITE.

NO ALLOWANCE FOR COMPACTION

NOTE: EARTHWORKS VOLUMES ARE FROM EXISTING GROUND LEVEL (EGL) TO FINISHED GROUND LEVEL (FGL) FOR PROPOSED BUILDING IS 300MM BELOW FINISHED FLOOR LEVEL (FHL).

EARTHWORKS VOLUME (m³)

CUT VOLUME = 3.5
 FILL VOLUME = 677
 FILL IMPORT = 673.5

Elevations Table			
Color	Min Elevation	Max Elevation	Volume (m ³)
Orange	-0.22	0.00	3.43
Light Green	0.00	0.25	417.56
Medium Green	0.25	0.50	201.67
Dark Green	0.50	0.75	57.07
Very Dark Green	0.75	1.03	0.69

LUC60362575

Approved Resource Consent Plan

04/12/2020

FOR CONSENT

CKL
 Auckland Office: A: 25 Broadway, Newmarket
 P: 09 524 7029
 Hamilton Office: Hamilton Road, Hamilton
 P: 07 849 8921
 Te Awamunui Office: A: 103 Market Street, Te Awamunui
 P: 07 871 6144

**PAERATA ROAD DEVELOPMENT
 PUKEKOHE INDUSTRIAL PARK AND ST. 1
 1199 PAERATA ROAD, PUKEKOHE**

**EARTHWORKS
 CUT AND FILL PLAN**

Issue Description	Checked	Date	Scale:
A FOR RESOURCE CONSENT	PM	10.07.20	1:500
	ES	17.06.20	
	ES	19.06.20	
	PM	10.07.20	(As Original)
Job No.:	PM		DWG No.:
A19389			210
			Rev:
			A



CKL
 Planning | Surveying | Engineering | Environmental
Auckland Office:
 A: 25 Broadway, Newmarket
 P: 09 524 7029
Hamilton Office:
 1000 Great North Road, Hamilton
 P: 07 849 8933
Te Awamutu Office:
 A: 103 Market Street, Te Awamutu
 P: 07 871 6144

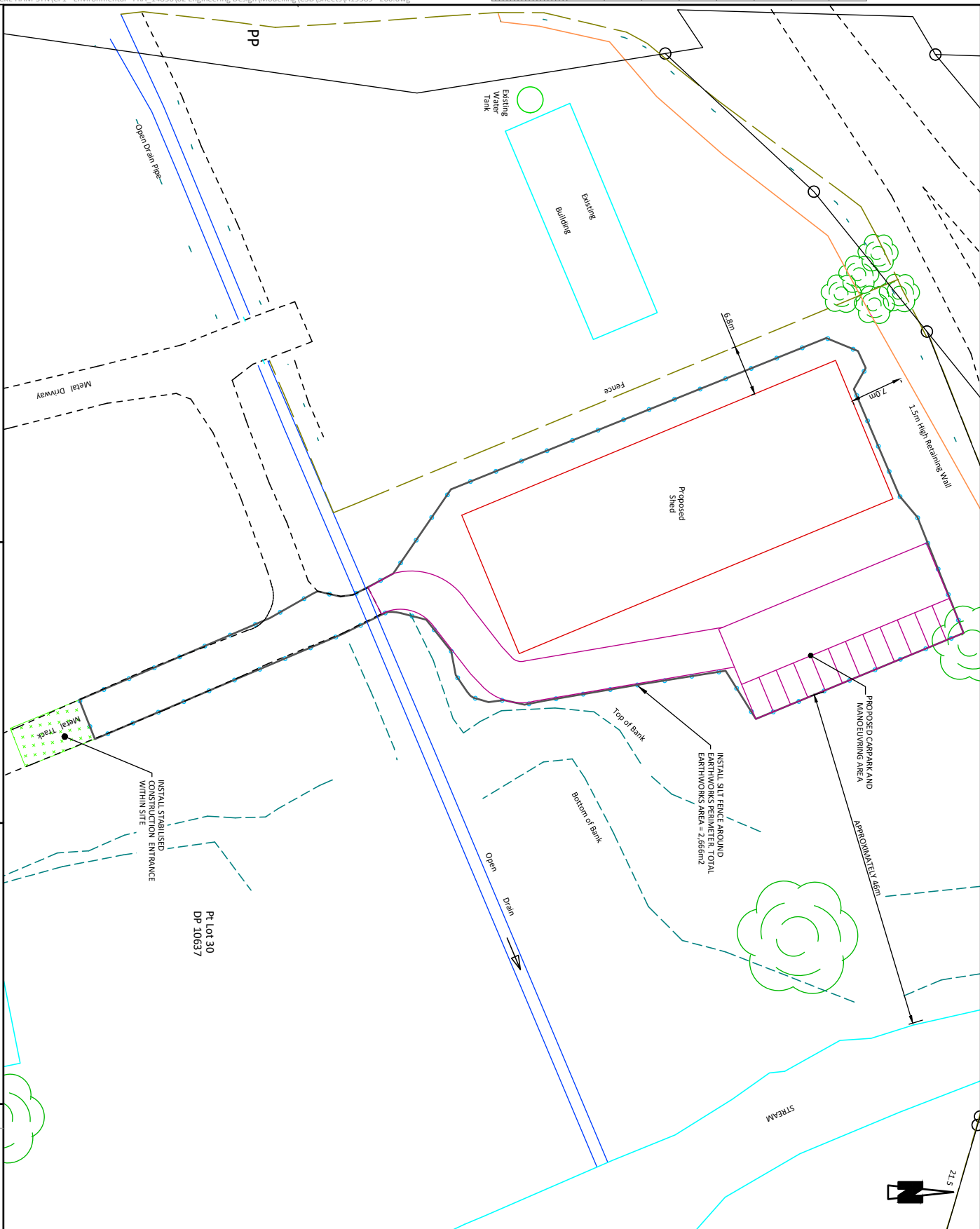
**PAERATA ROAD DEVELOPMENT
 PUKEKOHE INDUSTRIAL PARK AND ST. 1
 1199 PAERATA ROAD, PUKEKOHE**

**EROSION AND SEDIMENT
 CONTROL PLAN**

Issue Description	Checked	Date	Scale:
A FOR RESOURCE CONSENT	PM	10.07.20	1:500
B FOR RESOURCE CONSENT	BR	14.08.20	
	Designed:	17.06.20	(As Original)
	Drawn:	19.06.20	
	Checked:	10.07.20	
	Job No.:		DWG No.:
	A19389		220
			Rev: B

FOR CONSENT

LUC60362575
 Approved Resource Consent Plan
 04/12/2020



EROSION & SEDIMENT CONTROL LEGEND:

- EARTHWORKS AREA
- SILT FENCE
- STABILISED AREA

- EARTHWORKS NOTES:**
- ALL WORKS TO COMPLY WITH THE RELEVANT LOCAL AUTHORITY STANDARDS.
 - ALL EROSION AND SEDIMENT CONTROL MEASURES MUST BE OPERATIONAL PRIOR TO ANY WORKS COMMENCING AND SHALL BE INSTALLED IN ACCORDANCE WITH AC GOOD'S 'EROSION AND SEDIMENT CONTROL GUIDE FOR LAND DISTURBING ACTIVITIES'.
 - THE LOCATIONS OF ALL STOPPIES ARE WHOLLY THE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE LOCATED CLEAR OF ALL EARTHWORKS OPERATIONS AND AWAY FROM GEOTECHNICALLY UNSTABLE LAND.
 - ALL SETOUT TO BE UNDERTAKEN BY THE CONTRACTOR.
 - IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO LOCATE ALL SERVICES PRIOR TO ANY EXCAVATION.
 - IT IS THE CONTRACTOR'S RESPONSIBILITY FOR HEALTH & SAFETY AND SECURITY ON SITE. APPROPRIATE FENCING AND SIGNAGE SHALL BE ERECTED AND MAINTAINED AT ALL TIMES TO KEEP THE GENERAL PUBLIC OFF SITE.

STABILISED CONSTRUCTION ENTRANCE SPECIFICATIONS:

APPLICATION:
USE A STABILISED CONSTRUCTION ENTRANCE AT ALL POINTS OF CONSTRUCTION SITE INGRESS AND EGRESS WITH A CONSTRUCTION PLAN LIMITING TRAFFIC TO THESE ENTRANCES ONLY. THEY ARE PARTICULARLY USEFUL ON SMALL CONSTRUCTION SITES BUT CAN BE UTILISED FOR ALL PROJECTS.

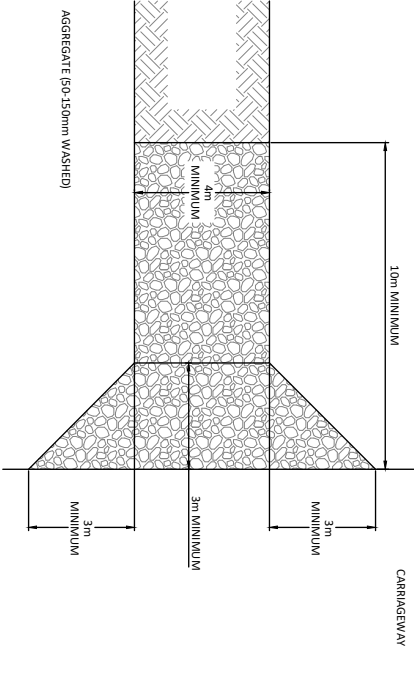
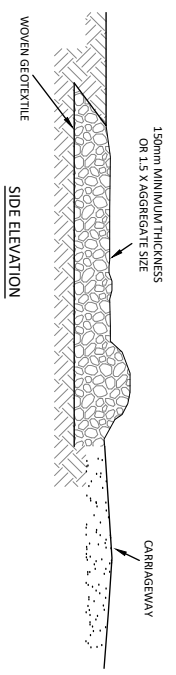
- DESIGN:**
1. CLEAR THE ENTRANCE AND EXIT AREA OF ALL VEGETATION, ROOTS AND OTHER UNSUITABLE MATERIAL AND PROPERLY GRADE IT.
 2. LAY WOVEN GEOTEXTILE, PIN DOWN EDGES AND OVERLAP JOINTS.
 3. PROVIDE DRAINAGE TO CARRY RUNOFF FROM THE STABILISED CONSTRUCTION ENTRANCE TO A SEDIMENT CONTROL MEASURE.
 4. PLACE AGGREGATE TO THE SPECIFICATIONS BELOW AND SMOOTH IT.

STABILISED CONSTRUCTION ENTRANCE AGGREGATE SPECIFICATIONS:

AGGREGATE SIZE	5 - 150mm WASHED AGGREGATE
THICKNESS	150mm MINIMUM OR 1.5 X AGGREGATE SIZE
LENGTH	10m MINIMUM
WIDTH	4m MINIMUM

MAINTENANCE

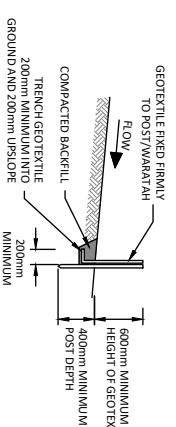
1. MAINTAIN THE STABILISED CONSTRUCTION ENTRANCE IN A CLEAN AND UNOBSTRUCTED CONDITION THROUGHOUT THE CONSTRUCTION SITE. AFTER EACH RAINFALL, INSPECT ANY STRUCTURE USED TO TRAP SEDIMENT FROM THE STABILISED CONSTRUCTION ENTRANCE AND CLEAN OUT AS NECESSARY.
2. WHEN WHEEL WASHING IS ALSO REQUIRED, ENSURE THIS IS DONE ON AN AREAS STABILISED WITH AGGREGATE WHICH DRAINS TO AN APPROVED SEDIMENT RETENTION FACILITY.



STABILISED CONSTRUCTION ENTRANCE



STANDARD FABRIC JOINT



SILT FENCE DESIGN CRITERIA:

SLOPE STEEPNESS %	SLOPE LENGTH (m) (MAXIMUM)	SPACING OF RETURNS (m)
< 2%	N/A	UNLIMITED
2 - 10%	40	60
10 - 20%	30	50
20 - 33%	20	40
33 - 50%	15	30
> 50%	6	20

TENSILE MODULUS: > 440N (ASTM D4632)
TENSILE STRENGTH: 0.140 Pa (MINIMUM)
APPROXIMATE OPENING SIZE: 0.1-0.5mm (ASTM D4751)

STABILISATION NOTES:

- GRASSING - STABILISATION ACHIEVED @ 80% GRASS COVER
- MIN. 100mm TOPSOIL
- TEMPORARY SEEDING
- ANNUAL BREGGRASS
- SEED APPLICATION @ 100-250 kg/ha
- PERMANENT BREGGRASS
- FESCUE/COCKSFOOT - 20%
- CLOVER/LOTUS & BROUWATOP - 5% EACH (10%)
- SEED @ 200-400 kg/ha
- FERTILISER: NPK (15:10:10)
- FERT APPLICATION @ 200-800 kg/ha
- MULCHING
- STRAW OR HAY MULCH TO BE APPLIED AT 4,000 - 6,000 kg/ha

Approved Resource Consent Plan

LUG60362575

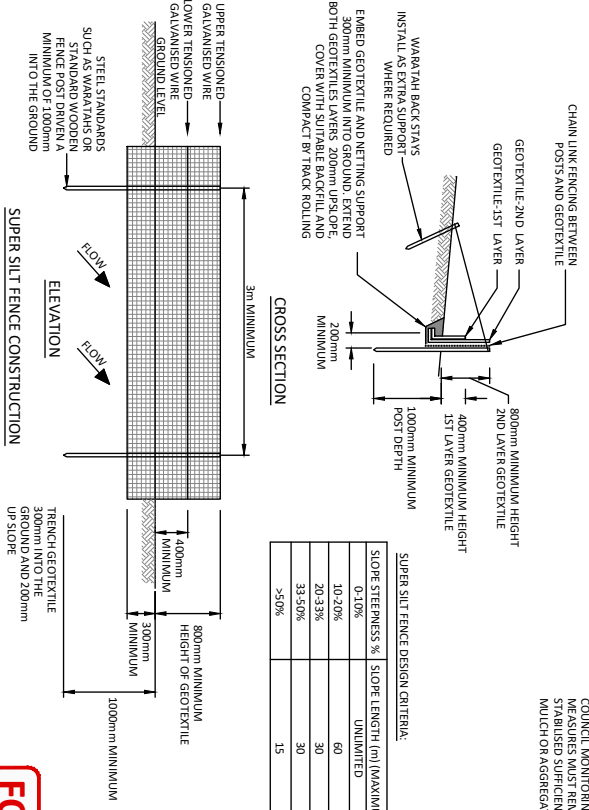
04/12/2020

GENERAL NOTES:

1. ALL EROSION AND SEDIMENT CONTROL MEASURES SHALL COMPLY WITH THE AUCKLAND COUNCIL GUIDELINE DOCUMENT GOOD PRACTICES IN EROSION AND SEDIMENT CONTROL (VERSION 17/90) AND ANY AMENDMENTS.
2. A COPY OF THE EROSION AND SEDIMENT CONTROL PLAN SHALL BE AVAILABLE ON THE SITE AT ALL TIMES AND ALL PERSONNEL INVOLVED IN LAND DISTURBANCE ACTIVITIES ON THE SITE SHALL BE ADVISED OF THE REQUIREMENTS OF THE PLAN BY THE CONSULTANT AND SHALL BE RESPONSIBLE FOR THE EROSION AND SEDIMENT CONTROL.
3. A PRESTART MEETING SHALL BE HELD BETWEEN THE CONSULTANT AND THE ENGINEER AND THE COUNCIL MONITORING OFFICERS PRIOR TO COMMENCEMENT OF EARTHWORKS.
4. ALL EROSION AND SEDIMENT CONTROL MEASURES MUST BE OPERATIONAL PRIOR TO WORKS COMMENCING ON SITE, UNLESS OTHERWISE AGREED.
5. THE CONTRACTOR SHALL SUBMIT RESULTS FOR THE COMPLETED SEDIMENT CONTROL MEASURES TO THE ENGINEER/COUNCIL MONITORING OFFICER FOLLOWING THE CONSTRUCTION OF THE CONTROL.
6. WHERE POSSIBLE, ALL CLEANWATER RUNOFF FROM STABILISED SURFACES INCLUDING CATCHMENT AREAS ABOVE THE SITE SHALL BE DIVERTED AWAY FROM EARTHWORK AREAS VIA STABILISED SURFACES ON THE STORMWATER SYSTEM, SO AS TO PREVENT SURFACE EROSION.
7. THE FINAL LOCATIONS OF ALL SEDIMENT RETENTION POUNDS AND DECONTAMINATING AREAS SHALL BE SELECTED ON SITE BY THE CONTRACTOR IN AGREEMENT WITH THE ENGINEER AND THE COUNCIL MONITORING ADVISER/OFFICER. ALL LOCATIONS SHALL HAVE DUE CONSIDERATION TO NATIVE VEGETATION, TOROROHARU AND ANY OTHER SPECIFIC REQUIREMENTS AS APPLICABLE.
8. THE CONTRACTOR IS SOLELY RESPONSIBLE FOR THE OPERATION AND MAINTENANCE OF ALL EROSION AND SEDIMENT CONTROL THROUGHOUT THE WORKS AS REQUIRED AND ENSURING COMPLIANCE WITH THE RESOURCE CONSENT.
9. THE SITE SHALL BE STABILISED WITH TOPSOIL AND GRASS AND/OR MULCH AS SOON AS PRACTICABLE AND IN A PROGRESSIVE MANNER AS EARTHWORKS/SITE WORKS ARE FINISHED OVER VARIOUS AREAS OF THE SITE. STABILISATION IS TO BE COMPLETED BY 30 APRIL OF THE CONSTRUCTION SEASON, UNLESS A LATER DATE IS APPROVED IN WRITING BY THE AUCKLAND COUNCIL.
10. EROSION AND SEDIMENT CONTROL MEASURES SHALL NOT BE REMOVED WITHOUT THE APPROVAL OF THE ENGINEER AND/OR COUNCIL MONITORING ADVISER/OFFICER. SEDIMENT CONTROL MEASURES MUST REMAIN IN PLACE UNTIL ALL SURFACES ARE STABILISED SUFFICIENTLY WITH 80% GRASS STRIKE, TOPSOIL AND MULCH OR AGGREGATE ON ROADWAYS/ACCESSWAYS.

SUPER SILT FENCE DESIGN CRITERIA:

SLOPE STEEPNESS %	SLOPE LENGTH (m) (MAXIMUM)	SPACING OF RETURNS (m)
0-10%	UNLIMITED	60
10-20%	60	50
20-33%	30	40
33-50%	30	30
> 50%	15	20



FOR CONSENT

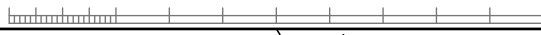
CKL
Planning | Surveying | Engineering | Environmental

Auckland Office:
A: 25 Broadway, Newmarket
P: 09 224 7029
Hamilton Office
P: 07 848 9921
Te Anau Office
P: 07 871 6144

**PAERATA ROAD DEVELOPMENT
PUKEKOHE INDUSTRIAL PARK AND ST
1199 PAERATA ROAD, PUKEKOHE**

**EROSION AND SEDIMENT
CONTROL STANDARD
DETAILS - SHEET 1**

Issue Description	Checked	Date	Scale:
A FOR RESOURCE CONSENT	PM	10.07.20	NTS
Designed:	ES	17.06.20	NTS
Drawn:	ES	19.06.20	(As Original)
Checked:	PM	10.07.20	
Job No.:			DWG No.:
A19389			230
			Rev.:
			A

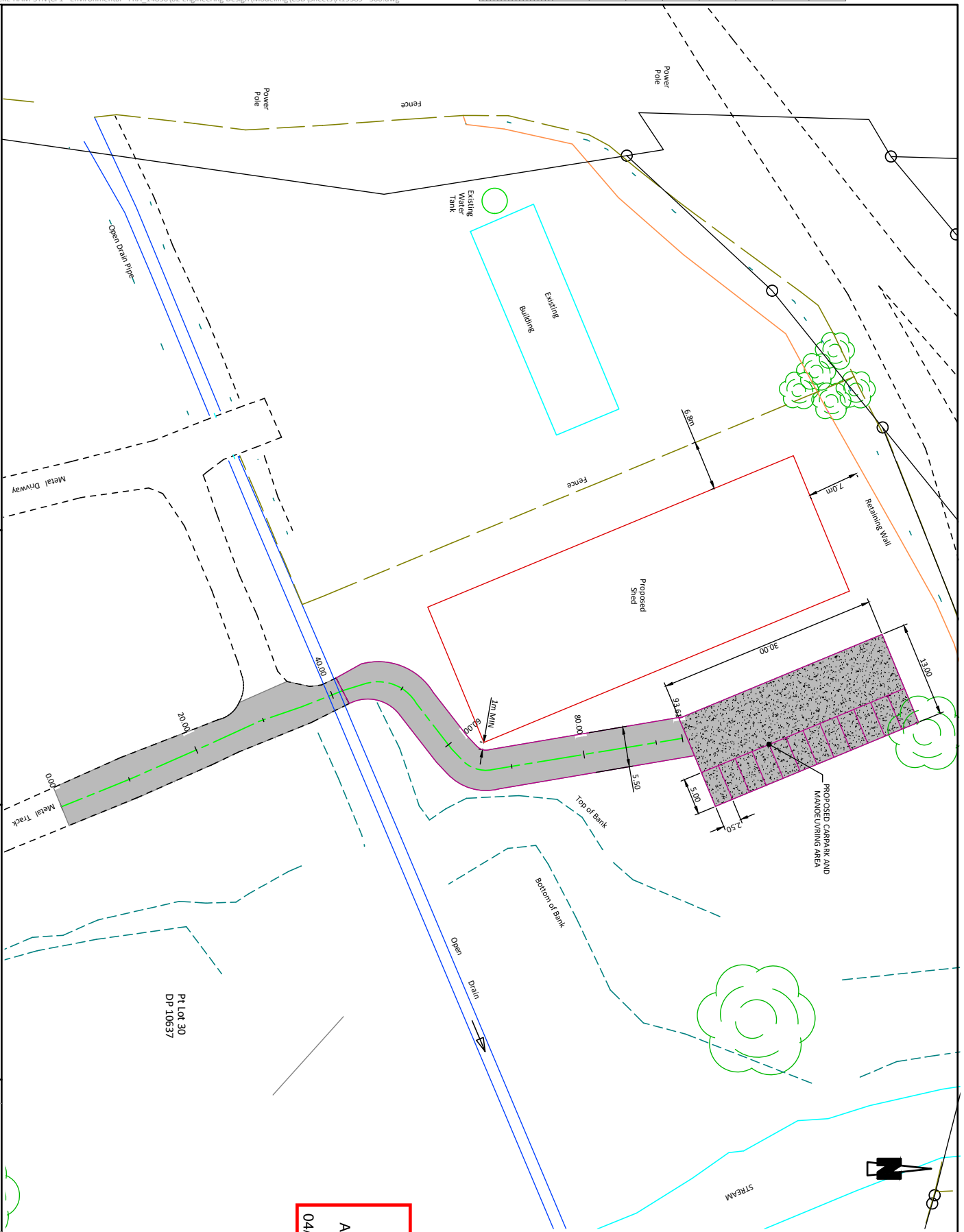


CKL
 Planning | Surveying | Engineering | Environmental

Auckland Office:
 A: 25 Broadway, Newmarket
 P: 09 524 7029

Hamilton Office:
 A: 38 Church Road, Hamilton
 P: 07 849 5929

Tauranga Office:
 A: 103 Market Street, Te Awamutu
 P: 07 871 6144



**PAERATA ROAD DEVELOPMENT
 PUKEKOHE INDUSTRIAL PARK AND ST.
 1199 PAERATA ROAD, PUKEKOHE**

ACCESSWAY LAYOUT PLAN

Issue Description	Checked	Date	Scale:
A FOR RESOURCE CONSENT	PM	10.07.20	1:500
		Designed: ES 17.06.20	
		Drawn: ES 19.06.20	
		Checked: PM 10.07.20	
		Job No: A19389	DWG No: 300
			Rev: A

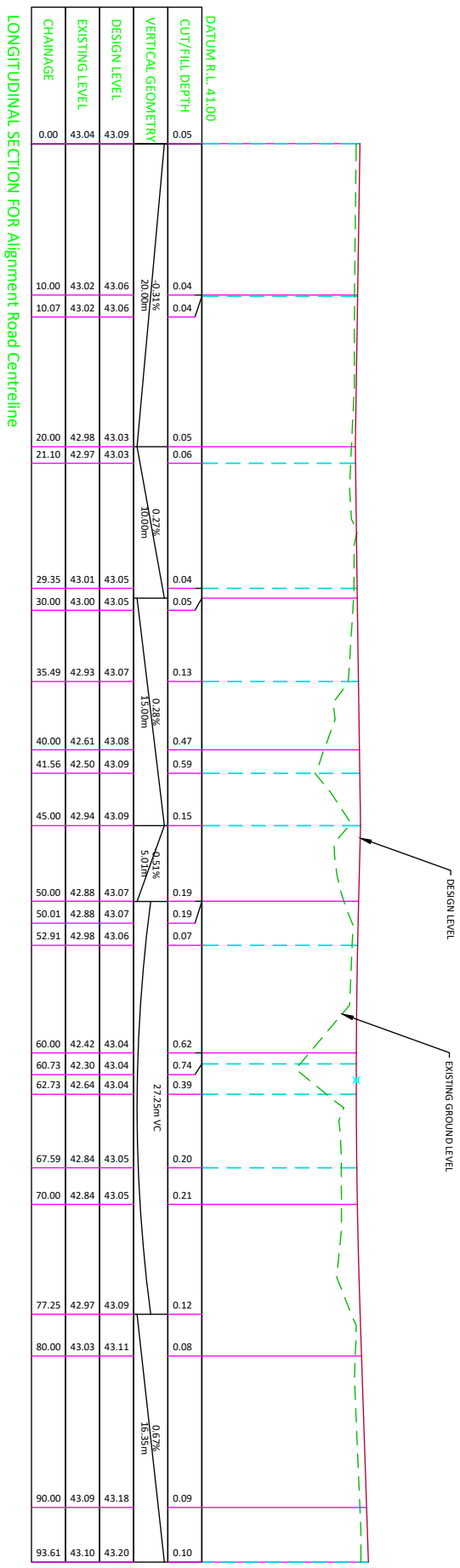
FOR CONSENT

LUC60362575
 Approved Resource Consent Plan
 04/12/2020

ROADING LEGEND:

- PROPOSED CARPARK AND MANOUVERING AREA
- PROPOSED GRAVEL DRIVEWAY

- ROADING/ACCESSWAY NOTES:**
- ALL WORKS TO BE CARRIED OUT IN ACCORDANCE WITH AUCKLAND COUNCIL AND AUCKLAND TRANSPORT (ATCOT) ENGINEERING STANDARDS.
 - ALL EXTRUDED/INSTITU CONCRETE TO BE MIN. 20 MPa STRENGTH AT 28 DAYS.
 - ALL ACCESSWAY SAWCUTS ARE TO BE AT 3m CRS TYP UNLESS NOTED OTHERWISE.
 - PAVEMENT DESIGN IS PROVISIONAL ONLY AND INSITU SUBGRADE STRENGTH SHALL BE CONFIRMED VIA SCOUR PENETRATION TESTS TO COMPLY WITH THE PROPOSED DESIGN. THE ENGINEER IS TO INSPECT, TEST AND APPROVE ALL SUBGRADES PRIOR TO AGGREGATE PLACEMENT.
 - ALL SUBGRADES SHALL BE TRIMMED WITHIN +/- 10mm TO PAVEMENT DESIGN LEVELS AND SHALL BE STRONG AND APPROVED PRIOR TO THE FINAL COURSE PLACEMENT.



LONGITUDINAL SECTION FOR Alignment Road Centreline

FOR CONSENT

CKL
 Planning | Surveying | Engineering | Environmental
 Auckland Office: A: 25 Broadway, Newmarket
 Hamilton Office: P: 09 524 7029
 Te Awamunui Office: P: 07 848 9922
 A: 103 Market Street, Te Awamunui
 P: 07 871 6144

**PAERATA ROAD DEVELOPMENT
 PUKEKOHE INDUSTRIAL PARK AND ST. 1
 1199 PAERATA ROAD, PUKEKOHE**

ACCESSWAY LONG SECTION

Issue Description	Checked	Date	Designed	Date	Scale
A FOR RESOURCE CONSENT	PM	10.07.20	E5	17.06.20	1:300
			Drawn: E5	06.07.20	(As Original)
			Checked: PM	10.07.20	
			Job No: A19389	DWG No: 310	Rev: A

Auckland Council
 Approved Resource Consent Plan
 LUC60362575
 04/12/2020

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:957] Notice of Requirement online submission - Heritage New Zealand Pouhere Taonga
Date: Monday, 13 November 2023 4:46:06 pm
Attachments: [Pukekohe NOR 4 - HNZPT Submission - 13 Nov 2023.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Heritage New Zealand Pouhere Taonga

Organisation name:

Full name of your agent: Alice Morris

Email address: amorris@heritage.org.nz

Contact phone number: 0276840833

Postal address:
PO Box 105-291

Auckland 1143

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 4 Pukekohe North-East Arterial

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
Please refer to the attached

I or we seek the following recommendation or decision from Auckland Council:
Please refer to the attached

Submission date: 13 November 2023

Supporting documents
[Pukekohe NOR 4 - HNZPT Submission - 13 Nov 2023.pdf](#)

Attend a hearing

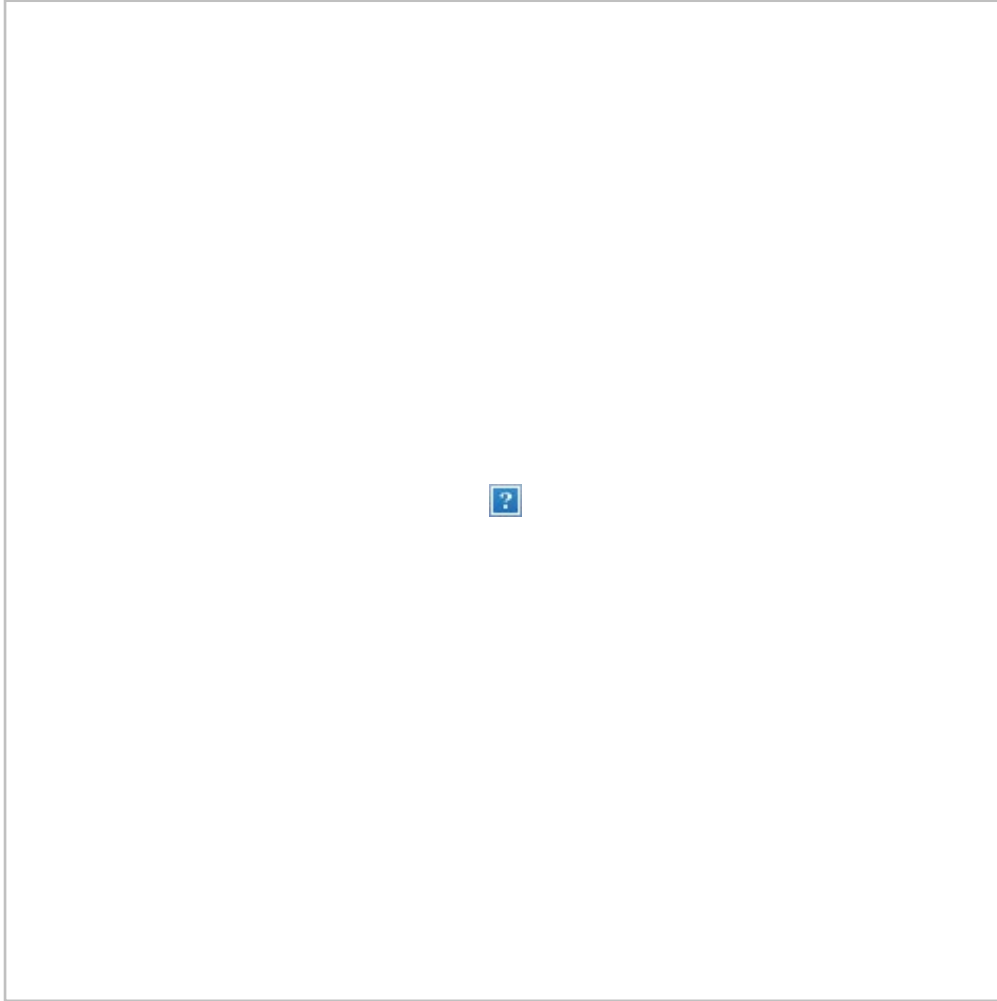
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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13 November 2023

File ref: AUP Pukekohe NoR 4

Planning Technician, Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

**SUBMISSION ON THE NOTICE OF REQUIREMENT FOR THE PUKEKOHE TRANSPORT NETWORK - NOR 4 –
PUKEKOHE NORTH-EAST ARTERIAL, BY THE REQUIRING AUTHORITY: AUCKLAND TRANSPORT**

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. The focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA).
4. The requirement for an Archaeological Authority to be obtained in accordance with the HNZPTA does not mitigate the effects of the NoR identified under the RMA. It is a separate statutory obligation before any physical works can be undertaken that may affect an archaeological site as defined under the HNZPTA. While obtaining an Archaeological Authority does not mitigate the effects on wider historic heritage values by the NoRs, it does ensure pre-1900 archaeological values associated with area of project works including unrecorded sites are fully assessed and formally documented through appropriate archaeological monitoring, investigation, and reporting. The Act does not however apply to buildings or structures that are post 1900 (unless they are declared under the HNZPTA) or to certain activities that may affect a pre-1900 building unless the building (or a pre-1900 component of) is to be demolished.
5. HNZPT supports the purpose of planning for a well-functioning urban environment through the protection of integrated transport networks to support the expected future growth needs.

The specific parts of the Notice of Requirement that Heritage New Zealand's submission relates to are:

6. HNZPT's focus is to ensure the protection of historic heritage, and mitigation to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.



7. HNZPT has reviewed the September 2023 'Pukekohe Transport Network Assessment of Effects on Historic Heritage' ('AEHH') prepared for the suite of NoRs for the Pukekohe Transport Network. In particular, noting the reference to the two possible pre-1900 villas at 1201 Paerata Road¹ and 87 Pukekohe East Road.²
8. HNZPT is supportive of the recommendations in the AEHH that further research and survey of these two places occurs as an outcome of a Historic Heritage Management Plan ('HHMP') before construction of NoR 4 commences.³ HNZPT also notes the statement in the report that "In all cases, where possible consideration should be given to relocating heritage buildings rather than demolishing them".⁴
9. While neither of the villas are presently scheduled, listed or recorded as archaeological sites, as potentially pre-1900, HNZPT considers there is the need for further assessment to determine their historic heritage significance and whether their historic heritage values are such that they should be protected from the effects arising from the future implementation of NoR 4 and to inform further statutory requirements under the HNZPTA. Accordingly, HNZPT supports the proposed precautionary approach to undertake further analysis of these potential pre-1900 sites recommended in the Assessment of Effects on Historic Heritage.⁵
10. HNZPT has also reviewed Te Tupa Ngatahi's recommended wording of draft Condition 22 HHMP, in particular the reference to obtaining an Archaeological Authority under the HNZPTA in point 22(b), and the use of the term 'unexpected' in point 22(b)(IX)C.

Heritage New Zealand Pouhere Taonga supports the Notice of Requirement (NoR 4).

The reasons for Heritage New Zealand's position are as follows:

11. The consideration, management, and mitigation of effects from the purpose of the designation on the historic heritage values of the place are required to ensure effects are appropriately mitigated.
12. The recommendations set out in September 2023 'Pukekohe Transport Network Assessment of Effects on Historic Heritage' and the suite of conditions set out in the 'Auckland Transport Condition Set – Pukekohe North-East Arterial' are appropriate, with particular focus on the two potentially pre-1900 villas that will be impacted by the construction of the Network proposed via NoR 4.

Heritage New Zealand seeks the following decision from Council:

13. The approval of NoR 4 - Pukekohe North-East Arterial with appropriate historic heritage conditions to ensure the protection of such identified resources from inappropriate development and use.

¹ Identified in Form 18 – NoR 4 as Property ID# 608433, Part Lot 30 DP 10637, 199 Paerata Road

² Identified in Form 18 – NoR 4 as Property ID# 608752, Part Allot 30 PSH OF Pukekohe, 131 Pukekohe East Road

³ Assessment of Effects on Historic Heritage, paragraphs 5.3.2, and 5.3.5

⁴ Assessment of Effects on Historic Heritage, paragraph 5.3.2

⁵ AEE, paragraph 11.10.1.2



HERITAGE NEW ZEALAND
POUHERE TAONGA

Heritage New Zealand wishes to be heard in support of their submission.

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

Yours sincerely

BHParslow

Director Northern Region

Address for service: Alice Morris
amorris@heritage.org.nz
PO Box 105 291
Auckland City 1143

Cc: Auckland Transport submissions@supportinggrowth.nz

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:960] Notice of Requirement online submission - Simon John Burgoyne
Date: Monday, 13 November 2023 8:16:07 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Simon John Burgoyne

Organisation name:

Full name of your agent:

Email address: simon.burgoyne@gmail.com

Contact phone number:

Postal address:

Pukekohe
Pukekohe 2676

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 4 Pukekohe North-East Arterial

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we are neutral to the Notice of Requirement.

The reason for my or our views are:

Keen to be kept informed of progress and updates as this process progresses and to remain on the mailing list etc.

I or we seek the following recommendation or decision from Auckland Council:
None

Submission date: 13 November 2023

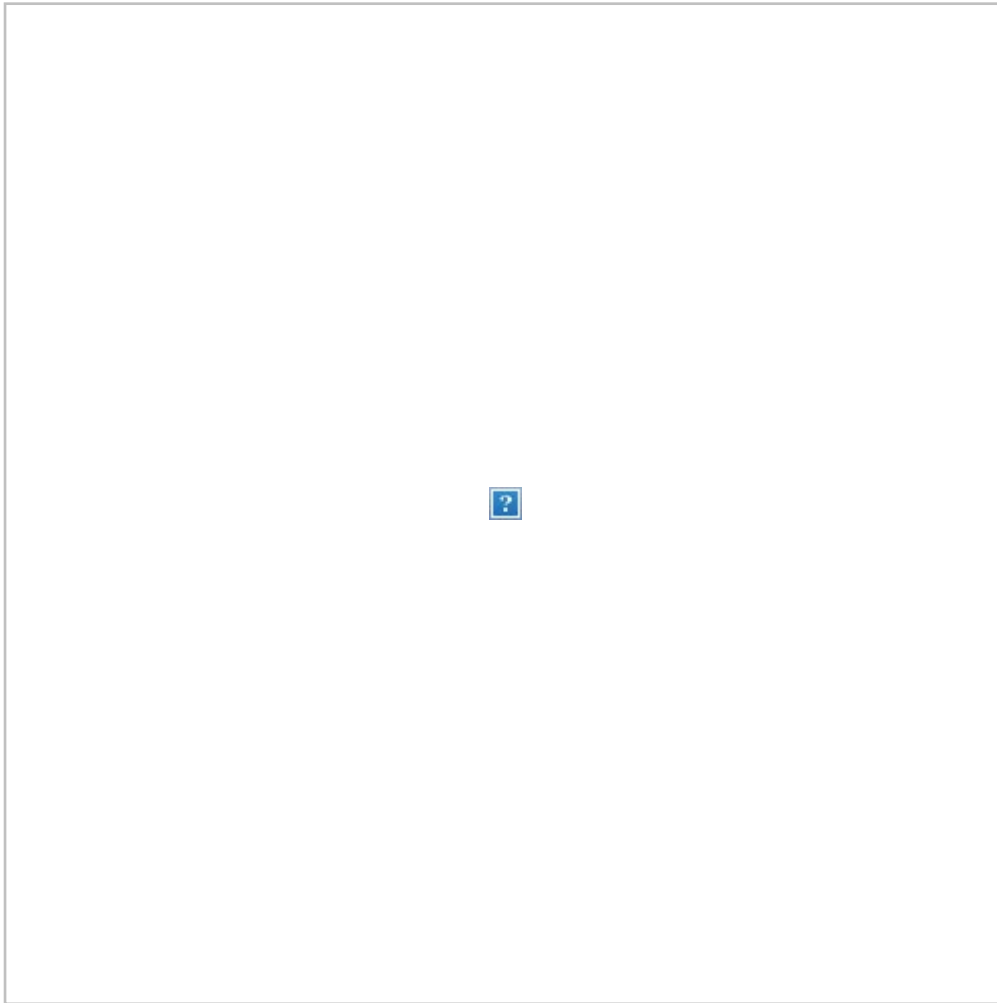
Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:964] Notice of Requirement online submission - Pam Butler Senior RMA Advisor KiwiRail
Date: Monday, 13 November 2023 9:46:11 pm
Attachments: [KiwiRail submission\(s\) Pukekohe package NoRs 1-5_20231113214229.671.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Pam Butler Senior RMA Advisor KiwiRail

Organisation name: KiwiRail Holdings Limited

Full name of your agent: KiwiRail Holdings Limited

Email address: Pam.butler@kiwirail.co.nz

Contact phone number: 0275708571

Postal address:
Private Bag 92138
Auckland 1142

Auckland 1142

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 4 Pukekohe North-East Arterial

The specific provisions that my submission relates to are:
Railway designations in Sth Auckland

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
see attached

I or we seek the following recommendation or decision from Auckland Council:
Recommend approval subject to proposed conditions

Submission date: 13 November 2023

Supporting documents
KiwiRail submission(s) Pukekohe package NoRs 1-5_20231113214229.671.pdf

Attend a hearing

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

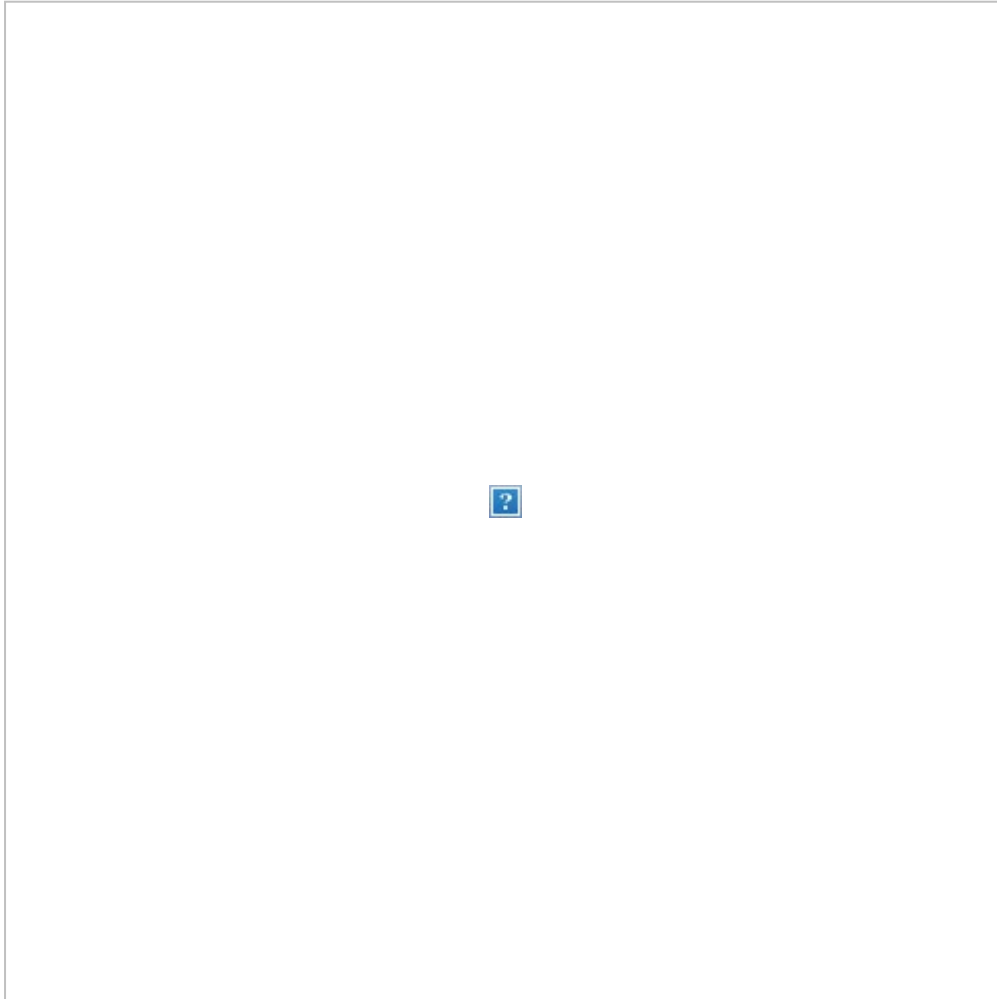
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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13 November, 2023

Reason for submission

KiwiRail is the State Owned Enterprise responsible for the management and operation of the national railway and Interislander ferry services. In many places, the rail network has been in place for over 100 years and remains crucially important to the economic and social development of the areas it services. The rail network serves two functions as a metropolitan public transport service in Auckland and Wellington primarily, and a route for freight and other services nationally.

The land upon which the rail network operates is owned by the New Zealand Railways Corporation and leased to KiwiRail. KiwiRail owns the rail infrastructure (including rails, sleepers, sidings, and depots) and is a railway operator for the purposes of the Railways Act 2005. It is also the licensed Access Provider under the Railways Act, which provides KiwiRail broad powers to safely control and restrict the use of railway assets and entry onto railway land.

KiwiRail Holdings Limited (KiwiRail) is working closely with Auckland Transport (AT) and Waka Kotahi (WK) to develop the strategic transport network to support Auckland's growth areas, particularly in the south. KiwiRail owns and maintains Auckland's Metro track network and is currently well into delivering major southern projects including electrification between Papakura and Pukekohe and, three new Drury stations (Drury, Ngākōroa and Paerātā), and will shortly embark on work to add capacity to the NIMT (North Island Main Trunk).

A functioning and efficient freight network is critical to the productivity of the nation's supply chain. KiwiRail also operates New Zealand's rail freight network and tourism passenger rail services between Auckland and Wellington and the Te Huia Hamilton – Auckland passenger service, which began in April 2021. Further interregional passenger growth is predicted. KiwiRail therefore has a significant interest in planning to enable the efficient flow of imports, exports, and domestic goods within and through the region. Freight tonnage is forecast to treble to, from and through the region over the next 25 years.

KiwiRail is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks (RTN), Active Mode Corridors (AMC) and road /highway networks which facilitate mode transfer and enable future urban growth.

The proposed Notices of Requirement (NoRs) cross designations for which KiwiRail is the requiring authority. Of key interest to KiwiRail is the intersection of the proposed designations with the existing rail corridor. These locations are shown on Table One overleaf.



Table One: Affected KiwiRail locations summary

NoR ¹	Affected KiwiRail site	Purpose and corridor impacts
Drury West Arterial NoR 1 (AT)	Designation 6302, NIMT, Burt Road	Proposed bridge as part of new transport corridor
	Drury West / Ngaakooroa Station; extends south from Ngaakooroa Rail Station	Tie in and upgrade the proposed station access way to provide for bus priority lanes. This arterial will connect the FUZ south of SH22 (State Highway 22) with the new rail station.
Drury – Pukekohe Link NoR 2 (Waka Kotahi)	Designation 6302, crosses the NIMT to connect to SH22	SH22 connection.
	Designation 6311 Paerata Interchange	Paerata Interchange and Accessway: Provides a connection to the Paerata Rail Station from Sim Road (south) proposed to be upgraded by NoR 2.
Paerata Connections NoR 3 (AT)	Designation 6310, Paerata Station	
	Designation 6311 Paerata Interchange	
	Designation 6302, NIMT (end of Sim Road)	Paerata Interchange and Accessway: Sim Road segment.
Pukekohe North-East Arterial NoR 4 (AT)	Designation 6302, crosses the NIMT at Paerata (near Butcher Road)	Proposed bridge as part of new transport corridor.
Pukekohe South-East Arterial NoR 5 (AT)	Designation 6302, crosses the NIMT in Pukekohe (south)	To connect to Svendsen Road / Wrightson Way.

As KiwiRail is the Requiring Authority for the earlier designation/s, approval under s177 of the Resource Management Act 1991 (RMA) is required for the secondary requiring authority to undertake works within the railway corridor. KiwiRail acknowledges that the NoR AEE(s) identify that further engagement with KiwiRail will continue as the Project is developed. KiwiRail expects that as part of that process the necessary approvals will be sought in due course.

The importance of planning for the future growth of both RTN and post CRL (City Rail Link) metro rail services and enabling the growing demand for freight movements and interregional rail services to, and through Auckland has emerged as a result of the work undertaken to date as part of the preparation of these NoRs.

Aligned with its broader national role, KiwiRail, AT, Auckland Council and WK are starting to plan for future rail investment to - remove capacity constraints, raise future passenger and freight levels of service to drive increases in rail mode share, and enable greater network reliability and resilience by improving maintenance options (without having to close lines for extended periods).

¹ NoR's 6, 7 and 8 are some distance from railway assets.

Specific areas that are of greatest interest to KiwiRail and around which further detail will be required prior to granting any s177 approval, include:

- a) That KiwiRail's strategy for growing the capacity and resilience of the NIMT through the provision of additional tracks is acknowledged and accommodated as far as possible in the development and design of the Project
- b) NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design
- c) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability.

Several of these initial issues are set out in Table Two below.

Table Two: NoR created constraint and suggested approach.

• NoR	Issue	• Resolution
1	Allows for an increase of track and rail maintenance access however limited flexibility for changes in rail design standards and further development	Ongoing dialogue and engagement before detailed design starts
2	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
3	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
4	No evident issues. Cuts near the Mission Bush corridor can be managed to protect for growth. However, the form that the bridge takes for this span and the impact of the structure on the current and future rail infrastructure will need to be agreed.	Ongoing dialogue and engagement before detailed design starts

<p>5</p>	<p>The proposed road bridge over the NIMT and Station Road is shown as a long single span which may not be practically feasible. There is a risk a central pier (or piers) is required and depending on the location may hinder future rail options</p> <p>There have been new high-speed crossovers installed as part of P2P just south of the new overbridge. There is potential that a 3rd and 4th track may be added to the NIMT from Pukekohe to these cross overs as part of the southern approach to the eventual Pukekohe to Papakura 4 tracking.</p> <p>Electrification of the rail network to Hamilton is a strong likelihood. Depending on the extent and proximity of any additional cross overs in a southern cluster, they may drive higher than normal OLE (Overhead Line Equipment) clearances under new road bridge.</p>	<p>Ongoing dialogue and engagement before detailed design starts</p> <p>Clarify potential location of Station Rd bridge support piers</p> <p>Ongoing dialogue and engagement before detailed design starts</p> <p>Future corridor OLE equipment clearance under full width of span needs to be clarified</p>
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Relief sought

KiwiRail generally supports NoR applications One to Five and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the applicant's proposed conditions, including in particular

- Condition 5 (All NoRs)– Network Utility Operators (s176 approval) to carry out routine works
- Condition 10 (All NoRs) - (Land Integration Process LIP)) which enables developers and agencies to seek the latest information to enable better planning and integration with the NoRs. It is suggested that the condition be altered at (c) (i) to add the word 'available' before 'designs' as there will be a limit about what information is available for the various packages during the designation term. For example, at preliminary design, 50% design, approved, or final design.
- Condition 11 UDLMP (Condition 11 for NoR 5) – to enable integration of the Project's permanent works into the surrounding landscape and urban context, of which KiwiRail's new stations will form part.
- Condition 26 (all NoRs) Network Utility Management Plan (NUMP) setting out a framework for protecting, relocating and working in proximity to existing network utilities.

13 November 2023

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

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- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

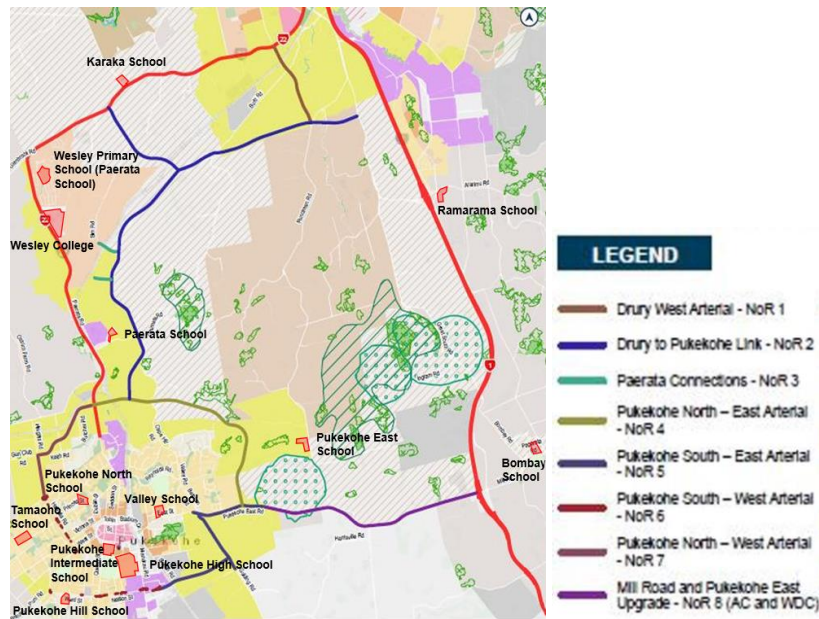


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
Underlined and strikethrough – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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From: [Sir William Birch](#)
To: [Unitary Plan](#)
Cc: [Siobhan A](#)
Subject: Submissions on NOR 4 and NOR 5 - Birch file: 5840
Date: Monday, 13 November 2023 3:56:59 pm
Attachments: [image002.png](#)
[Schedule 1.pdf](#)
[CP 5840 C.pdf](#)
[Draft Meeting Minutes with Auckland Council \(2023-9-12\).pdf](#)
[20231113153256422.pdf](#)

Dear team at Unitary Plan,

This submission (see Form 21 attached) is made by Birch Surveyors Ltd. on behalf of Siobhan Ainsley at part of 87 and part of 131 Pukekohe East Road, Pukekohe. The land in question is zoned as "Future Urban" on the Unitary Plan and both parcels of land will be significantly affected by the proposals in NOR 4 and NOR 5.

Our client is well aware of the efforts being made by the Auckland Council and Auckland Transport in particular to improve the traffic flows around Pukekohe and we have been instructed to work with Supporting Growth in their planning of a North East Arterial Ring Road and to provide a stormwater treatment pond for the upgrade and widening of Pukekohe East Road even though these public works are hugely disruptive to our client's long term development plans.

We have had a number of positive meetings with Helen Hicks and her team and have been impressed with their willingness to work with landowners to achieve results that are acceptable to all parties. The result of these meetings is that we have now agreed with the location of the propose Roundabout on Pukekohe East Road and we are providing for the Roundabout in a Proposed Private Plan Change application that is now being prepared to change the zoning of the Future Urban Land to a Mixed Housing residential Zone. A pre-application meeting for this Private Plan Change (PPC) was held with senior Council Planners and officers of Water Care and Auckland Transport on 12th of September 2023. A copy of the agreed minutes is attached. This PPC is now well advanced and all specialist reports in support of the Plan Change have either now been provided by consultants or are still currently being prepared by consultants.

Two of the plans prepared in support of the plan change are attached:

1. Plan of the proposed Plan Change area and
2. Concept Plan demonstrating feasibility of development

The concept plan shows the planned position of the Roundabout and this has been agreed by our client without prejudice and subject to adequate and due compensation for all of the public works requirements including the proposed SW treatment pond, that eventuate from the NOR requirements.

It is anticipated by our client that at the time of development of the residential land, after the Plan Change is operative that the earthworks will be designed to be consistent with the design of the Roundabout and the adjoining public road levels although these may not be constructed for potentially two or three decades.

A major concern of our client however, is that the proposed location of a stormwater treatment

pond on NOR 5 that provides for treatment from the wide roading on the southern side of Pukekohe East Road is in the centre of the land at 84 Pukekohe East Road that is planned for residential development. (see ID 608752) This does not make any sense and would be strongly opposed by our client. On the other hand it is a relatively simple matter to build the SW treatment pond either on the adjoining rural land owned by our client or somewhere in the proximity of the site shown on our attached concept plan to treat the runoff from Pukekohe East Road and the proposed residential development shown on our plan. It makes sense to have a single community owned pond to treat both the road water and the subdivision water and to design the ultimate subdivision to provide for this. This matter has been discussed with Supporting Growth and we hope to meet and explore this option further before the designations are finalised.

We trust the Auckland Transport and the Council will take this submission into consideration when finalising the areas to be designated. Please let me know if you have any queries.

As noted on Form 21 we wished to be heard at the hearing.

Kind regards,

Sir William Birch

FNZIS | RPSurv | LCS

Consultant

DDI: 09 237 0787

Mob: 027 294 8321



2A Wesley Street, Pukekohe 2120

PO Box 475, Pukekohe 2340

www.birch.nz

PUKEKOHE | PENROSE | HAMILTON | TAURANGA | TAIRUA

DRAFT ONLY



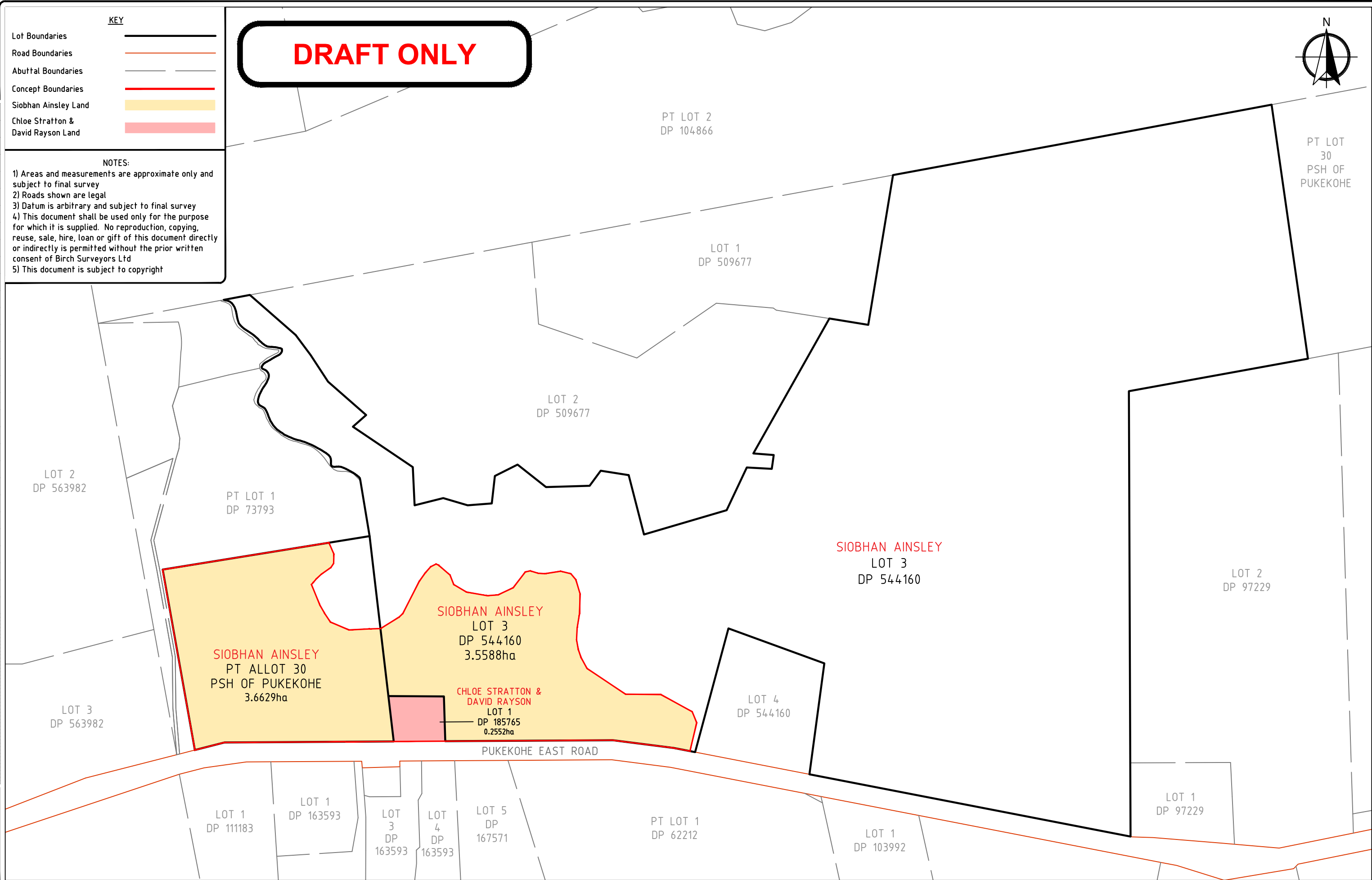
KEY

Lot Boundaries	
Road Boundaries	
Abuttal Boundaries	
Concept Boundaries	
Siobhan Ainsley Land	
Chloe Stratton & David Rayson Land	

NOTES:

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Birch Planning Surveying Engineering
LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

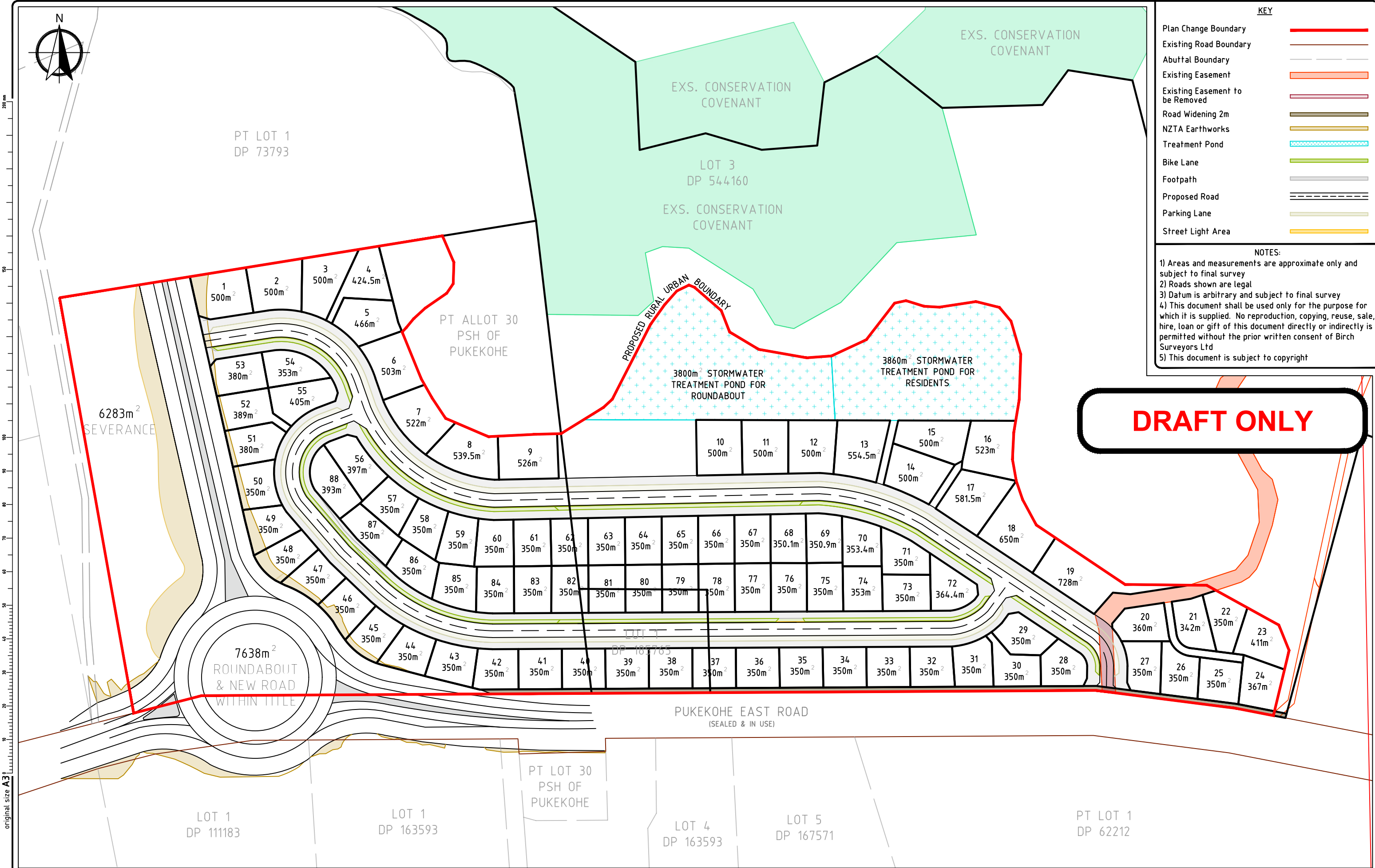
LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769ha
REGISTERED OWNERS	-

PROJECT NAME

**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840
Designed	-	Date	-	Scale	Hz: 1:3500 @ A3
Drawn	BSL	Date	11/2023	REV. BY	DATE
Approved	SWB	Date	11/2023	A	TR 11/23
				COMMENT	SCHEDULE 1

TITLE	SCHEDULE 1 - PLAN CHANGE AREA AREA 7.4769ha	
Drawing Name	F:\..ICAD\Schedule 1.dwg /	SUBJECT TO FINAL SURVEY
Rev.	A	2023



KEY

Plan Change Boundary	
Existing Road Boundary	
Abuttal Boundary	
Existing Easement	
Existing Easement to be Removed	
Road Widening 2m	
NZTA Earthworks	
Treatment Pond	
Bike Lane	
Footpath	
Proposed Road	
Parking Lane	
Street Light Area	

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 Quality ISO 9001	 Birch Planning Surveying Engineering LAND DEVELOPMENT CONSULTANTS 2A Wesley Street Pukekohe 2120 PO Box 475 Pukekohe 2340 Ph: 09 237 1111 pukekohe@birch.nz www.birch.nz	LOCAL AUTHORITY: AUCKLAND COUNCIL PLANNING MAP: - ZONING: FUTURE URBAN ZONE ACTIVITY: - COMPRISED IN: - TOTAL AREA: 7.4769ha REGISTERED OWNERS: -	PROJECT NAME HONARA PLAN CHANGE PUKEKOHE EAST ROAD PUKEKOHE	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>Surveyed</td><td>Date</td><td>Project No.</td></tr> <tr><td>T.RHODES</td><td>28/04/2022</td><td>5840</td></tr> <tr><td>Designed</td><td>Date</td><td>Scale HZ: 1:1500 @ A3</td></tr> <tr><td>-</td><td>-</td><td>-</td></tr> <tr><td>Drawn</td><td>Date</td><td>REV. BY DATE COMMENT</td></tr> <tr><td>BSL</td><td>11/2023</td><td>A TR 09/23 CONCEPT PLAN</td></tr> <tr><td>Approved</td><td>Date</td><td>B NS 10/23 -</td></tr> <tr><td>SWB</td><td>11/2023</td><td>C TR 11/23 ROAD</td></tr> </table>	Surveyed	Date	Project No.	T.RHODES	28/04/2022	5840	Designed	Date	Scale HZ: 1:1500 @ A3	-	-	-	Drawn	Date	REV. BY DATE COMMENT	BSL	11/2023	A TR 09/23 CONCEPT PLAN	Approved	Date	B NS 10/23 -	SWB	11/2023	C TR 11/23 ROAD	TITLE CONCEPT PLAN INDICATIVE ONLY Drawing Name: F:_CAD\CP 5840 C.dwg /CONCEPT
Surveyed	Date	Project No.																											
T.RHODES	28/04/2022	5840																											
Designed	Date	Scale HZ: 1:1500 @ A3																											
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Approved	Date	B NS 10/23 -																											
SWB	11/2023	C TR 11/23 ROAD																											



KEY

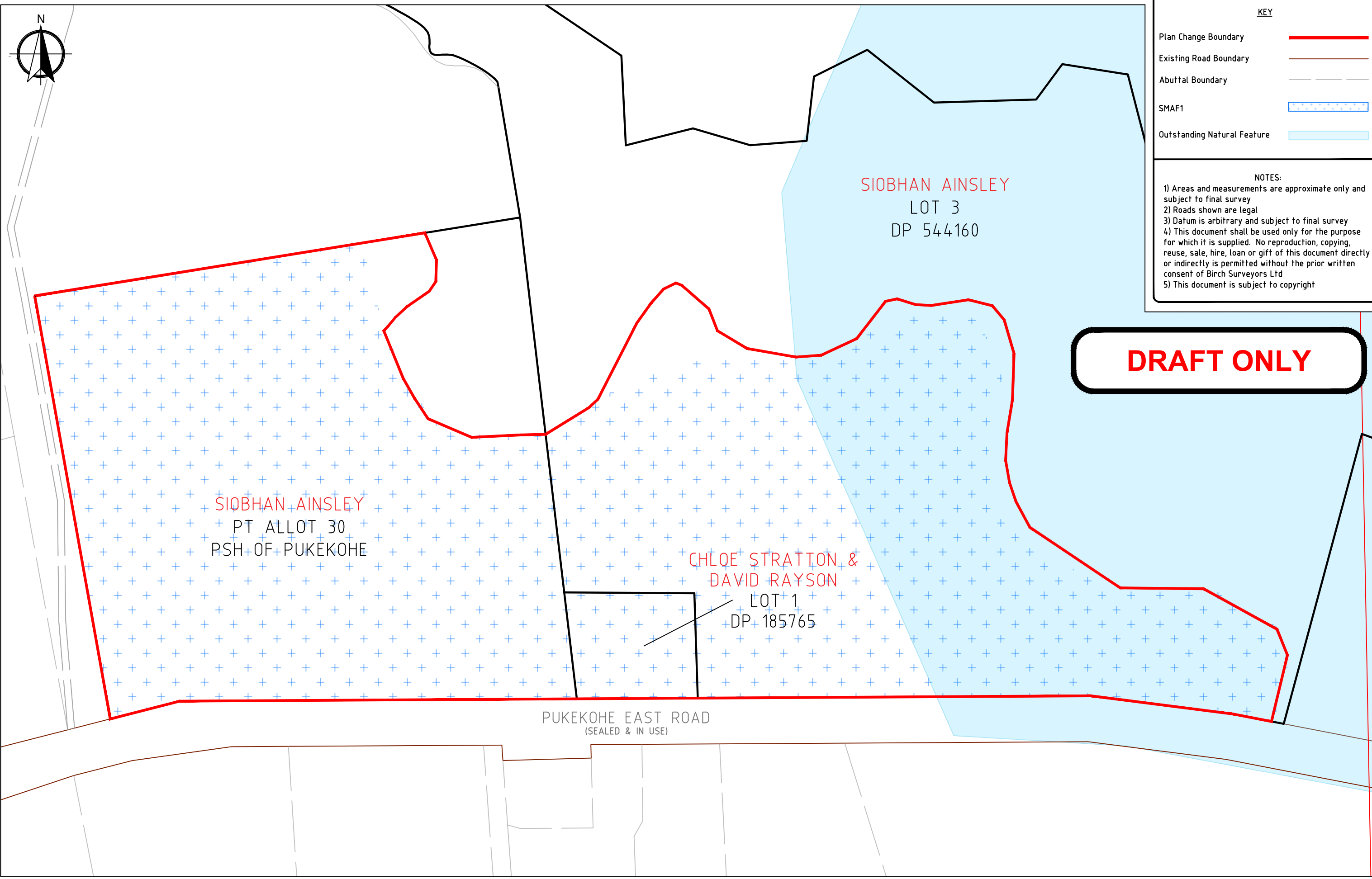
- Plan Change Boundary
- Existing Road Boundary
- Abuttal Boundary
- SMAF1
- Outstanding Natural Feature

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LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769 ha
REGISTERED OWNERS	-

PROJECT NAME

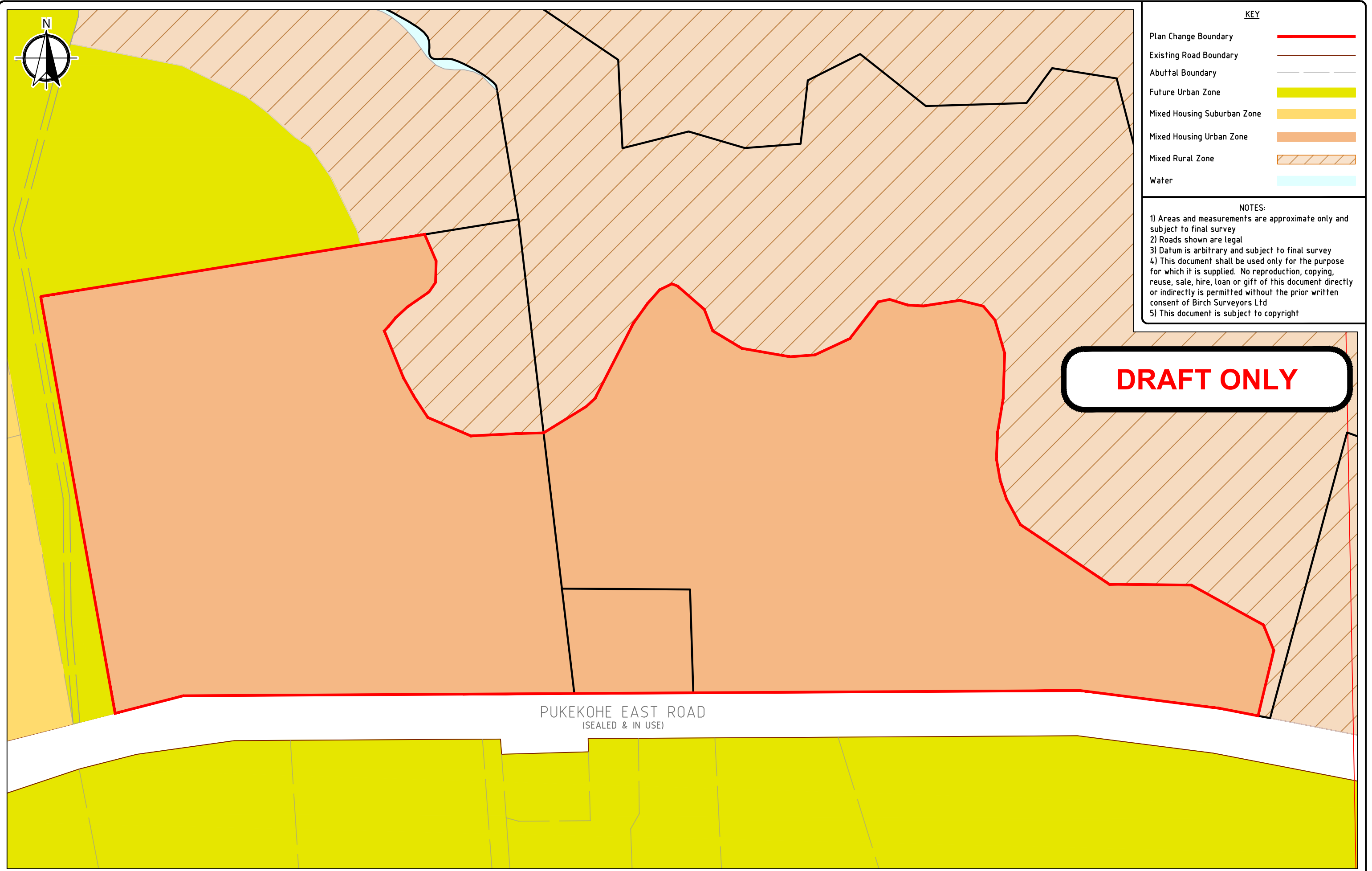
**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840		
Designed	-	Date	-	Scale	Hz: 1:1500 @ A3		
Drawn	-	Date	-	REV.	BY	DATE	COMMENT
BSL	-	11/2023	-	A	TR	09/23	CONCEPT PLAN
Approved	-	11/2023	-	B	NS	10/23	-
SWB	-	11/2023	-	C	TR	11/23	ROAD

TITLE

PRECINCT PLAN

Drawing Name: F:\..CAD\CP 5840 C.dwg /PRECINCT SUBJECT TO FINAL SURVEY Rev. C



KEY

Plan Change Boundary	
Existing Road Boundary	
Abuttal Boundary	
Future Urban Zone	
Mixed Housing Suburban Zone	
Mixed Housing Urban Zone	
Mixed Rural Zone	
Water	

- NOTES:**
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PUKEKOHE EAST ROAD
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LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
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**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840
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Approved	-	11/2023	-	B	NS 10/23
SWB	-	11/2023	-	C	TR 11/23 ROAD

TITLE

PLAN CHANGE AREA

Drawing Name F:_CAD\CP 5840 C.dwg /PLAN CHANGE SUBJECT TO FINAL SURVEY Rev. C

MINUTES OF MEETING

Project Name:	Honara Trust Plan Change	Our Ref:	PN 5840
Project Description:	Meeting with Auckland Council team to discuss plan change proposal		
Date:	12/09/2023		
Time:	12:00PM		
Location:	Auckland Council Offices (Albert Street)		
Attendees:	Craig Cairncross (Auckland Council) (CC) Chris Freke (Auckland Transport) (CF) Catherine Absil-Couzins (Auckland Transport) (CAC) Kerryn Swanepoel (Watercare) (KS) Siobhan & Ross Ainsley (Applicant/landowners) (SRA) Sir William Birch (Birch – Project Lead) (SWB) Kelly Bosgra (Birch – Engineering) (KB) James Oakley (Birch – Planning) (JO)		
Apologies:	-		
Absent:	-		
ITEM	DISCUSSION	ACTION	
1. Background/Land Ownership	<p>The properties and the ownership of the land that is subject to the plan change was discussed. SRA advised that they do not own 107 Pukekohe East Road but noted that the landowner would be supportive of a proposal to rezone their land. The installation of transport infrastructure was raised by CF.</p> <p>Other plan changes/developments in the area were discussed.</p>	-	
2. Outstanding Natural Feature	The Pukekohe East Tuff Ring partially applying over some of the Future Urban land was raised. This was discussed but there was no answer as to how this came about other than with reference to the development of the AUP.	-	
3. Transport	<p>The concept plan was discussed by SWB. There was discussion on previous consultation with the Supporting Growth Alliance and the identified access point to Pukekohe East Road. CF raised whether there was any input by a transport consultant on its appropriateness. JO advised input was yet to be provided.</p> <p>CF/CC enquired about setback distances between proposed access and the identified roundabout and the potential removal of access from Pukekohe East Road.</p>	-	
4. Stormwater Ponds	The indicative location of the stormwater ponds which straddles proposed area to be rezoned and adjoining Mixed Rural Zone (MRZ) area was discussed. Queries were raised regarding the consenting nature of the activity in the MRZ. Some options to address it were discussed including shifting the Rural Urban Boundary (which was noted as done as a desktop exercise in parts) or getting a designation applied over the location. Further investigation on this matter will be undertaken.	JO	
6. Wastewater/Water Supply	<p>KB described the proposed wastewater/water supply servicing regime. KS suggested talking with Myland Partners regarding their infrastructure.</p> <p>KB mentioned he would provide information to KS for the team to review and provide feedback on.</p>	KB/KS	
Meeting closed:	13:00		
Next meeting:	TBD		
Post Meeting Notes:	-		

DRAFT

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) SIR WILLIAM BIRCH (AGENT)

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

Address for service of Submitter

P.O. BOX 429, PUKEKOHE

Telephone: 0272948321

Email: sirwilliam@atbirch.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority	Auckland Transport
For: A new designation or alteration to an existing designation	Pukekohe NOR 4: Pukekohe North-East Arterial and NOR 5: Pukekohe East Road

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

This submission is on behalf of the owner Siobhan Ainsley of 87 Pukekohe East Road. - see attached email

My submission is:

- I or we support of the Notice of Requirement I or we oppose to the Notice of Requirement
I or we are neutral to the Notice of Requirement

The reasons for my views are:

see attached email

(continue on a separate sheet if necessary)


I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

see attached email

I wish to be heard in support of my submission

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

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



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

13 November 2023

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

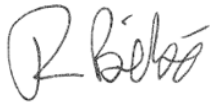
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

From: [Maurice](#)
To: [Unitary Plan](#)
Cc: submissions@supportinggrowth.nz
Subject: Notice of Requirement for Designation for Pukekohe North-East Arterial (NoR 4) for a new transport corridor including active mode facilities.
Date: Wednesday, 8 November 2023 12:29:14 pm

To Whom It May Concern

We live at 1223 Paerata Road, Pukekohe, and received a letter from the Auckland Council on 14 October 2023, dated 11 October 2023, informing us of the Notice of Requirement Pukekohe North-East Arterial (NoR 4) for a new transport corridor including active mode facilities, which affects our property.

We have some questions and concerns we wish to communicate to the Auckland Council to obtain their answers and solutions, before this Notice of Requirement is accepted by us, and these are as follows:

1. Will land be taken from us? We are concerned that this decreases our use of our property and may mean the removal of our fencing, gates, hedges and trees planted especially by us.
2. If so how much land will be taken?
3. If so will we be compensated for the taken land, and for the destruction of any of our trees and hedges, fencing and gates, and also compensated for the replanting of these hedges and trees, and for the replacement of fencing and gates to what was originally in place? How is the compensation worked out?
4. Is the widening of the road, for example, for pedestrians, cyclists, general transport and specially marked bus lanes?
5. What is Waka Kotahi Designation 6704 (SH22), we understood Auckland Transport was proposing the new roading?
6. What is Waka Kotahi Designation 6705 (SH22 Widening), we understood Auckland Transport was proposing the new roading?
7. We are concerned about the affect the work will have on the access to our property.
8. What does the re-grading of driveways entail, and does this affect our property?
9. We are concerned the driveway will need to be changed to a different place which will not be suitable because this will mean a cost and inconvenience in changing our private roading, fencing, trees, hedges and land use, to access our home and paddocks.
10. We are concerned the power supply system, that is poles and lines, may be moved and if so how this would affect us? If so, would more land be taken from us to accommodate the repositioning of the power poles and lines, and would we be compensated for the land taken? Also, how will this affect our trees and hedges, particularly, the closeness of these lines to our trees and hedges and the subsequent cost and inconvenience in having to have the trees and hedges trimmed regularly? Also, how this repositioning of the power supply would affect our fencing and gates, that is, if our fencing and gates needed to be moved or removed what compensation and reimbursement would we receive for doing so or would the council do the replacing and to the same as what was removed, for example, post and rail.
11. We are concerned ours and the neighbours private power supply along the driveway between our place and the neighbours would be affected and if so, who would be required to pay for the repositioning of the power poles and lines?
12. What are the construction activities including construction areas, and how will these affect us?
13. We are concerned about the close proximity of the construction activities including

construction areas to our place, and the dust that would be created.

14. We are concerned about the noise the construction activities including construction areas will produce due to the close proximity to our place.
15. We are concerned about what active mode facilities are and how they will affect us?
16. We are concerned about whether there will be road closures and if so which roads? If so, how long would these roads be expected to be closed for and what detours would be put in place?
17. Would there be hold ups on the existing thorough fare on the road with points men, and/or controlled traffic lights?
18. We are concerned about the duration of the works each day, that is the daily start and finish times, and how many days of the week will work take place, and does this include weekends?
19. We are concerned about the length of time the works would take, so what is the time frame for the works, how many months from start to finish?
20. If the Requirement is accepted, when would the works be expected to commence.
21. If the Requirement is accepted it seems other plans by Auckland Council would have already been decided and would go into affect to suit the future transport infrastructure that is proposed in our area, and particularly, the decision to go ahead to re zone our property and the neighbouring properties from currently zoned Future Urban, to Residential or Light Industrial or Commercial or something else? Therefore, we ask has a decision been made by Auckland Council to rezone our property and neighbouring properties? If so, when would the rezoning come into force? Re zoning will always have an impact on where a person chooses to live, so this is why we ask as this rezoning, if any, is important to our future.
22. Is the rail system near our property changing? If so, how?
23. Is the existing rail bridge near Butcher Road remaining?
24. If the Designation is authorised, is there an expiry date on the Designation?

We await your reply in anticipation.

Yours faithfully

Maurice and Colleen Connors

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:897] Notice of Requirement online submission - Anil Sachdeva -- Holy Properties Ltd
Date: Monday, 16 October 2023 10:00:54 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Anil Sachdeva -- Holy Properties Ltd

Organisation name:

Full name of your agent:

Email address: anilsachdeva2001@yahoo.com

Contact phone number:

Postal address:
5/7 Claude Road
Epsom
Auckland 1023

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:
124 Station Rad, Pukekohe

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

a) That I have marketed my affected property at No. 124 Station Road, Pukekohe for 4-5 months with no success due to the designated road. b) That due to my ill health and multiple serious health issues (CVD and Parasthesia -- cervical and lumbar spine etc.), I must sell this property sooner rather than later. c) That I have been in contact with Auckland Transport on their 'advance' acquisition of No. 124 Station Road, Pukekohe as they have blighted its value by the prospect of the public work proposed. d) That the impact of the Notice of Requirement on No. 124 is substantial.

I or we seek the following recommendation or decision from Auckland Council:

I request the AT/Auckland Council to uplift any Notice of Requirement on this property at 124 Station Road, Pukekohe

Submission date: 16 October 2023

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of

requirement as soon as reasonably practicable after submitting to Auckland Council.

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:904] Notice of Requirement online submission - Franklin Agricultural and Pastoral Society
Date: Wednesday, 25 October 2023 12:00:25 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Franklin Agricultural and Pastoral Society

Organisation name:

Full name of your agent:

Email address: accounts@pukekoheshowgrounds.co.nz

Contact phone number:

Postal address:

PO Box 32

Pukekohe

Auckland 2340

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

New connection from Golding Road to Svendsen Road, Pukekohe across Station Road - this appears to be proposed to run along the boundary of our property at 58 Station Road, Pukekohe

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

The Committee of the Franklin A & P Society are concerned about the possible impact of noise and heavy traffic movements where the proposed road is along the boundary of the Society's property. The Committee is also concerned that the peaty nature of the soil means the proposed bridge over Subway Road will need a large amount of embankments either side, which may further impact the Society's property. A large number of events are held at the Showgrounds every year specifically because of the quiet location, and a major route very close to the boundary would have a significant impact on noise levels and the events able to be held.

I or we seek the following recommendation or decision from Auckland Council:

Re-routing the proposed roading to an area which will not have such a significant impact on the Showgrounds - possibly towards the Auckland Trotting Club Golding Road development?

Submission date: 25 October 2023

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

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

- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:924] Notice of Requirement online submission - Cade Hubert Daroux
Date: Thursday, 9 November 2023 12:16:08 PM
Attachments: [SUBMISSION BY C91123.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Cade Hubert Daroux

Organisation name:

Full name of your agent:

Email address: cadedx@gmail.com

Contact phone number: 092388411

Postal address:

P O Box 692

Pukekohe

Pukekohe

Pukekohe 2340

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

The changes to the roading network in the Pukekohe area

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

As set out in my attached submission

I or we seek the following recommendation or decision from Auckland Council:

That the Notice of requirement be withdrawn or struck out

Submission date: 9 November 2023

Supporting documents

SUBMISSION BY C91123.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?

Yes

Declaration

I accept and agree that:

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

I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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SUBMISSION BY C.H. AND C.K.DAROUX

A letter from the Auckland Council dated 11 October 2023, received by us about 20 October, has advised us of nine Notices of Requirement affecting our Pukekohe property, with the last day for filing a submission on these being 13 November 2023. We have just returned to New Zealand after about two months overseas catching up on those things we could not do during the Covid pandemic. Had the deadline been during that period we note we would have lost the option of making a submission. Over the 34 years we have owned this property there have been many proposals for developments in the area and for changing the public corridors through it. This is the first notice of requirement and by luck we get only about 24 days to have a say regarding this proposed development.

There is growing pressure on the transport system in the Pukekohe area and we expect this will increase. Here and overseas the best way to deal with traffic pressure has been found to be the building of straight, direct, fast dual-lane expressways. The single most successful roading development in the Auckland area has been the Southern Motorway, which has provided brilliant service to the community for a long time. It has been so successful that the building of additional and support structures around it has lagged, and it has become clogged and inefficient -- but that is not a criticism of the motorway.

It is difficult, expensive and destructive to try to turn a two-lane local road into an expressway and the result creates the continuing problem of through traffic conflicting with local traffic, roadside activities and other modes of travel to the detriment of both through traffic and local traffic. For that reason, we favour a development along the lines of package 4 of the alternatives outlined on the council website, providing for a separate expressway, where the council considers it would be most useful, through greenfields. Once the through traffic has been separated, developments for the local roads remaining become much simpler. A more satisfactory result can be achieved with less destruction of existing arrangements, less delay, and hopefully less cost overall. Trying to upgrade local roads only inevitably results in short-term measures which will then need to be revisited and revisited as the area develops, duplicating the destruction, disruption to landowners and cost.

The council letter of 11 October advised us of a notice of requirement affecting our property at 140 Pukekohe East Rd, Pukekohe, being Part lot 1 Deposited Plan 62212 and Lot 1 Deposited Plan 80314 and being the land comprised and described in Certificate of Title NA75B/453 North Auckland Registry. The part of the property adjoining Pukekohe East Rd appears to be zoned for future developments although we are advised that such zoning permits us to carry on only farming activities. Unfortunately, since the property has acquired that zoning its rates have more or less quadrupled, making farming activities hopelessly uneconomic. That and the quickly changing local environment is forcing us to address the options we have with our future development zone sooner rather than later. Should the designations proposed proceed we expect we will need to pursue the procedure set out in section 185 of the Resource Management Act 1991.

The letter of 11 October does not give us a copy of any notices of requirement or set out how they specifically affect our property. It provides references to the websites for the Auckland Council and the Waikato District Council, upon which we note there are in fact two notices of requirement (appallingly set out) which directly affect our property being:

1. Notice of Requirement for a Designation of Land under Section 168 of the Resource Management Act 1991 dated 27 September 2023 applying to an area of land of about 11.7 hectares located between Pukekohe East Rd, Pukekohe and the Bombay interchange on Mill Rd, Bombay "... included in Attachment A of this Notice (NoR8) ...". Attachment A compiles a series of drawings with few references, measurements or marks but does contain

a reference 608893 to our property, advising that about 2147 m² of our land is to be designated. However, there are no measurements, directions, tags or descriptions to show what that area is and its dimensions and is therefore inadequate, defective and/or a nullity and the Notice should be struck out.

2. Notice of Requirement for a Designation of Land under Section 168(2) of the Resource Management Act 1991 dated 2 October 2023 applying to an area of land of the proposed Pukekohe South-East Arterial – NoR 5 “... shown on the Designation Plans included in Attachment A of this notice...”. Attachment A compiles a series of drawings with few references, measurements or marks, but does contain a reference 608893 to our property which advises that about 3205 m² of our land is to be designated. Again, there are no measurements, directions, tags or descriptions to show what that area is and its dimensions and is therefore inadequate, defective and/or a nullity and the Notice should be struck out.

We will file this submission separately for each of these notices to record our opposition to these proposals. Although the requiring authority for the first notice is Waka Kotahi NZ Transport Agency and for the second is Auckland Transport, these entities are working together with or for the Auckland Council which appears to have been organising the enormous amount of work that has been done. We will refer to that council but intend references to include the requiring authorities also where appropriate.

We have attended many meetings, speeches, discussion groups and presentations regarding proposed developments in the Pukekohe area over the years and have noted many plans for roading development in the area organised by the Franklin District Council and/or the Auckland Regional Council. We see some of these have been considered at least in part in the various suggestions set out in the council's Urban Design Evaluation. We expect that process will continue and the current thinking on what to do will change over time and will be modified by the developments which may be implemented by private interests around the roading network and by the council and others. We have seen some reports and documents regarding the Auckland Council's ideas and earlier this year we were invited to speak to council representatives about the road proposals. The representatives gave us a broad indication of the coming proposals but were not able to give us details on how that would affect our property. We raised some concerns and were advised to file submissions when the notification process began. We have not been visited or contacted by council staff to advance this or to consider whether the council can take an interest over our property or acquire the property or part of it.

Our property is used for pastoral farming and is about 1km from the Pukekohe built-up area. We are advised that several private applications have recently been granted to change parts of the future development zone between us and the built-up area to residential use and these now come up to part of our western boundary. There is also a group of rural residential properties beside Pukekohe East Rd in front of that western boundary. The front of our farm is now in the future development zone, which ends at our eastern boundary. During the 1990s Pukekohe East Rd was upgraded to widen and improve the road surface and to deal with some historical issues arising from previous road straightening. As part of this work a third lane of tar seal was installed in front of our property to provide a passing lane for traffic moving from Pukekohe towards Bombay. Since then, a series of changes were made to the intersection of Golding Rd and Pukekohe East Rd, culminating in the installation of a new roundabout which has been reasonably successful.

Most people in the Pukekohe area are focused on Auckland and choose to travel north along the State Highway 22 through Paerata to Drury. When the Auckland Southern Motorway was extended past Bombay, Pukekohe East Rd attracted more interest from travellers and the road has become

busier. We presume the road is mainly 20m wide along our boundary, which would approximate our measurements from fence to fence, although there is a road reserve on the northern side of the road resulting from a previous road realignment. The present road supports three lanes tar sealed for road traffic, and a shoulder, small bank and drain on each side. Over the past 30 years we have developed at considerable effort and expense a line of cherry, pohutakawa and pittosporum trees along our northern boundary adjacent to the road. They have been planted with gaps but provide a valuable physical barrier between the private rural property and the invasive public road and our neighbour to the east has continued the line with pittosporum trees along their frontage. The trees provide protection from the noise, sound and dust and some vibration from road users and at night substantially reduce the light pollution of vehicles and we would like to think that they beautify and enhance the area and improve the local amenity. They also protect road users from the prevailing south-westerly winds. Those benefits would continue to be appreciated by urbanised users of the property.

The council documents propose a new shared pedestrian and cycle path be erected along the southern side of the road and have indicated an area about 6m wide as being required for this. It is not clear how much of this 6m gap can be accommodated on the existing road and how much new ground the council demands from neighbouring properties. There is room on the existing road to install a footpath or footpaths on the existing area. We have ridden on many of the cycle ways and shared cycle paths in the Auckland area and most appear to be about 1-1.5m wide. Some have been a bit wider, but we struggle to see how 6m could be employed. We note a car lane is usually about 3m wide and that the council has contemplated four-laning the full length of Mill Rd and Pukekohe East Rd. It has indicated that providing four lanes at Mill Rd requires a road corridor 30m wide but where it proposes a two-lane road it indicates that a corridor 24m wide is sufficient for two road lanes, two walking paths, two cycling paths and seven medians, including two wide enough to support tree planting. We seek a solution that preserves our trees and object to their removal.

The council proposes installing a path on the southern side of Pukekohe East Rd but not having a path on the northern side of the road. We submit that this is a bad decision that will in time be regretted and reversed and a path will be installed on the northern side of the road, whether or not a path is present on the south side of the road, because:

1. The only footpath now on Pukekohe East Rd connects to one on East St coming out of Pukekohe and is on the north side. It extends in front of the Anselmi residential subdivision on the north side of Pukekohe East Rd up to Anselmi Ridge Rd. There is no footpath on the southern side coming out of Pukekohe on East St and up to Golding Rd. It is sensible to extend the existing path further along Pukekohe East Rd on the northern side before contemplating creating a new path on the southern side of the road now or in the future.
2. The council is concerned to not damage the Pukekohe East tuff ring. We have not identified in the documents what the Pukekohe East tuff ring is and where it is but we note that the council reports indicate that it is at present under Pukekohe East Rd and extending each side of it along part of that road in both the areas for designation Nor 5 and NOR8. Building a path beside the existing road will cause minimum damage to the tuff ring on whatever side of the road it is, but if a path is built on the southern side of the road and as we suggest a path will be recognised as needed on the north side of the road anyway there will be double damage.
3. The Pukekohe East crater lies to the north of Pukekohe East Rd and that road at present runs along that crater's edge. While there are many craters in the Auckland area, this crater is in remarkably good condition and is accessible to the public from Pukekohe East Rd and Runciman Rd to view as they drive past. Brave souls can choose to pull over to the shoulder

on the northern side to have a better look at the crater, which at present supports a polo field on the crater floor. The council suggests that a path on the southern side of Pukekohe East Rd will give an enhanced view of the crater, but this is rubbish. A path on the southern side of the road will give an enhanced view of three lanes of tar seal. Once the council has destroyed and removed all our trees and the neighbours' trees on the southern side of the road, a path on the south side will give a view of paddocks and in due course of urban living, plus a blast from the south-westerly winds. To gain an enhanced view of the crater, passersby would have to pull over to the north side of the road while driving west, as they do now, or walk across the vehicle lanes from the southern path. Not a satisfactory result. Many areas would value an unusual and interesting feature such as this and would try to make it available to the public and even perhaps create a viewing platform or area to assist this and improve local amenity. By placing the path on the southern side of the road the council deprives itself of the opportunity of creating such a viewing area or platform for the community.

4. Following previous road realignments there are several sections of road reserve beside Pukekohe East Rd. We have mentioned one on the northern side of the road opposite our property. At the top of the hill to the west is also a long section of road reserve. At the moment it's used as a gravel dump, although its eastern end can be used for parking for the Pukekohe East community hall and tennis court. These areas are already publicly owned and can be used for a path as well as supporting complementary facilities on the road's northern side. A path on the southern side of the road would require the acquisition or expropriation of private land, the destruction of private developments and rights for an area which cannot be incorporated and combined with the existing public areas on the other side of the road.
5. We see very few people walking along Pukekohe East Rd. There are a growing number of cyclists who use it. Clubs and groups normally travel in a mob, fast, wearing bright clothing using a car lane. We doubt they would change this practice. That leaves walkers and local cyclists etc and they would mainly use a pathway for access to and from the Anselmi residential subdivision, the new road the council proposes to build north of Pukekohe East Rd, to view the Pukekohe East crater, to reach of the Pukekohe East Hall and tennis centre or to go up Runciman Rd to the Pukekohe East residential area and school. All the areas likely to attract walkers and cyclists are on the northern side of the road.
6. The council shows concern for removing some trees on the northern side of Pukekohe East Rd should they decide to do work there. However, the same concern is not shown for removing numerous trees and lines of trees on the southern side of the road which are valuable to the tree owners and the community and the amenities of the area.
7. The land south of the Pukekohe East crater to the east of our property rises above the lip of the crater and a spur of that elevated area runs north into the crater. Pukekohe East Rd has been cut through that spur leaving a long, steep, high bank beside the carriageway on the southern side and a smaller steep bank on the northern side of the carriageway. Any road widening will require digging into those banks. A great deal more work and damage is required for a path on the southern side of the road.

A designation for 20 years

The Auckland Council proposes that the providing of a designation gives the people of the South Auckland area certainty that a roading system will be upgraded in the places as proposed by the council. This is not correct.

Under sections 9 and 176 of the Resource Management Act 1991 a designation on the district plan appears to work as a resource consent for the doing of the work allowed in the designation. They are in addition to any front-yard requirements in the district scheme. It does not permit or require the council to enter private property or do any work or make any alteration to a private property.

Therefore the people of the area can have no confidence that what the council now proposes can or will be done now or at any time in the future. However, under section 176 (b) no person (including the landowner) may without the prior written consent of the requiring authority concerned do anything in relation to the land subject to the designation that would prevent or hinder the proposed work, including any use of the land or subdivision of land or changing the character, scale or intensity of the use of the land.

So while the landowners affected by the designation have no certainty of receiving any benefit, they suffer severe restriction on their activities and rights of ownership of the property concerned for the period of the designation. For that loss and restriction of their rights they receive no consideration or compensation. This council acknowledges that while it has done a detailed business case for the development its plans are still in the concept stage and considerable detailed work is required, together with numerous more reports plans and investigations, before they do any work. For these reasons and the reasons given above we submit that the proposal which the notices of requirement set out is too vague, not clearly established and is not the best result or alternative available to show that the designations should be placed on the properties concerned.

The legislature has sought to limit the restriction and damage which can be created by the use of designations by placing a time limit before which the designation should lapse.

Under section 184 that time limit is five years unless a different time limit is stated, or a limit is extended. We submit that the council has not provided grounds which would justify an extension of a designation for longer than five years.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:926] Notice of Requirement online submission - Chris Feng
Date: Thursday, 9 November 2023 6:31:09 PM
Attachments: [NA56C-748_104 Golding Road.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Chris Feng

Organisation name:

Full name of your agent: Paul Zeng

Email address: fengchenglang@gmail.com

Contact phone number: 02102911085

Postal address:
104 Golding Road
Pukekohe
auckland 2677

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:
104 Golding Road, Pukekohe, Auckland, 2677

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Dividing the land into half will reduce the usage rate, making this land unfunctional in the local environment. This plan will generate negative effect on the environment and local economy, and is not consistent with the principle for sustainable development under the Resource Management Act. Not to mention that the property contains several native Totara trees that have grown for around a century. If owner wants to use the land in the future, he/she will need to cross the arterial road, which may lead to SERIOUS safety issue, due to the size of this road and the potential large traffic volume.

I or we seek the following recommendation or decision from Auckland Council:

Seeking the following decision: Place the construction from golding road to somewhere else.

Submission date: 9 November 2023

Supporting documents
NA56C-748_104 Golding Road.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?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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15 May 2023

G Feng & S Feng
18 Winstone Road
Mount Roskill
Auckland 1041

Kia ora

Property Address: 104 Golding Road
Record of Title number: NA56C/748
SG Reference Number: 534020

Pukekohe, Paerata, and south Drury future transport connections - Important information relating to your property.

We are writing to update you on essential transport infrastructure that is being planned in the next 20 to 30 years and what this may mean for you and your property.

Last year, we shared with the community the options we are looking at for a future transport network in Pukekohe, Paerata and south Drury. Since the conclusion of public feedback in late December 2022, we have continued to work on environmental and technical assessments to confirm those transport options. To find out more please visit our website <https://findoutmore-supportinggrowth.nz/pukekohe>

We can now share more detailed information with you about how our proposed routes could impact your property and the Notice of Requirement process to route protect certain areas of land for that purpose.

Enclosed with this letter is a plan showing a draft designation boundary and the extent of the potential impact on your property.

The proposed route and extent to which your property could be impacted may still change as further investigations and refinements are undertaken, including consultation with landowners, such as yourselves.

Once this work is completed, we will finalise the route for the project and seek the approvals required under the Resource Management Act 1991. At this stage, Waka Kotahi and Auckland Transport expect to lodge Notices of Requirement in late 2023.

We would like to talk with you about what the Notice of Requirement process means, answer any questions, and understand what support you may need before the process gets underway.

Please contact us to book a time to meet from 24 May to 16 June. We are available to meet with you over the phone, via an online meeting, or in person at Franklin: The Centre in Pukekohe or at our office in Auckland CBD if that works better for you.

What is a Notice of Requirement?

We are going through a Notice of Requirement process to officially designate and protect the land needed for future transport projects. This is a statutory process, similar to applying for resource consent under the Resource Management Act 1991.

You can read more about what a Notice of Requirement is at our website:

<https://www.supportinggrowth.govt.nz/property-owner-information/notice-of-requirement-process/>

Once the designation is in place, property owners, with some limitations, can continue to use, own, or sell their designated land until it is needed for construction.

These projects are not currently funded, so we are not seeking to purchase the land until funding becomes available, which may be in 20 to 30 years.

What happens next?

We expect to lodge the Notice of Requirement with Auckland Council by late 2023.

Auckland Council will then formally notify property owners, who can submit to support or oppose the designation and take part in a hearing, if they choose, as part of the decision-making process.

You can find information for property owners and an explanation of the route protection and Notice of Requirement processes on our website at: [supportinggrowth.govt.nz/property-owner-information](https://www.supportinggrowth.govt.nz/property-owner-information).

We know many of you may have been dealing with some uncertainty during our planning for future transport projects to support planned growth in your area. We hope this letter provides more clarity on the process ahead, how you may be impacted, and what actions you can take.

Please take the opportunity to meet with the Te Tupu Ngātahi team leading this project to talk about the Notice of Requirement process and ask questions about what this means for you.

Next steps – book in a time to talk to us

To book an online or in-person meeting:

- Scan the QR code or visit <https://calendly.com/d/ykz-cw4-tpk>
- Email us: info@supportinggrowth.nz
- Freephone 0800 GROW AKL (0800 4769 255)



Ngā mihi nui



Deepak Rama
Principal Transport Planner
Transport Services – System Design
Waka Kotahi NZ Transport Agency



Alastair Lovell
Auckland Transport Owner Interface Manager
Auckland Transport

Translation Support
Tautoko Takatau
翻译支持
번역 지원

Lagolago Faaliliu
Tokoni ki he Liliu Leá
ਅਨੁਵਾਦ ਸਹਾਇਤਾ

ترجمہ سپورٹ

If you would like this letter translated, or for a translator to support you during a meeting, please contact info@supportinggrowth.nz or call us on 0800 Grow Akl (0800 4769 255) and we can help arrange this.

Te reo Māori

Mēnā, e hiahia ana koe he reta Reo Māori, he kaiwhakamāori rānei hei tautoko i a koe i roto i te hui. Tuku īmera mai ki info@supportinggrowth.nz
He karere rānei ki te nama 0800 Grow Akl (0800 4769 255) ā, kātahi mātou ka āwhina ki te whakarite.

中文

如果您希望翻译这封信，或希望翻译人员在会议期间为您提供支持，请联系
info@supportinggrowth.nz或致电 0800 Grow Akl (0800 4769 255) 我们可以帮助安。

한국어

이 편지의 번역을 원하시거나 회의 중에 번역가의 도움을 받으려면 info@supportinggrowth.nz 로 연락하거나 0800 Grow Akl (0800 4769 255) 로 전화해 주시면 준비를 도와드릴 수 있습니다.

Gagana fa'a Sāmoa

Afai e mana'omia se fesoasoani i le fa'aliliuina o lenei tusi i le tatou gagana Samoa, ae fa'apea fo'i e mana'omia se tagata e fa'aliliuina o le gagana Samoa i le gagana Peretania i le taimi o le fonotaga, fa'amolemole fa'afeso'ota'i le info@supportinggrowth.nz, pe vala'au mai i le 0800 GrowAkl (0800 4769 255) ona e mafaiona matou fesoasoani i lenei mataupu matagofie.

Lea faka-Tonga

Kapau 'oku ke fie ma'u ke liliu 'a e tohi ni, pe ko ha tokotaha liliu lea ke poupu'u i koe lolotonga ha fakataha, kataki 'o fetu'utaki ki he info@supportinggrowth.nz pe telefoni mai kiate kimautolu 'i he 0800 tupu Akl (0800 4769 255) pea 'e lava ke mau tokoni 'i hono fokotu'utu'u 'eni.

ਪੰਜਾਬੀ

ਜੇਕਰ ਤੁਸੀਂ ਇਸ ਚਿੱਠੀ ਦਾ ਅਨੁਵਾਦ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ, ਜਾਂ ਇੱਕ ਅਨੁਵਾਦਕ ਲਈ ਇੱਕ ਮੀਟਿੰਗ ਦੌਰਾਨ ਤੁਹਾਡੀ ਮਦਦ ਕਰਨ ਲਈ, ਕਿਰਪਾ ਕਰਕੇ info@supportinggrowth.nz ' ਤੇ ਸੰਪਰਕ ਕਰੋ ਜਾਂ ਸਾਨੂੰ 0800 Grow Akl (0800 4769 255) 'ਤੇ ਕਾਲ ਕਰੋ ਅਤੇ ਅਸੀਂ ਇਸਦਾ ਪ੍ਰਬੰਧ ਕਰਨ ਵਿੱਚ ਮਦਦ ਕਰ ਸਕਦੇ ਹਾਂ।

اردو

اگر آپ چاہتے ہیں کہ اس خط کا ترجمہ ہو، یا کسی مترجم کے لیے ملاقات کے دوران آپ کی مدد کرے، تو براہ
پر info@supportinggrowth.nz 0800 Grow Akl (0800 4769 255) پر رابطہ کریں یا ہمیں
کال کریں اور ہم اس کا بندوبست کرنے میں مدد کر سکتے ہیں۔

DRAFT



Aerial imagery supplied by Neormap Australia Pty Ltd
Road names LINZ and ESRI Community Maps

Path: P:\381\3810934\TGI011 Map\06 ArcGIS Pro\04 SouthSGA_Pro_S_Pukekohe_PropertyPlans.aprx Name: SGA-EN-PUK-005-NoR 5

LEGEND

- Your Property
- Indicative area of your property within draft designation boundary

Earthworks	Retaining Wall	Cycleway	Proposed Design
Verge	Road Corridor	Verge Material/Median	
Bridge	Footpath	Stormwater Wetland/Attenuation Device	

Owner ID:534020
Title No: NA56C/748
104 Golding Road
Pukekohe South East Arterial (NoR 5)
Date : 11/05/2023

NOTES

- Property Boundary data derived from Land Information New Zealand
- This map shows the area of land that may be affected by the route
- This plan may not include all the land in your ownership over a wider area
- Blue hatched area for the proposed designation may also include areas to enable temporary construction works to take place

The recipient receives this information in confidence and in good faith to assist with discussions with the members of the Te Tupu Ng tahi Supporting Growth team. In receiving this information, the recipient acknowledges that this information is in draft form and may be subject to further amendments including (but not limited to) prior to the lodgment of the notice/s of requirement for the Level crossing removals and replacement projects, and as part of any subsequent detailed design process. The recipient further acknowledges that Te Tupu Ng tahi has no obligation to provide any such amendments or updates to the recipient as part of this process or otherwise.

This map contains data derived in part or wholly from sources other than those party to the Supporting Growth Alliance, and therefore, no representations or warranties are made by those party to the Supporting Growth Alliance as to the accuracy or completeness of this information. Map intended for distribution as a PDF document. Scale may be incorrect when printed.



My name is Craig Mills, I represent DH and IM Mills Properties, the land holders of 107 Golding Road. I am writing in opposition to the proposed NOR 5 plan (Pukekohe southeast Arterial) namely the notice of requirement for the property at 107 and 107a Golding Road, (Property ID - 609146 / Title Number - NA69C/823 / Legal Description - Lot 1 DP 120316). For the purpose of this document, I will hereafter refer to DH and IM Mills properties as Mills Properties

We are not opposed to the entirety of the plan, quite the contrary, we feel that the infrastructure throughout Pukekohe is in desperate need of upgrades, especially on Golding Road, where the driveways are blind, and the road surfaces are dangerously slick. It is a very unsafe road and needs to be a priority for upgrade. What we are opposed to is the requirement and usage of the front of the property and residential section at 107 Golding Road.

With proposed earthworks indicated to commence over the front of the property, including the front of the residential structure and within meters of the commercial building. This will render both areas of the property unusable during the time of works and large re developments needed to make the properties suitable for Mills Properties needs after the proposed works are completed.

There are many reasons why we feel that an alternative solution to the proposed notice of requirement and Auckland unitary Plan NoR5 should be sought. I will lay these out in no particular order.

- 1) Mills Properties purchased this property with the plan to develop it to better suit the needs of their business'. With the proposed earthworks and requisition of the front of the property, the commercial area will be unusable during the time of works and will require a large amount of redevelopment afterwards to return it to a useable state which will result in the useable land being drastically reduced.
 - a) The works that will need to take place at 107 Golding Road commercial area will cut through the front of the property close to the building, making it impossible to manoeuvre our transporter trucks to the rear of the building where Absolute Towing Ltd store their customers vehicles and do the majority of their daily activities.
 - b) The difference in height between the road and the existing building site is between three and four meters so the cut back on that drop will come very close to the building. This means that an alternative driveway would be needed to be cut opposite Royal Doulton Drive. Due to the nature of the land and the trucks that need to have access this alternate driveway would cut roughly 30 metres back into the property and split the useable land in two rendering the end of the building inaccessible and roughly 200 square metres of land would become unusable.
 - c) The works at the residential section will stop Absolute Towing from having any access to the top paddock, to remedy this there will need to be an alternative drive that would have to be built at the rear of the property. Roughly 50 metres in length.



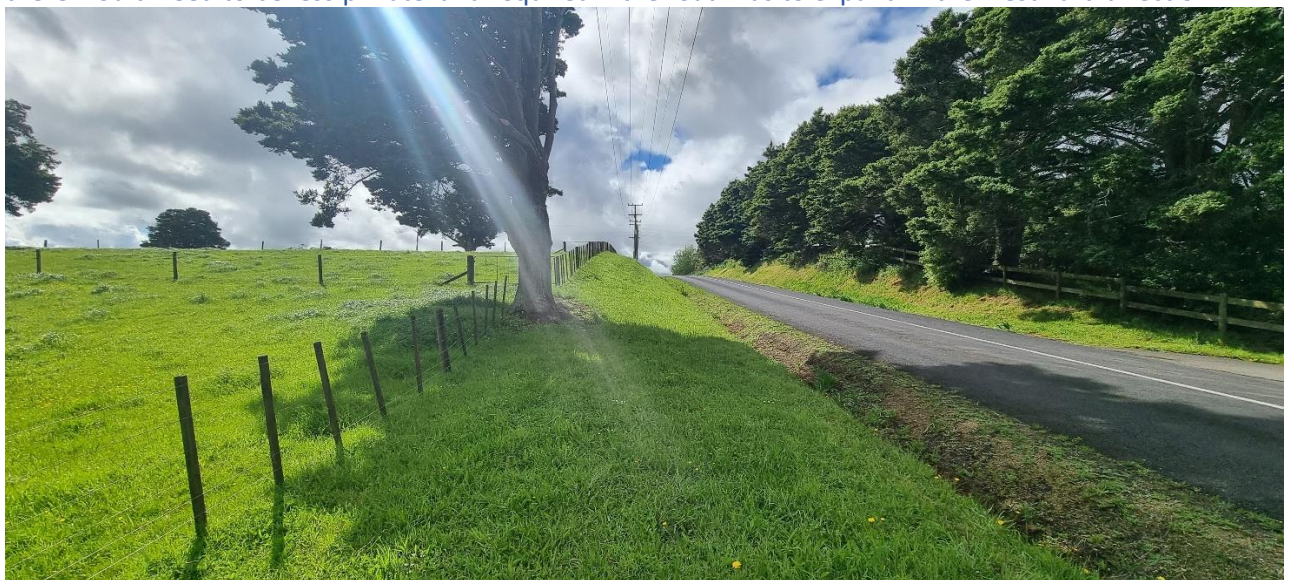
- 2) Mills Properties purchased 107 Golding Road in part to assist a family member who had fallen on hard times, in being able to occupy his own home, in what they were planning on being his “forever home”. During the works the residential structure will become uninhabitable and the garaging at the residential section will need to be removed. The family member that is occupying the residential section at Golding road. Has had a tumultuous few years with a failed marriage, some personal issues and business setbacks. This has resulted in him battling with depression and anxiety. To then inform him he will lose his home and section and expect him to move out and then rebuild after the works are done, this would be a lot for anyone to cope with let alone someone in his situation. The relocation costs would be roughly 5-10 thousand dollars and the rental costs for this would be roughly \$31,000.00 per annum and roughly \$9600 for storage rental per annum, at today’s market.
 - a) The threat of this requisition will mean that the family member occupying the residential section at 107 Golding Road will be unable to do the desired developments to his property and the desired renovations to the home or if he does it could be wasted money. He has plans to concrete the driveway and shed and refurbish the exterior and interior of the house as well as installing a pool and a pool house/sleepout for his adult children.
 - b) Leaving the occupier of the house in limbo for the next 10-20 years being unable to follow through with their plans is unacceptable. Asking anyone to do that is unacceptable.
- 3) Mills Properties is owned by David and Irene Mills, they also own the business that occupies the commercial area, namely Absolute Towing Limited. Absolute Towing Limited contracts to the New Zealand Police amongst many others including IAG and AA and private customers. Part of the Police contract is storing vehicles and providing undercover storage/workspace for forensic investigation. During the time that the works are underway we will not be able to access our building or our storage yard which will result in large costs to provide alternative solutions to continue to meet the requirements of the New Zealand Police and the major insurance companies
 - a) Once the earthworks and developments are completed the premises will not be adequate for its desired purposes.
 - b) Mills Properties have plans to upgrade the commercial building at 107 Golding Road, these upgrades will move the building slightly forward towards the road frontage with doors in the south end of the building. If these works are to go ahead the new building and property will become unusable and redevelopments will need to be completed to have the property meet Absolute Towing’s requirements once again, this could include shifting the building which would be extremely expensive.
- 4) We are concerned for the security of the vehicles in our storage whilst the works are to be completed. While Absolute Towing store vehicles they are liable for the security of the vehicles. With hundreds of workers having access to our yards how can AT guarantee the safety and security of our yard and the vehicles and equipment being held within. Temporary fencing will not meet the security requirements of the New Zealand Police or any of the major insurance companies that we contract to. The works that have been proposed will cut through our security fencing and provide ample points of entry. Not to mention the workers that will have access to and visibility of our site. And the sensitive information that they could pass on regarding vehicles stored in our yards.
- 5) Mills properties have future plans to develop the paddock area between the commercial area and residential section in part to accommodate the expected growth of the business, as well as provide further revenue as a public self-storage provider. Similar to the likes of National Storage or Storage King. This will not be feasible if the land area is reduced by the amount the council is proposing to acquire. The losses of revenue from failing to develop that part of the property would be in excess of \$1,000,000.00. The losses in revenue if that property is developed, then part of the land acquired and access is then blocked to customers, could be in the hundreds of thousands depending on the time required to complete the works and customer dissatisfaction and relocation, and loss of buildings etc.

We see a couple of alternatives to the development of the road and roundabout proposed to be situated in front of and encompassing 95, 101 and 107 Golding Road.

1. Firstly, the proposed roundabout could easily be shifted east towards Pukekohe by a matter of meters to occupy the available farmland (104 Golding road opposite 101 Golding road), that is already being earmarked for requirement, this would avoid unnecessarily destroying three homes and a business, as the widening that is required for the roundabout could be avoided and only a small amount of widening for the footpath/bike lane would be required at those properties. The farmland on the opposite side of the road is not only unoccupied by habitation but also allows for the widening of the road without causing owners and tenants to relocate. The houses at 52, 78 and 84 Golding Road would only be minimally affected by the widening of the road towards their side of the road and would not need to relocate during the works. As opposed to 95, 101, and 107 who will lose their homes entirely.



- c) The distance between the property boundary and the road on the west side of the road closest to Pukekohe is roughly 6 meters as opposed to 2.5 - 3 meters on the East side of the road closest to Bombay. Meaning there would need to be less private land required if the road was to expand in the westward direction.



- b) The land on the west side of the road is less obstructed than the east side of the road in the fact that the east side of the road has multiple large trees and hedging that are situated on the roadside and provide a wind block and privacy for the affected properties. The west side of the road has one tree on 110 Golding road that may be an obstruction. Mills Properties has in excess of 10 trees along 7 of which are very large and multiple smaller trees and hedging.



2. Secondly, we see an alternative route utilising existing Royal Doulton drive in replacement to the proposed roundabout, this alternative route could avoid major earthworks and save expenses. AT would still require multiple properties but less than the current proposed plan, the required properties at the end of Royal Doulton Drive are relatively flat compared to the existing plan which could also result in reduced costs. The proposed widening of the road continues down to Royal Doulton drive with the existing NoR 5 plan, and the distance between Golding Road and Svendsen would be the same. We believe that running a new road down Royal Doulton would also result in less obstruction during the project and again only rural land would be required. Nobody would have to leave their home.



- d) We believe this would also be safer as there would be ample visibility coming down the hill opposed to arriving blindly at a roundabout situated on the top of a hill.
- e) A roundabout could be situated at the intersection of Royal Doulton without having to acquire large amounts of land and cut up as many farms.

We notice that the proposed works seem to dog leg around the property at 84 Golding Road. So that this property is completely unaffected by the works (See map [SGA-PA-P-005-NOR05_PSEA - P:\381\3810934\TGI\01 Map\06 ArcGIS Pro\04 South\SGA_Pro_South_Pukekohe_Designation_Plan_Deliverable.aprx](#)). Does this property have some kind of immunity to requisition? Our proposed alternative solutions would require this property to sacrifice a small amount of the front of the section. We gather that the resident / Landowner would be opposed to our alternative, but we fail to see how three properties should be devastated so that one property should remain unaffected. I'm sure that with some reworking of the plan, we can come to a solution that doesn't require homes to be destroyed. We understand that we may all need to sacrifice a small amount of land to the upgrades, and we are happy to have discussions with the council about the requisition. But we are not prepared to sacrifice the large amount of our land currently requested and damage our home, our business and our prospects in the future when there is a non-occupied alternative available.

We would like to discuss this further and understand what restrictions this plan would put against our premises, for when we begin to develop the land in the near future. For example, if we were to continue our plans and apply for consent to construct a building in the path of these current plans would it be declined on the basis that the council have earmarked the land for future requisition?

In conclusion we are opposed to NoR 5, requisition of part of 107 and 107a Golding Road, (Property ID - 609146 / Title Number - NA69C/823 / Legal Description - Lot 1 DP 120316) we are opposed to this requisition due to the potential losses occurred during the time of development, and the reduced usability of our property during and after the works are completed, as well as the inability to develop our property which will hinder our growth, and the state of limbo that this would put our family and business for the next 20 to 30 years. We strongly encourage the council to reconsider the proposed plans and invite the designers and engineers to come and visit with Dave and myself, to discuss more appropriate options.

Thank you for your consideration to our opposition.

Sincerely,

Craig Mills
0274208595
Craig@curlys.co.nz

DH and I'm Mills Properties



Birch Rd

Dustless Blasting Counties

Gelding Rd

Pukekohe Showgrounds

Youngs Grove

Counties Radio Controlled Car Club

Pukekohe Car Club

Station Rd

Stables Rd

Olivale Grove

Royal Doulton Dr

Royal Doulton Dr

Lincoln Farm



MEGA Pukekohe

Google

340



341



Golding Rd

Golding

Golding Rd

Golding Rd

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Google

Layers





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107A

ROADSIDE SERVICE
CLARENCE
2014 1000 1000 1000





107A



Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:

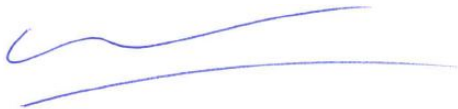
Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

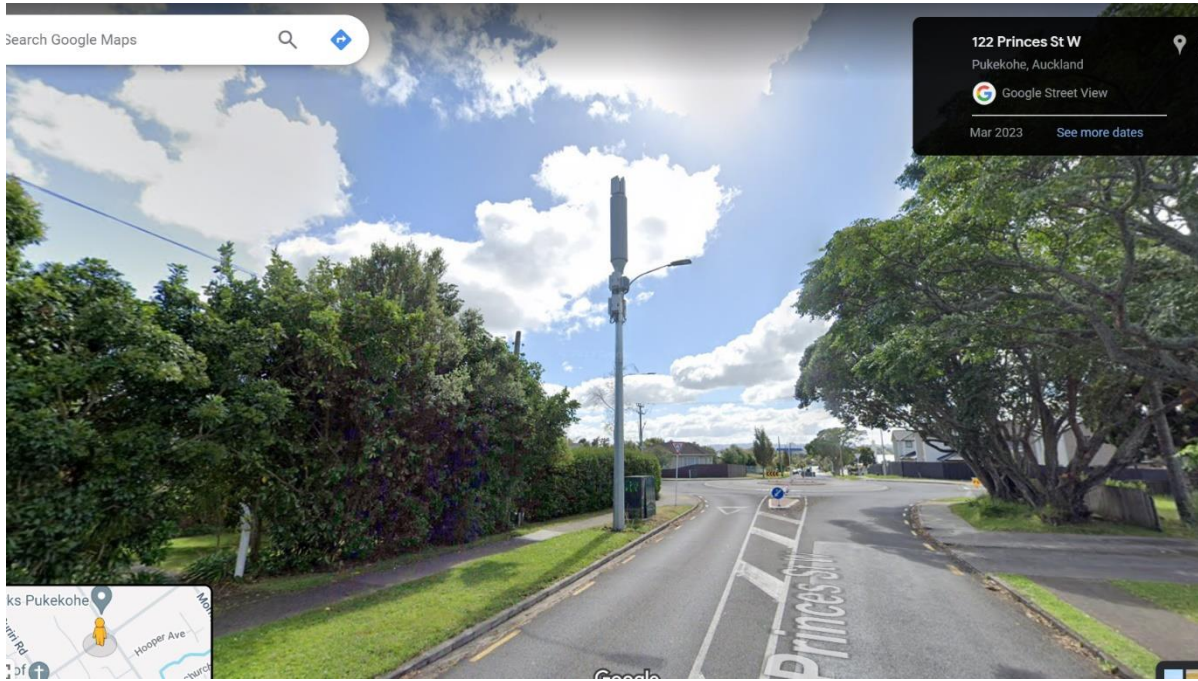
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

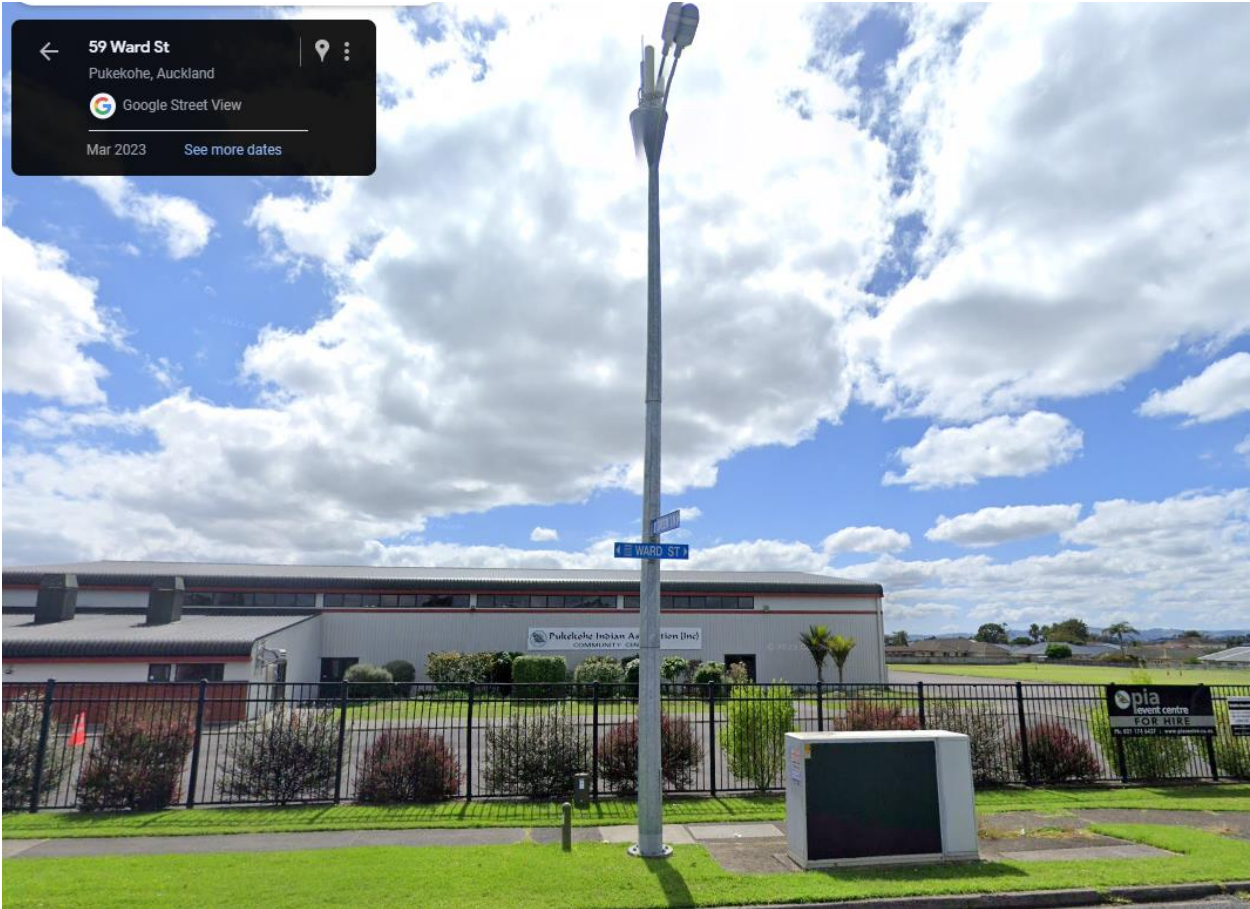
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

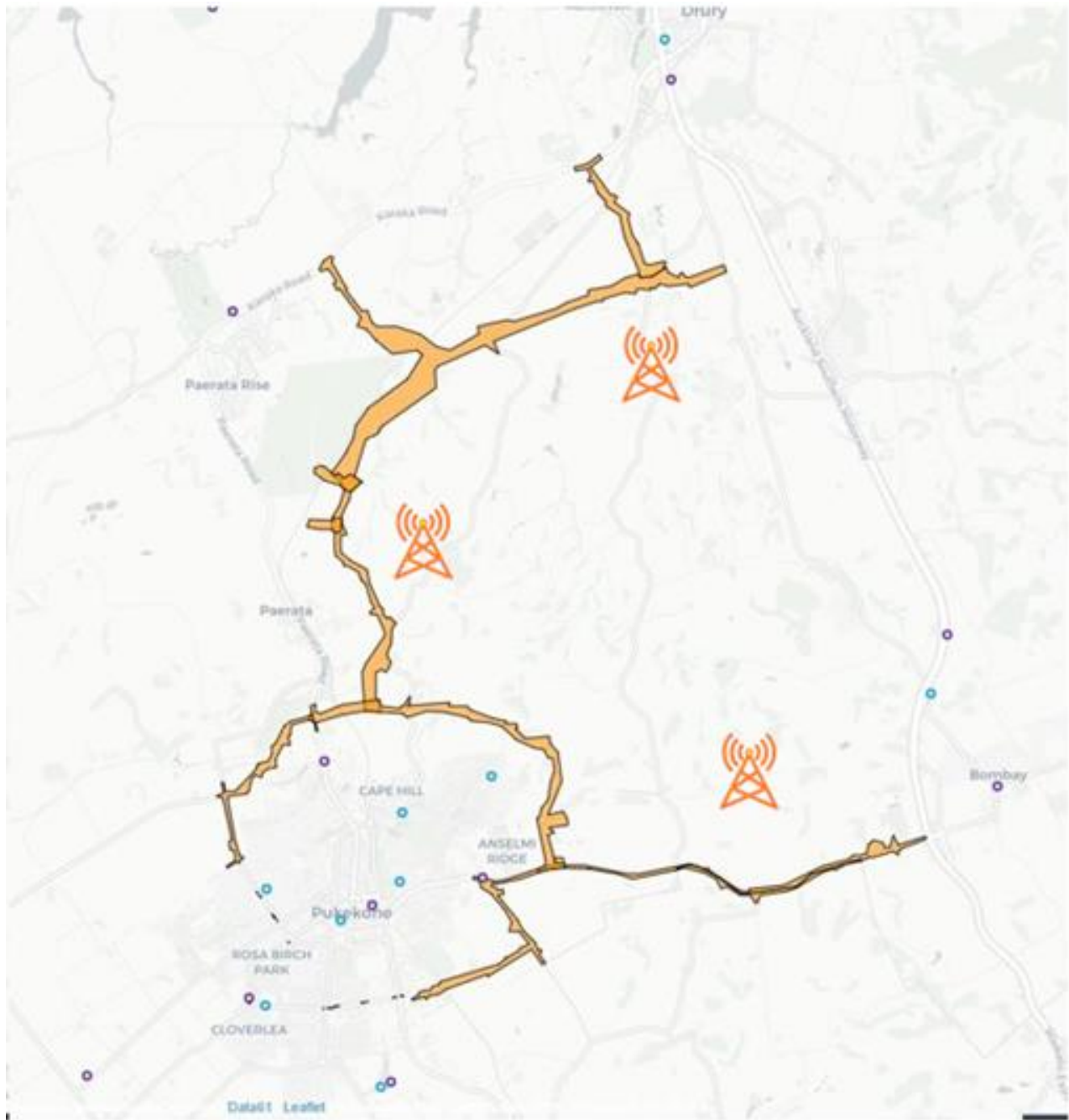


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

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

Address for service of Submitter

Telephone: Email:

Contact Person: (Name and designation if applicable)

Jade du Preez, Legal Counsel

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 5: Pukekohe South-East Arterial

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

My submission is:

I or we support of the Notice of Requirement I or we oppose to the Notice of Requirement
I or we are neutral to the Notice of Requirement

The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council *(give precise details including the general nature of any conditions sought).*

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



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

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

**SUBMISSION ON NOTICE OF REQUIREMENT FOR DESIGNATION
PUKEKOHE TRANSPORT NETWORK – NOTICE OF REQUIREMENT 5:
AUCKLAND TRANSPORT PUKEKOHE SOUTH-EAST ARTERIAL**

TO: Auckland Council

This submission is made by Enviro NZ Services Limited (**Enviro NZ**), on the Notice of Requirement by Auckland Transport for a Route Protection Designation for the construction, operation and maintenance of the Pukekohe South-East Arterial, comprising Notice of Requirement 5 (**NoR 5**) for the wider Pukekohe Transport Network Project (**the Project**).

Enviro NZ is not a trade competitor for the purpose of s 308B of the Resource Management Act 1991.

This submission relates to the entire Notice of Requirement (**NoR 5**) as it affects or relates to Enviro NZ's site at 10 Austen Place, Pukekohe.

Enviro NZ opposes NoR 5 on the following grounds:

Site and context

- (a) Auckland Transport proposes to designate Enviro NZ's entire 8,154 m² site at 10 Austen Place (**the Site**), for the Pukekohe South-East Arterial component of the Project, and specifically for the construction, operation and maintenance of a new transport connection between Golding and Svendsen Roads, Pukekohe, across the North Island Main Truck Rail Line (**NIMTL**).
- (b) Enviro NZ owns and operates the Pukekohe Transfer Station Resource Recovery Centre (**RRC**) on the Site, providing the only waste transfer service for Pukekohe and the wider South Auckland region, with the nearest equivalent facility being in Drury. The RRC services the towns of Pukekohe, Karaka, Waiuku, Glenbrook and Awhitu Peninsula, with a combined population of approximately 44,000 and a catchment area of circa 400 km².
- (c) The principal waste transfer facilities on the Site were constructed in 2005 and are operating at near capacity (36,000 tonnes per year). Enviro NZ has plans for further capital investment in the Site, to enable it to meet projected demand for the services provided.
- (d) The RRC's customer base comprises a mix of local authority controlled residential kerbside collections and private commercial collections, as well as direct public visitors to the Site from throughout the southern Auckland region. The RRC provides refuse disposal services and recycling services to the region.

- (e) The Site is suitably zoned Business – Light Industry under the operative Auckland Unitary Plan (**AUP**), and accessible from Manukau Road, an arterial road in the general business and light industrial area of Pukekohe.
- (f) As the Assessment of Environmental Effects (**AEE**) and supporting Assessment of Transport Effects (**ATE**) for the Project record, the Pukekohe-Paerata Structure Plan 2019 and recent AUP plan changes anticipate and provide for significant growth in this part of the Auckland region,¹ and demand for waste transfer facilities will increase proportionately accordingly. This includes rezoning of virtually all of the residential zoned land within the Pukekohe township from Mixed Housing – Suburban to Mixed Housing – Urban or Terrace Housing and Apartment Building zones (under Plan Change 78), i.e. at significantly greater intensity.
- (g) There are currently no known and available, suitably zoned and located alternative sites to which the RRC could relocate to meet the current and future expected demand for waste transfer services, and there is a significant lead in time for consenting and constructing an alternative facility, even if such a site were potentially available. Under the AUP there is a 300 m buffer requirement to obtain an air discharge consent as a controlled activity for a new waste transfer facility in the Light Industry (Business) zone, relative to any adjacent residential property. Under the Pukekohe-Paerata Structure Plan, the nearest future potentially suitable zoned land is some 1-2 km south of the Site, but may not be zoned for the purpose until 2035 or beyond.
- (h) In the meantime, Enviro NZ has no zoning or land acquisition powers as a waste infrastructure provider and (consenting issues aside), would be reliant on Auckland Transport requiring authority powers to access any suitably zoned and located alternative site, when and if that future zoning is ultimately in force.

Planning Blight and Uncertainty

- (i) In the meantime also, there is substantial uncertainty surrounding the timeframes for (and implementation of) the overall Project, noting the following statements in the AEE and ATE:
 - (i) Auckland Council’s updated Future Development Strategy as currently under development² proposes a new timeframe of land development (needing to be supported by the Project), which sequences land development later than originally proposed under the Council’s 2017 Future Urban Land Supply Strategy (**FULSS**).³

¹ Refer AEE pages 41- 44, ATE page 30.

² Noting that since the AEE was prepared, the strategy was adopted by Auckland Council on 6 November 2023.

³ AEE page 18, ATE page 31.

- (ii) The network envisaged by the Project is unlikely to be implemented until urbanisation is (at least) confirmed, and if urbanisation does not occur it is likely that the network will not be constructed.⁴
- (j) As the draft Integrated Transport Assessment (**ITA**) for the Drury-Opāheke and Pukekohe-Paerata Structure Plan areas prepared in 2019 records, the network recommended to support future growth in these areas (as then envisaged under the FULSS) assumed a full build out as at 2048.
- (k) As the AEE further records:
- ...a key purpose of these NoRs is to protect the necessary transport network that will support the future urbanisation of Pukekohe, Paerata and Drury. Accordingly, it is anticipated that the network will not be constructed and operational until urbanisation of the Pukekohe, Paerata and Drury West growth area has at least been confirmed or is under development.⁵
- (l) In this context, the Notices of Requirement for the Project (including NoR 5) are for **Route Protection** designations, rather than enabling new transport infrastructure in the short to medium term.⁶
- (m) In that regard, the AEE further records:
- The key objective of Te Tupu Ngātahi is to protect land for future implementation of the required strategic transport corridors/infrastructure. As a form of route protection, designations will identify and appropriately protect the land necessary to enable the future construction, operation and maintenance of these required transport corridors/infrastructure.⁷
- (n) Similarly, the AEE proposes a 20 year lapsing date in order to (*inter alia*):
- Provide statutory protection of the land required for transport infrastructure to support future growth in a manner that recognises the uncertainty associated with the timing of that growth.⁸
- (o) As matters stand however, and for an indefinite period of up to two decades from the lodging of NoR 5, Enviro NZ is not able to do anything on its Site which would “prevent or hinder” the Pukekohe South-East Arterial Project from proceeding, without written consent from Auckland Transport (s 178 of the RMA).

⁴ AEE page 33.

⁵ AEE page 38.

⁶ With the National Policy Statement – Urban Development (**NPS-UD**) defining medium term to be between three and 10 years.

⁷ AEE page 4.

⁸ AEE page 32.

- (p) Specifically, Enviro NZ is effectively precluded from initiating and completing its planned expansion of facilities on the RRC Site to meet existing and projected demand, along with meeting ongoing (and future renewed) discharge consent requirements as will likely require new physical works (additional mitigation facilities), on the basis that such investment and activities might:
- (i) Prevent or hinder the proposed (future) work, by establishing new buildings and facilities within the designation footprint of the proposed roading corridor; and
 - (ii) Adversely affect the amount of compensation available to Enviro NZ, assuming the Project ultimately proceeds and acquisition of the Site follows the designation under the Public Works Act 1981 (**PWA**).
- (q) In this overall context, the proposed 20 year lapsing date is patently unacceptable and tantamount to an abuse of Auckland Transport's designation powers; blighting all directly affected properties for an excessive period of time, and in circumstances where the designations sought are to secure Route Protection for a prospect, rather than to enable any work that is known to be reasonably necessary, in the short to medium term.

Significant adverse effects on environment

- (r) Ultimately however, and assuming implemented, the designation and work under NoR 5 would force the entire Site and RRC to close, without any current known or foreseeable alternative site or feasible replacement scenario (as submitted above).
- (s) In addition to these direct, immediate and long term severe effects of the designation for the RRC (as borne by Enviro NZ), the wider adverse social and economic effects must be considered. In that regard, the RRC represents key social infrastructure serving the people and communities of the South Auckland region, falling within the definition of infrastructure under the Natural and Built Environment Act 2023 (**NBEA**), s 7 (district or regional resource recovery or waste disposal facilities), and NPS-UD (additional infrastructure definition, specifically).
- (t) The inability to sensibly (and without material risk) maintain, upgrade and expand the waste transfer facilities and services on the Site to meet existing and projected demand, along with future consenting requirements, for up to two decades before the designation is activated, will adversely affect those people and communities reliant on the waste transfer facilities and services provided by the Site. There is no assessment of this wider social, community and economic impact in NoR 5 or the supporting documentation, whatsoever.

- (u) Overall, the designation and work would have a significant adverse effect on the environment, as defined under the RMA to include physical resources, people and communities, and the social and economic conditions which affect them.

Designation footprint excessive – not reasonably necessary

- (v) Designation impacts aside, the work as proposed and as would directly affect and occupy the entire RRC Site, is not necessary to meet the objectives for NoR 5, as set out on page 14 of the AEE specifically.
- (w) The proposed designation footprint (Form 18, Sheets 10 and 11) is intended to provide for:
 - (i) Nine development lanes including (in addition to the two lanes for general traffic), two cycling lanes, two pedestrian lanes, two landscaping corridors, and a central corridor between the two general traffic lanes, over a total corridor width of 24 m.⁹
 - (ii) Batter slopes and bridge construction along with a 20 m corridor for construction access and environmental controls.¹⁰
- (x) The designation footprint under NoR 5 is excessive, with the corridor as affects the Site essentially serving as a ‘bypass’ (enabling through traffic movement) rather than connecting key destinations such as schools, town centres or public transport centres (railway stations or park and ride bus facilities). 9 lanes of transport corridor are not needed in that context, nor to meet the NoR5 objectives.
- (y) Similarly, extensive and excessive areas of land are being designated for batter slopes (as would occupy a substantial portion of the designation footprint affecting the site), bridge construction and associated construction access, despite the current design being indicative only, recognising the “flexibility” required due to the uncertainty of the future urban environment.¹¹
- (z) In short, the designation footprint is over inflated and speculative rather than reasonably necessary, to enable the intended work to achieve the relevant Project objectives.

Inadequate consideration of alternatives

- (aa) In that regard, the consideration of alternatives to the designation and work has been manifestly inadequate, as well as irrational. There has been no:

⁹ Pukekohe Transport Network Assessment of Alternatives Report (**Alternatives Report**), page 167.

¹⁰ AEE page 35.

¹¹ AEE page 34.

- (i) Assessment proportionate to the scale of impact on (and including) Enviro NZ, the RRC Site, and communities affected by the NoR 5 designation and ultimate Site closure, or
 - (ii) Effective engagement with land owners on an informed basis enabling a reasonable opportunity to respond before route, site and method assessments were completed by Auckland Transport, with the 'Options Assessment Report' prepared prior to lodgement of NoR 5, instead withheld from Enviro NZ during the consultation process.
- (bb) The Alternatives Report lodged with NoR 5 reveals that, at the Route Refinement level of assessment:
- (i) No assessment was made of the "social cohesion" effects of the constrained and ultimately displaced provision of waste transfer services in Pukekohe for the people and communities of South Auckland. Nor were the impacts on public health and safety from the lack of waste infrastructure assessed;
 - (ii) Route PSEP-S3-01 (the southern-most route investigated over the NIMTL) was instead "least preferred" for the social cohesion criterion, due to impacts on existing industrial development and the retail activities of the Mitre 10 complex;¹² i.e., giving preference to retail and industry generally, over effects on waste transfer infrastructure;
 - (iii) The selected (preferred) route S3-02 as affects Enviro NZ's Site has a worse score (greater adverse impact) in the Multi-Criteria Analysis (MCA) Table for "land requirements",¹³ than the route (S3-01) said to be "not preferred" on that criterion (again, due to impacts on the Mitre 10 complex);¹⁴
 - (iv) The preferred route (S3-02) as affects Enviro NZ's site is recognised in the assessment as having the largest impacts on the environmental criteria of landscape and visual (loss of a daylighted stream corridor) and ecology, along with stormwater (having the largest effect on flooding with the largest flood plain effects from earthworks);¹⁵ and
 - (v) Again, contradicting that assessment, the MCA Table records the preferred option (S3-02) as having the same or lesser adverse impact in terms of landscape, ecology and natural hazards as the options being discarded (S3-01 and S3-03).¹⁶ To the extent determined by the MCA

¹² Alternatives Report page 172.

¹³ Alternatives Report page 170.

¹⁴ Alternatives Report page 172.

¹⁵ Alternatives Report pages 172-173.

¹⁶ Alternatives Report page 170.

scoring, incorrect MCA ratings appear to have led to an inferior corridor route being preferred.

- (cc) These points aside, and on the information available to Enviro NZ, Auckland Transport has failed to consider alternatives for the crossing of the NIMTL which do not require a batter slope (including at grade options and/or use of a retaining wall) and therefore such an extensive footprint occupying the entire RRC Site.

Statutory Tests

- (dd) The designation and work would be contrary to the objectives and policies of Chapters B2 and B3 of the AUP and the NPS-UD which provide for social and community infrastructure, in order to meet the foreseeable needs of people and communities, and in particular, as to the following provisions of these instruments:
 - (i) A quality built environment Objectives B2.3.1(1), and (3).
 - (ii) Residential Growth Policy B2.4.2(6).
 - (iii) Social facilities Objective B2.8.1(1), Policy B2.8.2(4).
 - (iv) Infrastructure Objectives B3.2.1(2), B3.2.1(3), B3.2.1(4), B3.2.1(5).
 - (v) Infrastructure Policies B3.2.2(1), B3.2.2(2), B3.2.2(4), B3.2.2(5).
 - (vi) Transport Policy B3.3.2(7).
 - (vii) NPSUD Objective 1.
 - (viii) NPSUD Objective 6.
 - (ix) NPSUD Objective 8.
 - (x) NPSUD Policy 1(c).
 - (xi) NPSUD Policy 10(b) and Clause 3.5 regarding the availability of additional infrastructure.
- (ee) The designation and work are contrary to the stated objective (page 15 of the AEE) of integrating with and supporting planned urban growth, as to the continued and sufficient provision of waste transfer infrastructure, specifically.
- (ff) The designation and work would be contrary to the sustainable management purpose and principles of Part 2 of the RMA, including for failing to sustain the potential of the physical resources of the RRC Site to meet foreseeable needs, and the efficient use and development of the RRC Site.

In summary and for all of these reasons, NoR 5 should be withdrawn as it affects the Site, having regard to the statutory tests in s 171 of the RMA.

Enviro NZ seeks that NoR 5 be cancelled or modified so as to delete the Site from the designation footprint, and otherwise be withdrawn.

If others are making a similar submission Enviro NZ would consider presenting a joint case with them.



Martin Williams
Counsel for Enviro NZ Services Limited

Date: 10 November 2023

Martin Williams
Barrister
21 Browning Street / PO Box 754
Napier 4140

Tel: (06) 835 0665
0274 490 676

Email: martin@shch.nz

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:931] Notice of Requirement online submission - Xiaoli Chen
Date: Saturday, 11 November 2023 7:30:39 AM

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Xiaoli Chen

Organisation name:

Full name of your agent:

Email address: d.law@barfoot.co.nz

Contact phone number: 0215853339

Postal address:

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we are neutral to the Notice of Requirement.

The reason for my or our views are:

AT need to give us a date or time frame for the upgrade of the Road

I or we seek the following recommendation or decision from Auckland Council:
no date or time frame I am not interest to discuss selling my some of my land to AT

Submission date: 11 November 2023

Attend a hearing

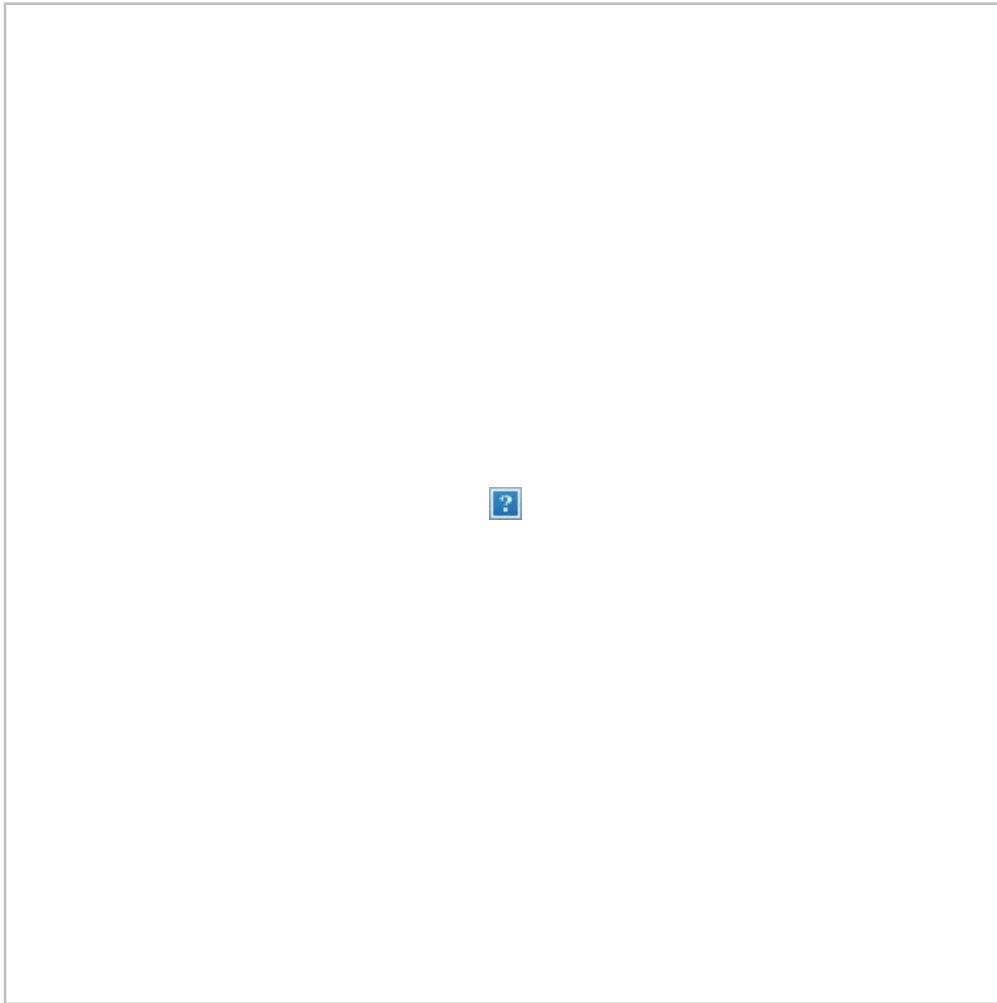
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:942] Notice of Requirement online submission - Bernard Kennelly
Date: Sunday, 12 November 2023 9:15:47 PM
Attachments: [Nor5 Kennelly_98B Pukekohe East Rd further information.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Bernard Kennelly

Organisation name:

Full name of your agent:

Email address: kennellys@ps.gen.nz

Contact phone number: 021393553

Postal address:
98B Pukekohe East Rd
RD2
Pukekohe
Auckland 2677

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

The required amount of land for 98B Pukekohe Rd (Property ID 608813) is stipulated as 1034m. This is far more than is what is required to meet the object of the road realignment when the current land use and future land use, as the land is zoned "Future Urban", is taken into account. There is an embankment that runs the length of the property boundary with the current road that can be utilised to ensure better use of the land and still meet the objectives of the Auckland Unitary Plan.

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

We do not fully oppose the Notice of Requirement, we believe there is a better solution to the "Proposed Designated Boundary" that better meets the council objective and ensures land is not wasted and required unnecessarily. The council does not need all the land it has published as being required. My solution only requires approx. 400m, best guess. This will not only save the council money in the purchase cost but using the current land infrastructure should result in further savings in not having to build more infrastructure.

I or we seek the following recommendation or decision from Auckland Council:

The Designation Boundary on 98B Pukekohe Road be altered to run along the top of the current embankment between the current road and the house - see attached diagram. Where the required construction area cuts the North Western corner of the property the current land already in use by the Auckland City Council for a water culvert to drain the rain run off from approx. 500m of Pukekohe East Rd can be acquired for this project. This proposal does not restrict the current designated Construction area as mapped in the Notice.

Submission date: 12 November 2023

Supporting documents
[Nor5 Kennelly_98B Pukekohe East Rd further information.pdf](#)

Attend a hearing

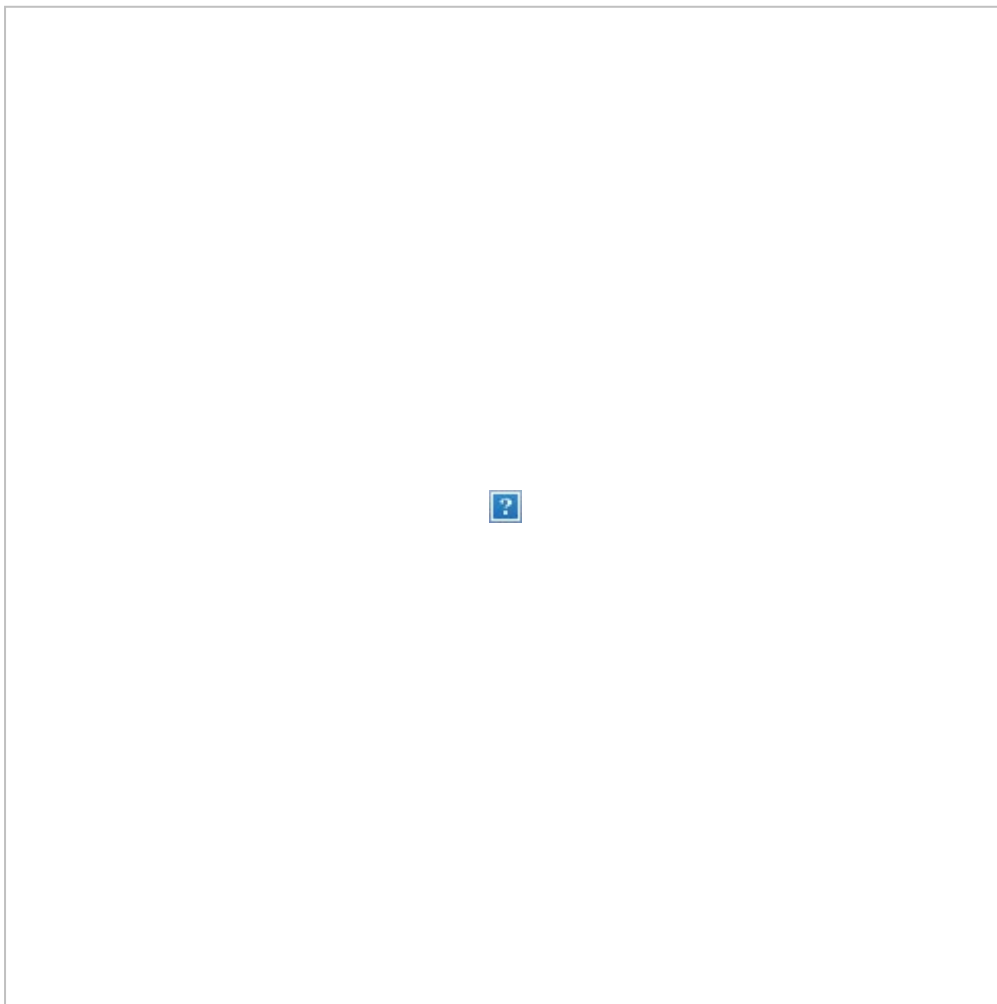
Do you wish to be heard in support of your submission? Yes

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

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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Further information in support of the requested redrawing of the 'Proposed Designation Boundary' at 98B Pukekohe East Rd.

Picture from the "05_pnor5-pukekohe-south-east-arterial-general-arrangement-layout-plan" document. The Pink Dot-Dash line is "Proposed Designation Boundary", the Red line drawn on the map is the suggested redrawing of the Designation Boundary using the current embankment that runs along the property boundary that separates the road from the property. The Northwestern corner of the property is already in use by the council to run a culvert through the embankment and then via open drain along the southern side of the embankment to drain the road rainwater run off down the side of the property to a stream on the neighbour's property to the south of ours. This is the water run off for approx. 500m of road to the east of the culvert. There is also a pipe that runs under the road from the northern side of the road to drain the northern side road drain too.



The proposed redrawn of the Designation Boundary (Red line) is outside of the stipulated Construction Area that will be used for the Construction of the Road. This is from the "07_pnor5-assessment-of-construction-noise-and-vibration-effects" document. Pg 72



The current proposed Designation Boundary line looks like it was the easiest line to draw and does not take into account the current embankments and land already in use for the council, nor the planned future use of the required land as zoned Future Urban.

Picture of current embankment in North Eastern end of 98B Pukekohe east Rd. The Road level at this end of the property is approx halfway up the embankment. The Proposed Designated Boundary is at the bottom of the embankment on the left of this picture.



The embankment at 98B Pukekohe East Road, approx. halfway along the property boundary with the road. The Road is level with the top of the embankment at this point. The Proposed Designated Boundary requires half of the grass in this picture from right to left.



The North western end of the Property, the road level is the same as the top of the embankment. This picture also shows the Culvert exit – left hand side of the picture among the agapanthus, the rocks are to ensure the water from the road drain flows to the west along the southern side of the embankment and then curves around to flow down the side of the property to a stream on the neighbours property. The Proposed Designated Boundary is this side of the Beehives in the picture. Our proposal is along the bottom of the embankment from the culvert entrance into the property to the neighbours boundary to the left hand side of this picture. Virtually all the flat grass area is maintained for future land use for housing.



The Culvert entrance from the roadside open drain, we maintain and keep this open on behalf of the council. This handles the rainwater runoff from Pukekohe East Road for approx. 500m (this starts at Valley Royal Way) to the east of this culvert entrance.



The culvert exit into the property on the southern side of the embankment.



An open drain runs along the embankment and then down the side of the property to a stream on the neighbour's property.



The Road showing the open drain next to the road that then drains through our property. This council Culvert is next to the far lamppost in this picture. The picture shows the embankment and how the land in front of the house on the other side of the embankment is much lower than the road. The excess land as the Proposed Designation Boundary plans to be required would be a waste of available flat land for future housing – the land is zoned Future Urban.



Matches the picture on page 51 of “11_pnor5-assessment-of-landscape-and-visual-effects” document, to show the drain and the road.

Figure 4-28: NoR 4 – Pukekohe North-East Arterial – Existing Environment



Figure 4-29: Looking west from Pukekohe East Road near the location where NoR 4 will intersect with NoR 5. Photo from near 98 Pukekohe East Road. (Source: MJ_GL)

The alignment of NoR 4 to the east of SH22 extends from Butcher Road and crosses through an area of pastoral land, a small pocket of rural residential development (accessed from Paerata Road), the

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:948] Notice of Requirement online submission - Kevin Golding
Date: Monday, 13 November 2023 12:01:44 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Kevin Golding

Organisation name:

Full name of your agent: Kevin Golding

Email address: kevingolding.nz@gmail.com

Contact phone number:

Postal address:

4 McRae Road

Mt Wellington

Auckland 1060

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

The proposed road about on Golding road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Mature native trees including a 100 year old Kauri tree are in the designated area identified for removal i.e. at 97 Golding Road.

I or we seek the following recommendation or decision from Auckland Council:

To install traffic signals at the intersection rather than the proposed round about, minimising the impact on land required. This would save the mature native trees.

Submission date: 13 November 2023

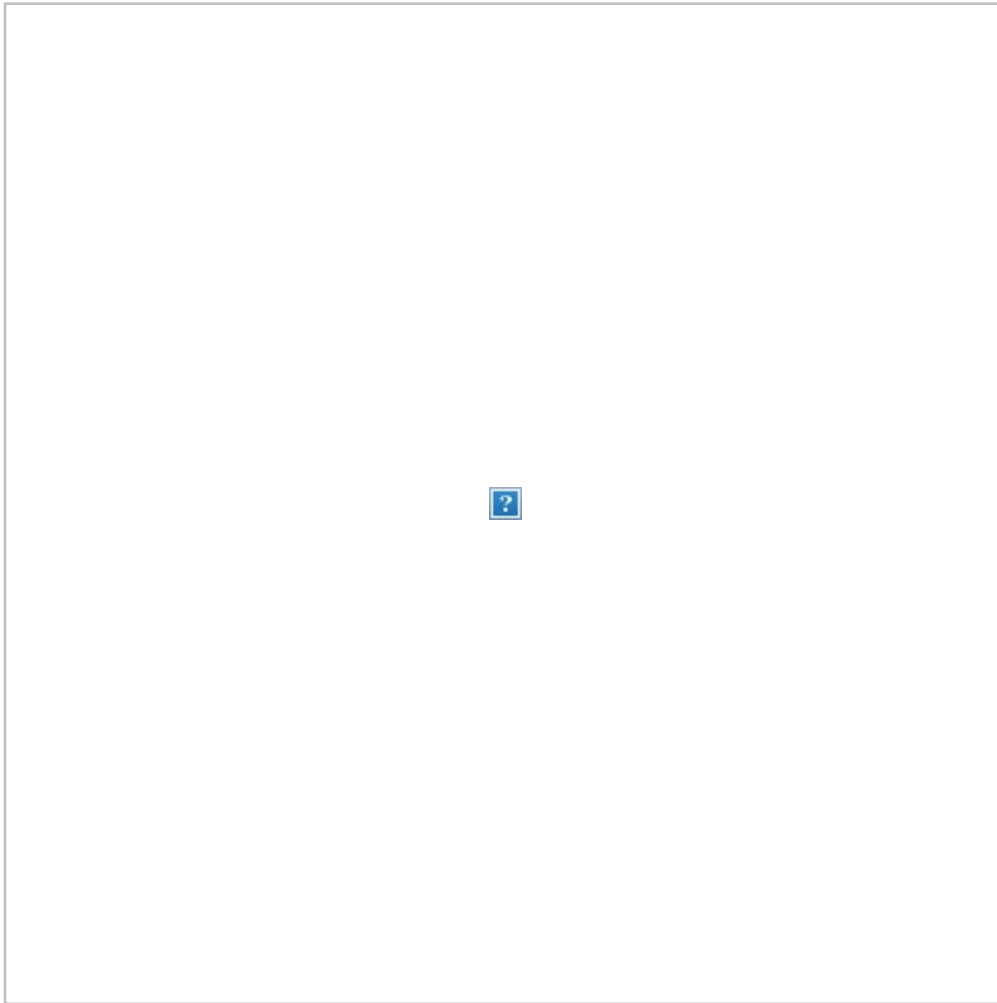
Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:950] Notice of Requirement online submission - Michael Lieshout
Date: Monday, 13 November 2023 12:31:17 pm
Attachments: [20231113125227863.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Michael Lieshout

Organisation name: Crosten Investments Ltd

Full name of your agent: Michael Lieshout

Email address: michael@pukekohebuilders.co.nz

Contact phone number: 0272922093

Postal address:

michael@pukekohebuilders.co.nz

Auckland

Auckland 2340

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:

6 Austen Place & 50 & 52 Crosbie Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

The above named properties are only required during construction works. The proposed road and footpath is outside the above noted property boundaries. The proposed South-Eastern arterial route will pass in front of the biggest Primary School in Pukekohe which will be hazardous for the School children and cause severe traffic congestion at school opening and closing each day. The proposed South Eastern arterial route should be formed on Kitchener Road, Pukekohe.

I or we seek the following recommendation or decision from Auckland Council:

Formation of the South-Eastern arterial route via Kitchener Road, Pukekohe.

Submission date: 13 November 2023

Supporting documents

[20231113125227863.pdf](#)

Attend a hearing

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

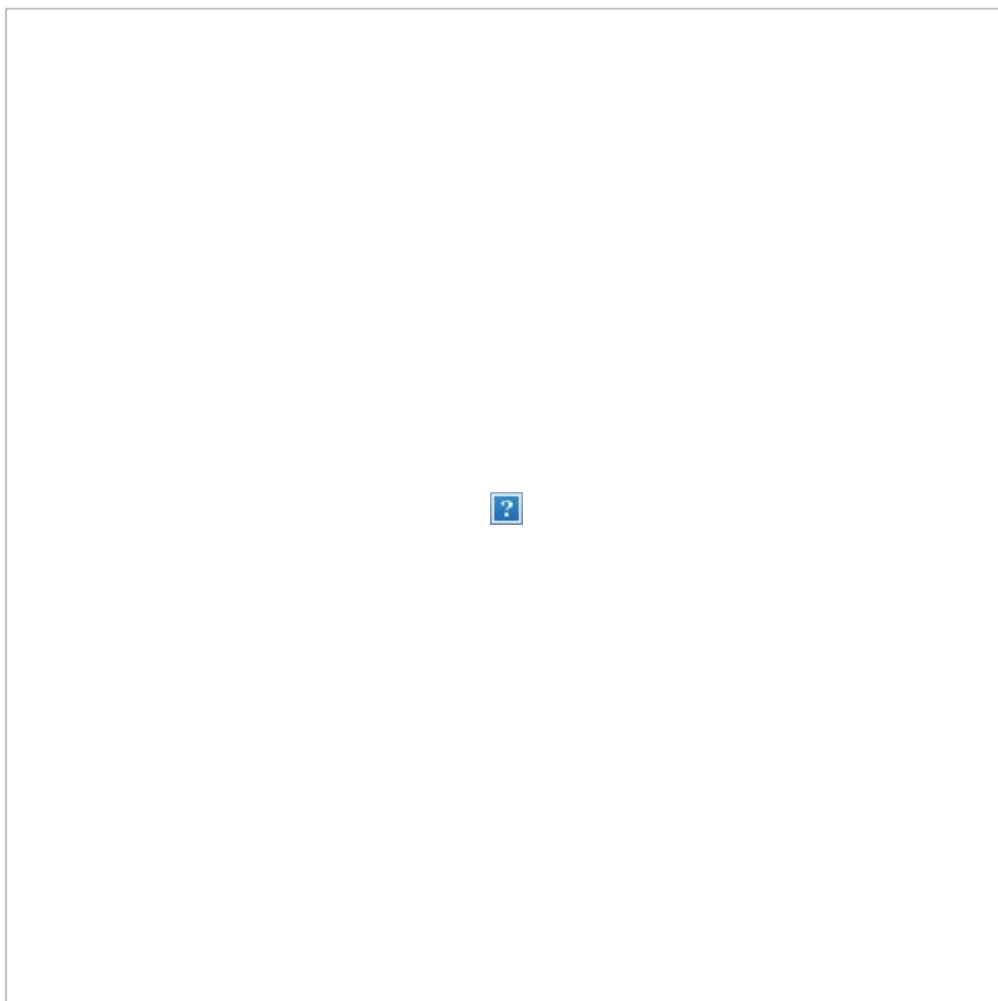
Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

I accept and agree that:

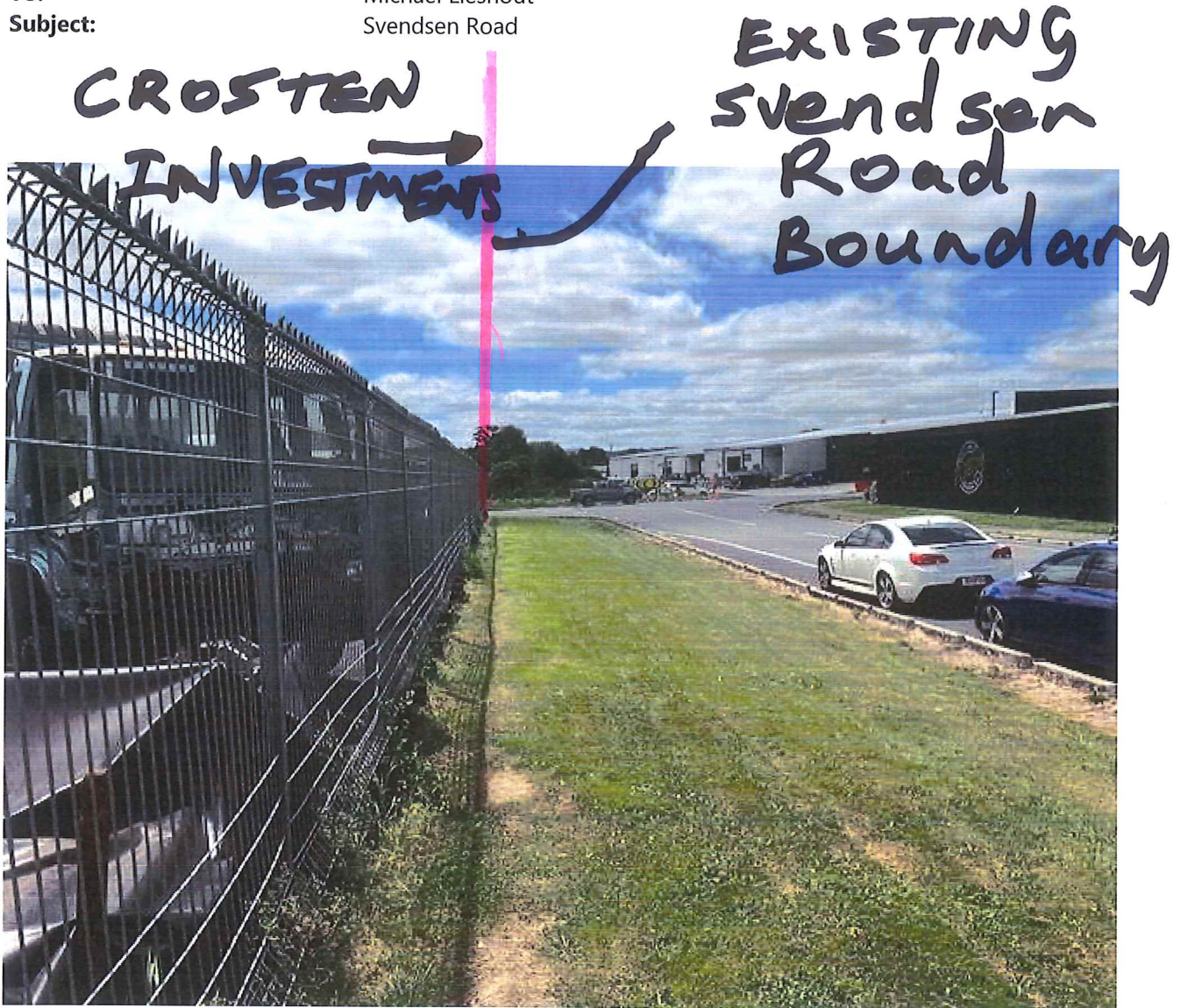
- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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Michael Lieshout

From: Michael Lieshout
Sent: Monday, 13 November 2023 12:10 p.m.
To: Michael Lieshout
Subject: Svendsen Road



Sent from my iPhone

Form 21

Submission on a Notice of Requirement NoR 5: Pukekohe South-East Arterial (Auckland Transport)

To: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Shao Jie Zheng

Address for Service: C/- CivilPlan Consultants Limited
PO Box 97796
Manukau City
Auckland 2241
Attn: David Clouston

Telephone: (09) 222 2445

Email: davidc@civilplan.co.nz

This is a submission on a Notice of Requirement (NoR) lodged by Auckland Transport for the following:

- NoR 5 – Pukekohe South-East Arterial

1. The Submitter

- 1.1 Shao Jie Zheng is a Director of Shen & Zheng Investments Ltd, which owns the site at 108A Golding Road, Pukekohe (Lot 1 DP 141042 and Lot 2 DP 102609), being land over which part of NoR 5 applies, as shown in Figures 1 and 2 below.
- 1.2 The site is used for farming and contains a dwelling and agricultural buildings. The site has an area of 3.38 hectares and is zoned Future Urban Zone under the AUP(OP).
- 1.3 The submitter is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 ('RMA').



Figure 1: 108A Golding Road

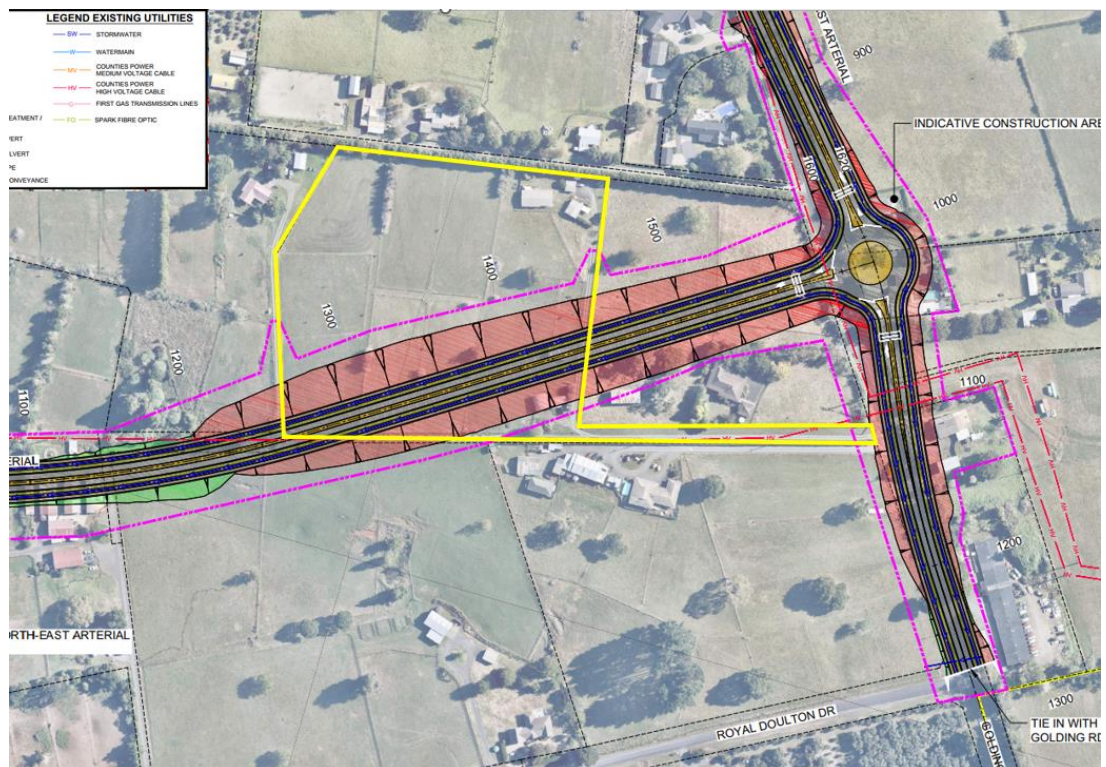


Figure 2: 108A Golding Road

2. Pukekohe Growth Area Background

- 2.1 The south-east Pukekohe area is a greenfield expansion area confirmed through the Auckland Unitary Plan as Future Urban Zone anticipated to provide for population growth in Auckland. Subsequently, structure planning for this land and the wider Pukekohe-Paerata area was undertaken by Auckland Council, with the Pukekohe-Paerata Structure Plan being adopted by the Auckland Council Planning Committee in August 2019. The Pukekohe-Paerata Structure Plan (PPSP) identifies the need for integrated land use and transport planning, and identifies strategic transport connections to be confirmed through further technical investigations and landowner engagement.
- 2.2 The PPSP meets the AUP Appendix 1 Structure Plan guidelines. The PPSP identifies the subject site as being suitable for medium density residential development, identifying suitable future zoning as being the Mixed Housing Urban zone.
- 2.3 The PPSP identifies a required east-west strategic roading link, being the arterial road NoR 5 seeks to designate a route for. However, the indicative alignment shown on the PPSP does not traverse the subject site and is shown instead to intersect with Golding Road at Royal Doulton Drive (see Figure 3 below).

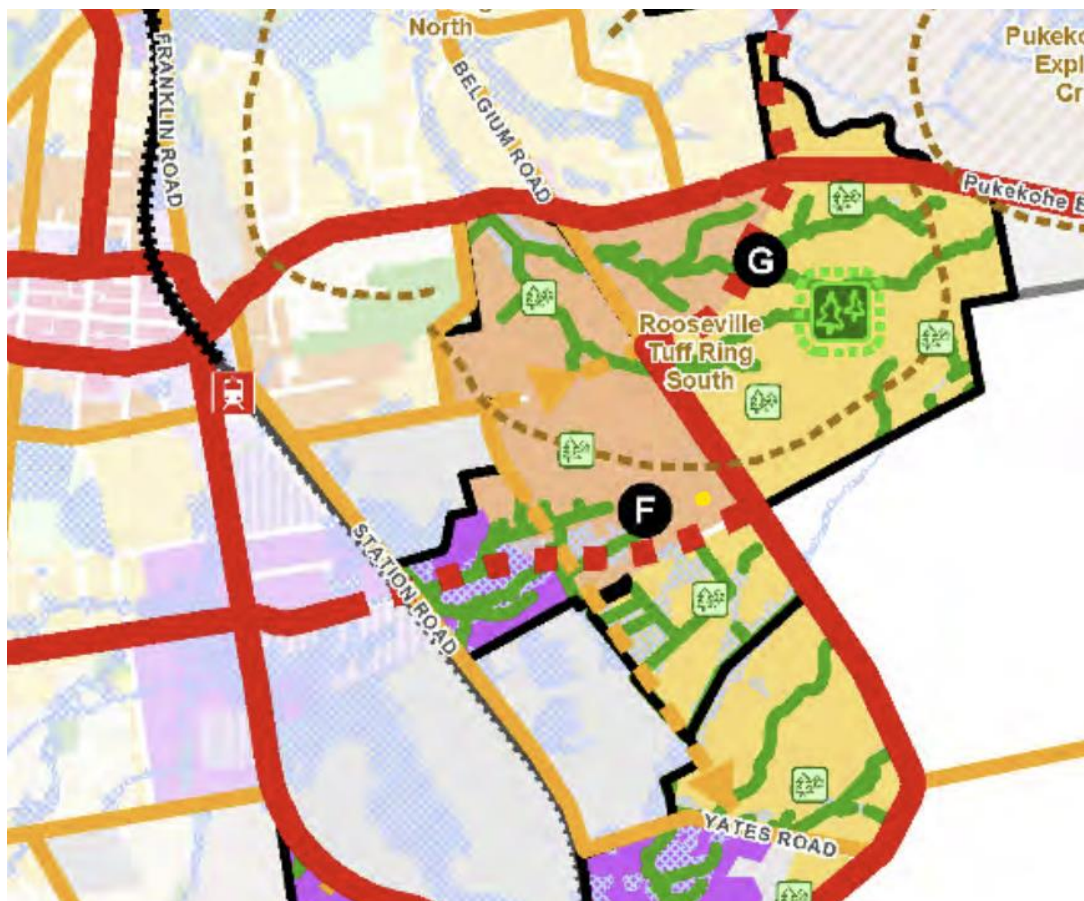


Figure 3: Pukekohe-Paerata Structure Plan Map – Yellow dot indicates 108A Golding Road

2.4 The Auckland Council Future Urban Land Supply Strategy 2017 identified this land as being development ready between 2023-2027. The Future Development Strategy 2023-2053, just released by Council, identifies a timing delay for this land, now indicated for development in 2035+.

2.5 As identified in the NoR documentation, there are several plan changes in the vicinity of the site that are at various stages of the planning process. Plan Change 74 applies to the land to the south of the subject site, directly south of Royal Doulton Drive. Decisions were issued for this plan change in March 2023 and it is currently subject to one appeal. The precinct plan for this plan change anticipates a future arterial road at its northern boundary intersecting with Golding Road.

3. The Submission

3.1 The Submitter recognises that there are benefits at a strategic transport level to the provision of an east-west connection from Svendsen Road to Golding Road to redirect general traffic and freight away from the Pukekohe town centre and to provide additional resilience to the wider network. However, the submitter **opposes** the proposed alignment of NoR 5 for the following reasons:

- a) The proposed alignment does not align with the indicative route alignment identified in the PPSP, or any of the route options contemplated in the Assessment of Alternatives Report prepared for the NoR. In particular:
 - i) The PPSP shows the east-west road connecting from Station Road to Royal Doulton Drive.
 - ii) The recommended corridor Option SE-2B in the Assessment of Alternatives Report is shown to connect to Golding Road at Royal Doulton Drive (consistent with the Structure Plan) and the report states there will be a new connection from Golding Road, upgrading Royal Doulton Drive through the FUZ, crossing the NIMT and linking to Svendsen Road.
 - iii) There is no rationale or justification provided for the proposed alignment and intersection location with Golding Road, being north of Royal Doulton Drive.
 - iv) There is no consideration of the effects of this adjusted alignment compared to the alignment and intersection locations contemplated in the Structure Plan and the Assessment of Alternatives Report.
- b) The concept design for the road layout/roundabout and NoR land take area is flawed, and does not appropriately recognise the Future Urban zoning of the land and how the proposed road will integrate with future urban development. For example:
 - i) The NoR traverses fragmented land parcels, which are in different ownership. The road alignment would create awkward and irregular shaped land parcels on either side that would not provide for efficient and effective urban land development when this land is rezoned.

- ii) Significant batters are proposed to manage level differences between the road and adjacent land. There is no consideration of integration with future land use in terms of potential design levels, interfaces, access etc. and insufficient information to adequately assess these effects and associated costs.
 - iii) No provision has been made for potential road future connections for development with the submitter's land. The documentation suggests that local access to the arterial network should be avoided. However, it will not be possible to develop this land for future residential land uses without a roading connection to the arterial road network.
 - iv) The road alignment, if not following the alignment indicated in the PPSP and Assessment of Alternatives Report connecting to Royal Doulton Drive, could follow existing property boundaries, creating more regular development parcels for future residential development and thus better design and integration outcomes.
 - v) The horizontal and vertical alignment of the roads could be modified to reduce land take and the amount of cut and extent of batters required within the FUZ land. The preferred Option SE-2B appears to have more appropriate landform compared to the proposed alignment that rises to the north-east. The topography of the proposed alignment is steeper in parts resulting in additional earthworks and potentially higher construction cost.
- c) There is no information provided regarding how property access will be maintained to the submitter's land during and following works. The transport assessment identifies that access may be restricted to some properties, but does not identify which ones, thus it is unclear if this will apply to the Submitter's access.

3.2 The Submitter **opposes** the proposed conditions of the NoR for the following reasons:

- a) The 20 year lapse date sterilises future development of the Submitter's land. The land is earmarked to be rezoned and developed in the next 10-15 years. This creates a disconnect between the timing of development and the implementation of the road network, and the integration of land use and transport outcomes, particularly as the NoR extent is significantly larger than the road boundary in order to enable construction of the road.
- b) The SCEMP does not include any provision for affected landowner input into the management plans or any resolution process for where the concerns of the landowner are not being adequately addressed by the outline plan of works/management plans.
- c) The ULDMP requires stakeholders to be invited to participate in the detailed design 6 months prior to the start of detailed design. There is no obligation for this participation to continue through the detailed design.

3.3 Overall, the Submitter considers that NoR 5:

- a) Has not appropriately considered alternative routes and methods for undertaking the proposed works. In particular, the proposed road alignment through the Submitter's land, which differs from the alternatives considered in the application documentation and the PPSP, is unjustified.
- b) Does not promote the sustainable management of natural and physical resources and is contrary to Part 2 of the RMA, as:
 - i) The adverse effects of NoR 5 on the use and development of the Submitter's land (and associated costs) have not been avoided, remedied or mitigated.
 - ii) The social, economic and cultural wellbeing of the community of Pukekohe and the wider Auckland Region are not provided for, as the NoR will result in inefficient use and development of Future Urban Zoned land.

4. Relief Sought

4.1 The Submitter seeks the following relief:

- a) That NoR 5 be **declined**;

OR

- b) That the road alignment of NoR 5 be amended so that it does not bisect the Submitters land at 108A Golding Road. This could be achieved by:
 - i) Adjusting the alignment so that it follows a similar alignment to that shown on the PPSP and that contemplated in the Assessment of Alternatives, connecting with Royal Doulton Drive; OR
 - ii) Realigning the road to follow the southern boundary of the Submitter's land and extend this alignment to connect to Golding Road; OR
 - iii) An alternative alignment that does not bisect the Submitter's landholding.

AND

- c) That the conditions of NoR 5 be amended to address the Submitter's concerns;

AND

- d) Any alternative relief of like effect, to the satisfaction of the Submitter.

AND

- e) Any consequential or incidental amendments necessary to achieve the relief sought, to the satisfaction of the Submitter.

5. Procedural Matters

- 5.1 The Submitter wishes to be heard in support of its submission.
- 5.2 If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.

Signature:



.....
David Clouston, Planner,
CivilPlan Consultants Ltd
on behalf of Shao Jie Zheng



.....
Emma Bayly, Associate
CivilPlan Consultants Ltd

Date: 13 November 2023

S:\Jobs\HPCL2489 - Shen & Zheng Investments Limited\ Pukekohe NoRs\HPCL2489-PukekoheSouthEastArterialNOR

UNDER the Resource Management Act 1991

AND

IN THE MATTER of a submission by **OMAC LIMITED AND NEXT GENERATION PROPERTIES LIMITED** on a notice of requirement to **AUCKLAND COUNCIL** by **AUCKLAND TRANSPORT** for the Pukekohe South-East Arterial

SUBMISSION BY OMAC LIMITED AND NEXT GENERATION PROPERTIES LIMITED ON AUCKLAND TRANSPORT NOTICE OF REQUIREMENT (NOR 5) FOR THE PUKEKOHE SOUTH-EAST ARTERIAL

1. INTRODUCTION

- 1.1 This is a submission on the Notice of Requirement (“NoR”) that has been lodged by Auckland Transport under section 168 of the Resource Management Act 1991 (“RMA”), in respect of the Pukekohe South-East Arterial (“NoR 5”). NoR 5 seeks to provide a new and upgraded transport corridor in Pukekohe, including active mode facilities. As part of those works, it proposes to upgrade part of Pukekohe East and Goulding Roads, as well as provide a new connection between Goulding and Svendsen Roads (across Station Road and the NIMT).
- 1.2 The submission is made on behalf of OMAC Limited and Next Generation Properties Limited (“the Submitters”) in relation to the land at 47 Goulding Road and 50 Pukekohe East Road, Pukekohe (“the affected land”). The affected land is currently subject to a private plan change request for it to be rezoned live-zoned from Future Urban to Residential – Mixed Housing Urban under the partly operative Auckland Unitary Plan (“AUP”). That private plan change is known as “Kohe 2”.
- 1.3 The Submitters are presently master-planning the site for re-zoning. Further work / engagement between AT and the submitters may resolve many of the issues raised in this submission and *inter alia* enable the efficient use and development of land and establishment of the arterial. However, in light of the statutory timeframe, this submission is filed to set out the Submitters concerns in advance of those further discussions being completed.
- 1.4 The Submitters are not trade competitors for the purposes of section 308A of the RMA.
- 1.5 This submission addresses the following:
 - (a) Submitters’ overall position on NoR 5 (Section 2);
 - (b) Submitters’ grounds for opposing NoR 5 (Section 3); and
 - (c) Relief sought (Section 4).

2. SUBMITTERS’ POSITION ON NOR 5

- 2.1 The Submitters do not oppose NoR 5 in principle. In particular, the Submitters support:

- (a) The indicative 24m wide road cross section for both Pukekohe East and Goulding Roads; and
 - (b) The provision of two lanes for general traffic with active mode facilities on the southern side of the corridor on Pukekohe East Road and on both sides for the remainder of the corridor.
- 2.2 This proposed roading typology is anticipated (and provided for) in both the Kohe 2 private plan change request and in the neighbouring plan change (immediately to the west of Kohe 2) that has recently been approved, known as Plan Change 76 (“PC76”).
- 2.3 However, the Submitters oppose NoR 5 to the extent that it extends onto and impacts the parts of the affected land that are sought to be rezoned in accordance with Kohe 2 (as shown in **Annexure 1**). In this regard, the Submitters’ position is that:
- (a) NoR 5 does not have sufficient regard to relevant provisions of applicable national policy statements (“NPS”) and the AUP, including the Regional Policy Statement (“RPS”) provisions in Chapter B of the AUP;
 - (b) There has been inadequate consideration of alternative sites, routes and methods for undertaking at least part of the works proposed by NoR 5; and
 - (c) The full extent of the work and designation boundary (particularly as it extends onto the affected land) is not necessary for achieving Auckland Transport’s objectives in respect of NoR 5.
- 2.4 The Submitters accordingly seek that:
- (a) The designation footprint be modified (and reduced) as outlined in this submission; or
 - (b) Alternatively (and if the project cannot be undertaken within that reduced corridor), NoR 5 be withdrawn.
- 2.5 Without derogating from the generality of the above, the Submitters further seek that:
- (a) The NoR be removed, where it currently extends onto the parts of the affected land that are sought to be rezoned in accordance with Kohe 2 (as shown in **Annexure 1**); and
 - (b) The width of the designation footprint is reduced to only that required to provide the total 24m wide road cross section, along both the Pukekohe East and Goulding Road frontages.

3. SUBMITTERS’ GROUNDS FOR OPPOSING NOR 5

3.1 Section 171 of the RMA provides as follows:

171 Recommendation by territorial authority

...

- (1) *When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to:*

- (a) *Any relevant provisions of:*
 - (i) *A national policy statement:*
 - (ii) *A New Zealand coastal policy statement:*
 - (iii) *A regional policy statement or proposed regional policy statement:*
 - (iv) *A plan or proposed plan; and*
- (b) *Whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if:*
 - (i) *The requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *It is likely that the work will have a significant adverse effect on the environment; and*
- (c) *Whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
- (d) *Any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

3.2 We address each of the Submitters' grounds of opposition to NoR 5, having regard to those statutory requirements, as follows.

Consideration of/regard to relevant policy and plan provisions

3.3 Auckland Transport, as the requiring authority, has failed to have adequate regard to relevant provisions of applicable NPS in preparing the NoR. More specifically, but without limiting the generality of the above:

- (a) Objective 2 of the National Policy Statement on Urban Development ("NPS:UD"), which states that:

Planning decisions improve housing affordability by supporting competitive land and development markets.

- (b) Policy 1 of the NPS:UD, which states that:

Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) *Have or enable a variety of homes that:*
 - (i) *Meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) *Enable Māori to express their cultural traditions and norms; and*
- (b) *Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

- (c) *Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *Support reductions in greenhouse gas emissions; and*
- (f) *Are resilient to the likely current and future effects of climate change.*

3.4 NoR 5 fails to address Objective 2 and Policy 1 of the NPS:UD, as the proposal seeks to remove areas proposed (and recently re-zoned, or shortly to be re-zoned) for housing. This would in turn reduce the area of land that is available for the development of much needed housing, which will be both appropriately priced and located (in terms of access to housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport).

3.5 The requiring authority has also failed to have adequate regard to the RPS provisions (Chapter B) of the AUP in preparing NoR 5. More specifically, but without limiting the generality of the above, the RPS provides as follows:

B2.2.1. Objectives:

(1) *A quality compact urban form that enables all of the following:*

- (a) *A higher-quality urban environment;*
- (b) *Greater productivity and economic growth;*
- (c) *Better use of existing infrastructure and efficient provision of new infrastructure;*
- (d) *Improved and more effective public transport;*
- (e) *Greater social and cultural vitality;*
- (f) *Better maintenance of rural character and rural productivity; and*
- (g) *Reduced adverse environmental effects.*

...

(3) *Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.*

3.6 Further, the requiring authority has failed to have adequate regard to relevant provisions of the AUP in preparing NoR 5. More specifically, but without limiting the generality of the above:

(a) Objective (4) of the AUP's Residential- Mixed Housing Urban Zone, which states:

Non-residential activities provide for the community's social, economic and cultural well-being, while being compatible with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood.

- 3.7 With respect to those AUP provisions, the designation footprint (as currently proposed) is not compatible with the development anticipated by Kohe 2 and its proposed rezoning of the affected land. In particular, by providing for batter slopes, wetlands, laydown areas and other features beyond the required 24m road corridor and on land intended for development, the proposal:
- (a) Will not contribute to the development of a quality, compact urban form;
 - (b) Does not represent better use of existing infrastructure and the efficient provision of new infrastructure;
 - (c) Will not assist to ensure sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth; and
 - (d) Will reduce the amenity of the neighbourhood rather than contributing to it.

Consideration of alternative sites, routes and methods

- 3.8 The assessment of environmental effects (“AEE”) prepared in support of NoR 5 correctly accepts that an assessment of alternatives is required under section 171(1)(b) of the RMA with respect to the NoR, given that:
- (a) The requiring authority does not have an interest in the land sufficient for undertaking the work; and
 - (b) It is likely that the work will have a significant adverse effect on the environment.
- 3.9 In terms of alternative routes for undertaking the project, the AEE then states as follows:¹

Within the Pukekohe-Paerata and Drury West area, options identified for further investigation included:

- *Pukekohe Ring Road;*
- *New road connecting Pukekohe with Paerata, Drury West and SH1;*
- *SH22 Connections; and*
- *Other safety and/or walking and cycling improvements.*

The draft Strategic South DBC included the “strategic” components of the Pukekohe area: the Pukekohe Expressway and the Pukekohe Urban Arterial (north-east section of the “ring route”). The Strategic South DBC undertook alternatives assessment on these components and recommended preferred options that were presented in public engagement in 2020.

...

At the corridor level, alternatives were assessed in four groups:

¹ Pukekohe Transport Network – Assessment of Effects on the Environmental, September 2023, version 1, at page 23.

- *Pukekohe Local – local connections around Pukekohe as alternatives to the current main connection through the Pukekohe centre.*

Once preferred corridors were identified for the Pukekohe Transport Network, route refinement assessments were undertaken at a “micro” level to further develop the corridor options. Additional assessments were undertaken during route refinement to determine appropriate tie-ins, side of road widening and cycling facility placement.

3.10 The Submitters’ position is that the alternatives assessment undertaken for NoR 5 is deficient, in that:

- (a) The AEE does not demonstrate that there was a sufficiently robust assessment of alternative methods for undertaking the project works along Pukekohe East and/or Goulding Roads, in a way that contains the works within the 24m width corridors that the proposed Kohe 2 precinct plan provides for. This includes an assessment of alternatives that did not result in wetlands, laydown areas and other features associated with the works being located on the affected land.
- (b) The options assessment has failed to address provision for an intersection with the collector road identified in PC76 Precinct Plan (I453 Pukekohe East-Central Precinct) and the Kohe 2 proposed plan change and the NoR should be amended to reflect both.
- (c) The proposed batter slopes are inefficient and Auckland Transport has not adequately considered whether a smaller designation footprint could be achieved by using alternative methods such as retaining walls.
- (d) It is anticipated some of the land within the current designation boundary on the affected land may in fact only be required for laydown areas (or other such temporary activities) during construction. However, the NoR:
 - (i) Does not clearly set out or identify such temporary activities, and where the designation footprint will be reduced/pulled back following construction; or
 - (ii) Demonstrate that adequate consideration has been given to alternative methods or sites that could be used for required laydown areas or other temporary facilities.

Whether extent of designation boundary is reasonably necessary to achieve objectives

3.11 The AEE states that the purpose and project objectives for NoR 5 – Pukekohe South-East Arterial are:²

The purpose of the designation is for the construction, operation, and maintenance of a transport corridor.

The project objectives are to provide for new and upgraded transport corridor between Pukekohe East Road and Svendsen Road that:

- 1 *Improves connectivity*
- 2 *Is safe*

² Ibid, at page 14-15.

- 3 *Provides resilience in the transport network*
- 4 *Integrates with and supports planned urban growth*
- 5 *Integrates with and supports the existing and future transport network*
- 6 *Improves travel choice and contributes to mode shift.*

3.12 The Submitters' position is that the work and designation (in particular, the extent of the designation boundary) are not reasonably necessary for achieving Auckland Transport's objectives for NoR 5. More specifically, but without limiting the generality of the above:

- (a) As currently proposed, the designation boundaries extend over (and will effectively remove) land that is sought to be zoned (or already zoned) for residential development. As such, the NoR does not align with its purpose to "*integrate with and support*" planned urban growth. To the contrary, it will effectively preclude some aspects/areas of that planned growth. In that regard, the Assessment of Alternatives for the Pukekohe Transport Network³ identifies that one of the key factors in considering options for this project is the extent to which they integrate with planned developments in the area, in particular along Golding Road.
- (b) The precinct provisions proposed for Kohe 2 already provide for a 2m setback, to allow a total 24m road width for both Pukekohe East and Goulding Roads, as well as wetland areas. Such provisions already sufficiently achieve the objectives of NoR 5, making it unnecessary to designate any land beyond the required 24m road corridor.

4. RELIEF SOUGHT

4.1 For the above reasons, the Submitters seek that:

- (a) The territorial authority recommend that NoR 5 be subject to such modifications and/or conditions as are necessary to address the issues raised in this submission. Such amendments would include but are not limited to:
 - (i) Providing for an intersection (with traffic lights) at the point where the collector road shown in the PC76 Precinct Plan (I453 Pukekohe East-Central Precinct) intersects with the Golding Arterial and/or as shown in the Kohe 2 Proposed Plan Change; and
 - (ii) Reducing the footprint of the NoR as outlined in this submission.
- (b) In the alternative, the territorial authority recommend that NoR 5 be withdrawn; and
- (c) Such other and further relief as is appropriate to address the issues raised in this submission.

4.2 The Submitters wish to be heard in support of this submission.

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

³ Being Appendix A to the AEE, at page 84.

DATED at Auckland this 13th day of November 2023.



A W Braggins

Counsel for OMAC Limited and Next Generation Properties Limited

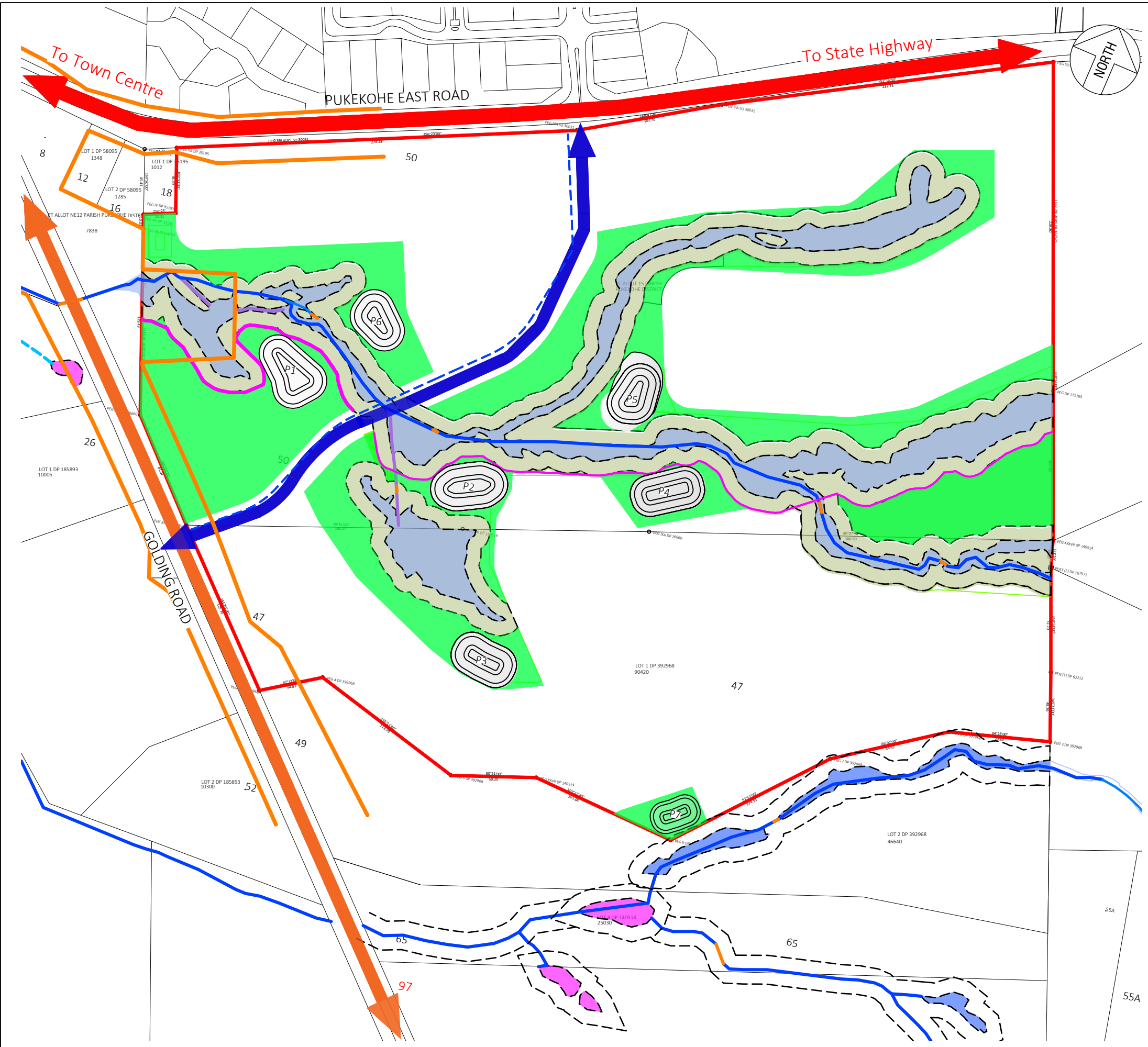
Address for service of the Submitter:

Andrew Braggins
The Environmental Lawyers
Level 4, The B:Hive
72 Taharoto Road
Takapuna 6022










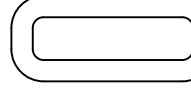

Email: andrew@telawyers.co.nz

ANNEXURE 1

**PROPOSED KOHE 2 PRECINCT PLAN, OVERLAIN WITH THE
PROPOSED DESIGNATION BOUNDARIES FOR NOR 5 (INDICATIVE ONLY)**



PRECINCT PLAN

-  PRECINCT BOUNDARY
-  ARTERIAL ROAD (Existing and Upgrades)
-  COLLECTOR ROAD (Existing and Upgrades)
-  PROPOSED COLLECTOR ROAD
-  PUBLIC OPEN SPACE RESERVE AREA
-  NATURAL STREAM/RIPARIAN
-  PERMANENT STREAM
-  PROPOSED CYCLE PATH
-  PROPOSED SHARED PATH
-  PROPOSED DETENTION POND
-  PUKEKOHE NoR BOUNDARY (INDICATIVE)

NOTE: PROPOSED ROADS MUST BE DESIGNED TO PROVIDE AT LEAST TWO FUTURE CONNECTIONS TO THE EASTERN SITE BOUNDARY AND ONE FUTURE CONNECTION TO THE SOUTHERN SITE RESIDENTIAL ZONE BOUNDARY. REFER TO CONCEPT MASTER PLAN FOR DETAILS.

DESIGNED:	BK
DRAWN:	SG
RELEASED:	SB
REVISION	AMENDMENT
BY	SB



PROJECT: 47 GOLDING ROAD & 50 PUKEKOHE EAST ROAD, PUKEKOHE

TITLE: PRECINCT PLAN PC2

STATUS:	FOR INFORMATION ONLY
DRAWING NO.:	A102
SCALE & SIZE:	1:2750 A3
REV:	417
DATE:	20/07/23

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UNDER the Resource Management Act 1991

AND

IN THE MATTER of a submission by **AEDIFICE DEVELOPMENT NO.1 LIMITED** on a notice of requirement to **AUCKLAND COUNCIL** by **AUCKLAND TRANSPORT** for the Pukekohe South-East Arterial

SUBMISSION BY AEDIFICE DEVELOPMENT NO.1 LIMITED ON AUCKLAND TRANSPORT NOTICE OF REQUIREMENT (NOR 5) FOR THE PUKEKOHE SOUTH-EAST ARTERIAL

1. INTRODUCTION

- 1.1 This is a submission on the Notice of Requirement (“NoR”) that has been lodged by Auckland Transport under section 168 of the Resource Management Act 1991 (“RMA”), in respect of the Pukekohe South-East Arterial (“NoR 5”). NoR 5 seeks to provide a new and upgraded transport corridor in Pukekohe, including active mode facilities. As part of those works, it proposes to upgrade part of Pukekohe East and Goulding Roads, as well as provide a new connection between Goulding and Svendsen Roads (across Station Road and the NIMT).
- 1.2 The submission is made on behalf of Aedifice Development No.1 Limited (“the Submitter”) in relation to the land at 2 and 19 Goulding Road, Pukekohe (“the affected land”).¹ The affected land, together with adjoining properties, was recently live-zoned for development under Plan Change 76 (“PC76”).
- 1.3 The Submitter is not a trade competitor for the purposes of section 308A of the RMA.
- 1.4 This submission addresses the following:
- (a) Submitter’s overall position on NoR 5 (Section 2);
 - (b) Submitter’s grounds for opposing NoR 5 (Section 3); and
 - (c) Relief sought (Section 4).

2. SUBMITTER’S POSITION ON NOR 5

- 2.1 The Submitter does not oppose NoR 5 in principle. In particular, the Submitter supports:
- (a) The indicative 24m wide road cross section for both Pukekohe East and Goulding Roads; and
 - (b) The provision of two lanes for general traffic with active mode facilities on the southern side of the corridor on Pukekohe East Road and on both sides for the remainder of the corridor.

¹ For completeness, the affected land is held in titles NA682560 (Section 2 Survey Office Plan 476438) for 2 Goulding Road and NA116C/150 (Lot 3, DP 185893) for 19 Goulding Road.

- 2.2 This proposed roading typology is anticipated (and provided for) in both PC76 and in the neighbouring proposed plan change (to the east of PC76) at 47 Golding Road (known as Kohe 2).
- 2.3 However, the Submitter opposes NoR 5 to the extent that it extends onto and impacts the parts of the affected land that have been rezoned in accordance with PC76 (as shown in **Annexure 1**). In this regard, the Submitter's position is that:
- (a) NoR 5 does not have sufficient regard to relevant provisions of applicable national policy statements ("NPS") and the partly operative Auckland Unitary Plan ("AUP", including the Regional Policy Statement ("RPS") provisions in Chapter B of the AUP);
 - (b) There has been inadequate consideration of alternative sites, routes and methods for undertaking at least part of the works proposed by NoR 5; and
 - (c) The full extent of the work and designation boundary (particularly as it extends onto the affected land) is not necessary for achieving Auckland Transport's objectives in respect of NoR 5.
- 2.4 The Submitter accordingly seeks that:
- (a) The designation footprint be modified (and reduced) as outlined in this submission; or
 - (b) Alternatively (and if the project cannot be undertaken within that reduced corridor), NoR 5 be withdrawn.
- 2.5 Without derogating from the generality of the above, the Submitter further seeks that:
- (a) The NoR be removed, where it currently extends onto the parts of the affected land that have been rezoned in accordance with PC76 (as shown in **Annexure 1**); and
 - (b) The width of the designation footprint is reduced to only that required to provide the total 24m wide road cross section, along both the Pukekohe East and Goulding Road frontages.

3. SUBMITTER'S GROUNDS FOR OPPOSING NOR 5

- 3.1 Section 171 of the RMA provides as follows:

171 Recommendation by territorial authority

...

- (1) *When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to:*

(a) *Any relevant provisions of:*

(i) *A national policy statement:*

(ii) *A New Zealand coastal policy statement:*

(iii) *A regional policy statement or proposed regional policy statement:*

- (iv) *A plan or proposed plan; and*
- (b) *Whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if:*
 - (i) *The requiring authority does not have an interest in the land sufficient for undertaking the work; or*
 - (ii) *It is likely that the work will have a significant adverse effect on the environment; and*
- (c) *Whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
- (d) *Any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*

3.2 We address each of the Submitter's grounds of opposition to NoR 5, having regard to those statutory requirements, as follows.

Consideration of/regard to relevant policy and plan provisions

3.3 Auckland Transport, as the requiring authority, has failed to have adequate regard to relevant provisions of applicable NPS in preparing the NoR. More specifically, but without limiting the generality of the above:

- (a) Objective 2 of the National Policy Statement on Urban Development ("NPS:UD"), which states that:

Planning decisions improve housing affordability by supporting competitive land and development markets.

- (b) Policy 1 of the NPS:UD, which states that:

Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

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

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

3.4 NoR 5 fails to address Objective 2 and Policy 1 of the NPS:UD, as the proposal seeks to remove areas proposed (and recently re-zoned, or shortly to be re-zoned) for housing. This would in turn reduce the area of land that is available for the development of much needed housing, which will be both appropriately priced and located (in terms of access to housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport).

3.5 The requiring authority has also failed to have adequate regard to the RPS provisions (Chapter B) of the AUP in preparing NoR 5. More specifically, but without limiting the generality of the above, the RPS provides as follows:

B2.2.1. Objectives:

(1) *A quality compact urban form that enables all of the following:*

(a) *A higher-quality urban environment;*

(b) *Greater productivity and economic growth;*

(c) *Better use of existing infrastructure and efficient provision of new infrastructure;*

(d) *Improved and more effective public transport;*

(e) *Greater social and cultural vitality;*

(f) *Better maintenance of rural character and rural productivity; and*

(g) *Reduced adverse environmental effects.*

...

(3) *Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.*

3.6 Further, the requiring authority has failed to have adequate regard to relevant provisions of the AUP in preparing NoR 5. More specifically, but without limiting the generality of the above:

(a) Objective (4) of the AUP's Residential- Mixed Housing Urban Zone, which states:

Non-residential activities provide for the community's social, economic and cultural well-being, while being compatible with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood.

3.7 With respect to those AUP provisions, the designation footprint (as currently proposed) is not compatible with the development anticipated by PC78 and its rezoning of the affected land. In particular, by providing for batter slopes, wetlands, laydown areas and other features beyond the required 24m road corridor and on land intended for development, the proposal:

(a) Will not contribute to the development of a quality, compact urban form;

- (b) Does not represent better use of existing infrastructure and the efficient provision of new infrastructure;
- (c) Will not assist to ensure sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth; and
- (d) Will reduce the amenity of the neighbourhood rather than contributing to it.

Consideration of alternative sites, routes and methods

3.8 The assessment of environmental effects (“AEE”) prepared in support of NoR 5 correctly accepts that an assessment of alternatives is required under section 171(1)(b) of the RMA with respect to the NoR, given that:

- (a) The requiring authority does not have an interest in the land sufficient for undertaking the work; and
- (b) It is likely that the work will have a significant adverse effect on the environment.

3.9 In terms of alternative routes for undertaking the project, the AEE then states as follows:²

Within the Pukekohe-Paerata and Drury West area, options identified for further investigation included:

- *Pukekohe Ring Road;*
- *New road connecting Pukekohe with Paerata, Drury West and SH1;*
- *SH22 Connections; and*
- *Other safety and/or walking and cycling improvements.*

The draft Strategic South DBC included the “strategic” components of the Pukekohe area: the Pukekohe Expressway and the Pukekohe Urban Arterial (north-east section of the “ring route”). The Strategic South DBC undertook alternatives assessment on these components and recommended preferred options that were presented in public engagement in 2020.

...

At the corridor level, alternatives were assessed in four groups:

- *Pukekohe Local – local connections around Pukekohe as alternatives to the current main connection through the Pukekohe centre.*

Once preferred corridors were identified for the Pukekohe Transport Network, route refinement assessments were undertaken at a “micro” level to further develop the corridor options. Additional assessments were undertaken during route refinement to determine appropriate tie-ins, side of road widening and cycling facility placement.

² Pukekohe Transport Network – Assessment of Effects on the Environmental, September 2023, version 1, at page 23.

3.10 The Submitter's position is that the alternatives assessment undertaken for NoR 5 is deficient, in that:

- (a) The AEE does not demonstrate that there was a sufficiently robust assessment of alternative methods for undertaking the project works along Pukekohe East and/or Goulding Roads, in a way that contains the works within the 24m width corridors that the PC76 precinct plan provides for. This includes an assessment of alternatives that did not result in batter slopes, laydown areas and other features associated with the works being located on the affected land.
- (b) The options assessment has failed to address provision for an intersection with the collector road identified in PC76 Precinct Plan (I453 Pukekohe East-Central Precinct) and the Kohe 2 proposed plan change and the NoR should be amended to reflect both.
- (c) The proposed batter slopes are inefficient and Auckland Transport has not adequately considered whether a smaller designation footprint could be achieved by using alternative methods such as retaining walls.
- (d) It is anticipated some of the land within the current designation boundary on the affected land may in fact only be required for laydown areas (or other such temporary activities) during construction. However, the NoR:
 - (i) Does not clearly set out or identify such temporary activities, and where the designation footprint will be reduced/pulled back following construction; or
 - (ii) Demonstrate that adequate consideration has been given to alternative methods or sites that could be used for required laydown areas or other temporary facilities.

Whether extent of designation boundary is reasonably necessary to achieve objectives

3.11 The AEE states that the purpose and project objectives for NoR 5 – Pukekohe South-East Arterial are:³

The purpose of the designation is for the construction, operation, and maintenance of a transport corridor.

The project objectives are to provide for new and upgraded transport corridor between Pukekohe East Road and Svendsen Road that:

- 1 *Improves connectivity*
- 2 *Is safe*
- 3 *Provides resilience in the transport network*
- 4 *Integrates with and supports planned urban growth*
- 5 *Integrates with and supports the existing and future transport network*
- 6 *Improves travel choice and contributes to mode shift.*

³ Ibid, at page 14-15.

3.12 The Submitter's position is that the work and designation (in particular, the extent of the designation boundary) are not reasonably necessary for achieving Auckland Transport's objectives for NoR 5. More specifically, but without limiting the generality of the above:

- (a) As currently proposed, the designation boundaries extend over (and will effectively remove) land that is zoned (or sought to be zoned) for residential development. As such, the NoR does not align with its purpose to "*integrate with and support*" planned urban growth. To the contrary, it will effectively preclude some aspects/areas of that planned growth. In that regard, the Assessment of Alternatives for the Pukekohe Transport Network⁴ identifies that one of the key factors in considering options for this project is the extent to which they integrate with planned developments in the area, in particular along Golding Road.
- (b) The precinct provisions approved in PC76 already provide for a 2m setback, to allow a total 24m road width for both Pukekohe East and Goulding Roads. Such provisions already sufficiently achieve the objectives of NoR 5, making it unnecessary to designate any land beyond the required 24m road corridor.

4. RELIEF SOUGHT

4.1 For the above reasons, the Submitter seeks that:

- (a) The territorial authority recommend that NoR 5 be subject to such modifications and/or conditions as are necessary to address the issues raised in this submission. Such amendments would include but are not limited to:
 - (i) Providing for an intersection (with traffic lights) at the point where the collector road shown in the PC76 Precinct Plan (I453 Pukekohe East-Central Precinct) intersects with the Golding Arterial and/or as shown in the Kohe 2 Proposed Plan Change; and
 - (ii) Reducing the footprint of the NoR as outlined in this submission.
- (b) In the alternative, the territorial authority recommend that NoR 5 be withdrawn; and
- (c) Such other and further relief as is appropriate to address the issues raised in this submission.

4.2 The Submitter wishes to be heard in support of this submission.

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

DATED at Auckland this 13th day of November 2023.



A W Braggins
Counsel for Aedifice Development No.1 Limited

⁴ Being Appendix A to the AEE, at page 84.

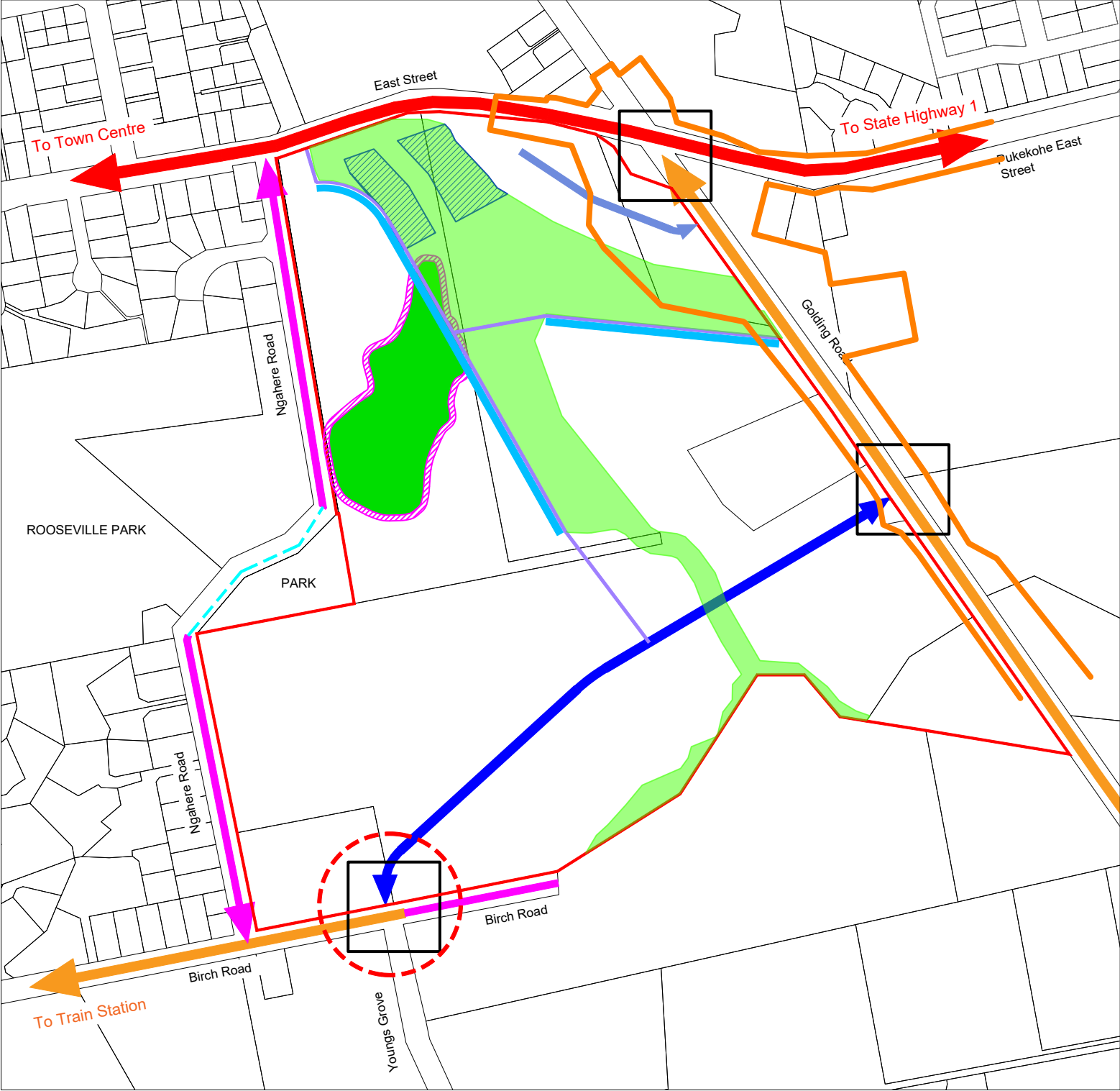
Address for service of the Submitter:

Andrew Braggins
The Environmental Lawyers
Level 4, The B:Hive
72 Taharoto Road
Takapuna 6022

















Email: andrew@telawyers.co.nz

ANNEXURE 1

**PC76 PRECINCT PLAN, OVERLAIN WITH THE PROPOSED DESIGNATION BOUNDARIES FOR NOR 5
(INDICATIVE ONLY)**



LEGENDS

- | | | | |
|--|--|---|---|
|  | PRECINCT BOUNDARY |  | SEA - SIGNIFICANT ECOLOGICAL AREA |
|  | ARTERIAL ROAD |  | INDICATIVE COMMUNAL WETLAND |
|  | COLLECTOR ROAD
(Note: Refer to Rule I4XX.6.4.7) |  | SEA 5M BUFFER |
|  | LOCAL ROAD |  | DRAINAGE RESERVE, STREAM /
RIPARIAN AREAS AND POTENTIAL
FUTURE PARK |
|  | INDICATIVE COLLECTOR ROAD |  | KEY INTERSECTIONS |
|  | INDICATIVE LOCAL ROAD |  | FIXED CONNECTION POINT |
|  | INDICATIVE CYCLE AND PEDESTRIAN PATHS |  | INDICATIVE PUKEKOHE N _o R BOUNDARY |
|  | INDICATIVE PARK/STREAM EDGE ROAD | | |
|  | INDICATIVE PEDESTRIAN PATH | | |

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:963] Notice of Requirement online submission - Pam Butler Senior RMA Advisor KiwiRail
Date: Monday, 13 November 2023 9:46:10 pm
Attachments: [KiwiRail submission\(s\) Pukekohe package NoRs 1-5.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Pam Butler Senior RMA Advisor KiwiRail

Organisation name: KiwiRail Holdings Limited

Full name of your agent: KiwiRail Holdings Limited

Email address: Pam.butler@kiwirail.co.nz

Contact phone number: 0275708571

Postal address:
Private Bag 92138
Auckland 1142

Auckland 1142

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 5 Pukekohe South-East Arterial

The specific provisions that my submission relates to are:
Railway designations in Sth Auckland

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
see attached

I or we seek the following recommendation or decision from Auckland Council:
Recommend approval subject to conditions

Submission date: 13 November 2023

Supporting documents
KiwiRail submission(s) Pukekohe package NoRs 1-5.pdf

Attend a hearing

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

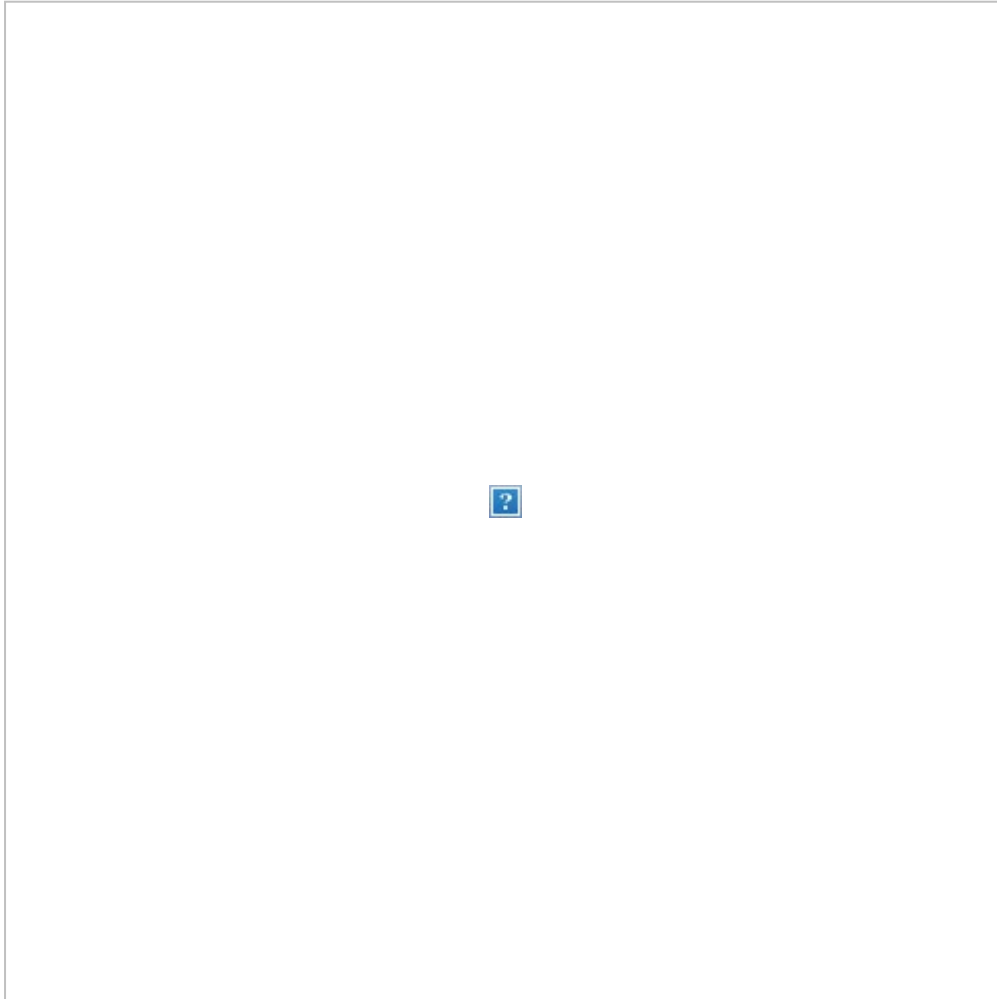
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

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

I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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13 November, 2023

Reason for submission

KiwiRail is the State Owned Enterprise responsible for the management and operation of the national railway and Interislander ferry services. In many places, the rail network has been in place for over 100 years and remains crucially important to the economic and social development of the areas it services. The rail network serves two functions as a metropolitan public transport service in Auckland and Wellington primarily, and a route for freight and other services nationally.

The land upon which the rail network operates is owned by the New Zealand Railways Corporation and leased to KiwiRail. KiwiRail owns the rail infrastructure (including rails, sleepers, sidings, and depots) and is a railway operator for the purposes of the Railways Act 2005. It is also the licensed Access Provider under the Railways Act, which provides KiwiRail broad powers to safely control and restrict the use of railway assets and entry onto railway land.

KiwiRail Holdings Limited (KiwiRail) is working closely with Auckland Transport (AT) and Waka Kotahi (WK) to develop the strategic transport network to support Auckland's growth areas, particularly in the south. KiwiRail owns and maintains Auckland's Metro track network and is currently well into delivering major southern projects including electrification between Papakura and Pukekohe and, three new Drury stations (Drury, Ngākōroa and Paerātā), and will shortly embark on work to add capacity to the NIMT (North Island Main Trunk).

A functioning and efficient freight network is critical to the productivity of the nation's supply chain. KiwiRail also operates New Zealand's rail freight network and tourism passenger rail services between Auckland and Wellington and the Te Huia Hamilton – Auckland passenger service, which began in April 2021. Further interregional passenger growth is predicted. KiwiRail therefore has a significant interest in planning to enable the efficient flow of imports, exports, and domestic goods within and through the region. Freight tonnage is forecast to treble to, from and through the region over the next 25 years.

KiwiRail is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks (RTN), Active Mode Corridors (AMC) and road /highway networks which facilitate mode transfer and enable future urban growth.

The proposed Notices of Requirement (NoRs) cross designations for which KiwiRail is the requiring authority. Of key interest to KiwiRail is the intersection of the proposed designations with the existing rail corridor. These locations are shown on Table One overleaf.



Table One: Affected KiwiRail locations summary

NoR ¹	Affected KiwiRail site	Purpose and corridor impacts
Drury West Arterial NoR 1 (AT)	Designation 6302, NIMT, Burt Road	Proposed bridge as part of new transport corridor
	Drury West / Ngaakooroa Station; extends south from Ngaakooroa Rail Station	Tie in and upgrade the proposed station access way to provide for bus priority lanes. This arterial will connect the FUZ south of SH22 (State Highway 22) with the new rail station.
Drury – Pukekohe Link NoR 2 (Waka Kotahi)	Designation 6302, crosses the NIMT to connect to SH22	SH22 connection.
	Designation 6311 Paerata Interchange	Paerata Interchange and Accessway: Provides a connection to the Paerata Rail Station from Sim Road (south) proposed to be upgraded by NoR 2.
Paerata Connections NoR 3 (AT)	Designation 6310, Paerata Station	
	Designation 6311 Paerata Interchange	
Paerata Connections NoR 3 (AT)	Designation 6302, NIMT (end of Sim Road)	Paerata Interchange and Accessway: Sim Road segment.
	Pukekohe North-East Arterial NoR 4 (AT)	Designation 6302, crosses the NIMT at Paerata (near Butcher Road)
Pukekohe South-East Arterial NoR 5 (AT)	Designation 6302, crosses the NIMT in Pukekohe (south)	To connect to Svendsen Road / Wrightson Way.

As KiwiRail is the Requiring Authority for the earlier designation/s, approval under s177 of the Resource Management Act 1991 (RMA) is required for the secondary requiring authority to undertake works within the railway corridor. KiwiRail acknowledges that the NoR AEE(s) identify that further engagement with KiwiRail will continue as the Project is developed. KiwiRail expects that as part of that process the necessary approvals will be sought in due course.

The importance of planning for the future growth of both RTN and post CRL (City Rail Link) metro rail services and enabling the growing demand for freight movements and interregional rail services to, and through Auckland has emerged as a result of the work undertaken to date as part of the preparation of these NoRs.

Aligned with its broader national role, KiwiRail, AT, Auckland Council and WK are starting to plan for future rail investment to - remove capacity constraints, raise future passenger and freight levels of service to drive increases in rail mode share, and enable greater network reliability and resilience by improving maintenance options (without having to close lines for extended periods).

¹ NoR's 6, 7 and 8 are some distance from railway assets.

Specific areas that are of greatest interest to KiwiRail and around which further detail will be required prior to granting any s177 approval, include:

- a) That KiwiRail's strategy for growing the capacity and resilience of the NIMT through the provision of additional tracks is acknowledged and accommodated as far as possible in the development and design of the Project
- b) NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design
- c) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability.

Several of these initial issues are set out in Table Two below.

Table Two: NoR created constraint and suggested approach.

• NoR	Issue	• Resolution
1	Allows for an increase of track and rail maintenance access however limited flexibility for changes in rail design standards and further development	Ongoing dialogue and engagement before detailed design starts
2	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
3	Allows for an increase of track capacity however limits provision of maintenance access to improve resilience	Ongoing dialogue and engagement before detailed design starts
4	No evident issues. Cuts near the Mission Bush corridor can be managed to protect for growth. However, the form that the bridge takes for this span and the impact of the structure on the current and future rail infrastructure will need to be agreed.	Ongoing dialogue and engagement before detailed design starts

<p>5</p>	<p>The proposed road bridge over the NIMT and Station Road is shown as a long single span which may not be practically feasible. There is a risk a central pier (or piers) is required and depending on the location may hinder future rail options</p> <p>There have been new high-speed crossovers installed as part of P2P just south of the new overbridge. There is potential that a 3rd and 4th track may be added to the NIMT from Pukekohe to these cross overs as part of the southern approach to the eventual Pukekohe to Papakura 4 tracking.</p> <p>Electrification of the rail network to Hamilton is a strong likelihood. Depending on the extent and proximity of any additional cross overs in a southern cluster, they may drive higher than normal OLE (Overhead Line Equipment) clearances under new road bridge.</p>	<p>Ongoing dialogue and engagement before detailed design starts</p> <p>Clarify potential location of Station Rd bridge support piers</p> <p>Ongoing dialogue and engagement before detailed design starts</p> <p>Future corridor OLE equipment clearance under full width of span needs to be clarified</p>
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Relief sought

KiwiRail generally supports NoR applications One to Five and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the applicant's proposed conditions, including in particular

- Condition 5 (All NoRs)– Network Utility Operators (s176 approval) to carry out routine works
- Condition 10 (All NoRs) - (Land Integration Process LIP)) which enables developers and agencies to seek the latest information to enable better planning and integration with the NoRs. It is suggested that the condition be altered at (c) (i) to add the word 'available' before 'designs' as there will be a limit about what information is available for the various packages during the designation term. For example, at preliminary design, 50% design, approved, or final design.
- Condition 11 UDLMP (Condition 11 for NoR 5) – to enable integration of the Project's permanent works into the surrounding landscape and urban context, of which KiwiRail's new stations will form part.
- Condition 26 (all NoRs) Network Utility Management Plan (NUMP) setting out a framework for protecting, relocating and working in proximity to existing network utilities.

13 November 2023

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

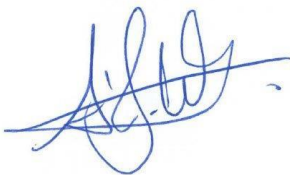
5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

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- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

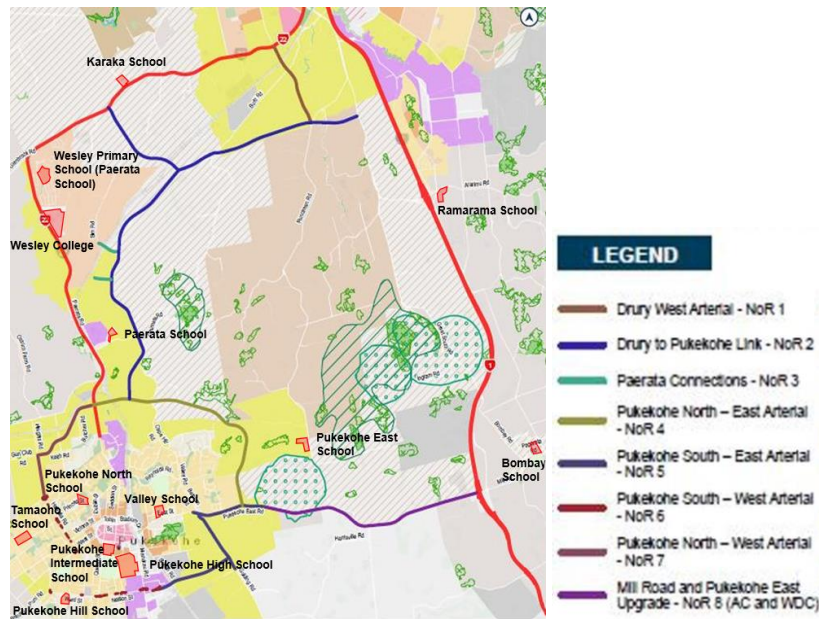


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

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- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - Inclusion of the Ministry and schools in the SCEMP; and
 - Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
<u>Underlined and strikethrough</u> – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
--	---	--

From: [Sir William Birch](#)
To: [Unitary Plan](#)
Cc: [Siobhan A](#)
Subject: Submissions on NOR 4 and NOR 5 - Birch file: 5840
Date: Monday, 13 November 2023 3:56:59 pm
Attachments: [image002.png](#)
[Schedule 1.pdf](#)
[CP 5840 C.pdf](#)
[Draft Meeting Minutes with Auckland Council \(2023-9-12\).pdf](#)
[20231113153256422.pdf](#)

Dear team at Unitary Plan,

This submission (see Form 21 attached) is made by Birch Surveyors Ltd. on behalf of Siobhan Ainsley at part of 87 and part of 131 Pukekohe East Road, Pukekohe. The land in question is zoned as "Future Urban" on the Unitary Plan and both parcels of land will be significantly affected by the proposals in NOR 4 and NOR 5.

Our client is well aware of the efforts being made by the Auckland Council and Auckland Transport in particular to improve the traffic flows around Pukekohe and we have been instructed to work with Supporting Growth in their planning of a North East Arterial Ring Road and to provide a stormwater treatment pond for the upgrade and widening of Pukekohe East Road even though these public works are hugely disruptive to our client's long term development plans.

We have had a number of positive meetings with Helen Hicks and her team and have been impressed with their willingness to work with landowners to achieve results that are acceptable to all parties. The result of these meetings is that we have now agreed with the location of the propose Roundabout on Pukekohe East Road and we are providing for the Roundabout in a Proposed Private Plan Change application that is now being prepared to change the zoning of the Future Urban Land to a Mixed Housing residential Zone. A pre-application meeting for this Private Plan Change (PPC) was held with senior Council Planners and officers of Water Care and Auckland Transport on 12th of September 2023. A copy of the agreed minutes is attached. This PPC is now well advanced and all specialist reports in support of the Plan Change have either now been provided by consultants or are still currently being prepared by consultants.

Two of the plans prepared in support of the plan change are attached:

1. Plan of the proposed Plan Change area and
2. Concept Plan demonstrating feasibility of development

The concept plan shows the planned position of the Roundabout and this has been agreed by our client without prejudice and subject to adequate and due compensation for all of the public works requirements including the proposed SW treatment pond, that eventuate from the NOR requirements.

It is anticipated by our client that at the time of development of the residential land, after the Plan Change is operative that the earthworks will be designed to be consistent with the design of the Roundabout and the adjoining public road levels although these may not be constructed for potentially two or three decades.

A major concern of our client however, is that the proposed location of a stormwater treatment

pond on NOR 5 that provides for treatment from the wide roading on the southern side of Pukekohe East Road is in the centre of the land at 84 Pukekohe East Road that is planned for residential development. (see ID 608752) This does not make any sense and would be strongly opposed by our client. On the other hand it is a relatively simple matter to build the SW treatment pond either on the adjoining rural land owned by our client or somewhere in the proximity of the site shown on our attached concept plan to treat the runoff from Pukekohe East Road and the proposed residential development shown on our plan. It makes sense to have a single community owned pond to treat both the road water and the subdivision water and to design the ultimate subdivision to provide for this. This matter has been discussed with Supporting Growth and we hope to meet and explore this option further before the designations are finalised.

We trust the Auckland Transport and the Council will take this submission into consideration when finalising the areas to be designated. Please let me know if you have any queries.

As noted on Form 21 we wished to be heard at the hearing.

Kind regards,

Sir William Birch

FNZIS | RPSurv | LCS

Consultant

DDI: 09 237 0787

Mob: 027 294 8321



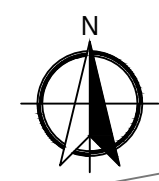
LAND DEVELOPMENT CONSULTANTS

2A Wesley Street, Pukekohe 2120

PO Box 475, Pukekohe 2340

www.birch.nz

PUKEKOHE | PENROSE | HAMILTON | TAURANGA | TAIRUA



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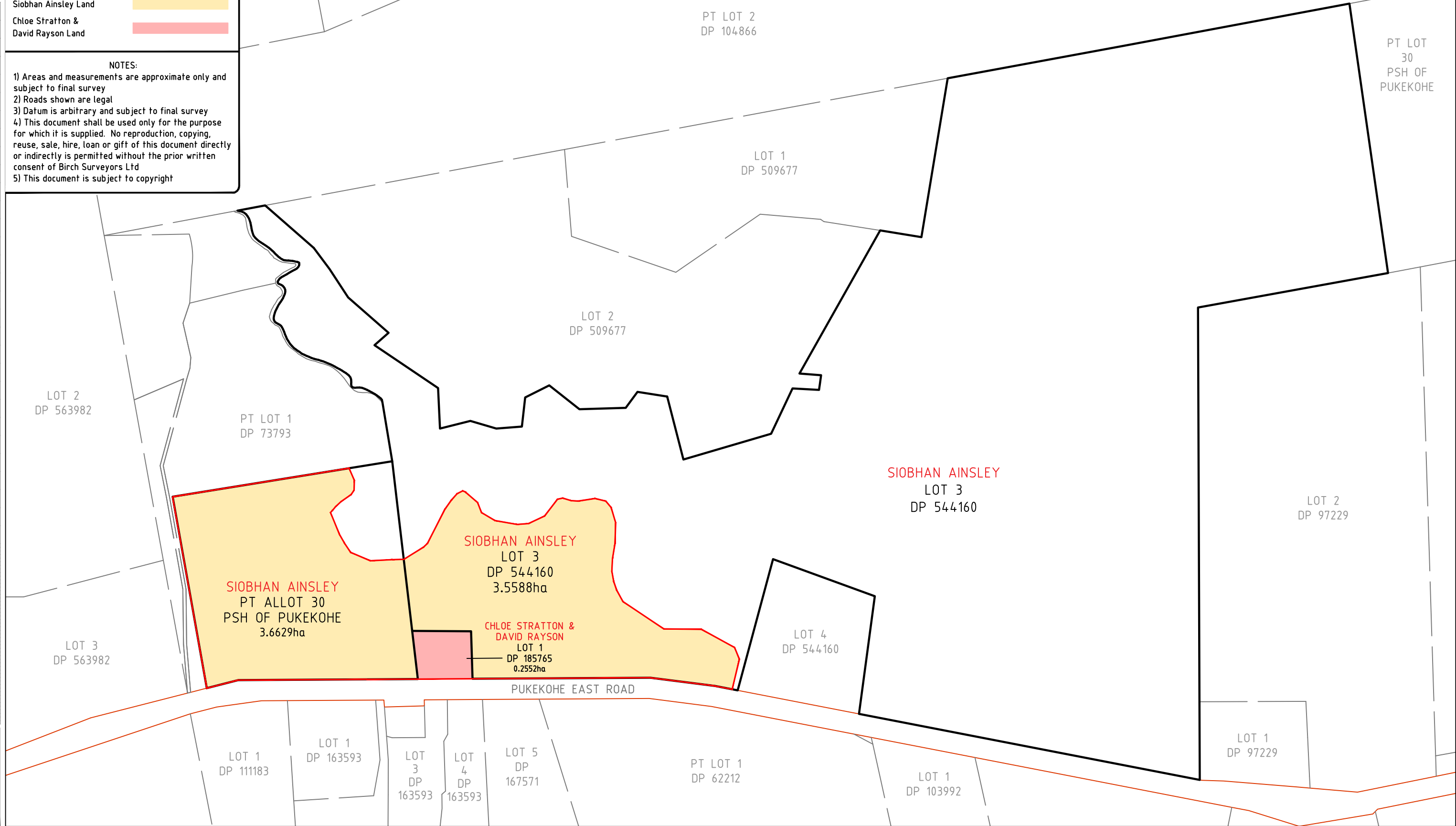
KEY

Lot Boundaries	
Road Boundaries	
Abuttal Boundaries	
Concept Boundaries	
Siobhan Ainsley Land	
Chloe Stratton & David Rayson Land	

NOTES:

- 1) Areas and measurements are approximate only and subject to final survey
- 2) Roads shown are legal
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Birch Planning Surveying Engineering
LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769ha
REGISTERED OWNERS	-

PROJECT NAME

**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840
Designed	-	Date	-	Scale	Hz: 1:3500 @ A3
Drawn	BSL	Date	11/2023	REV. BY DATE COMMENT	A TR 11/23 SCHEDULE 1
Approved	SWB	Date	11/2023		

TITLE	SCHEDULE 1 - PLAN CHANGE AREA AREA 7.4769ha	
Drawing Name	F:\..ICAD\Schedule 1.dwg /	SUBJECT TO FINAL SURVEY
Rev.	A	A



PT LOT 1
DP 73793

LOT 3
DP 544160

EXS. CONSERVATION
COVENANT

EXS. CONSERVATION
COVENANT

PT ALLOT 30
PSH OF
PUKEKOHE

PROPOSED RURAL URBAN
BOUNDARY

3800m² STORMWATER
TREATMENT POND FOR
ROUNDAABOUT

3860m² STORMWATER
TREATMENT POND FOR
RESIDENTS

6283m²
SEVERANCE

7638m²
ROUNDAABOUT
& NEW ROAD
WITHIN TITLE

PUKEKOHE EAST ROAD
(SEALED & IN USE)

PT LOT 30
PSH OF
PUKEKOHE

LOT 1
DP 111183

LOT 1
DP 163593

LOT 4
DP 163593

LOT 5
DP 167571

PT LOT 1
DP 62212

KEY

Plan Change Boundary	
Existing Road Boundary	
Abuttal Boundary	
Existing Easement	
Existing Easement to be Removed	
Road Widening 2m	
NZTA Earthworks	
Treatment Pond	
Bike Lane	
Footpath	
Proposed Road	
Parking Lane	
Street Light Area	

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LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769ha
REGISTERED OWNERS	-

PROJECT NAME

**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	Date	Project No.
T.RHODES	28/04/2022	5840
Designed	Date	Scale HZ: 1:1500 @ A3
-	-	-
Drawn	Date	REV. BY DATE COMMENT
BSL	11/2023	A TR 09/23 CONCEPT PLAN
Approved	Date	B NS 10/23
SWB	11/2023	C TR 11/23 ROAD

TITLE

**CONCEPT PLAN
INDICATIVE ONLY**

Drawing Name: F:_CAD\CP 5840 C.dwg /CONCEPT

462 Rev. C



KEY

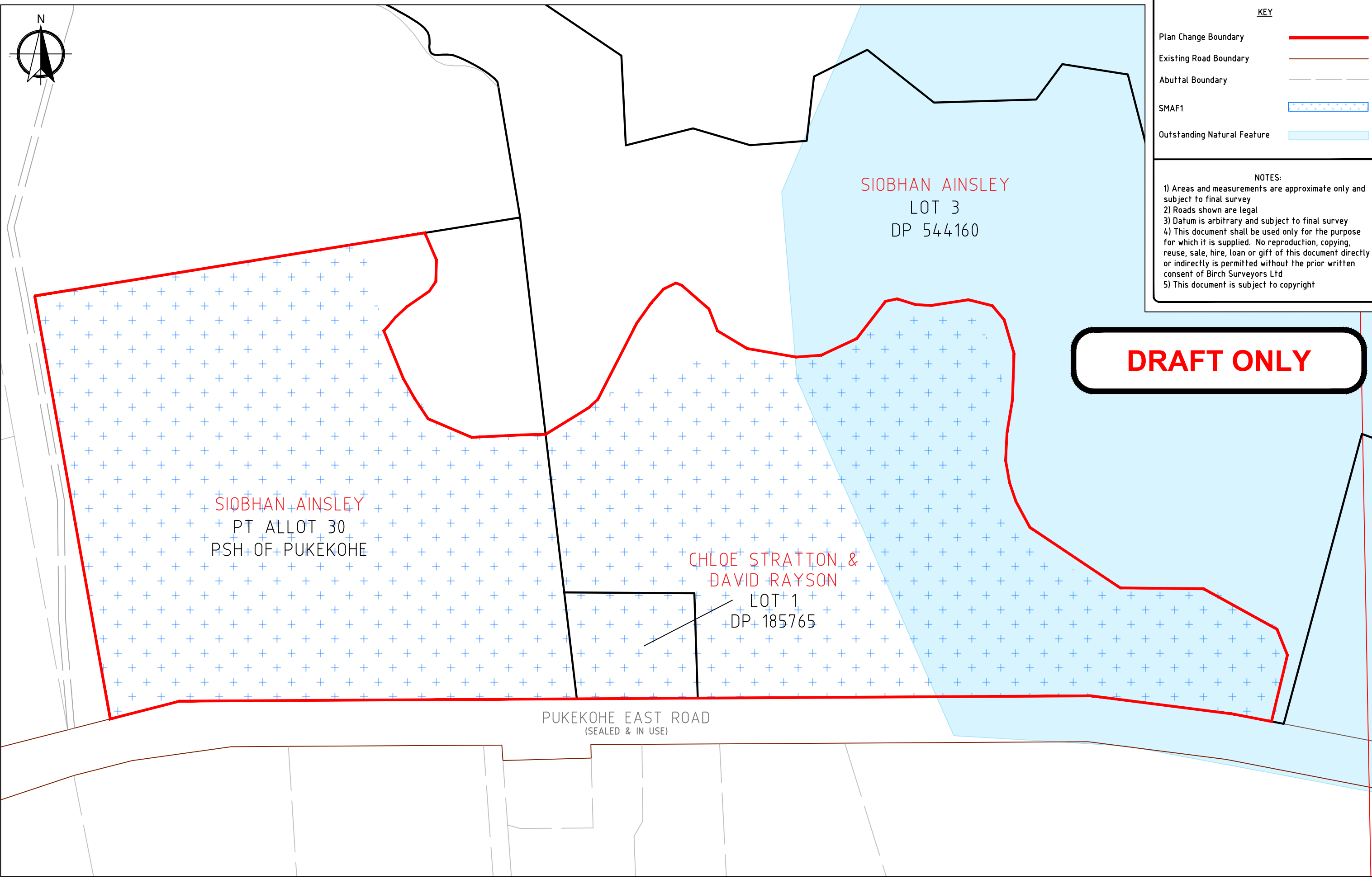
- Plan Change Boundary
- Existing Road Boundary
- Abuttal Boundary
- SMAF1
- Outstanding Natural Feature

NOTES:

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Engineering

LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769 ha
REGISTERED OWNERS	-

PROJECT NAME

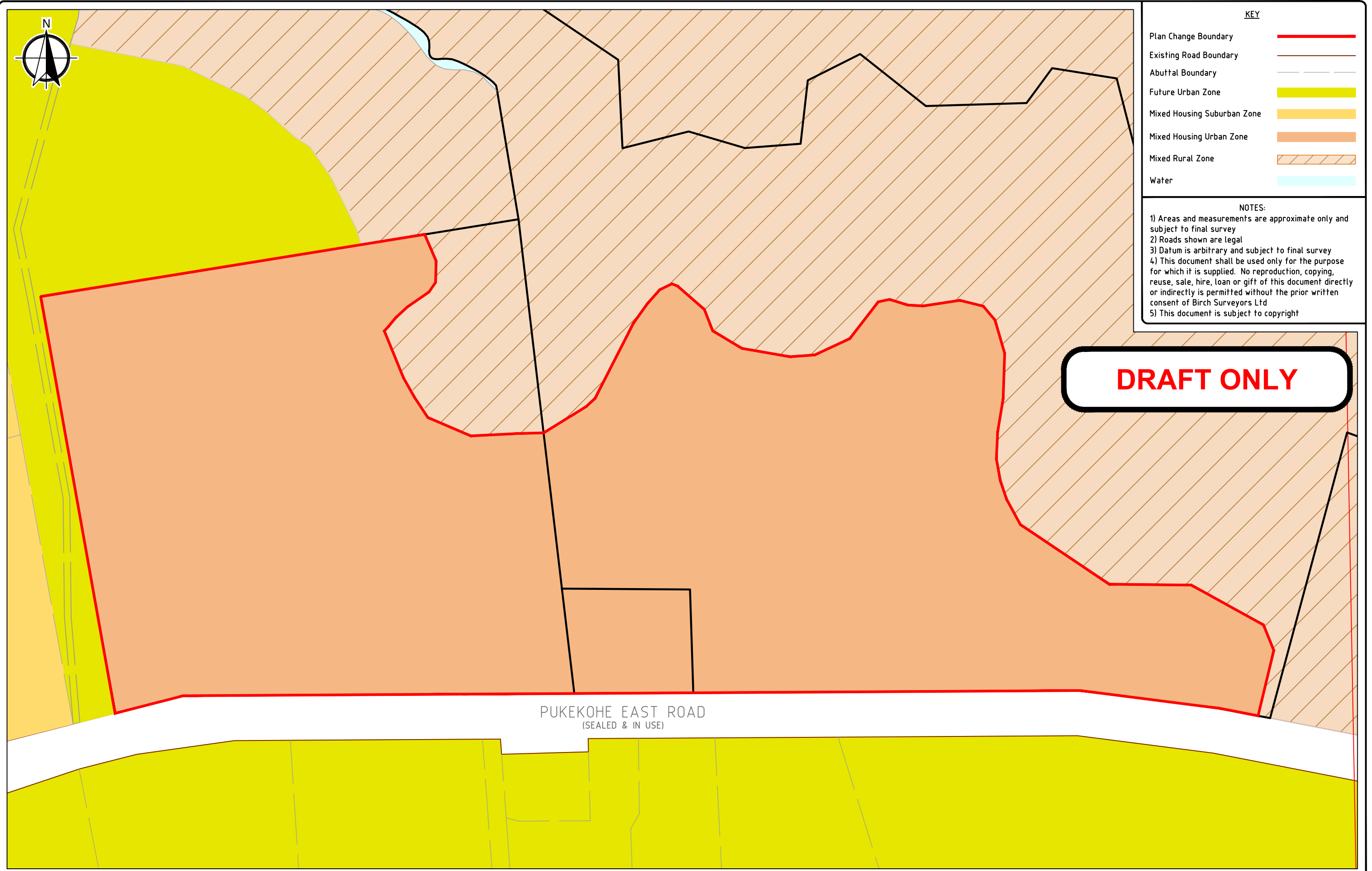
**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840
Designed	-	Date	-	Scale	Hz: 1:1500 @ A3
Drawn	-	Date	-	REV. BY DATE COMMENT	
BSL	-	11/2023	-	A TR 09/23	CONCEPT PLAN
Approved	-	11/2023	-	B NS 10/23	-
SWB	-	11/2023	-	C TR 11/23	ROAD

TITLE

PRECINCT PLAN

Drawing Name: F:\..CAD\CP 5840 C.dwg /PRECINCT SUBJECT TO FINAL SURVEY Rev. C



KEY

Plan Change Boundary	
Existing Road Boundary	
Abuttal Boundary	
Future Urban Zone	
Mixed Housing Suburban Zone	
Mixed Housing Urban Zone	
Mixed Rural Zone	
Water	

- NOTES:**
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PUKEKOHE EAST ROAD
(SEALED & IN USE)

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Birch Planning Surveying Engineering
LAND DEVELOPMENT CONSULTANTS

2A Wesley Street
Pukekohe 2120
PO Box 475
Pukekohe 2340

Ph: 09 237 1111
pukekohe@birch.nz
www.birch.nz

LOCAL AUTHORITY	AUCKLAND COUNCIL
PLANNING MAP	-
ZONING	FUTURE URBAN ZONE
ACTIVITY	-
COMPRISED IN	-
TOTAL AREA	7.4769ha
REGISTERED OWNERS	-

PROJECT NAME

**HONARA PLAN CHANGE
PUKEKOHE EAST ROAD
PUKEKOHE**

Surveyed	T.RHODES	Date	28/04/2022	Project No.	5840		
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Approved	-	11/2023	-	B	NS	10/23	-
SWB	-	11/2023	-	C	TR	11/23	ROAD

TITLE

PLAN CHANGE AREA

Drawing Name: F:_CAD\CP 5840 C.dwg /PLAN CHANGE SUBJECT TO FINAL SURVEY Rev. C

MINUTES OF MEETING

Project Name:	Honara Trust Plan Change	Our Ref:	PN 5840
Project Description:	Meeting with Auckland Council team to discuss plan change proposal		
Date:	12/09/2023		
Time:	12:00PM		
Location:	Auckland Council Offices (Albert Street)		
Attendees:	Craig Cairncross (Auckland Council) (CC) Chris Freke (Auckland Transport) (CF) Catherine Absil-Couzins (Auckland Transport) (CAC) Kerryn Swanepoel (Watercare) (KS) Siobhan & Ross Ainsley (Applicant/landowners) (SRA) Sir William Birch (Birch – Project Lead) (SWB) Kelly Bosgra (Birch – Engineering) (KB) James Oakley (Birch – Planning) (JO)		
Apologies:	-		
Absent:	-		
ITEM	DISCUSSION	ACTION	
1. Background/Land Ownership	<p>The properties and the ownership of the land that is subject to the plan change was discussed. SRA advised that they do not own 107 Pukekohe East Road but noted that the landowner would be supportive of a proposal to rezone their land. The installation of transport infrastructure was raised by CF.</p> <p>Other plan changes/developments in the area were discussed.</p>	-	
2. Outstanding Natural Feature	The Pukekohe East Tuff Ring partially applying over some of the Future Urban land was raised. This was discussed but there was no answer as to how this came about other than with reference to the development of the AUP.	-	
3. Transport	<p>The concept plan was discussed by SWB. There was discussion on previous consultation with the Supporting Growth Alliance and the identified access point to Pukekohe East Road. CF raised whether there was any input by a transport consultant on its appropriateness. JO advised input was yet to be provided.</p> <p>CF/CC enquired about setback distances between proposed access and the identified roundabout and the potential removal of access from Pukekohe East Road.</p>	-	
4. Stormwater Ponds	The indicative location of the stormwater ponds which straddles proposed area to be rezoned and adjoining Mixed Rural Zone (MRZ) area was discussed. Queries were raised regarding the consenting nature of the activity in the MRZ. Some options to address it were discussed including shifting the Rural Urban Boundary (which was noted as done as a desktop exercise in parts) or getting a designation applied over the location. Further investigation on this matter will be undertaken.	JO	
6. Wastewater/Water Supply	<p>KB described the proposed wastewater/water supply servicing regime. KS suggested talking with Myland Partners regarding their infrastructure.</p> <p>KB mentioned he would provide information to KS for the team to review and provide feedback on.</p>	KB/KS	
Meeting closed:	13:00		
Next meeting:	TBD		
Post Meeting Notes:	-		

DRAFT

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) SIR WILLIAM BIRCH (AGENT)

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

Address for service of Submitter

P.O. Box 429, PUKEKOHE

Telephone: 0272948321

Email: sirwilliam@atbirch.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority	Auckland Transport
For: A new designation or alteration to an existing designation	Pukekohe NOR 4: Pukekohe North-East Arterial and NOR 5: Pukekohe East Road

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

This submission is on behalf of the owner Siobhan Ainsley of 87 Pukekohe East Road. - see attached email

My submission is:

- I or we support of the Notice of Requirement
- I or we are neutral to the Notice of Requirement
- I or we oppose to the Notice of Requirement

The reasons for my views are:

see attached email

(continue on a separate sheet if necessary)


I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

see attached email

I wish to be heard in support of my submission

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

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



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

13 November 2023

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

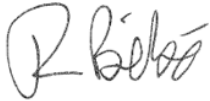
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

SUBMISSION BY PUKEKOHE MEGA TRUSTEES LIMITED AND WRIGHTSON WAY LIMITED ON NOTICE OF REQUIREMENT BY AUCKLAND TRANSPORT FOR PUKEKOHE SOUTH EAST ARTERIAL PROJECT AND PUKEKOHE SOUTH WEST UPGRADE PROJECT UNDER CLAUSE 7 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: unitaryplan@aucklandcouncil.govt.nz

Auckland Council
Level 16, 135 Albert Street
Private Bay 92300
Auckland 1142

Submitters: Pukekohe Mega Trustees Limited and Wrightson Way Limited

C/- Bianca Tree
MinterEllisonRuddWatts
PO Box 3798
Auckland 1140

bianca.tree@minterellison.co.nz

Phone: (09) 353 9784

Scope of submission

1. This is a submission by Pukekohe Mega Trustees Limited (**PMT**) and Wrightson Way Limited (**WWL**) (on a joint and several basis) on the notices of requirement (**NOR**) by Auckland Transport (**AT**) on behalf of the Supporting Growth Alliance (**SGA**) for a designation for a public work. The two NORs that PMT and WWL are submitting on are:
 - (a) the Pukekohe South East Arterial to upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Railway Line, including active mode facilities (**NOR 5**); and
 - (b) the Pukekohe South West Upgrade to upgrade the transport corridor between Helvetia Road and Svendsen Road, including active transport facilities and associated infrastructure (**NOR 6**).

2. PMT and WWL are not trade competitors for the purposes of section 308B of the Resource Management Act 1991 (**RMA**).
3. PMT and WWL oppose the NOR unless the matters in this submission are addressed.

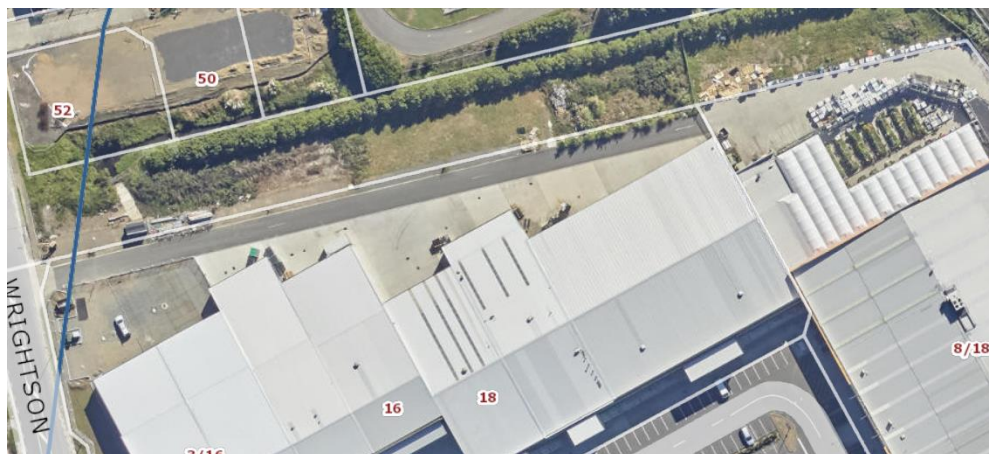
Background

4. PMT is the owner of the property at 12 Wrightson Way, Pukekohe (legal description Lot 11 DP 417411), which is a 1.4751 hectare site. PMT owns the Mitre 10 Mega currently located on the Site, which is leased and operated by Mitre 10 (New Zealand Limited).
5. WWL is the owner of the property at 16 – 18 Wrightson Way, Pukekohe (legal description Lot 10 DP 417411) which is a 1.323 hectare site. The buildings are tenanted by multiple tenants including Furniture Now, Guthrie Bowron, Stihl Shop, Dulux Trade, and others.
6. Both properties are part of the Pukekohe Mega Centre (**PMC**), which is a large format retail centre, which is a well-established commercial centre operating since approximately 2007 providing commercial activities in Pukekohe. The PMC site is approximately 13.4 hectares and is home to Harvey Norman, Briscoes, Rebel Sport, and Noel Leeming alongside Mitre 10. There are also several smaller retail outlets within the PMC.



7. A key feature of the PMC that is integral to the operation of the retail outlets is the rear access service lane, which is accessed from Wrightson Way and traverses the perimeter of the site, with vehicles travelling in a clockwise direction around the perimeter of the PMC, before exiting back onto Wrightson Way and connecting onto Manukau Road.

8. The service lane and access with Wrightson Way has been designed to enable both small trucks and larger vehicles such as 23m B-trains and 19.45m semi truck and trailer to access all loading bays for all units for inbound and outbound goods. The service lane forms part of the manoeuvring space for some of the loading bays. Smaller service vehicles servicing the WWL business to the north of the site also enter and exit via Wrightson Way (rather than traveling around the perimeter and increasing service vehicle movements on the Mitre 10 site). The service lane along the northern property boundary, and entry / exit to Wrightson Way, is shown below.



9. As there are multiple landowners, lessees and tenants within the PMC, there are easements registered on the relevant records of title to facilitate these service vehicle movements and enable all tenancies to operate.
10. The proposed boundary of NOR 5 includes the northern leg of the rear access service lane, including the current service lane access / exit from Wrightson Way, and the north-eastern corner of the Mitre 10 Mega Site, as shown below.



11. PMT and WWL understand that:
- (a) The NOR 5 boundary, with an exception of a small area in the north west of the Site, is for the purpose of construction activities only and will only be temporarily required for the works.
 - (b) The permanent works corridor will not include the service lane, except that the access to the service lane from Wrightson Way may need realignment, and a small corner of the PMC land is proposed to be acquired for the proposed roundabout (as noted above).
 - (c) The service lane is required for construction to enable access to the southern fill batter of the eastern leg of the proposed arterial, leading up to the roundabout and crossing over the North Island Main Trunk line.
 - (d) Final detail and proposed extents of the temporary construction corridor and the permanent works corridor will not be confirmed until detailed design stage. There is no certainty of this in NOR 5.
 - (e) AT is seeking a lapse date for the Designation for the NOR of 20 years.

Reason for submission

12. PMT and WWL oppose NOR 5 and NOR 6 in their entirety.
13. In general, PMT and WWL oppose the NOR as they:
- (a) Will not promote sustainable management of resources; and therefore will not achieve the purpose of the RMA;
 - (b) Are contrary to Part 2 and other provisions of the RMA;
 - (c) Will not meet the reasonably foreseeable needs of future generations;
 - (d) Do not adequately avoid, remedy or mitigate adverse effects on the environment;
 - (e) There has been an inadequate consideration of alternative sites, routes and methods;
 - (f) The location and extent of NOR 5 (and in particular its extension over the Site) is not necessary for achieving the objectives for which NOR 5 and NOR 6 are sought;

- (g) There has been insufficient consideration of the adverse effects of NOR 5 and NOR 6 on the operation of the PMC, including the necessary continued efficient, effective and safe operation of the service lane and the loading areas for access, manoeuvring, and loading operations both during construction and when the proposed arterial is operational.
14. Further to the general grounds above, PMT and WWL oppose the NOR on the following specific grounds:
- (a) Inclusion of the rear access service lane within the designation boundary of NOR 5 will have significant adverse effects on the continued use and development of the PMC as NOR 5 has not identified that the service lane is required for temporary construction access only.
 - (b) AT has not adequately considered alternatives for the arterial / Wrightson Way / Crosbie Road intersection design that require less land, avoids the service lane in its entirety, and provides a safer entrance and exit into Wrightson Way and the service lane for PMC customers and service vehicles.
 - (c) These issues are further exacerbated from the long time period sought for the lapse date on the Designation, and therefore blight that the Designation will have on the Site.

Decision sought

15. Decline NOR 5 and NOR 6 unless the matters raised in this submission are addressed in full, including:
- (a) modifying the boundary for NOR 5 as shown in Appendix A;
 - (b) modifying NOR 5 and NOR 6 to move the proposed arterial alignment to the north;
 - (c) ensuring efficient, effective and safe access is provided for customers to the PMC, both during construction and when the arterial is operational; and
 - (d) ensuring that the service lane and loading areas can continue to efficiently, effectively and safely service the PMC, both during construction and when the arterial is operational.
16. PMT and WWL wish to be heard in support of this submission.
17. If others make a similar submission, PMT and WWL will consider presenting a joint case with them at a hearing.

Dated this 13th day of November 2023

**Pukekohe Mega Trustees Limited and Wrightson
Way Limited** by their solicitors and duly authorised
agents MinterEllisonRuddWatts



Bianca Tree

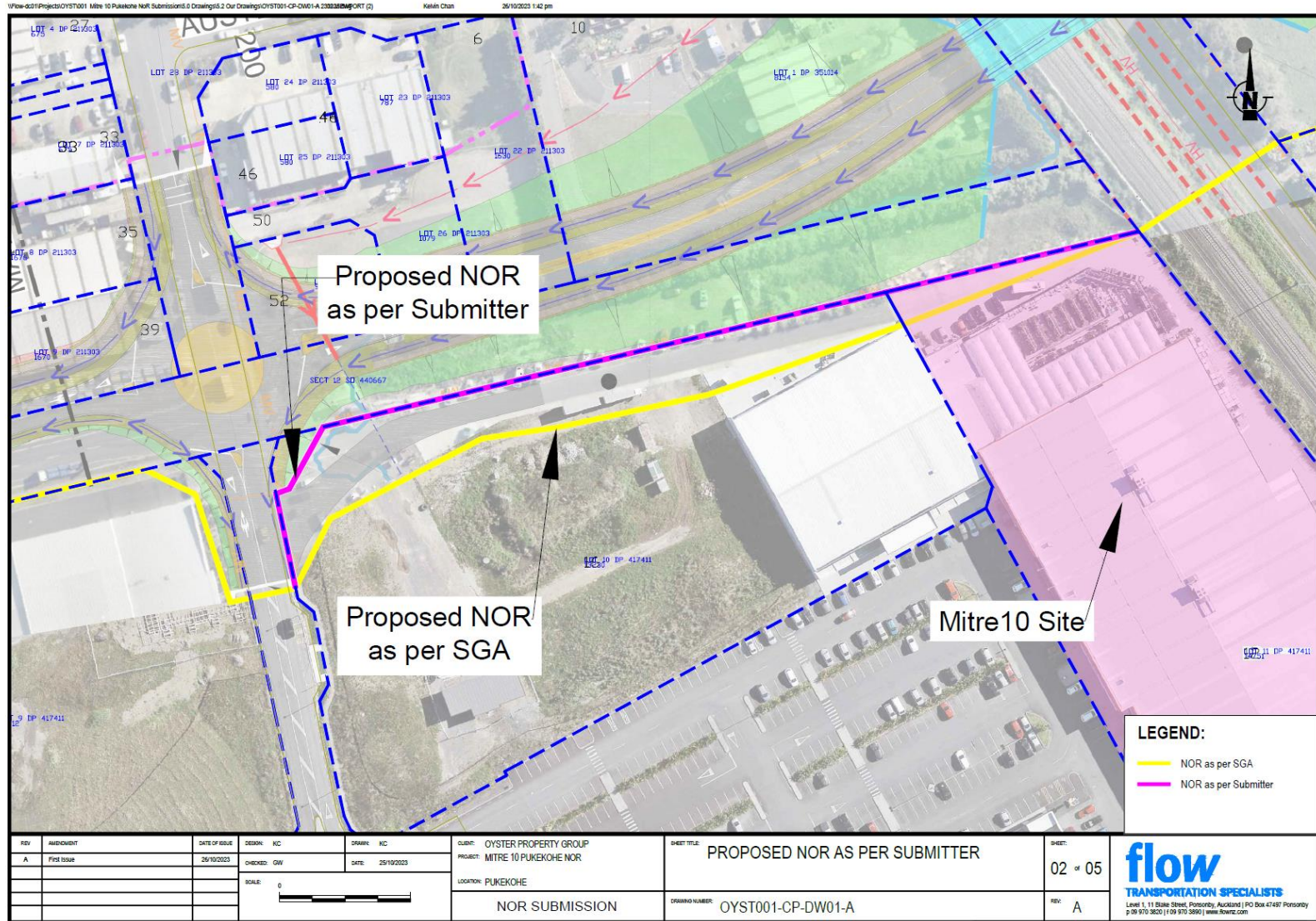
Counsel for Pukekohe Mega Trustees Limited and
Wrightson Way Limited

Address for service of submitter:

Pukekohe Mega Trustees Limited and Wrightson Way Limited
C/- MinterEllisonRuddWatts
PO Box 3798
Auckland 1140

Attention: B Tree
Telephone no: (09) 353 9700
Fax no: (09) 353 9701
Email: bianca.tree@minterellison.co.nz

Appendix A – Proposed modification to NOR 5 designation boundary



From: [Kathryn Cole](#)
To: [Unitary Plan](#)
Subject: Notice of Requirement -Pukekohe (NoR 6) South-West Upgrade
Date: Monday, 23 October 2023 5:21:15 pm

To whom it may concern,

I am writing this letter in response to correspondence received from the Auckland Council re the above mentioned as my property will be one of the affected properties in this proposal.

Tēnā koe, my name is Kathryn Cole. I am a local resident in Pukekohe of 64 years having been born and raised here. My husband (retired) and I have lived at 117 Princes Street for about twenty years. During which time we have seen a lot of changes within our neighbourhood, some good, some not so good. There are many new housing developments in this area and a new school. We now have three schools within close proximity to each other and two Day Care Centres, one of which is three doors down from us.

I was very grateful for the assistance given by an Auckland Council staff member who helped clarify what the actual proposal entailed in terms of work/construction, which brings me to my first question. In future, can you please outline the description of intended works planned or any such applications, in plain speaking language. Transparency is all that we ask in any communication - clear, detailed with dates, times etc.

We have not had very good experiences in the past when dealing with Auckland Transport and Waka Kotahi and are a little apprehensive about entering into another cycle with them. When the local bus services were introduced, the idea was to put a bus stop right outside our house ignoring the fact that it was only metres away from the then very busy and dangerous intersection, also obscuring the view of cars travelling across the intersection. I met/spoke with the team who had an information site at our local market and explained my concerns but never received feedback at the time. I felt having a bit of local knowledge might aid in their decision making. I also wrote of my concerns to the council and offered a solution which I am happy to say after many conversations, ended with a good outcome, a safer location further down the street which is easily accessible for the community as a whole.

When works began on the newly installed roundabout on Princes Street, there were the obvious disruptions to be expected - traffic delays, detours, noise etc. which were reasonable and acceptable. However what was not acceptable nor reasonable was the blatant disregard of the hours of work and the unbearable noise levels we were subjected to by the contractor. What was stated in the initial correspondence about working hours and conditions was not adhered to many times. For example - work was to cease at 7pm. This did not happen. Work continued throughout the whole night on more than one occasion involving a huge asphalt machine which caused the whole street to vibrate and was so loud it was deafening, right outside our bedroom window, leaving us sleep deprived and very angry as I had to start work at 6am. We weren't even advised about the noise levels that this machine would create. When I tried to contact the person in charge, the call went straight to voicemail, several times and when I finally got through to a real person, the response was very casual and evasive. We then had issues with the contractor (Fulton Hogan) about damages done to our property after the work was completed - namely our fence was broken, the front lawn was left uneven, concrete had been sprayed on the fence, concrete clumps were left on the front lawn, the topsoil wasn't level with the new footpath, the general state of the adjoining road and neighbouring properties were left in a mess, the workmen had just dumped their lunch/morning tea rubbish. A huge hole was dug outside on the front lawn where concrete and rubbish was discarded and then covered up. Contractor vehicles were constantly parked in our driveway which prevented us from getting in or out. All of which I took photos and sent in with a complaint. The foreman displayed a non willingness to work through the issues or engage in dialogue with us. In fact he denied all of it until the photos were presented to him. Auckland Council very kindly sent a mediator to work through and resolve the issues which was finally completed about a month later. The whole point being is that Auckland Council pay these contractors with our rates money and it's a lot of money. They shouldn't be paid if the jobs are below standard or contracts breached!. Hence our apprehension and wanting more information.

With the intension of these proposed works, is it going to cause more congestion? We would like to know what work is actually going to be carried out on this next proposal and could someone from Council come and explain it to us in full . It would be helpful to have current diagrams showing the affected areas. We would also like an assurance in writing that work conditions will be strictly adhered to at all times and that the bulk of the work is carried out during the day and not at night or on Sundays. More importantly, will consultation with the people affected take place so that an agreement between all parties **before commencement** of all work etc is

set.. We have a few elderly residents on our street as well. We felt 'bulldozed' by the contractors on our last experience simply because we had no person to contact when the issues were happening and it just seemed that they could just do what they wanted. Not a good way to promote sustaining relationships with the community.

In as much as Auckland Transport and Waka Kotahi have a responsibility to develop/maintain transport infrastructure, I believe they also have an obligation and responsibility to factor in the safety aspect for the communities in the planning and design process. Since the roundabout has been installed, there has been a huge increase in traffic flow through Princes Street coming from the West end of Princes Street where all the new housing development and school is. Cars travel at high speeds through here from the Princes Street West end and on some occasions we have motorbike riders screaming up and down the road doing wheel stands. They have also been known to ride on the footpaths. There are also tractors that use this road which seems odd as there are no market gardens near the vicinity that would warrant them being in the area. Because we have the three schools as previously mentioned it brings the obvious - high density of traffic and pedestrians, particularly children, which is of grave concern to us, being grandparents. About three months ago we witnessed a little one all of about aged five, standing at the edge of the roundabout, waiting to cross. She was obviously unaware of the dangers and proceeded to cross narrowly being missed by a car that came screaming around the corner. I alerted my husband who went out to the roundabout. In the meantime, a young man in a black commodore car approaching the roundabout, had seen her, stopped, got out and helped the little one across the road. He then phoned the parents and waited for them to arrive. This is an all too familiar occurrence now. On another occasion just two days ago, a child was on the crossing on her scooter and was almost hit by a car speeding around the corner. A truck owned by one of the local produce companies stopped in front of another child on a scooter and luckily he did because he slowed the speeding traffic that was coming up behind him from the opposite direction from the Victoria Street end. My own car whilst parked on the roadside outside my gate was rear ended. There was significant damage caused to my car all because the gentleman was travelling so fast, he didn't have time to react quick enough as he was coming around the corner. Even though he admitted fault and the insurance settled everything, there was still no need for it to happen. He was simply going too fast. I don't feel safe even coming out of my driveway on the roundabout corner. Last month there were three really bad accidents at the roundabout. Bringing me back to my original point. There needs to be some thought when future proofing these projects, about how these changes will keep communities safe. Whether speed restrictions need to be implemented by introducing speed bumps (which I'm in favour of) or speed cameras thus deterring heavy traffic around the school zones particularly on a road such as this (Princes Street) or investigating other routes to take the heavy streams of traffic away from the school zones. The onus also rests on driver behaviour, responsibility and compliance as well I do agree. But hopefully by implementing these additional measures it will reduce the potential risk factors. Since the roundabout was opened, the volume of traffic has continued to increase steadily and consistently and I feel we need to quieten and deter the traffic that comes from the Princes Street west end travelling on to Princes Street for the reasons previously outlined. It can't be that because the design looks good on paper or that it's convenient to put it on the plan that, that's how it should be or just because it happens everywhere else in Auckland doesn't mean it should happen here. Each community has its own makeup - some with high commercial areas, others with industrial zones and here, market garden/produce communities.

I have always found Auckland Council to be helpful in my past dealings with them and forward thinking. I thank council for the opportunity to express my views and for their consideration. We simply don't want to go through another experience as outlined earlier so it is my hope that Auckland Council will encourage and insist on, whilst working alongside other agencies such as Auckland Transport and Waka Kotahi, to be transparent, respectful and honest and take all considerations into account when planning future projects and that all contractors alike, be held accountable for what they say and do and keep them to their word.

I am happy to discuss this with you further should you require it.

Ngā mihi
Kathryn Cole

M: 022 027 5685



480

Auckland Council

Private Bag 92300

Auckland 1142

Attn: Planning Technician

Postage on this envelope may be used only once within New Zealand

Sorted and delivered by NZ Post

Sender *Gloria Mayor*

Name:

Company:

Address: *11 Nelson St.*

Town/City: *Pukekohe* Postcode: *2120.*

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

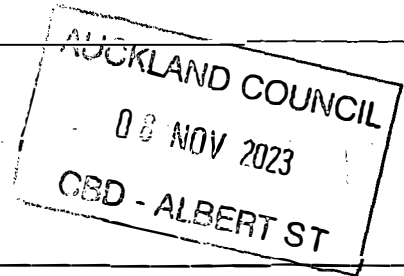
Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Gloria Ann Mayor

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



Address for service of Submitter

111 Nelson Street

Pukekohe

Telephone:

09 2387785

Email:

malcolmondgloria@gmail.com

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 6: Pukekohe South-West Upgrade

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

We are objecting to submission on a requirement for a designation or an alteration to a designation at 111 Nelson Street Pukekohe relating to all the above sections

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

The adverse effect on the value of the property and the saleability. It appears this is mainly to install a cycleway which will effect my and others driveways to the degree of making them dangerous.

485

Great sentimental value will be lost with the removal of my rose garden, many of the plants have been given by friends and family who have since passed.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

If a cycleway is to be installed we recommend installing it on the otherside of the road where there is currently a large vacant section adjoined by the Cosmopolitan Club.

I wish to be heard in support of my submission

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

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

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

3-11-2023
Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

EWEN CAMPBELL McINTYRE ; BEVERLEY EILEEN McINTYRE

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

Address for service of Submitter

1 WARD ST, PUKEKOHE 2120

Telephone:

0211 322 883

Email:

ecmc155@gmail.com

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 6: Pukekohe South-West Upgrade

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

PLEASE SEE SEPARATE SUBMISSION PAPER

ATTACHED

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

As per separate attached submission

I wish to be heard in support of my submission



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



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




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

7 - 11 - 23
Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

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- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Submission to Auckland Council on

Pukekohe : Pukekohe South-West Upgrade (NoR 6) Auckland Transport

With particular reference to 1 Ward Street , Pukekohe.

FROM: Ewen McIntyre and Bev McIntyre

DATE: 7 November 2023

WE object to NoR 6 in so far as it affects 1 Ward St.

Background.

We, Ewen and Bev McIntyre, purchased 1 Ward St, Pukekohe in early 2022 and moved into the premises on 6 April 2022.

We retired from farming at Puni where we lived for 48 years.

1 Ward St has proved an ideal retirement property for us as it is relatively flat with minimal steps and is close to amenities. A 500 square meter section provides adequate space for Bev's love of gardening.

Overview of this submission.

Firstly, a look at the design of the changes as they affect 1 Ward St and note some alterations that would mitigate our concerns.

Secondly, a perusal of the legal ramifications of the changes sought.

Thirdly, a discussion of the financial ramifications for us with the NoR as currently formulated.

Summary

DESIGN of NoR 6 as it affects 1 Ward St

Land Requirement

From our perusal of the documents available to us, we see that the NoR would require 56 square meters of our section on the Northern side of Ward St. It appears that the NOR is to enable a slip lane for left turning traffic onto Queen St, a cycle lane and footpath.

As this boundary of 1 Ward St to the road reserve is 19.39 metre in length, we calculate the requirement is for a strip of land approximately 2.9 meters wide.

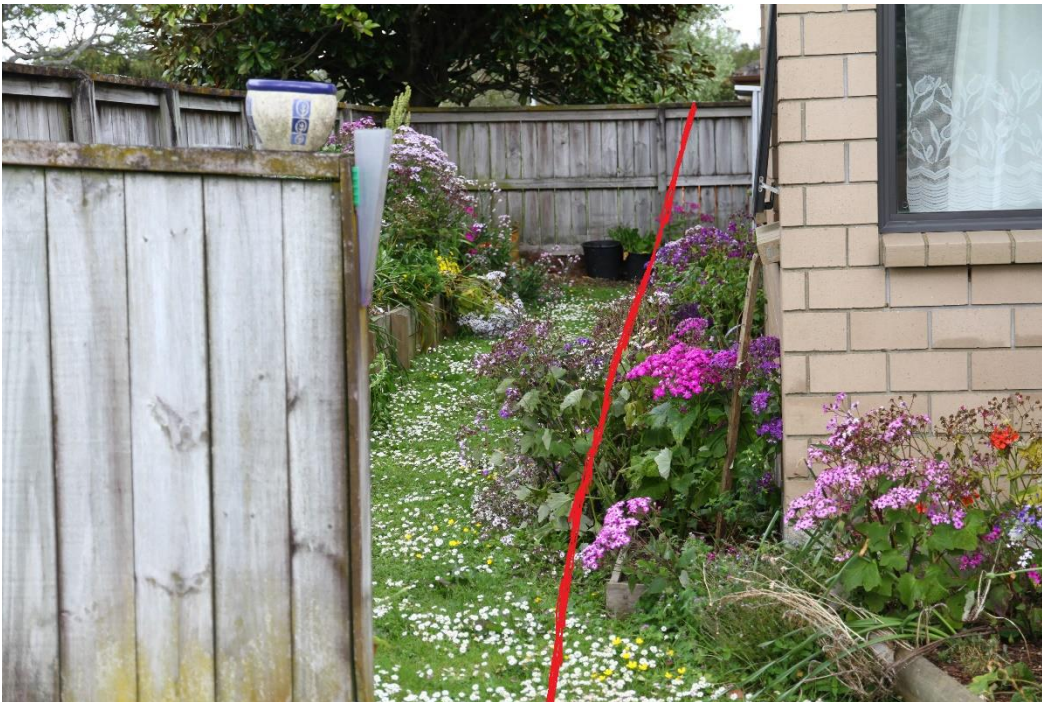
The recorded distance from the house to the road reserve is approximately 4.0 metres.

This would indicate a proposed boundary approximately 1.1 metre from the house.

This would mean no more than a narrow passageway down the southern side of the house.

The 56 square meters is the prime gardening area of the section.

The following photo is of the area of garden that would be impacted along with a red line indicating the possible new boundary alignment approximately 1 meter from the dwelling.



Assuming some sort of solid barrier would be erected then this would produce a prison-like effect in our window view.



This is the current view from the main bedroom onto the garden area with the boundary fence approximately 4 meters from the window.

Cycleway

It should be noted that vehicle access for 1 Ward St is from/onto Queen St. An alternative address for this property is 179 Queen St.

Because of this we have concerns around the transition of the cycleway at the Queen St interface. This would interfere with our vehicle access to Queen St and create a dangerous situation with cycles suddenly appearing, perhaps at a higher speed than anticipated.

It seems a poor design philosophy to have cycleways crossing vehicle access to properties. Who has the right-of-way?

It is also a concern regarding the earthworks that may occur and what effect that may have on the flooding prospects of 1 Ward St.

Flooding

A major rebuild of the area some years ago to install a traffic roundabout and improve floodwater egress certainly worked early this year when large rainfall events occurred. This area receives a significant amount of surface water running off Pukekohe hill. We would hope that there would be no changes that would increase the likelihood of our house being flooded.

SOLUTIONS/SUGGESTIONS/QUESTIONS:

- 1) What evidence is there that the proposed slip lane for left turning traffic onto Queen St is necessary? If the slip lane is removed, then, the cycleway and footpath could be largely contained in the current road reserve, and less of our land would be required.
- 2) Make use of land on the south side of Ward St in the design of the upgrades. Has there been any consideration in this regard, as there appears to be some distance from the houses to the road reserve on this side of the road, and there is also undeveloped land to the east of Queen St and South of Nelson St.
- 3) End cycleway at the walkway to Parsot Place and divert cyclists onto that road. This would also give better access for cyclists across Queen St.
- 4) Redesign the intersection of Ward, Queen, and Nelson to obviate the need to take any land from 1 Ward St.

Legal Ramifications of the NoR on 1 Ward St.

There is currently a 3-meter distance requirement for yardage between a house and a road reserve.

How would the Council overcome this requirement if this proposal were to proceed?
How will the Council overcome the effects on our amenity and enjoyment of our land?

Financial Implication of NoR 6 on 1 Ward St.

We have the immediate and ongoing effect on the saleability of the property.
We believe that it would be a difficult property to sell with the prospect of a road reserve wall in very close proximity to the house.
There is also the fact that over 10 % of the section would be taken for the development.

While this would still conform to the current legal requirement of less than 50% site coverage the fact is that the best portion of the section would have disappeared.

An experienced Licenced Real Estate Salesperson has inspected the property and has the following advice:

- 1) This Notice of Requirement would greatly reduce the number of potential purchasers due the unknown factor of if and when the development may take place.
- 2) Interested buyers would want a significant discount on the fair market value of 1 Ward St. because of this unknown factor.

In the short term, who has responsibility for the decrease in the value of 1 Ward St?

Summary.

We object to the NoR6 as;

- it will negatively impact our ability to enjoy our land, as we do currently, and will leave our yard space approximately 1.1m from the house to the road reserve;
- it will negatively impact our onsite amenity values;
- we have not seen evidence as to the need for this road upgrade as proposed, particularly a slip lane for left turning traffic onto Queen St, that could reduce or even remove the requirement for our land;
- we have not seen evidence as to whether any alternative options to the design and location of the intersection upgrade, utilising the southern side of Ward St and the vacant land to the east of Queen St, and south of Nelson St, have been considered, to lessen the impact and extent of our land being taken;
- we have concerns as to the control of the cycle lane speed around the corner towards our vehicle crossing, and the intersection area;
- there are financial implications to us that have not been addressed or discussed.

Conclusion.

We object to NoR 6 on the basis that it unfairly impinges on our freehold rights to have quiet enjoyment of our property at 1 Ward St.

We believe there are potential other adequate solutions to enable the successful completion of this intersection without the need to take land from 1 Ward St.

The financial implications are immediate as well as long term and are difficult to address unless Council buys the property outright.

Finally, is it possible to have a contact person available to us to discuss these ongoing issues?

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:917] Notice of Requirement online submission - Jade Baker
Date: Tuesday, 7 November 2023 10:00:46 AM

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Jade Baker

Organisation name:

Full name of your agent: Jade Baker

Email address: jade.moulden9@gmail.com

Contact phone number:

Postal address:
43 Nelson Street
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 6 Pukekohe South-West Upgrade

The specific provisions that my submission relates to are:
43 Nelson Street Pukekohe

Do you support or oppose the Notice of Requirement? I or we are neutral to the Notice of Requirement.

The reason for my or our views are:

I understand the potential benefits of having more active transport modes in the future. My concern is that in the consultation documents provided, the requirement area goes right up to the house. When we discussed this with the representatives from Supporting Growth, we were assured the use of that area was temporary during construction and the permanent requirement is much smaller. The issue we have is that this is not differentiated in the plans and verbal assurances are insufficient when the project is so far off execution (10+ years I was told). I have to disclose that there is a requirement on this property if we decide to sell and potential buyers cannot be expected to accept our word for it that part of the requirement is temporary. Not only that, but going off the current plan, a potential buyer would be very put off by the idea of members of the public being that close to the house as it will detrimentally affect privacy and sense of safety, which will decrease the value we receive when we sell. When the work eventually happens, that owner will receive compensation but every person prior will be disadvantaged unless the plans are clarified and there is a clear and documented explanation for the different uses planned. I did not understand why the other side of the road was not viable when I discussed the plan with the Supporting Growth team. Knowing the area well, I would have thought there were benefits given there is a park and primary school on the south side of the road, meaning families and children using the cycle lanes would not have to cross traffic to get to their destinations. There is also a largely unused section on the corner of Nelson and Queen Street which would decrease impacted households across the road. There is a new set of townhouses going in next to the park so a requirement now would surely be more cost effective as there wont be fences to replace and less disruptive to homeowners as they are yet to be constructed.

I or we seek the following recommendation or decision from Auckland Council:

Rework the plans to clearly differentiate between permanent requirements and temporary

requirements. Provide estimated timeframes for temporary use. Describe the different compensation methods (e.g. permanent requirement will be bought at fair market value, temporary requirements will be rented at fair market value).

Submission date: 7 November 2023

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during detailed design where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:

Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

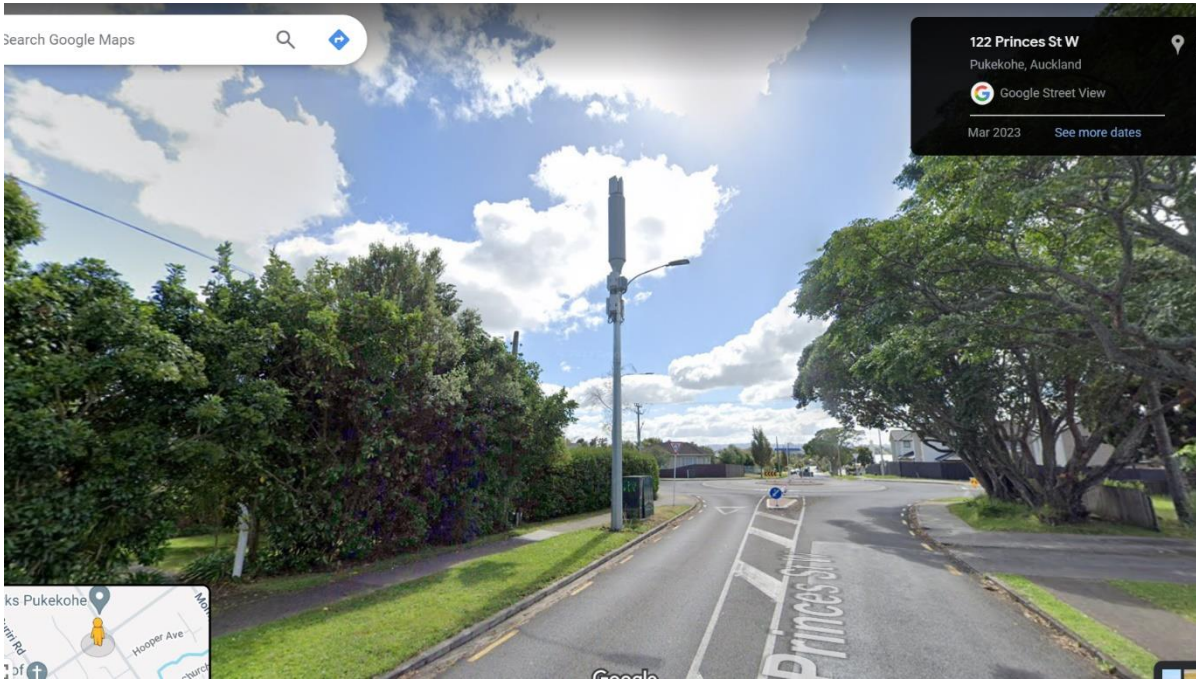
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

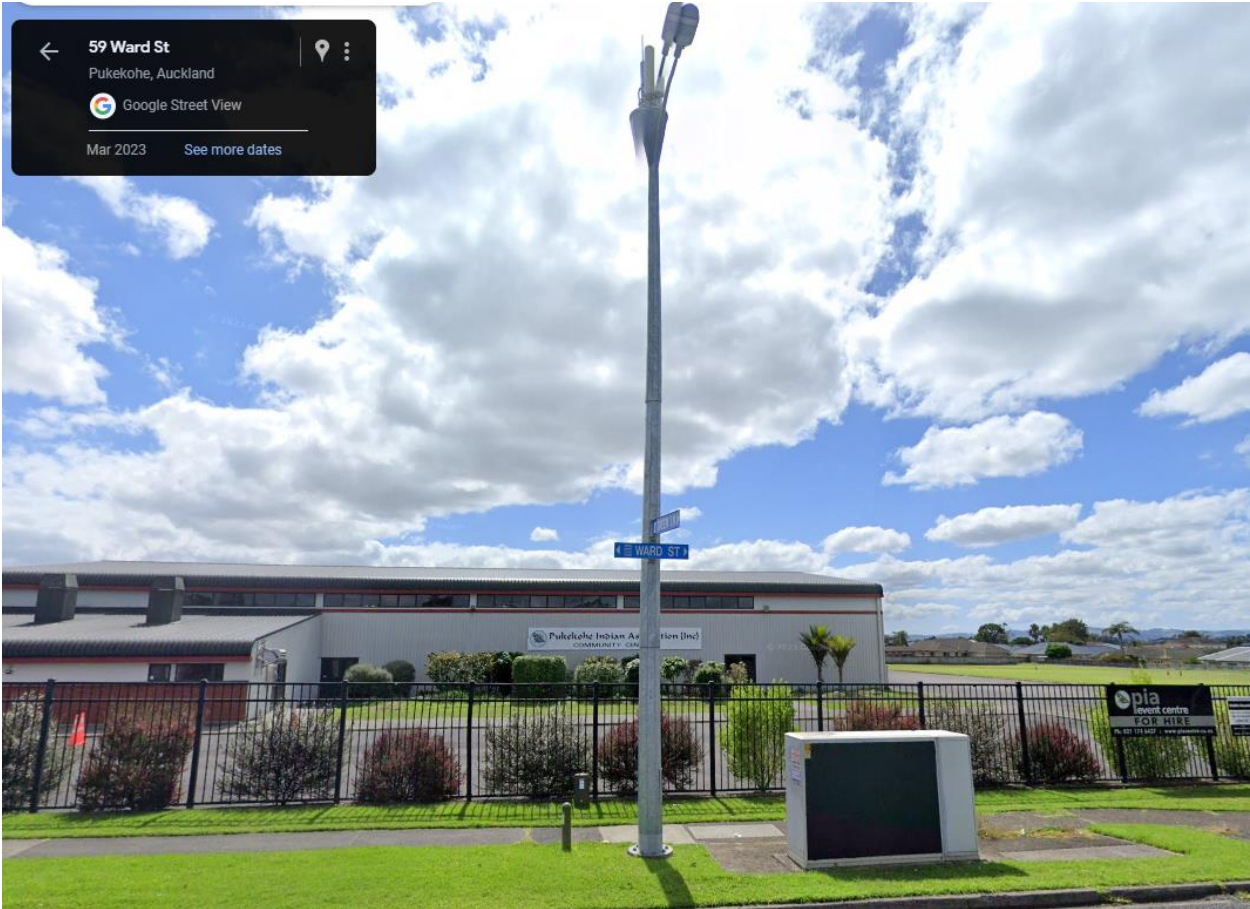
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

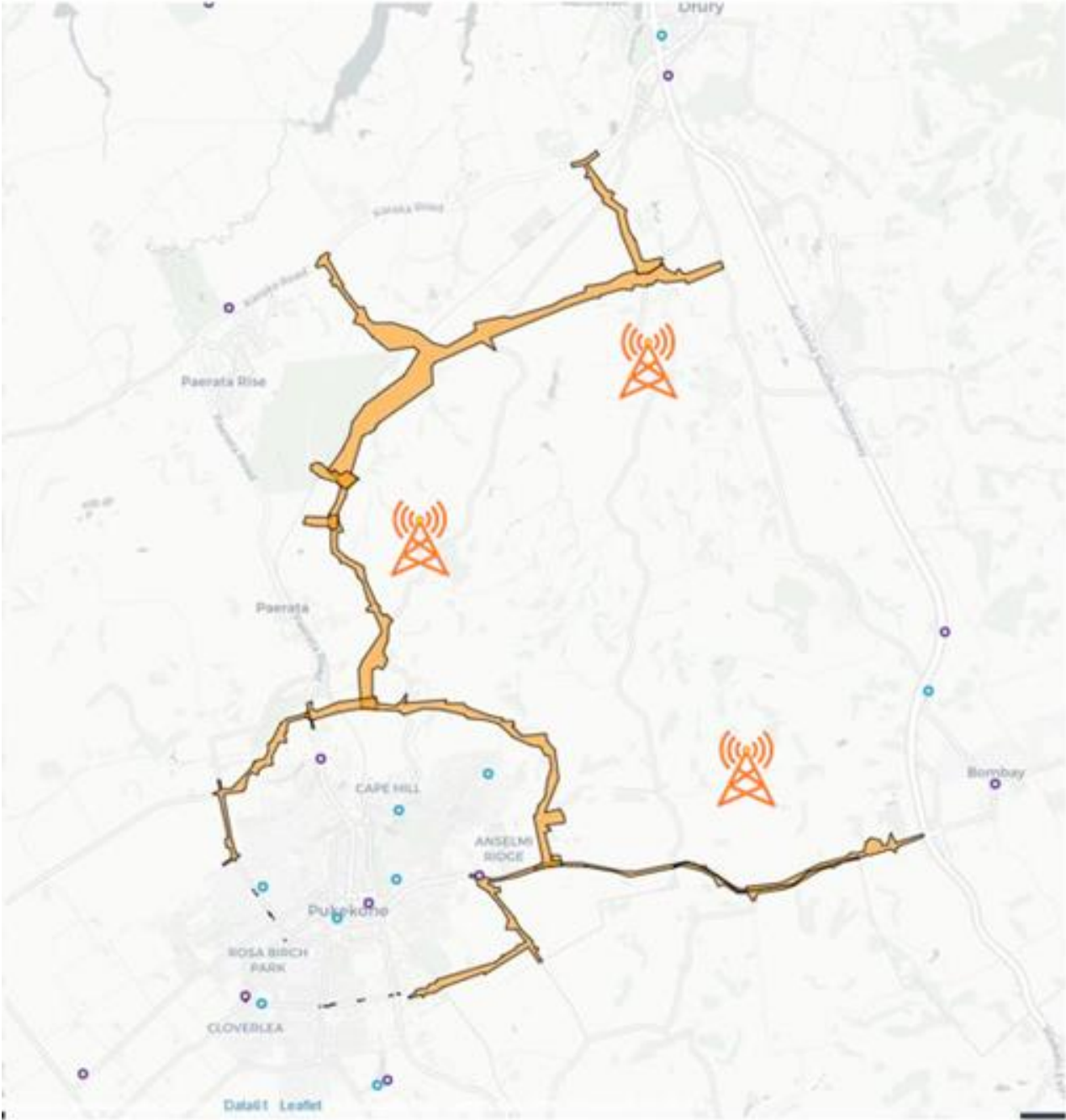


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

Submission re Notice of Requirement by NZ Transport Agency

Re:

Property Address: 73 West St Pukekohe

Record of Title number: 310149

SG Reference Number: 550949

The subject property is a freehold 120 square metre, brick & tile, two bedroom with single garage dwelling, sited on a 302 square metre land area.

The property is fully fenced with a matching brick and metal fence, which is also fully hedged and gated. This provides privacy for the property occupants.

Secure 'off street parking' is available for two vehicles in addition to the single garage. There is no adjacent street parking due to the intersection.

The existing council footpath adjacent to the hedge/fence is varied in width from 1.83m to 2.20m wide, as it transverses the corner of West St and Helvetia Road. This is currently used safely by both pedestrians and cyclists.

In addition to this width from the footpath edge to the curb is a council grass verge of 2.1m to 2.3m.

This gives a full width from fence to gutter/kerb of 3.93m to 4.5m.

This 3.93m to 4.5m is more than adequate for the proposed joint footpath/ cycleway as it exceeds the Auckland Council owned joint cycleway/footpath width at the Auckland City waterfront.

The proposal to take land from the front garden which has a width of 3.25m from house to fence is highly detrimental to this small land area property and it's occupants. .

It will result in reduced outdoor living space, reduced privacy for the occupants and the removal of one on-site parking space. It is also detrimental to the property's value.

Diagonally opposite on the round-a-bout on the corner of West St and Harris St is a vacant area of land, bigger than the entire land area of 73 West St, owned by Auckland Council and currently designated as a public park. It has a tree and a rarely used park bench.

As it is proposed that the intersection will be altered in addition to the cycleway requirements, the use of this council land area, which will not affect any residential property facing the roundabout is the sensible way forward.

We therefore do not agree to the proposal to take land from the front garden at 73 West St Pukekohe when there is currently adequate existing footpath and grass verge width for the proposed joint footpath/cycleway.

In addition there is available council land diagonally opposite to allow for a realignment of the intersection, complete with joint footpath/cycleway on that side of the road.

We will speak to this at any future hearing.

Christine & Brent McMahon

Trustees –

Cell phone - 027 2612441

Correspondence to:

P.O.Box 38 586

Howick , Auckland 2145.

**Planning Technicians
Plans & Places
Auckland Council
Private Bag 92300
Auckland 1142**

Submission re Notice of Requirement

Property Address; 73 West St Pukekohe

SG Reference Number 550949

23/10/2023

From: [Boyd Scott](#)
To: [Unitary Plan](#)
Subject: submission for property 99 nelson st pukekohe SG REF 534324
Date: Friday, 10 November 2023 6:55:06 pm

to whom it may concern ,with reference to letter dated 11th october am contacting you confirm our submissions for the proposed driveway and footpath upgrade.

these were discussed at a landowner meeting at franklin centre edmund hillary room 26/10/23 .

As we both work from home internet connection is vital at all times to properly function in a professional capacity .the main connection to the house crosses across the main driveway where the designated work would be.

Access in and out of the property is available 24hours a day 7 days a week.

Any hedges /shrubs fences retaining walls damaged or removed to be replaced or compensated.

In the event of having to temporarily vacate premises compensation for accommodation is guaranteed.

This is our home of many years we do not wish to move or in any way forced to re locate to another residence.

Why cant this foot path upgrade and cycleway development go on the other side of nelson street where there are no driveways below street level? or even developing the said proposal in Kitchener Rd Pukekohe.

Also as this proposal is a regrade only please confirm dates and that a future purchase of the land is not the case at any time which was intimated in a letter from nz transport agency 15 may 2023.

thank you regards Boyd Scott + Penny Farrer ph 021 885944 penny

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:962] Notice of Requirement online submission - Heritage New Zealand Pouhere Taonga
Date: Monday, 13 November 2023 9:46:09 pm
Attachments: [Pukekohe NOR 6 - HNZPT Submission - 13 Nov 2023.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Heritage New Zealand Pouhere Taonga

Organisation name:

Full name of your agent: Alice Morris

Email address: amorris@heritage.org.nz

Contact phone number: 0276840833

Postal address:
PO Box 105-291

Auckland 1143 1143

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 6 Pukekohe South-West Upgrade

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:
Please refer to the attached.

I or we seek the following recommendation or decision from Auckland Council:
Please refer to the attached

Submission date: 13 November 2023

Supporting documents
[Pukekohe NOR 6 - HNZPT Submission - 13 Nov 2023.pdf](#)

Attend a hearing

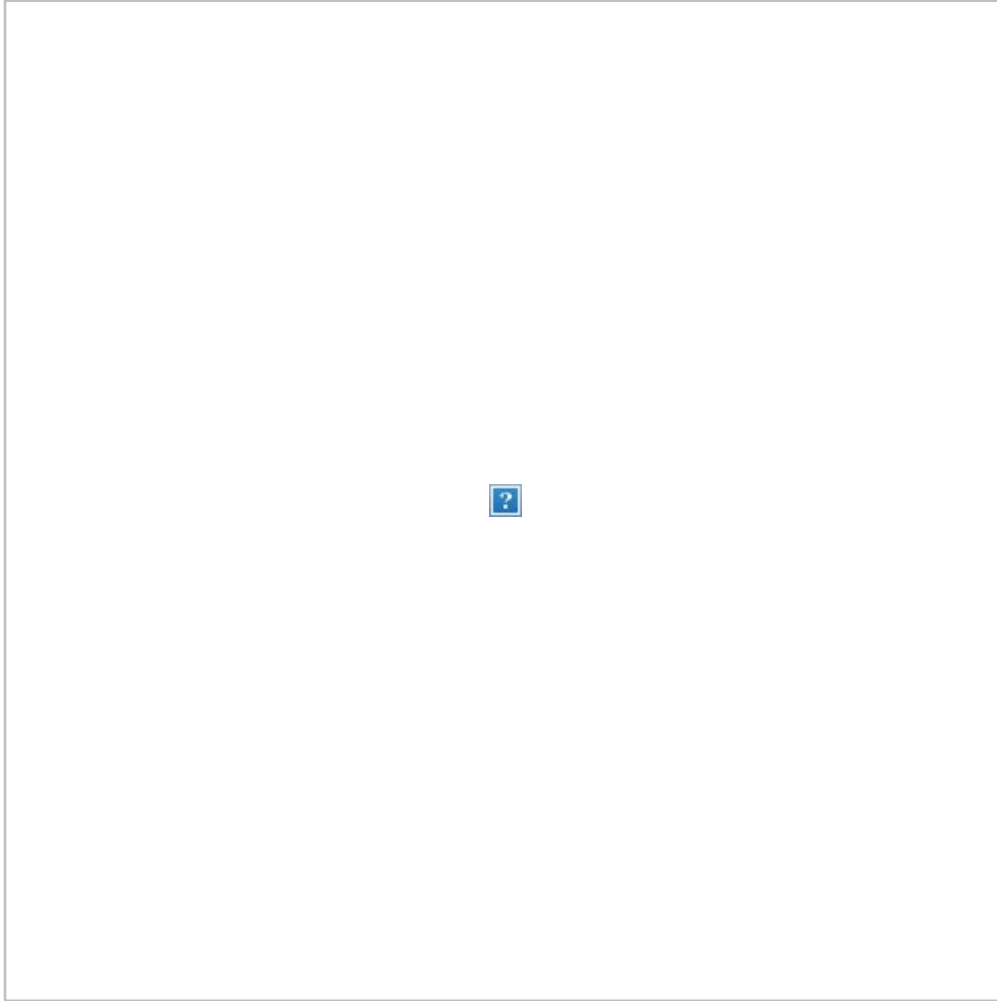
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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13 November 2023

File ref: Pukekohe NoR 6

Planning Technician, Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

SUBMISSION ON THE NOTICE OF REQUIREMENT FOR THE PUKEKOHE TRANSPORT NETWORK - NOR 6 – PUKEKOHE SOUTH-WEST UPGRADE, BY THE REQUIRING AUTHORITY: AUCKLAND TRANSPORT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. The focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA).
4. The requirement for an Archaeological Authority to be obtained in accordance with the HNZPTA does not mitigate the effects of the NoR identified under the RMA. It is a separate statutory obligation before any physical works can be undertaken that may affect an archaeological site as defined under the HNZPTA 2014. While obtaining an Archaeological Authority does not mitigate the effects on wider historic heritage values by the NoRs, it does ensure pre-1900 archaeological values associated with area of project works including unrecorded sites are fully assessed and formally documented through appropriate archaeological monitoring, investigation, and reporting. The Act does not however apply to buildings or structures that are post 1900 (unless they are declared under the HNZPTA) or to certain activities that may affect a pre-1900 building unless the building (or a pre-1900 component of) is to be demolished.
5. HNZPT supports the purpose of planning for a well-functioning urban environment through the protection of integrated transport networks to support the expected future growth needs.

The specific parts of the Notice of Requirement that Heritage New Zealand's submission relates to are:

6. HNZPT's focus is to ensure the protection of historic heritage, and appropriate mitigation is applied to manage any adverse effects resulting from the physical construction of the Network through the Outline Plan of Works process in the future.



7. The particular matter of focus for HNZPT regarding NoR 6 is the proposed designation over the extent of place of Nehru Hall ('the Hall') at 59 Ward Street¹ a Category B Scheduled Historic Heritage Place (#2235) in Schedule 14.1 Schedule of Historic Heritage, Auckland Unitary Plan (AUP).² It is noted that the reason for this section of the NoR is for a future upgrade of the Ward Street and Puni Place intersection.
8. Development or uses to the Hall's extent of place must be considered in accordance with the Regional Policy statement ('RPS') objectives and policies set out in Chapter B5 – Historic Heritage and Special Character, and the provisions of Chapter D17 – Historic Heritage Overlay of the Auckland Unitary Plan ('AUP').
9. As part of considering the effect of this, HNZPT has reviewed the September 2023 'Pukekohe Transport Network Assessment of Effects on Historic Heritage' ('AEHH') prepared for the suite of NoRs for the Pukekohe Transport Network along with the other relevant documents accompanying the Assessment of Environmental Effects ('AEE').
10. HNZPT does not *per se* disagree with the historic heritage description set out in the AEHH. However, HNZPT would like to emphasise the importance of this place at a national level, being considered the site of the very first hall owned and created by the Indian community in Aotearoa New Zealand.³ New Zealand Indians currently form one of the country's largest ethnic groups, and this place is a rare example of a place recognised for its early historical associations with the Indian migrant community.
11. Nehru Hall, when constructed in 1953 was offset from the centre of the property, being closer to the front boundary with Puni Road, and the formal footpath entranceway at Ward Street was located directly parallel with the main entrance to the Hall. This site layout has remained unchanged since construction and the setbacks to both frontages, the formal entrance, including the brick and decorative iron arched gateway forms an important part of the Hall's extent of place. The scale of the original extent can be seen to reflect the place's importance to the community and its historical position in what was an open, market garden landscape.
12. It is identified that the designation boundary will encroach into the Hall's curtilage and "immediately abuts the hall building".⁴ Nevertheless, the AEHH recommendations advise that the designation boundary can remain unchanged, and effects on heritage values from the location of the designation boundary will be addressed via the application of a Historic Heritage Management Plan ('HHMP') condition. It is also important to note that in the AEE it is stated that a portion of the Hall's curtilage will be "used for temporary construction" and that works will actually involve "earthworks, including batters, berms and sidewalks will extend into the extent of place"⁵; and "the pedestrian footpath is proposed to be brought closer to the frontage of the building".⁶

¹ identified in Form 18 – NoR 6 as Property ID# 609265, Part Lot 3 DP 887, 59 Ward Street, Sheet #4

² The place is scheduled in Appendix 14.1 of the Auckland Unitary Plan for its historical, social and physical heritage values.

³ Assessment of Effects on Historic Heritage, section 4.1.7; Auckland Council Heritage Unit, Pukekohe Heritage Survey, 2014, p.223, [Pukekohe heritage survey appendix 1 \(p.151-293\) \(aucklandcouncil.govt.nz\)](#) [accessed 9 Nov 2023]

⁴ AEE, paragraph 11.10.1.2, and 11.10.4

⁵ AEE, paragraph 11.10.1.2, NoR 6, page 164

⁶ AEE, paragraph 11.12.4, page 172



13. HNZPT is concerned with the encroachment into the extent of place, on the exterior of the Hall building, and the loss of the Hall's original setting, including the original entrance gateway.
14. HNZPT considers abutting the designation boundary onto the western wall of the Hall impacts on the extent of place and the scheduled heritage building. Therefore, further analysis should be applied to determine actual effects and how to mitigate those.
15. The AEE does not explicitly state what is to happen to the decorative arched gateway at the formal entrance to Nehru Hall other than it would be removed. While HNZPT notes that in the AEHH it recommends that "appropriate mitigation is to lift the gateway intact and reinstate it on the new boundary, following best conservation practice".⁷
16. Nevertheless, although it is proposed in the AEE to "avoid and mitigate effects on the Nehru Hall"⁸ by applying of a HHMP. the potential for effects on Nehru Hall is not specifically identified in the draft HHMP condition. HNZPT considers the HHMP should be specifically addressing how effects arising from the works, as outlined in the AEE, are to occur within Nehru Hall's extent of place or how the Hall's gateway will be appropriately mitigated.
17. This encroachment and resulting reduction of the extent of place will, in HNZPT's view, impact on the heritage values of the Nehru Hall and its context, with reduction of the original curtilage and removal or relocation of the gate amending the original spatial relationship between the Hall's main entrance and the brick pillar gateway
18. HNZPT acknowledges that the NoR is for the securing of the corridor and not the actual construction of the network. However, , there is a clear intent to either remove or relocate the associated brick gateway and reduce the original extent of place.⁹ In reviewing Te Tupa Ngatahi's recommended wording of draft Condition 22 HHMP for NoR 6, HNZPT would expect consideration of these changes and how they are to be addressed in a specifically tailored HHMP rather than relying on a general worded HHMP

Heritage New Zealand Pouhere Taonga opposes the Notice of Requirement (NoR 6).

The reasons for Heritage New Zealand's position are as follows:

19. The consideration, management, and mitigation of effects from the purpose of the designation on the historic heritage values of the place are required to ensure effects are appropriately mitigated.
20. The recommendations set out in September 2023 'Pukekohe Transport Network Assessment of Effects on Historic Heritage' and the suite of conditions set out in the 'Auckland Transport Condition Set – Pukekohe South-West Upgrade do not fully consider or mitigate the known effects that will result from NoR6 on the Nehru Hall and its extent of place.

Heritage New Zealand seeks the following decision from Council:

⁷ Assessment of Effects on Historic Heritage, section 5.3.3

⁸ AEE, paragraph 11.10.1.2, NoR 6, page 164

⁹ The Nehru Hall and its full extent of place is identified in the AUP planning maps



21. The removal of the portion of the proposed extent of NoR 6 – Pukekohe South-West Upgrade affecting Nehru Hall and its extent of place.
22. Or, if the recommendation is to retain the NoR designation within 59 Ward Street that the wording of the Historic Heritage Management Plan (HHMP) condition be amendment to read (amendments shown by underlining and ~~struckthrough~~) or any other provisions that achieve the same:

Historic Heritage Management Plan (HHMP)

- (a) *A HHMP shall be prepared in consultation with Council, HNZPT and Mana Whenua prior to the Start of Construction for a Stage of Work.*
- (b) *The objective of the HHMP is to protect historic heritage and to remedy and mitigate any residual effects as far as practicable. To achieve the objective, the HHMP shall identify:*
- (i) *Any adverse direct and indirect effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures;*
 - (ii) *Methods for the identification and assessment of potential historic heritage places within the Designation to inform detailed design;*
 - (iii) *Known historic heritage places and potential archaeological sites within the Designation, including identifying any archaeological sites for which an Archaeological Authority under the HNZPTA will be sought or has been granted;*
 - (iv) *Any unrecorded archaeological sites or post-1900 heritage sites within the Designation, which shall also be documented and recorded;*
 - (v) *Roles, responsibilities and contact details of Project personnel, Council and HNZPT representatives, Mana Whenua representatives, and relevant agencies involved with heritage and archaeological matters including surveys, monitoring of Construction Works, compliance with AUP accidental discovery rule, and monitoring of conditions;*
 - (vi) *Specific areas to be investigated, monitored and recorded to the extent these are directly affected by the Project;*
 - (vii) *The proposed methodology for investigating and recording post-1900 historic heritage sites (including buildings) that need to be destroyed, demolished or relocated, including details of their condition, measures to mitigate any adverse effects and timeframe for implementing the proposed methodology, in accordance with the HNZPT Archaeological Guidelines Series No.1: Investigation and Recording of Buildings and Standing Structures (November 2018), or any subsequent version;*
 - (viii) *Methods to acknowledge cultural values identified through Condition 9 where archaeological sites also involve ngā taonga tuku iho (treasures handed down by our ancestors) and where feasible and practicable to do so;*
 - (ix) *Methods for avoiding, remedying or mitigation adverse effects on historic heritage places and sites within the Designation during Construction Works as far as practicable. These methods shall include, but are not limited to:*
 - A. *security fencing or hoardings around historic heritage places to protect them from damage during construction or unauthorised access;*
 - B. *measures to mitigate adverse effects on historic heritage sites that achieve positive historic heritage outcomes such as increased public awareness and interpretation signage; and*



- C. *Training requirements and inductions for contractors and subcontractors on historic heritage places within the Designation, legal obligations relating to unexpected discoveries, the AUP Accidental Discovery Rule (E11.6.1). The training shall be undertaken prior to the Start of Construction, under the guidance of a Suitably Qualified Person and Mana Whenua representatives (to the extent the training relates to cultural values identified under Condition 16.*
- (x) For Nehru Hall (AUP:OP Schedule 14.1 #02235) measures and methods shall be identified to:
- A. appropriately avoid, remedy, or mitigate adverse construction effects;
- B. appropriately relocate the formal brick pillar gateway associated with Nehru Hall (AUP:OP Schedule 14.1 #02235) in a manner that respects the heritage value of the building and gateway and their spatial interrelationship, and
- C. identify long term protection management of heritage elements of Nehru Hall that will be abutting the Puni Road designation boundary.
- (c) *Electronic copies of all historic heritage reports relating to historic heritage investigations (evaluation, excavation and monitoring), shall be submitted to the Manager within 12 months of completion.*

Accidental Discoveries

Advice Note: The requirements for accidental discoveries of heritage items are set out in Rule E11.6.1 of the AUP

23. The amendment of the wording of the Urban and Landscape Design Management Plan ('ULDMP') to reference and provide for Nehru Hall.
24. **Heritage New Zealand wishes to be heard in support of their submission.**
25. **If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.**

Yours sincerely

BHParslow

Director Northern Region

Address for service: Alice Morris
amorris@heritage.org.nz
PO Box 105 291
Auckland City 1143

Cc: Auckland Transport submissions@supportinggrowth.nz

From: [Rachel Simpson](#)
To: [Unitary Plan](#); [project19@sga.in.consultationmanager-preview.com](#); [Theresa.Walsh@supportinggrowth.nz](#)
Subject: [EXTERNAL] Submission on Pukekohe South-West Upgrade (NoR 6) Auckland Transport
Date: Tuesday, 14 November 2023 10:10:29 am

Caution: This is an external email. Please check email address is from a trusted sender before taking action or clicking on links.

Submitter details: Rachel Simpson, Michael Hickmott

Address for service of Submitter: 60 Helvetia Road

Telephone: 0211388871, 0212085463

Fax/Email: rachelsimpsonnz@gmail.com, mhickmott@hotmail.co.nz

This is a submission on a notice of requirement: Pukekohe South West

Arterial (NoR 6) By: Auckland Transport For: A new designation or alteration to an existing designation

The specific parts of the above notice of requirement that my submission relates to are:

Helvetia Road, Pukekohe, and number 60 (Title No: 173847) (SG ref 550896)

My submission is: We do NOT support the Notice of Requirement

The reasons for my views are:

1.

Changes on property:

The widening of the road to increase foot traffic and add a cycleway will entirely remove our berm. We need to use a portion of the driveway within the berm section for parking, as we do not (and will not) have street-side parking, and we are concerned about making access to the property more difficult. We anticipate this will affect our property value, and mental health.

There is also planned earthworks/excavation of our retaining wall, and we are concerned that if it is changed per the plans, there will be an unsightly chunk taken out of the retaining wall which will affect property value, and usability of our property.

The indicative area within the designation boundary comes all the way up the side of our house, to our bedroom, and affects a significant corner of our retaining wall and land. We intend to fence in that area of the property and raise the retaining wall (to match those of #53) for privacy in the near future, and have concerns that a designation will prevent us from doing so.

2.

Footpath and pedestrian safety:

The proposed footpath will be much closer to our retaining wall than it is currently (with a 1-2m berm as a buffer) - this will significantly reduce visibility when we exit our driveway and will be unsafe for both us and pedestrians. We are also concerned that bringing the footpath closer to our property line will increase the likelihood of theft or trespass if the foot traffic is increased. These concerns will apply to many properties in this area, as they were not designed to accommodate the lack of berm.

3.

Bike lane Usage:

Dirt bikes are a notorious, deafening nuisance in Pukekohe. We have significant concern that a bike lane will be used as a 'dirt bike lane' rather than anything else.

We also do not believe that there is or shall be a significant enough number of cyclists to justify such a large cycleway. It is incredibly rare to see cyclists on the length of Helvetia Road, as the significant hill makes it unappealing, and it is far easier to cross over Helvetia and ride parallel on flatter streets.

4.

Freight, and Road noise:

Making Helvetia Road a more appealing road for freight (rock haulers, produce trucks, livestock transport), will affect the quiet of living in the suburbs. We are concerned both for the increased noise and wear on the road, as well as pedestrian safety, as having more large vehicles will make it more dangerous for the people needing to cross these roads, especially school children.

5.

Construction

We are concerned that the significant amount of roadworks required to update this road will affect our quiet enjoyment of this property, through increased noise, limited access, and disconnection of services. The power poles that connect our properties are in the centre of the proposed footpath, and as many people work from home these days or require power for health and safety, having power turned off while it is moved could be dangerous or extremely inconvenient.

I seek the following recommendation or decision from the Council:

We believe Auckland Council should reconsider the project, and focus on getting freight out of the suburbs of Pukekohe. That is what is unsafe.

We request the plans to widen the road and add a cycleway be scrapped, as overall safety for the area can be increased by rerouting commercial traffic/freight (by providing an alternate route, circumventing the suburbs).

Should the plans go ahead, we ask that the Council will compensate the property owners for the negative effects it will have on the affected properties, and require the companies undertaking the works to make provisions to minimise the impact of the works on the residents.

I wish to be heard in support of my submission

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

-
- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

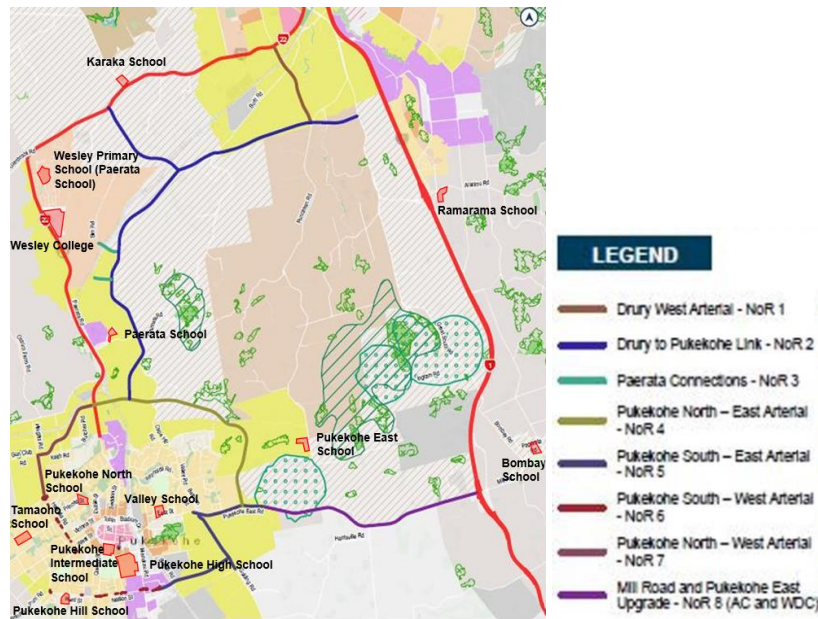


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

-
- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
Underlined and strikethrough – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) <u>The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</u></p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

545

potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

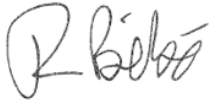
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

SUBMISSION BY PUKEKOHE MEGA TRUSTEES LIMITED AND WRIGHTSON WAY LIMITED ON NOTICE OF REQUIREMENT BY AUCKLAND TRANSPORT FOR PUKEKOHE SOUTH EAST ARTERIAL PROJECT AND PUKEKOHE SOUTH WEST UPGRADE PROJECT UNDER CLAUSE 7 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: unitaryplan@aucklandcouncil.govt.nz

Auckland Council
Level 16, 135 Albert Street
Private Bay 92300
Auckland 1142

Submitters: Pukekohe Mega Trustees Limited and Wrightson Way Limited

C/- Bianca Tree
MinterEllisonRuddWatts
PO Box 3798
Auckland 1140

bianca.tree@minterellison.co.nz

Phone: (09) 353 9784

Scope of submission

1. This is a submission by Pukekohe Mega Trustees Limited (**PMT**) and Wrightson Way Limited (**WWL**) (on a joint and several basis) on the notices of requirement (**NOR**) by Auckland Transport (**AT**) on behalf of the Supporting Growth Alliance (**SGA**) for a designation for a public work. The two NORs that PMT and WWL are submitting on are:
 - (a) the Pukekohe South East Arterial to upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Railway Line, including active mode facilities (**NOR 5**); and
 - (b) the Pukekohe South West Upgrade to upgrade the transport corridor between Helvetia Road and Svendsen Road, including active transport facilities and associated infrastructure (**NOR 6**).

2. PMT and WWL are not trade competitors for the purposes of section 308B of the Resource Management Act 1991 (**RMA**).
3. PMT and WWL oppose the NOR unless the matters in this submission are addressed.

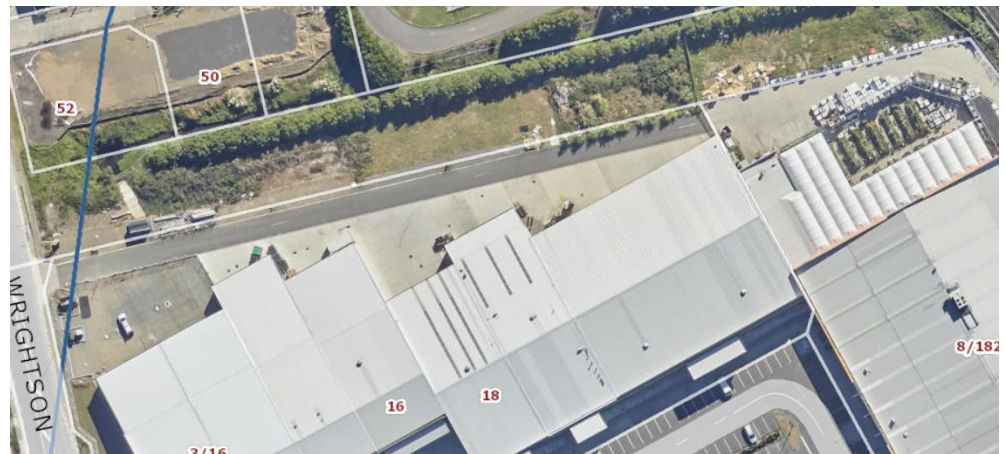
Background

4. PMT is the owner of the property at 12 Wrightson Way, Pukekohe (legal description Lot 11 DP 417411), which is a 1.4751 hectare site. PMT owns the Mitre 10 Mega currently located on the Site, which is leased and operated by Mitre 10 (New Zealand Limited).
5. WWL is the owner of the property at 16 – 18 Wrightson Way, Pukekohe (legal description Lot 10 DP 417411) which is a 1.323 hectare site. The buildings are tenanted by multiple tenants including Furniture Now, Guthrie Bowron, Stihl Shop, Dulux Trade, and others.
6. Both properties are part of the Pukekohe Mega Centre (**PMC**), which is a large format retail centre, which is a well-established commercial centre operating since approximately 2007 providing commercial activities in Pukekohe. The PMC site is approximately 13.4 hectares and is home to Harvey Norman, Briscoes, Rebel Sport, and Noel Leeming alongside Mitre 10. There are also several smaller retail outlets within the PMC.

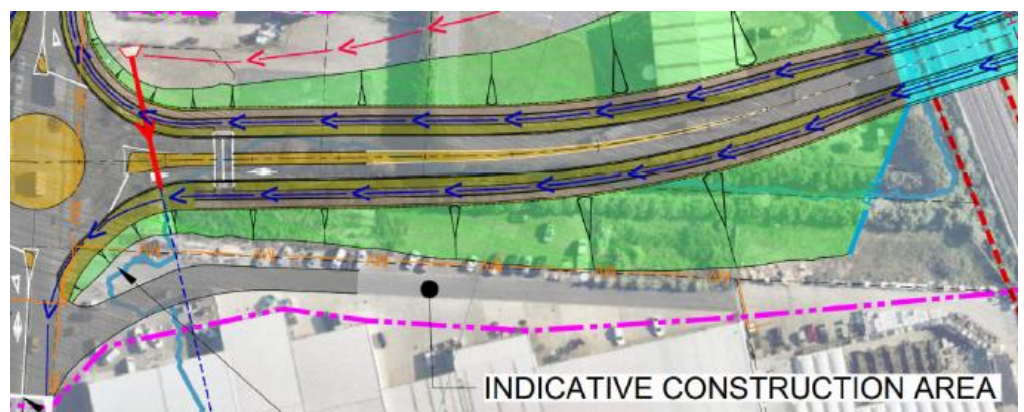


7. A key feature of the PMC that is integral to the operation of the retail outlets is the rear access service lane, which is accessed from Wrightson Way and traverses the perimeter of the site, with vehicles travelling in a clockwise direction around the perimeter of the PMC, before exiting back onto Wrightson Way and connecting onto Manukau Road.

8. The service lane and access with Wrightson Way has been designed to enable both small trucks and larger vehicles such as 23m B-trains and 19.45m semi truck and trailer to access all loading bays for all units for inbound and outbound goods. The service lane forms part of the manoeuvring space for some of the loading bays. Smaller service vehicles servicing the WWL business to the north of the site also enter and exit via Wrightson Way (rather than traveling around the perimeter and increasing service vehicle movements on the Mitre 10 site). The service lane along the northern property boundary, and entry / exit to Wrightson Way, is shown below.



9. As there are multiple landowners, lessees and tenants within the PMC, there are easements registered on the relevant records of title to facilitate these service vehicle movements and enable all tenancies to operate.
10. The proposed boundary of NOR 5 includes the northern leg of the rear access service lane, including the current service lane access / exit from Wrightson Way, and the north-eastern corner of the Mitre 10 Mega Site, as shown below.



11. PMT and WWL understand that:
- (a) The NOR 5 boundary, with an exception of a small area in the north west of the Site, is for the purpose of construction activities only and will only be temporarily required for the works.
 - (b) The permanent works corridor will not include the service lane, except that the access to the service lane from Wrightson Way may need realignment, and a small corner of the PMC land is proposed to be acquired for the proposed roundabout (as noted above).
 - (c) The service lane is required for construction to enable access to the southern fill batter of the eastern leg of the proposed arterial, leading up to the roundabout and crossing over the North Island Main Trunk line.
 - (d) Final detail and proposed extents of the temporary construction corridor and the permanent works corridor will not be confirmed until detailed design stage. There is no certainty of this in NOR 5.
 - (e) AT is seeking a lapse date for the Designation for the NOR of 20 years.

Reason for submission

12. PMT and WWL oppose NOR 5 and NOR 6 in their entirety.
13. In general, PMT and WWL oppose the NOR as they:
- (a) Will not promote sustainable management of resources; and therefore will not achieve the purpose of the RMA;
 - (b) Are contrary to Part 2 and other provisions of the RMA;
 - (c) Will not meet the reasonably foreseeable needs of future generations;
 - (d) Do not adequately avoid, remedy or mitigate adverse effects on the environment;
 - (e) There has been an inadequate consideration of alternative sites, routes and methods;
 - (f) The location and extent of NOR 5 (and in particular its extension over the Site) is not necessary for achieving the objectives for which NOR 5 and NOR 6 are sought;

- (g) There has been insufficient consideration of the adverse effects of NOR 5 and NOR 6 on the operation of the PMC, including the necessary continued efficient, effective and safe operation of the service lane and the loading areas for access, manoeuvring, and loading operations both during construction and when the proposed arterial is operational.
14. Further to the general grounds above, PMT and WWL oppose the NOR on the following specific grounds:
- (a) Inclusion of the rear access service lane within the designation boundary of NOR 5 will have significant adverse effects on the continued use and development of the PMC as NOR 5 has not identified that the service lane is required for temporary construction access only.
 - (b) AT has not adequately considered alternatives for the arterial / Wrightson Way / Crosbie Road intersection design that require less land, avoids the service lane in its entirety, and provides a safer entrance and exit into Wrightson Way and the service lane for PMC customers and service vehicles.
 - (c) These issues are further exacerbated from the long time period sought for the lapse date on the Designation, and therefore blight that the Designation will have on the Site.

Decision sought

15. Decline NOR 5 and NOR 6 unless the matters raised in this submission are addressed in full, including:
- (a) modifying the boundary for NOR 5 as shown in Appendix A;
 - (b) modifying NOR 5 and NOR 6 to move the proposed arterial alignment to the north;
 - (c) ensuring efficient, effective and safe access is provided for customers to the PMC, both during construction and when the arterial is operational; and
 - (d) ensuring that the service lane and loading areas can continue to efficiently, effectively and safely service the PMC, both during construction and when the arterial is operational.
16. PMT and WWL wish to be heard in support of this submission.
17. If others make a similar submission, PMT and WWL will consider presenting a joint case with them at a hearing.

Dated this 13th day of November 2023

**Pukekohe Mega Trustees Limited and Wrightson
Way Limited** by their solicitors and duly authorised
agents MinterEllisonRuddWatts



Bianca Tree

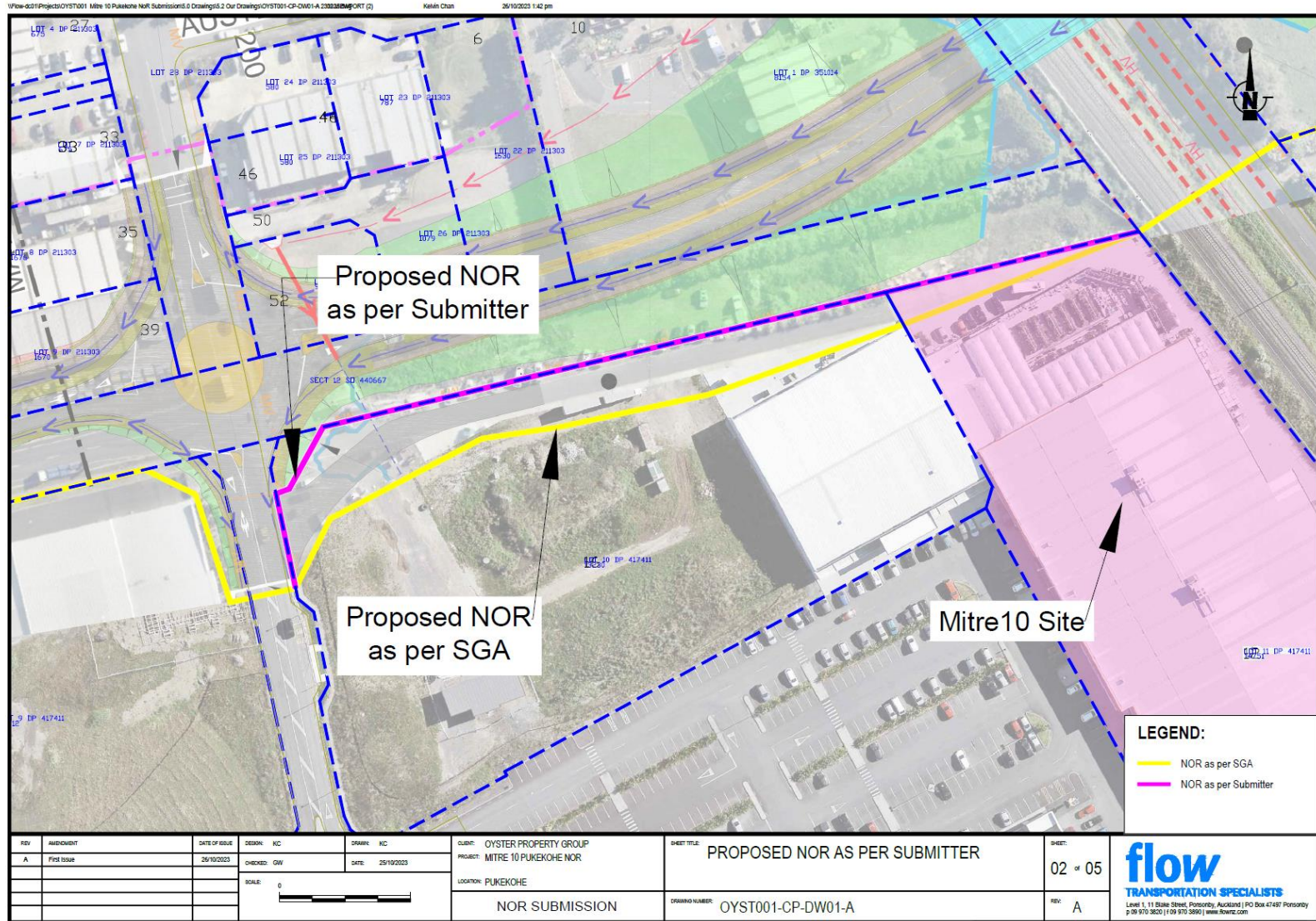
Counsel for Pukekohe Mega Trustees Limited and
Wrightson Way Limited

Address for service of submitter:

Pukekohe Mega Trustees Limited and Wrightson Way Limited
C/- MinterEllisonRuddWatts
PO Box 3798
Auckland 1140

Attention: B Tree
Telephone no: (09) 353 9700
Fax no: (09) 353 9701
Email: bianca.tree@minterellison.co.nz

Appendix A – Proposed modification to NOR 5 designation boundary



REV	AMENDMENT	DATE OF ISSUE	DESIGN: KC	DRAWN: KC	CLIENT: OYSTER PROPERTY GROUP	SHEET TITLE: PROPOSED NOR AS PER SUBMITTER	SHEET: 02 of 05
A	FIRST ISSUE	25/10/2023	CHECKED: GW	DATE: 25/10/2023	PROJECT: MITRE 10 PUKEKOHE NOR		
			SCALE: 0		LOCATION: PUKEKOHE		
					NOR SUBMISSION	DRAWING NUMBER: OYST001-CP-DW01-A	REV: A

LEGEND:

- NOR as per SGA
- NOR as per Submitter

flow
TRANSPORTATION SPECIALISTS
Level 1, 11 Blake Street, Ponsonby, Auckland | PO Box 41497 | Ponsonby
p 09 970 3620 | f 09 970 3890 | www.flownz.com

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:902] Notice of Requirement online submission - Stuart John Lawson and Paulene Anne Lawson
Date: Tuesday, 24 October 2023 1:01:04 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Stuart John Lawson and Paulene Anne Lawson

Organisation name:

Full name of your agent:

Email address: shadypines@outlook.co.nz

Contact phone number:

Postal address:
110 Butcher Road
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

It would be cheaper, we think, for the new road to continue on from Gun Club Road then along Heights Road to Paerata Road and a new roundabout established on the corner of Heights and Paerata Roads. This would also release more land for housing or agricultural purposes than the proposed route.

I or we seek the following recommendation or decision from Auckland Council:

For the route to extend from Gun Club Road along Helvetia Road to Heights Road and then to Paerata Road.

Submission date: 24 October 2023

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:911] Notice of Requirement online submission - Lisa Anne Whiteman
Date: Thursday, 2 November 2023 6:15:47 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Lisa Anne Whiteman

Organisation name:

Full name of your agent:

Email address: lisa.whiteman82@gmail.com

Contact phone number: 021 817564

Postal address:
112 Butcher Road
Phone: 021 817564
Pukekohe 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:
112 Butcher Road, Pukekohe.

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

I object to the proposal of NoR7 based on the following facts: • Currently we have an existing road for traffic to connect from Helevita Rd to Paerata Rd which runs through heights RD. This road can be made safer, already provides connectivity and can be improved, can be improved to further provide resilience in the transport network, it supports urban growth. Adding roundabouts and widening this existing road is the best proposal for our current community, it would be the least expensive and would protect the current land around the West Pukekohe area. It is the most logical, economical and common-sense proposal to make. • The proposed plan creates many more roads, that are taking more and more land from landowners to provide more transport options to get in and out of Pukekohe. When I look at the plans it is a mess, there are roads connecting to bigger roads and this is going to create congestion at roundabouts when the traffic merges onto the main road. • The proposed road by my property where I live will change my outlook from farmland to a busy 24-metre-wide two-lane road. My family will be exposed to traffic pollution, traffic noise, and this will severely impact on our health and wellbeing. It will devalue the price of my property. A Danish study showed that long term exposure to traffic air pollution causes the risk of developing chronic obstructive pulmonary disease. This website from America shows that living near an urban road you are risk of dementia, and poor cognition. • The traffic noise from a car is between 70 -80 dBa, whereas for a truck, truck and trailer it is a lot louder. This will impact on our wellbeing, our sleep, providing a level of noise that is unacceptable for residents. Because of the market areas in Pukekohe, we have trucks and trailers coming in and out everyday. The proposed road going down to a roundabout in Butcher Road will have these trucks and trailers traveling along it, using air brakes to slow down, the noise from these trucks will be close to where many people live, creating noise and more air pollution. Even putting up a sign no air brakes will not prevent this from happening. • The proposal states that there is a low level on the landscape. I am not sure how this is measured. But the facts are that the outlook from our properties will be a very busy noisy road, to look at, we will have air pollution. The proposal also states this would contribute to a mode shift and

transition to allow carbon transport mode. But, we have only a few non carbon cars and this has been written to sell this proposal with no consideration for the residents living in this quiet country area. You are proposing to create yet another road, using up land where people live, when there is already a road closeby that can easily be improved at a cheaper cost. • It is time to start proposing and planning with a common sense and logical approach. We have an existing road. We only have a budget this big, we can't afford to create new roads, buying large amounts of land to create new roads. We have roads with slips in them, and roads in bad need of repairs. This is the priority. The existing road can be made safer, improved, widened and will carry on diverting the traffic away from the centre of Pukekohe. Auckland transport can action this by employing a consultant to create a safer, wider more improved road, on the existing road. (Living Near Highways and Air Pollution | American Lung Association website for data information. I believe this proposal is frivolous and does not demonstrate a resonable or relevant reason to be created, given the existing road that can easily be improved.

I or we seek the following recommendation or decision from Auckland Council:
Stop this proposal. Keep our land and community as it is. Improve the current existing road, and save money to be able to repair the existing roads of any slips and repairs that need to be done.

Submission date: 2 November 2023

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?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:912] Notice of Requirement online submission - SOO-HWAN CHA
Date: Thursday, 2 November 2023 7:46:02 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: SOO-HWAN CHA

Organisation name:

Full name of your agent:

Email address: min1027@hotmail.com

Contact phone number: 022 533 9125

Postal address:
157 Beatty Road
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:
157 Beatty Road Pukekohe Auckland

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Proposed Pukekohe North-West upgrade Plan as it affects 157 Beatty Road, Pukekohe. Since 1999, our three families that have been living at 157 Beatty Road Pukekohe has operated a business here growing and producing quality tomatoes. For 24 years, this location has been central to our livelihood. Hence, learning of the proposed new road planned by Waka Kotare has been a deeply concerning revelation for us. Our property, both home and income, seems to have been overlooked in the planning process. The entirety of our land has been designated within the boundary for the new road plan. Our reasons for opposing this decision are as follows: Economic Dependency: The cultivation and sale of tomatoes is our primary source of income. Without the glasshouse on our land, our means of providing for our family is severely jeopardized. We are uncertain about how the Council expects us to maintain our livelihood without this crucial facility. Horticultural Importance: Horticulture is a cornerstone of New Zealand's primary industries. We take pride in delivering high quality tomatoes to the market. The potential loss of our production means consumers will miss out on a reliable source of this essential vegetable. We believe that too much high value land has been taken for housing. While we are not entirely against the Council's plan, we urge reconsideration. We hope for a revised proposal that respects our business and living conditions.

I or we seek the following recommendation or decision from Auckland Council:

Modify the boundary so that only the land essential for road construction is purchased. Ensure the remaining land, along with the glasshouse and residential structures, remain untouched.

Submission date: 2 November 2023

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?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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

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

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

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

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

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

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

Address for service of Submitter

Telephone:

Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 7: Pukekohe North-West Upgrade

The specific parts of the above notice of requirement that my submission relates to are: (give details including property address):

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council *(give precise details including the general nature of any conditions sought).*

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



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

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Proposed Pukekohe North-West upgrade
Plan as it affects 157 Beatty Road,
Pukekohe.

Since 1999, our three families that have been living at 157 Beatty Road Pukekohe has operated a business here growing and producing quality tomatoes. For 24 years, this location has been central to our livelihood. Hence, learning of the proposed new road planned by Waka Kotare has been a deeply concerning revelation for us.

Our property, both home and income, seems to have been overlooked in the planning process. The entirety of our land has been designated within the boundary for the new road plan.

Our reasons for opposing this decision are as follows:

Economic Dependency: The cultivation and sale of tomatoes is our primary source of income. Without the glasshouse on our land, our means of providing for our family is severely jeopardised. We are uncertain about how the Council expects us to maintain our livelihood without this crucial facility.

Horticultural Importance: Horticulture is a cornerstone of New Zealand's primary industries. We take pride in delivering high quality tomatoes to the market. The potential loss of our production means consumers will miss out on a reliable

source of this essential vegetable. We believe that too much high value land has been taken for housing.

While we are not entirely against the Council's plan, we urge reconsideration. We hope for a revised proposal that respects our business and living conditions.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:914] Notice of Requirement online submission - Chris Balle
Date: Friday, 3 November 2023 4:16:09 pm

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Chris Balle

Organisation name: Balle Bros Fresh Produce Ltd

Full name of your agent:

Email address: chris.balle@ballebros.co.nz

Contact phone number:

Postal address:

Pukekohe
South Auckland 2676

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:
Properties in the vicinity of 166, 185 Heights Rd Pukekohe

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:

We support the requirement of land dedicated to a new section of arterial road suitable for HPMV units. We see it as imperative that forecast growth of Pukekohe, Paerata, Drury is well catered for in terms of roading infrastructure for both heavy vehicles and smaller commercial type vehicles such as trades utes, vans and the like . It is critical that along side investment in public transport there is commensurate resources made available to upgrade the roading network not only locally but encompassing an approach that is more overarching. We encourage uptake of public transport and the utilisation of alternative means of transport such as cycleways (as they are made available) to free up existing roading infrastructure capacity for those users that are not readily able to avail of the public network , particularly trains. We acknowledge the time and efforts of Auckland Transport and Waka Kotahi and others trying to engage with as many stakeholders as possible to ensure a robust process before settling on the preferred route. Although we are not entirely aligned with the proposed route we broadly accept that the process has been systematic and exhaustive and it is not possible to fully appease all stakeholders

I or we seek the following recommendation or decision from Auckland Council:
We recommend that the designation NOR 7: NW Upgrade is adopted

Submission date: 3 November 2023

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification
Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

Submitter details

Full Name: Des and Lorraine Morrison

Organisation Name N/a

For office use only Submission No:
Receipt Date:

Address for service of Submitter

17 Butcher Road Pukekohe 2120

Telephone: 027 305 5129
Contact Person: Des Morrison

Email: des.lorraine@xtra.co.nz

This is a submission on a notice of requirement:

By: Name of Requiring Authority	Auckland Transport
For: A new designation or alteration to an existing designation	Pukekohe NOR7: Pukekohe North-West Arterial

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the above notice of requirement that my submission relates to are:

- Entire NOR7 Pukekohe North-West Arterial
- In particular, but without limitation, its application to 17 and 17A Butcher Road Pukekohe

My submission is:

We **OPPOSE** the Notice of Requirement

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

The reasons for my views are:

- Refer attached written submission
-
-
-
-

I seek the following recommendation or decision from the Council *(give precise details including the general nature of any conditions sought).*

- Refer attached written submission
-
-

I wish to be heard in support of my submission

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



Signature of Submitter

10 November 2023
Date

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

SUBMISSION ON PUKEKOHE NOR7: PUKEKOHE NORTH-WEST UPGRADE

Property Owners D S & LA MORRISON

Owner ID 533451

A. EXECUTIVE SUMMARY

1. Our home and lifestyle block at 17 and 17A Butcher Road will be directly affected by the proposed notice of requirement for the new Pukekohe North-West Arterial (**NOR7**).
2. We oppose NOR7 in its current form as:
 - (a) there is a lack of alignment with the relevant planning documents and a lack of consideration of the impacts on the planned future residential use;
 - (b) three waters and other infrastructure have not been appropriately considered;
 - (c) insufficient consideration has been given to multi-modal transport and traffic management issues;
 - (d) there has not been sufficient ecological assessment work undertaken to understand the site-specific effects and mitigations required;
 - (e) an integrated approach is required so that there is certainty for landowners in terms of effects, timing, and the basis for compensation; and
 - (f) the NOR in its current form is inconsistent with purpose and principles of the Resource Management Act 1991 (**RMA**).
3. We ask that the NOR7 be declined unless or until all of the matters set out in this submission have been appropriately addressed, or alternatively, agreement is reached with the Applicant¹ for the early purchase of our property, on the basis set out at the end of this submission.
4. We intend to appear and speak to our submission at the hearing.

¹ Auckland Transport and Waka Kotahi New Zealand Transport Agency.

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

B. THE LAND USE AND THE OWNERS

5. We own the land located at 17 and 17A Butcher Road, Pukekohe (Title No: 634673).
6. We originally purchased the land as part of a larger 10-acre block on the 15th of November 1973 – some 50 years ago.
7. At that time, there was no road, power, or water to the site. Together with our neighbour, we installed and paid for the road, power, and water connections, to enable us both to build houses on our respective blocks of land.
8. We purchased the land as both a home for us and a lifestyle farm. Our first house was built on the land in 1982.
9. In 2012, we applied for a subdivision consent to divide our land into two lots:
 - (a) Lot 1, a 1.1345-hectare parcel of land on which our former house was located; and
 - (b) Lot 2, a 2.2813-hectare parcel of land which contained an old cow shed, yards, streams, and a pond.
10. This consent was granted on 16 September 2013.
11. On the 7th of November 2014, we sold Lot 1 (57 Butcher Road) and then proceeded to build another house on Lot 2 (17 Butcher Road). We moved into that house (which is our current home) in 2015.
12. In 2016, we built a large shed next to our house, and then in 2018 we built a minor dwelling on the property for our son. While that minor dwelling has a separate postal address (17A Butcher Road) it remains on the same title.
13. We are now retired and looking to downsize from lifestyle farming.

C. ISSUES

C1. Lack of alignment with plans and impacts on planned developability

14. With the continued expansion of Pukekohe north, our land (and others in the area), have long been earmarked as areas appropriate to accommodate future urban growth. This proposed future urban use was initially reflected in the 2007 Franklin District Plan Growth Strategy and changes to the (then) Franklin District Plan and Auckland Regional Growth Plans. Following the

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

establishment of Auckland Council, that future urban use was further confirmed through the original 2012 (and updated) Auckland Council Spatial Plan, the 2016 Auckland Unitary Plan, the Future Urban Land Supply Strategy 2017 and the 2019 Pukekohe-Paerata Structure Plan (**Structure Plan**).

15. Our land is currently zoned Future Urban Zone under the Auckland Unitary Plan. The Structure Plan indicates it is to be zoned Residential Mixed Housing Suburban once it is 'live' zoned.²
16. The change in land use proposed by NOR7 is significantly different to that planned use. We are concerned that the impacts NOR7 will have on the achievement of the vision and outcomes set out in those planning documents has not been properly assessed.
17. The extent of the direct effects of the construction of this arterial route on our property is shown on the plan attached in **Appendix A** to this submission labelled "Draft Pukekohe North West Arterial NOR7 Owner ID 533451". These effects include:
 - (a) earth works to facilitate the road corridor, verge, footpath, cycleway, retaining wall, and median;
 - (b) stormwater wetland attenuation device to manage stormwater volumes from the upper catchment of Heights Road;
 - (c) battered road edge that closes off Butcher Road to the west and extends around to the entrance at the northern eastern end of the property.
18. This design effectively negates any development potential for our property as Residential - Mixed Housing Suburban given:
 - (a) approximately 1/3 of the property is within the direct footprint of the designation;
 - (b) the existing road frontage (to Butcher Road and through to SH22) is removed;
 - (c) the adverse operational effects our property will experience due to noise

² While both the Future Urban Land Supply Strategy and the Structure Plan anticipate the land being 'live' zoned between now and 2027, we understand that earlier this month the Council adopted its Future Development Strategy 2023-2053 which would delay that live zoning until 2040+.

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

from the road, air quality, visual/amenity impacts and stormwater; and

(d) the existing site-specific constraints (gas line, stream setbacks and floodplains).

19. It is noted that while the assessment of environmental effects correctly recognised it was necessary to assess the effects of NOR7 on the future planned environment, it stopped short of considering the impact NOR7 would have on the ability of affected land to be used for its planned purpose. Assessment of operational effects were limited to existing dwellings, when under the Residential – Mixed Housing Suburban zone, up to 3 dwellings are enabled as of right on a site, and subdivision down to a minimum site area of 320m² are provided for on sites like ours (which is greater than 1 ha in size) as a restricted discretionary activity.

C2. Three waters and other infrastructure

20. At present the Light Industry zone and the Residential Mixed Housing Suburban zone (around Helvetia Road as shown on the Structure Plan attached as **Appendix 2**), are the upper catchment areas for water collected and distributed through permanent and intermittent streams in our property out to the main Paerata Whangapouri Stream and then into the Manukau Harbour.
21. The arterial road and associated development will increase the volume of water to be dissipated through these waterways.
22. As our Butcher Road property is at the lower end of the catchment, strategies, and solutions to mitigate flooding concerns in a Residential Mixed Housing Suburban zone are required. At present the assessment appears to be based on existing use and location of dwellings rather than the planned residential use. Accordingly, in our view, it may underestimate the likely effects and mitigations required. In particular, it may be that one stormwater attenuation device of the size proposed is not sufficient or the most appropriate way to address the effects of the arterial given the planned residential (medium density) development anticipated to occur within the catchment. We consider it is critical that an integrated approach is taken so that all relevant effects are considered and comprehensively addressed in a manner that supports and does not undermine the planned urban form for the area. It may be that there

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

are better ways to address stormwater through provision for park or reserve areas which could act as a water sink capable of managing water volumes during the catastrophic weather events while at the same time providing further recreational facilities for the surrounding residential communities. These options do not appear to have been considered.

23. Further, little thought appears to have been given to whether the current location and design of the NOR7 arterial corridor will/should be able to accommodate other infrastructure necessary to service the planned residential area. This includes domestic water reticulation, sewerage, power, and communications. While the assessment of environmental effects notes that consultation has occurred with these infrastructure providers it does not appear that the ability to accommodate these aspects was specifically assessed.

C3. Multi-modal transport and traffic management

24. The design of the north-western arterial in the Butcher Road area needs review. On the northern side of the route, in the Light Industrial area are agricultural businesses involved in the sale and servicing of large heavy equipment, associated high frequency traffic movements involving large equipment transporters operating across pedestrian and cycle lanes, which is a safety hazard and needs to be addressed. On the eastern side of State Highway 22 opposite Butcher Road, is also land proposed to be zoned Light Industrial and the same would apply.
25. There is also currently a lack of geotechnical information to substantiate the viability of constructing a rail overbridge in the location of The Paerata Tuff Ring. Given the previous rural uses and infilling that has occurred in some of these areas, such information is important to ground truth the design. Leaving the collection of this information until detailed design is too late. This is because it risks further variations to NOR7 being required which has the potential to considerably extend the period of uncertainty for affected landowners.
26. It is recognised that there is existing congestion on State Highway 22 and that the proposed NOR is intended to partly address that issue. However, and as noted in the Pukekohe Transport Network Urban Design Evaluation,

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

September 2023 (at p.58-59), there is a significant amount of planning work still to be undertaken to integrate the road with the planned residential development.

27. The easement for the NZ Steel gas line runs through the Structure Plan area. The safety hazards identified above, associated with mixed modal transport interactions would be eliminated if the pedestrian and cycle ways utilised either the easement or stream buffer provision. This is noted in the Structure Plan.

C4. Ecological effects

28. The ecological effects of NOR7 and how those effects may differ from the planned residential use have not been subject to detailed assessment. No comprehensive baseline studies have been undertaken of the waterways, ecosystems, fauna, and species within and adjacent to the area affected by NOR7. The exact effects remain unknown, and the proposed mitigations are left to future management plans, drafts of which have not been provided.
29. For our property there are two existing waterways as well as open wetland areas. There are a large assemblage of birds which use these. The larger water body also has eels, as well as watercress and is supported by a large-planted area at its eastern end – part of which will be directly impacted by NOR7.

C5. Need for integrated approach to development

30. While we understand that the current application is for a notice of requirement and that land acquisition matters are dealt with under the Public Works Act 1981, the processes are connected – with decisions in one affecting the other. In particular, the characteristics of an identified property may make it more or less appropriate, and the circumstances and views of the property owner will affect the time and cost of acquiring a property.
31. For us, while we have identified several issues with the proposal, we expect that with time and further work they could be addressed. However, that is likely to take considerable time as the NOR7 works through hearings and any appeal processes. It may also result in a greater proportion of our property being required (such as for stormwater mitigation/planting). That gives rise to considerable uncertainty, which is only exacerbated by the 20-year lapse term

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

sought.

32. Given our circumstances (retired and looking to downsize), the implementation timeframes, and the unique characteristics of our property, we consider the best solution is for the Applicant to agree to negotiate an early purchase of our whole property (not just the area affected by the current NOR7 footprint). This is because of the adverse effects attributable to the NOR7 route and the lost opportunity costs noted above. It is also because we consider our property would provide the Applicant with a unique opportunity to address some of the issues outlined above. Any such agreement would however need to be based on the existing and planned Residential Mixed Housing Suburban zoning of the property, take account of the lost opportunity cost, and ensure the Applicant fully funds the negotiation and agreement process to achieve an agreed settlement date.
33. While we understand that this panel cannot require that outcome, we have included it here to signal how we consider our issues can best be addressed by the Applicant.

C6. Purpose and principles of the RMA

34. We consider that the proposal in its current form is not consistent with the sustainable management purpose or the principles of the RMA.
35. It does not adequately assess and address all relevant effects – particularly traffic, stormwater, ecology, development capacity and amenity. It also does not enable us to provide for our social and economic wellbeing given it undermines our ability to use our property for its planned residential purpose and significantly constrains what use we can make of it in the intervening period (some 20 years). This is not what we envisioned for our retirement.

D. CONCLUSION AND RELIEF

36. The joint agencies that have lodged the Notice of Requirements, Auckland Transport and Waka Kotahi, represent major regional and national governance organisations that are required to deliver on the vision and outcomes identified for this project in an integrated sustainable manner.
37. There are some fundamental gaps and issues with the current NOR7 proposal,

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7

which mean that it should not proceed in its current form.

38. If the NOR is to proceed, we consider it requires some rework, to ensure the effects have been appropriately assessed and addressed, and so that there is greater alignment with planned future urban residential use of the area.
39. We consider our property at 17 Butcher Road provides a unique opportunity to address some of these issues in a holistic way and we are willing to negotiate an early settlement and sale of this property based on the circumstances outlined in the above submission.
40. We therefore seek that the NOR7 is declined unless or until the matters raised in this submission have been appropriately addressed, and/or agreement is reached for early sale of our property on the basis set out in this submission.

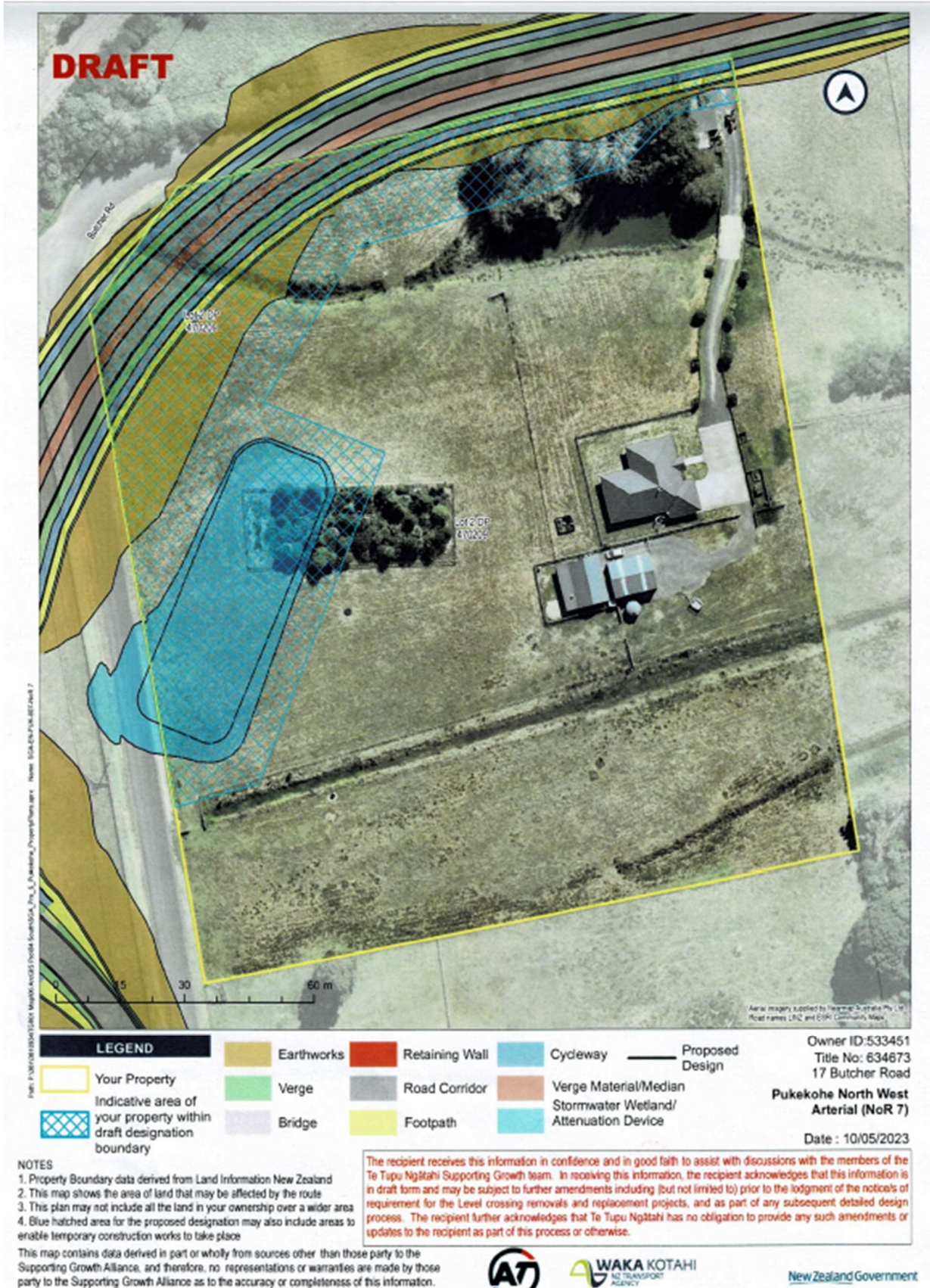
Signed by and behalf of Des and Lorraine Morrison by:



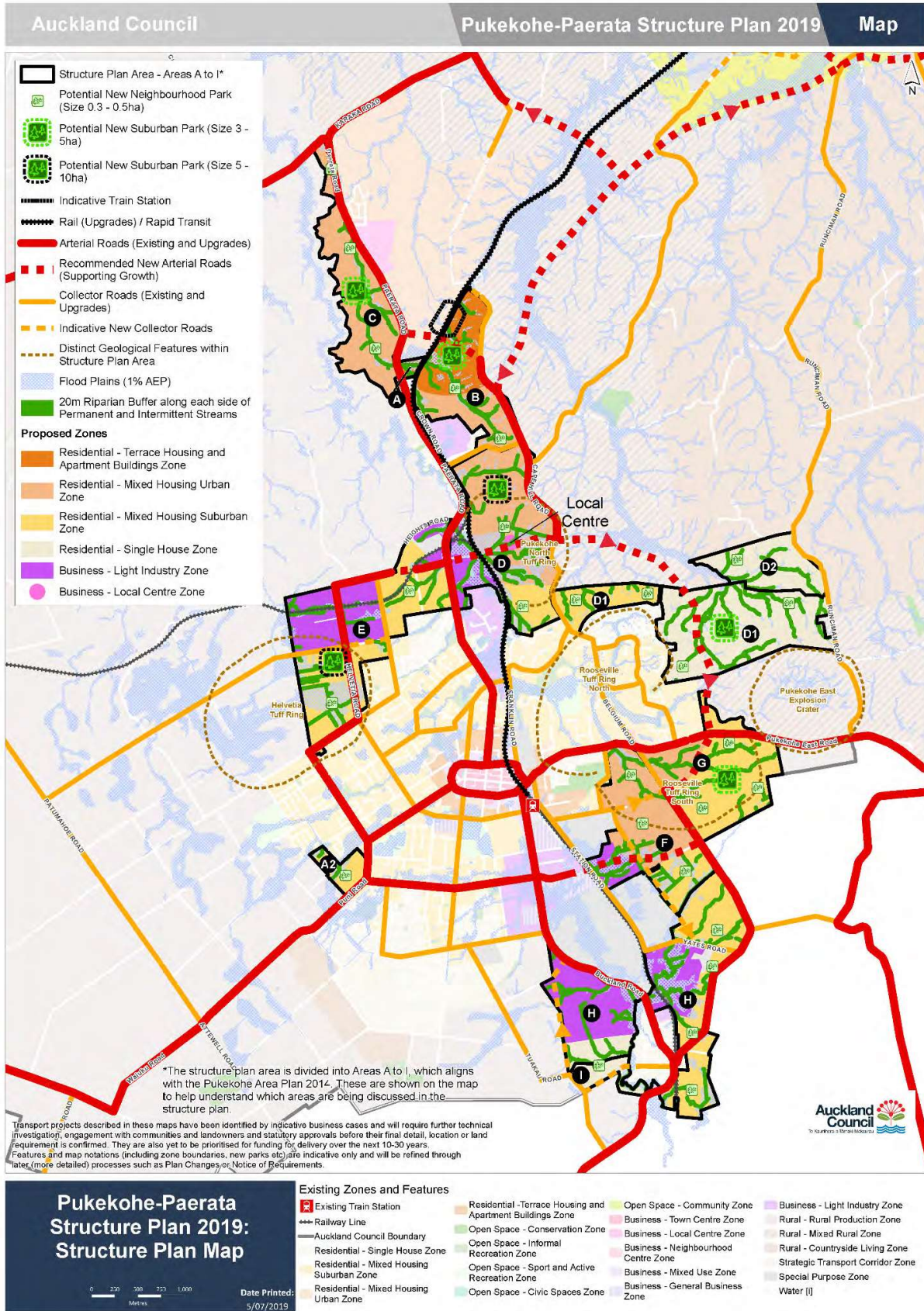
Des Morrison

10 November 2023

APPENDIX 1 – DRAFT PUKEKOHE NORTH WEST ARTERIAL NOR7



APPENDIX 2 – PUKEKOHE-PAERATA STRUCTURE PLAN 2019



Form 21

Submission on requirements for designations

To: Auckland Council
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Waikato District Council
Private Bag 544
Ngaruawahia
3742
info@waidc.govt.nz

Name of submitter: Aotearoa Towers Group (ATG)
Trading as FortySouth
Private Bag 92161
Auckland 1142

Chorus New Zealand Limited (Chorus)
PO Box 632
Wellington

Connexa Limited (Connexa)
167 Victoria St West
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)
Private Bag 92161
Auckland 1142

Spark New Zealand Trading Limited (Spark)
Private Bag 92028
Auckland 1010

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the ***Telecommunications Submitters***.

The Proposal:

This is a submission on the following notices of requirement by Auckland Transport and Waka Kotahi NZ Transport Agency for transport projects in Pukekohe, Paerata and Drury in South Auckland:

- Pukekohe Transport Plan NoR 1: Drury West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 2: Drury – Pukekohe Link (Waka Kotahi NZ Transport Agency)
- Pukekohe Transport Plan NoR 3: Paerata Connection (Auckland Transport)
- Pukekohe Transport Plan NoR 4: Pukekohe North-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 5: Pukekohe South-East Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 6: Pukekohe South-West Upgrade (Auckland Transport)
- Pukekohe Transport Plan NoR 7: Pukekohe North-West Arterial (Auckland Transport)
- Pukekohe Transport Plan NoR 8: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport Agency) (Auckland Council and Waikato District Council)

The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the notice of requirement that this submission relates to are:

The conditions of the designations that relate to Network Utility Operators and the Land Use Integration Process (LIP).

The Telecommunications Submitters' submission is that:

The Telecommunications Submitters have no position on the overall Pukekohe to Drury package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The Telecommunications Submitters **oppose** the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The organisations collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also crucial for supporting social and economic wellbeing and measures to reduce travel demand. It provides opportunities for work from home/remote work solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy.

The equipment used to deliver this is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. The design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable than trying to retrofit necessary telecommunications/ broadband infrastructure later due to disruptions and/ or incompatibility with project design.

Existing Infrastructure

A summary of existing infrastructure located in the project footprints is as follows and is outlined in more details viewable in **Appendix A**:

- FortySouth Facility: Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network).
- FortySouth Facility: Pole located at 122 Princes St W in NoR 6 (supporting One NZ network).
- Connexa Facility: Found at Belgium Road Intersection in NoR 5 (supporting Spark network).
- Connexa Facility: 59 Ward Street in NoR 6 (Supporting 2degrees network).
- Connexa Facility: Pole on Puni Road in NoR 6 (Supporting Spark network).
- Chorus has extensive fibre and copper lines networks throughout the project area.
- Mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads which may be within project corridors when works proceed.

Future Infrastructure Requirements

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. This is especially significant for future development with the introduction of advanced technology such as 5G infrastructure, which will be crucial to transport infrastructure. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit

them at a later date. This process does not always run smoothly. To provide a previous example, Spark had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting, it proved to be very challenging to try to incorporate necessary telecommunications infrastructure into the design of this project. Connexa is already planning for potentially up to three additional mobile sites along the proposed designation corridors.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable the development of new network utility including telecommunications infrastructure where practicable to do so¹. While the Telecommunication Submitters are not asking for the exact same outcomes of these examples, it demonstrates mutual benefits with ease of collaboration, communication and cohesive infrastructure development.

This is reflected in more recent times in two separate occasions earlier this year where Auckland Transport and Waka Kotahi agreed to amend their proposed Network Utility Management Plan (NUMP) conditions to involve network utility operators during the design phase, as well as the inclusion of Land Integration Process (LIP) conditions on Auckland Transport designations. Satisfactory conditions in this regard have been agreed with the requiring authorities in the Airport to Botany and North West Transport Projects (aside to an equivalent approach to the LIP condition for Waka Kotahi designations). However, those agreed amendments to the NUMP condition have not been carried through to the Pukekohe to Drury NoRs.

All NoRs include a NUMP condition in the general conditions (26 for Auckland Transport and 25 for Waka Kotahi), which is not the same as the previously and recently agreed upon NUMP condition wording for the other abovementioned projects. The NUMP conditions used in the Pukekohe to Drury Project NoRs do not include the updated clause “(d) *the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.*”

¹ East West Link Condition NU2, W2W Condition 24A

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, it is reasonable for there to be provisions to ensure the matter is properly considered during the design phase through consultation with network utility operators as it sets appropriate expectations and ensures these opportunities are properly explored. This enables proper consideration of making provision for communications infrastructure that support the function of the roads and/or serves adjacent growth. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which has previously been the focus of conditions to manage network utilities.

Whilst the LIP condition on Auckland Transport 's proposed designation now matches changes agreed on the other projects, there is still no equipment process for the proposed Waka Kotahi designations in this project to ensure the various telecommunications network providers are properly identified and engaged at relevant project stages.

Consultation with Telecommunications Network Utility Operators

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.

The Assessment of Environmental Effects (AEE) for each notice sets out the relevant utility providers who have assets within and around the proposed designations and is listed in the Network Utility Effects section. However, none of the Telecommunication Submitters are listed within the affected Utility Providers despite having existing infrastructure within and around the proposed designated boundaries. Therefore, it is a concern they will not be consulted as part of the NUMP development for each stage.

Spark and One NZ operate mobile phone/wireless broadband networks that are often located on facilities located in or adjacent to roads, while Chorus operate fixed line assets in roads including fibre. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa who are also acquiring the fixed assets of 2degrees, and similarly One NZ has sold its fixed mobile assets to Aotearoa Towers Group (trading as FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition for the Waka Kotahi designations is proposed to provide more clarity on which telecommunications/broadband operators may be affected and to enable an engagement process to be established as the projects advance. This is not required for the Auckland Transport conditions given the LIP condition.

Land Use Integration Process (LIP)

Auckland Transport included a satisfactory LIP condition within their NoR's which are listed below. This reflected their previous requested changes to clause (f) and (f)(iii) and agreed upon for the Airport to Botany and Northwest Projects NoRs.

However, the following NoR's lodged by Waka Kotahi did not include LIP conditions:

- Pukekohe Transport Plan: Drury – Pukekohe Link (Waka Kotahi NZ Transport)
- Pukekohe Transport Plan: Mill Road and Pukekohe East Road Upgrade (Waka Kotahi NZ Transport) (Auckland Council and Waikato District Council)

The exclusion of LIP conditions creates a potential lack of integration and dialogue between the project teams and existing infrastructure providers such as the Telecommunications Submitters. This may compromise effective collaboration, cohesiveness and proper exploration of opportunities with regard to future infrastructure requirements being integrated into these projects. The Telecommunication Submitters are seeking relief in the form of satisfactory LIP conditions (equivalent to the Auckland Transport conditions) to be included within the two Waka Kotahi NoRs, or an alternative condition of like effect in regard to addressing the issues raised by the Telecommunications Submitters, or an advice note to the NUMP condition to clearly identify the current major network providers operating fibre and mobile phone/wireless broadband networks.

The Telecommunications Submitters seeks the following decision from the Requiring Authorities:

Amend the NUMP condition for each notice of requirement, as follows:

Network Utility Management Plan (NUMP)

(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.

(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:

(i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;

(ii) protect and where necessary, relocate existing network utilities;

- (iii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
- (iv) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.*
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) **during detailed design** where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.*
- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner*

Add an advice note to the NUMP condition for the Waka Kotahi designations unless a Land Integration Process (LIP) condition or similar is added in the alternative:

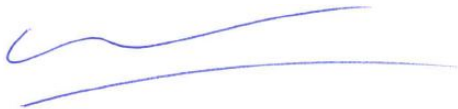
Advice Note:

For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group (FortySouth), Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited, Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).

Add a LIP condition equivalent to that proposed for the Auckland Transport designations, or any alternative mechanism ensuring there is a process for the project teams for the Waka Kotahi designations to properly identify and engage with relevant telecommunication network utility operators as part of project design.

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 10 November 2023

Address for service of submitter:

Chris Horne

Incite

PO Box 3082

Auckland

Telephone: 0274 794 980

E-mail: chris@incite.co.nz

Appendix A

Impacted Telecommunication Facilities

Telecommunication Sites Impacted

FortySouth

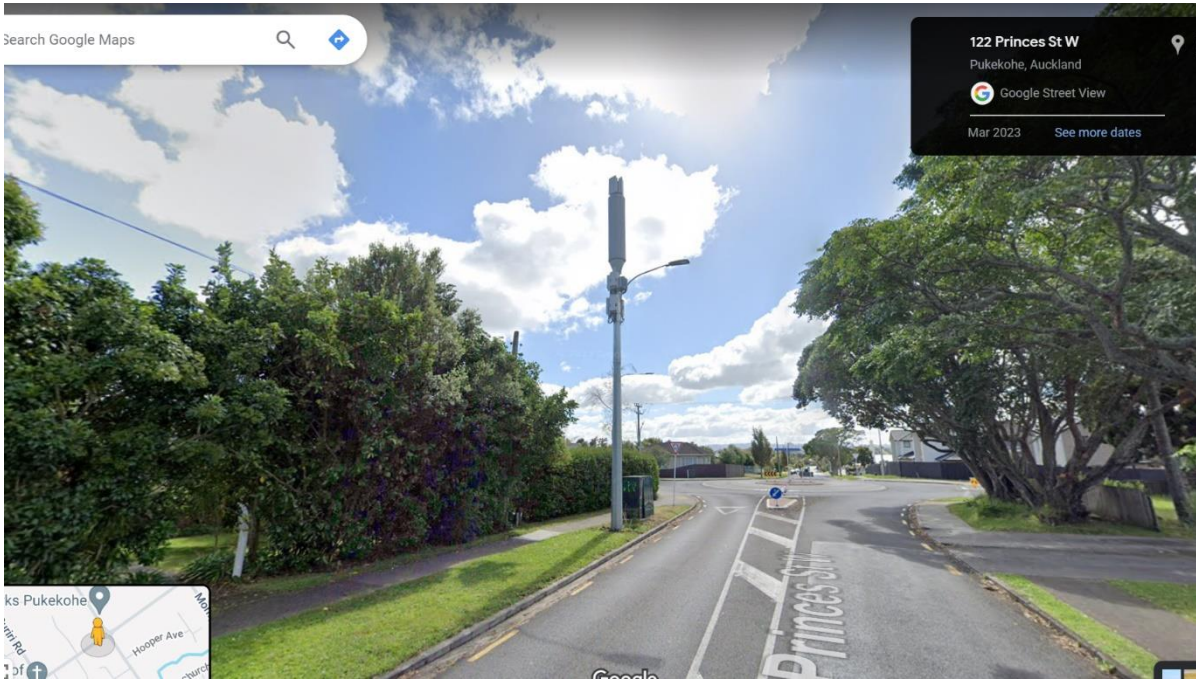
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting One NZ network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole located at 122 Princes St W in NoR 6 (supporting One NZ network)



Connexa

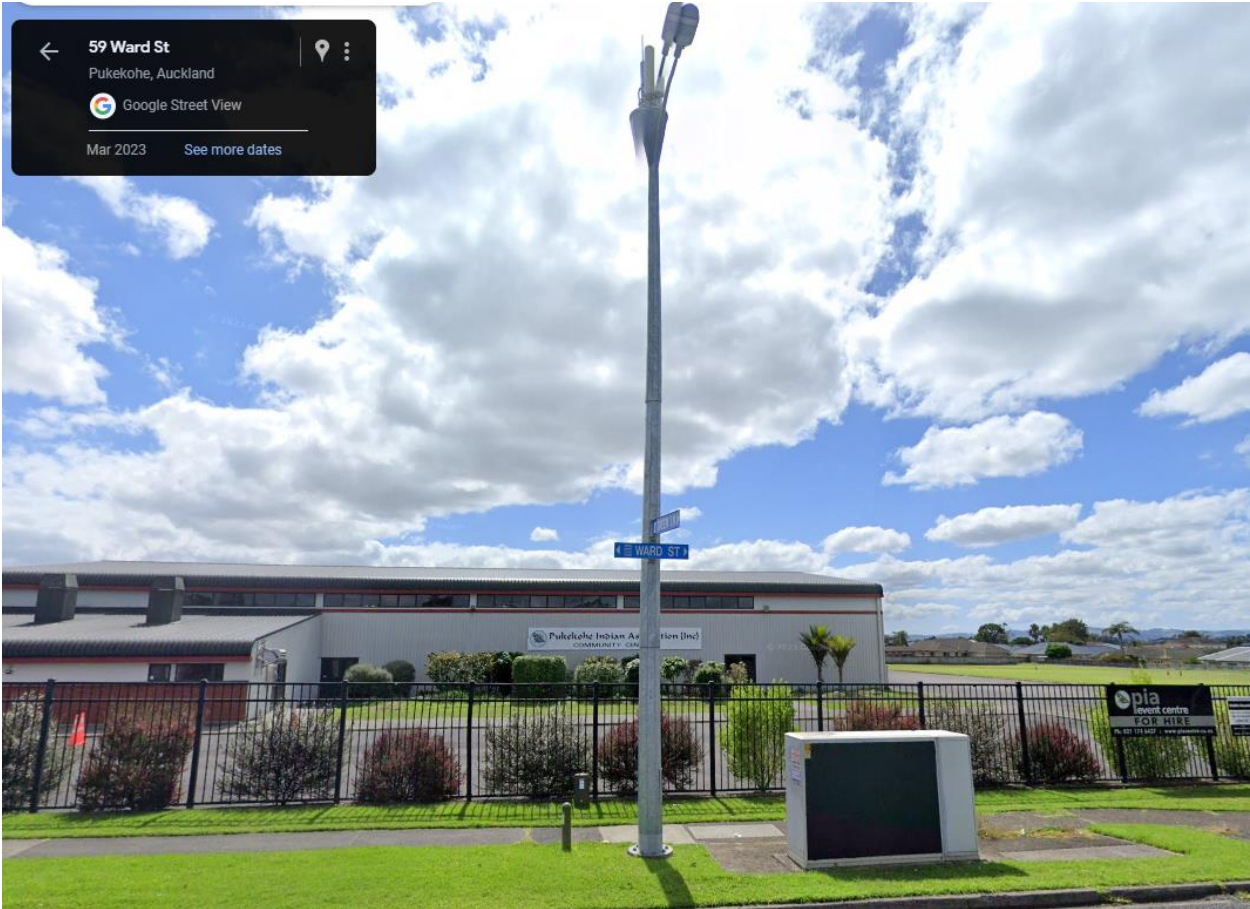
NoR 5 - Pukekohe South-East Arterial (Auckland Transport)

- Pole located at the Belgium Road Intersection in NoR 5 (supporting Spark network)



NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- 59 Ward Street in NoR 6 (Supporting 2Degrees network)

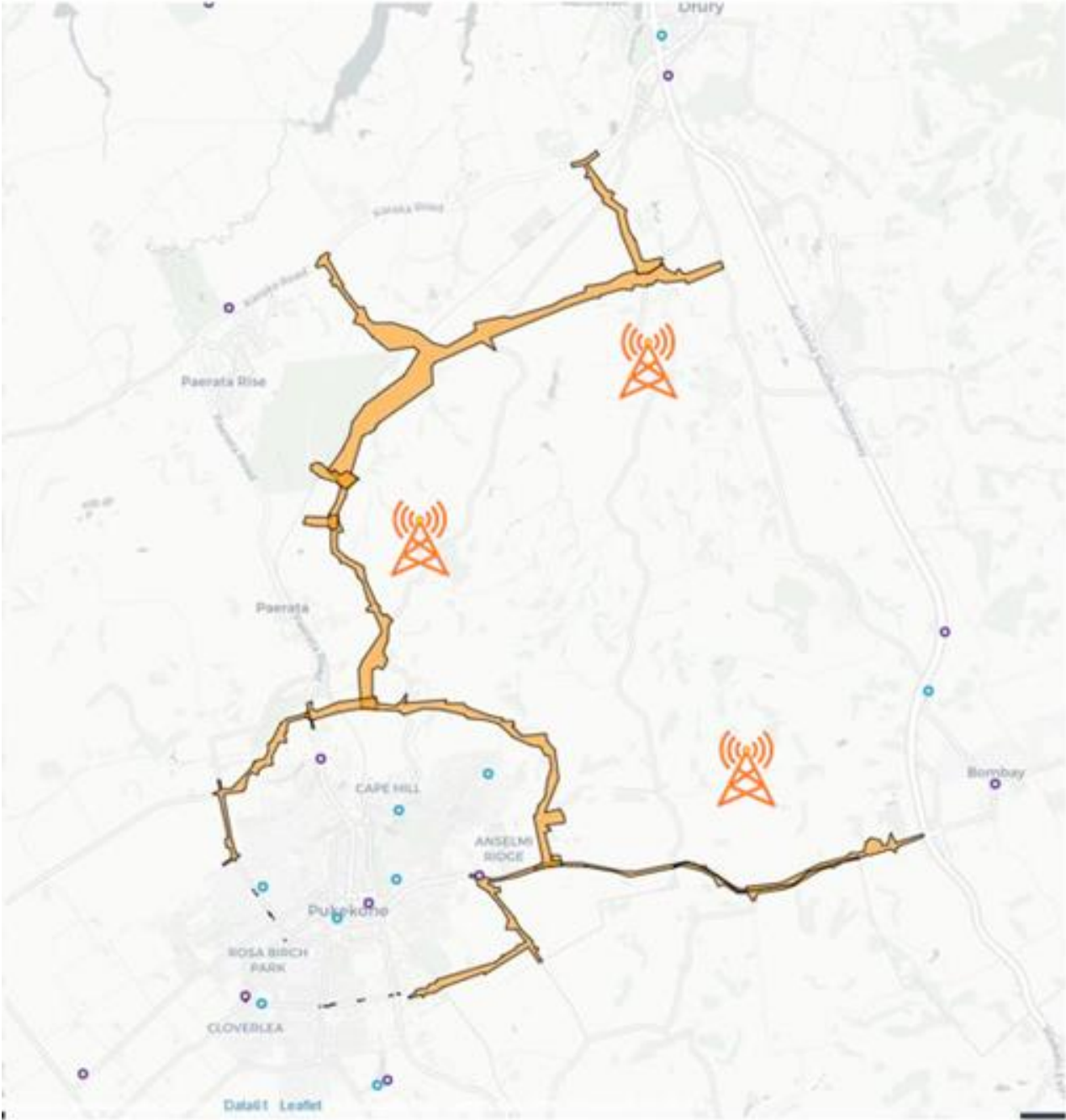


NoR 6 - Pukekohe South-West Upgrade (Auckland Transport)

- Pole on Puni Road in NoR 6 (Supporting Spark network)



Connexa Indicative Future Site Requirements



The yellow transmission pole symbols are indicative future Connexa sites. The proposed new locations are:

- Runciman South
- Paerata
- Bombay West

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:934] Notice of Requirement online submission - Jane Emma Telfer
Date: Sunday, 12 November 2023 1:30:38 PM

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Jane Emma Telfer

Organisation name:

Full name of your agent: Jane Emma Telfer

Email address: telferje@hotmail.com

Contact phone number:

Postal address:
101 Butcher Road
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:
Butcher Road, Pukekohe

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

The Butcher Road community would be divided and adversely affected by the increased traffic causing noise pollution and destruction of the environment. Safety issues would arise from the increased traffic. It is not a cost effective option, given the topography when there is an existing alternative route.

I or we seek the following recommendation or decision from Auckland Council:

To use existing infrastructure - Heights Road to Helvetia Road or Heights Road to Beatty Road and Birdwood Road. There is also the option of the paper road from the end of Butcher Road to Heights Road.

Submission date: 12 November 2023

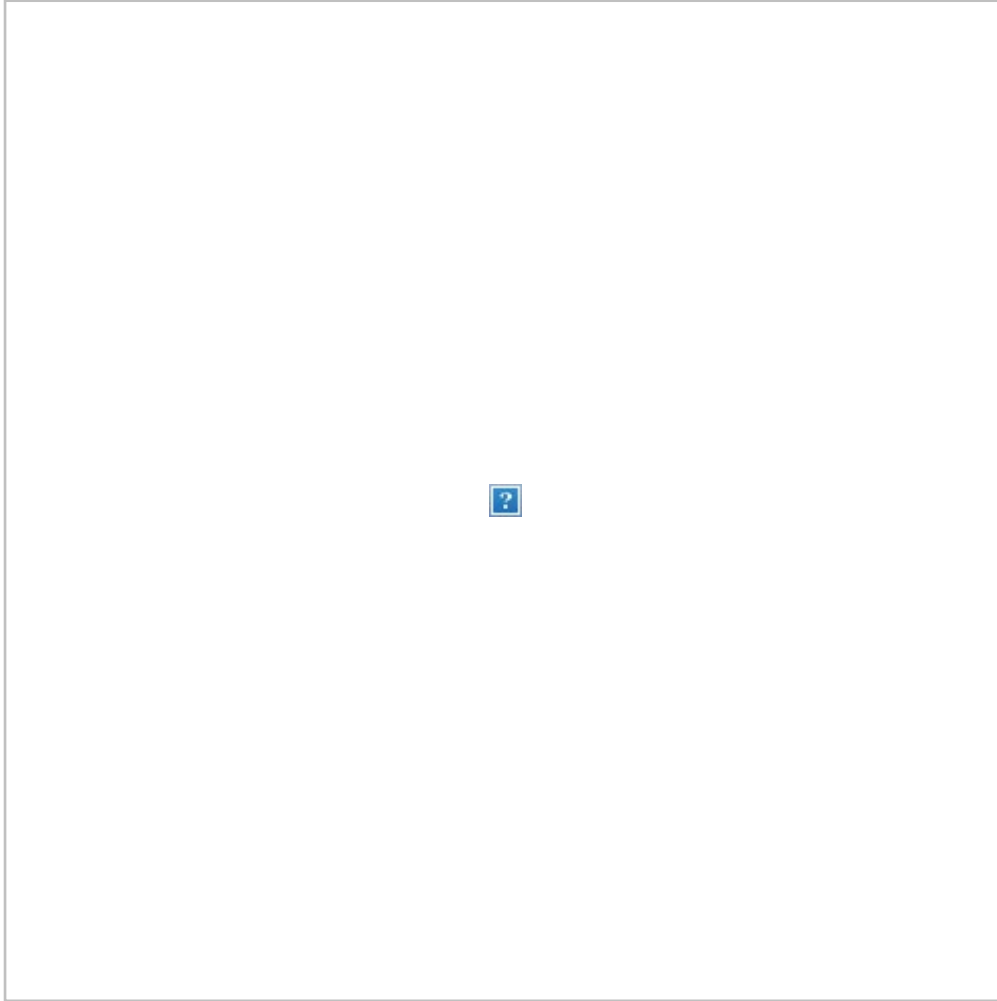
Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:937] Notice of Requirement online submission - Nicola Payne
Date: Sunday, 12 November 2023 5:15:40 PM

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Nicola Payne

Organisation name:

Full name of your agent:

Email address: niccpayne@gmail.com

Contact phone number: 021926939

Postal address:
97 Butcher Road
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

We have concerns specifically to the proposed route of the arterial cutting across Butcher Road to Helvetia Road. The option provided in the public notice is different to the options considered in the Assessment of Alternatives document. The "preferred" segments of NW Option 1A and NW Option 2A do not correspond with the option proposed in the "Notice". Where is the assessment criteria for the different proposed route? How can a proposed route be notified without the relevant assessment being completed, and if the assessment has been completed, shouldn't this be published? Our concerns with the route are centred on the recommendation to build a complete new road when one exists, Heights Road. This road already works as a pseudo alternative route from Pukekohe to Paerata Road, we support this being permanently used. Upgrade to this road would have less impact on existing infrastructure and a new roundabout on the junction of Heights Road and Paerata Road would benefit this junction. There are several mentions of benefits by bringing the arterial road closer to within Pukekohe township. We believe the opposite is true. An arterial should circumnavigate a township, not pass through it. Pukekohe is growing, this arterial (not just NOR 7) has multiple parts of the route that will cut through the town and divide the community. To reference the minutes from the Franklin Council Board, they noted 27th June 2023, they recommend reconsidering the use of Gun Club Road and Patumahoe Road as an effective method to divert traffic away from residential areas. We support their view. Even with some mitigation, the ecological impact still remains moderate for a new road, whereby utilising an existing road would not require any mitigation.

I or we seek the following recommendation or decision from Auckland Council:

We seek the recommendation to utilise existing roads to facilitate this arterial and to develop a "true" arterial that circumnavigates the future Pukekohe township.

Submission date: 12 November 2023

Attend a hearing

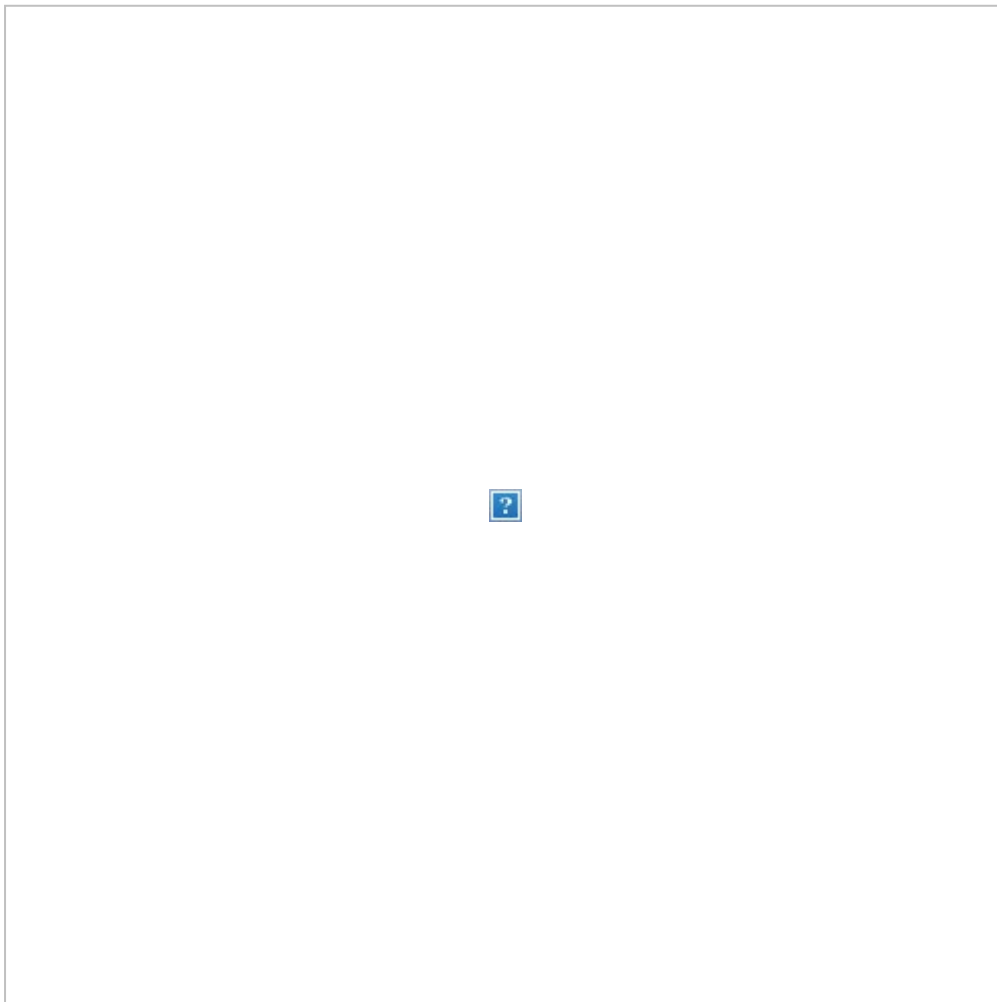
Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



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From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:941] Notice of Requirement online submission - CHRIS and ANGELA LYNCH
Date: Sunday, 12 November 2023 8:45:42 PM

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: CHRIS and ANGELA LYNCH

Organisation name:

Full name of your agent:

Email address: angelynch@xtra.co.nz

Contact phone number:

Postal address:
99 Butcher Road]
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

a) The proposed road is completely at odds to the rural environment surrounding Butcher Road, Pukekohe. b) The creation of a major road to intersect Butcher Road will create safety issues, particularly with the residents of Butcher Road, endeavouring to turn RIGHT on to a major road. c) The use of the roads by trucks and other heavy vehicles will cause major noise issues for the residents of Butcher Road. d) There are alternative routes open to the Council including use of Heights Road which is already being used as a bypass route for heavy vehicles and traffic to and from State Highway 22. Council needs to explore the use of this alternative route rather than significantly impacting a quiet semi-rural / residential area.

I or we seek the following recommendation or decision from Auckland Council:

The decision we seek is that the Council finds an alternative route for this bypass road using / upgrading the existing Helvetia and Heights Roads.

Submission date: 12 November 2023

Attend a hearing

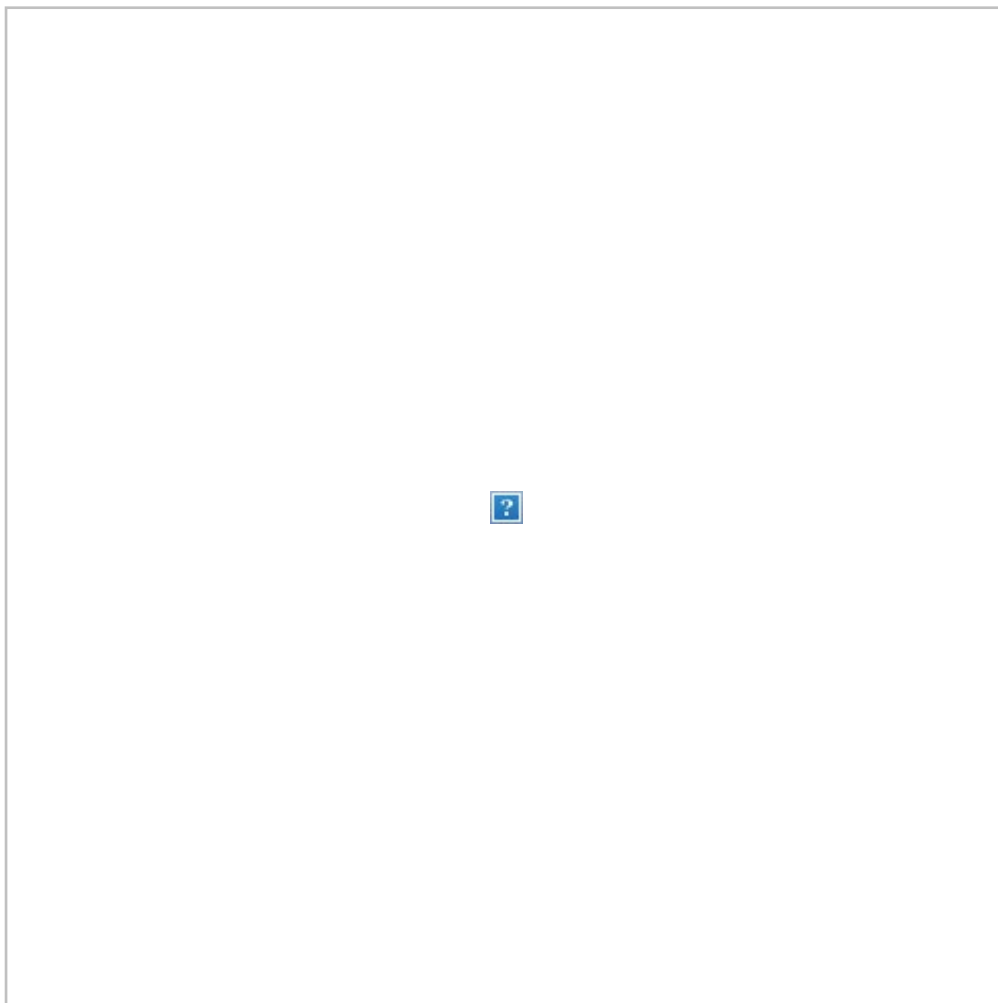
Do you wish to be heard in support of your submission? No

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of

requirement as soon as reasonably practicable after submitting to Auckland Council.



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Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) David and Teresa Polwart

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

Address for service of Submitter

62 Butcher Rd Pukekohe 2120

Telephone:

274975268

Email:

dave@onsiteprojects.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Pukekohe NOR 7: Pukekohe North-West Upgrade

The specific parts of the above notice of requirement that my submission relates to are: *(give details including property address):*

Nor7 Pukekohe North-West Arterial

Particular to, but without limitation, 36 and 62 Butcher Rd Pukekohe

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

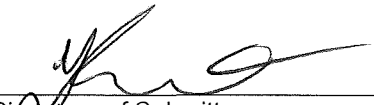
The reasons for my views are:

Attached on separate page 3

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council *(give precise details including the general nature of any conditions sought).*

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



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

11/13/2023

Date

Notes to person making submission:

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

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Submissions on Requirement for Designation 62 & 36 Butcher Road, Pukekohe

Reasons for Opposing Notice of Requirement for Pukekohe North-West Upgrade (NoR 7)

BACKGROUND

We acquired 62 Butcher Road, Pukekohe in 2002 as our long-term family home. It is a rural lifestyle property of about 2.5 hectares on the northern fringe of Pukekohe. It had all the attributes that we wanted for our family and for our long-term financial security.

Ultimately as a developer and builder within the Franklin area it is our intention that we would be able to develop the land at the appropriate time in conjunction with Pukekohe's urban growth.

The opportunity arose to acquire the neighbouring land at 36 Butcher Road and we also bought that in 2010. That property is used for our rural business and as a residential rental property.

We have made substantial alterations and additions to our home and have constructed buildings for business use. Under numerous successive future growth plans produced by the former Franklin District Council and the Auckland Council our land has been included for future urban growth to the north of Pukekohe. We always planned that we would be able to develop our properties and sell at a time which suited us in accordance with our circumstances and the progress of development of the urban area.

We oppose the proposed North-West Arterial Route proceeding through our properties. The property at 36 Butcher Road would be completely within the proposed road corridor and one half of the property at 62 Butcher Road would be within the corridor.

REASONS

Our reasons for opposing the Notice of Requirement are as follows:

1. We would be unable to pursue any future plans for development of our land as part of the natural future expansion of Pukekohe. Our land is zoned Future Urban under the unitary plan and the Structure plan indicates Residential Mixed Housing when zoned. We would not be in control of the timing of realising our main asset.
2. No clear timetable has been indicated other than 20 plus years before work is likely to begin. We will face the uncertainty of not knowing when the plans will begin to be acted upon. We have been frequently told that no funding is available for this project and therefore we are concerned about the ability for compensation if we should seek it.
3. We do not believe that the proposed route through Butcher Road and neighbouring properties is the best option. Insufficient investigation has been undertaken on less intrusive alternatives such as utilising the existing Heights Road route. That route with suitable engineering and design work can be integrated with State Highway 22 and the proposed North-Eastern Arterial Route.
4. Our future use of the land would be restricted while the designation is on our properties. Council would be unlikely to grant any Resource Consents for any substantial works or buildings.

We request that Council reconsiders the route for the Pukekohe North-Western Arterial and properly investigates the use of Heights Road.

From: NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: [ID:969] Notice of Requirement online submission - Robert Allan John Burns
Date: Monday, 13 November 2023 10:16:09 pm
Attachments: [106 Beatty Road.pdf](#)

The following customer has submitted a Notice of Requirement online submission.

Contact details

Full name of submitter: Robert Allan John Burns

Organisation name:

Full name of your agent:

Email address: r.sburns@xtra.co.nz

Contact phone number: 021685574

Postal address:
25 Anzac Road
Pukekohe
Auckland 2120

Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Pukekohe : NOR 7 Pukekohe North-West Upgrade

The specific provisions that my submission relates to are:
106 Beatty Road, Pukekohe

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:
See attachment.

I or we seek the following recommendation or decision from Auckland Council:
See attachment.

Submission date: 13 November 2023

Supporting documents
106 Beatty Road.pdf

Attend a hearing

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

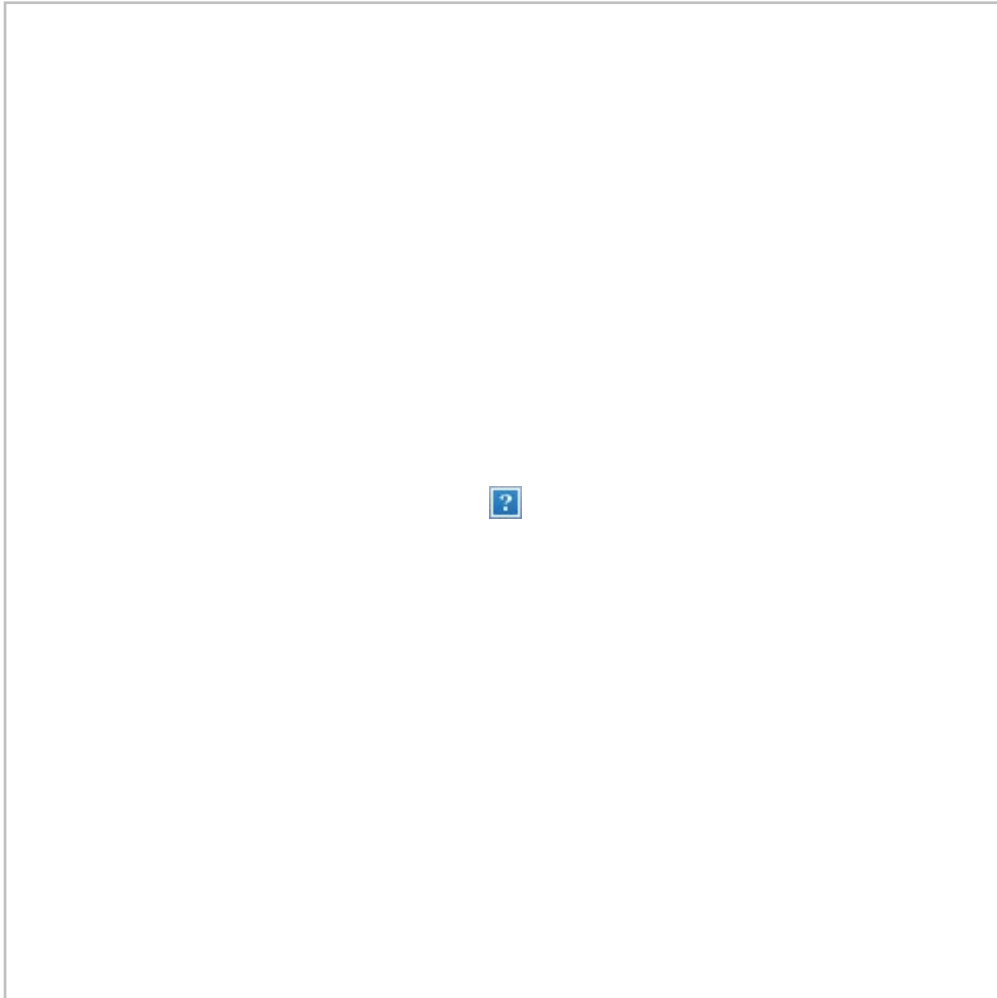
Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of

requirement as soon as reasonably practicable after submitting to Auckland Council.



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

106 Beatty Road, Pukekohe

My brother and I own the site at 106 Beatty Road, and the NoR for the Pukekohe North West arterial crosses through the middle of our 10 acre lifestyle block. This is the remaining slice of our family farm. My grandfather purchased the farm upon returning home from WW1, and subsequently my parents took over after they married post-WW2.

My brother and I grew up here, and the house on the site was built by our parents during our childhood. Our mother passed away in 1995, and my father remained living in the house, continuing to tend to the block until his death in 2017 at age 94. Since then, my brother and I have rented the house out. It's long history within our family means a great deal to us.

Relief sought by this submission:

1. It is sought that the alignment of the Pukekohe North West Arterial road remains as far to the north-west of the site as possible, and therefore keeping the house and the surrounding curtilage as far from the proposed arterial road as possible.
2. It is sought that noise attenuation is put in place during construction and also post-construction once the arterial road is operational.
3. It is sought that planting is used on both sides of the arterial road to minimise the visual amenity impacts of the arterial road on our site.
4. It is sought that our site is able to access the Pukekohe North West arterial road from both the north-western and the south-eastern portions (where the house sits) for future industrial development to the north-west, and residential development to the south-east.
5. As a consequential change based on the amended route of the Pukekohe North West Arterial I seek that the future land use on 106 Beatty Road be changed to part industrial and part residential. The arterial route itself would form the boundary between the two zones to mitigate any potential reverse sensitivity effects.

This would be consistent with the Pukekohe-Paerata Structure Plan (2019) which notes on page 21 that:

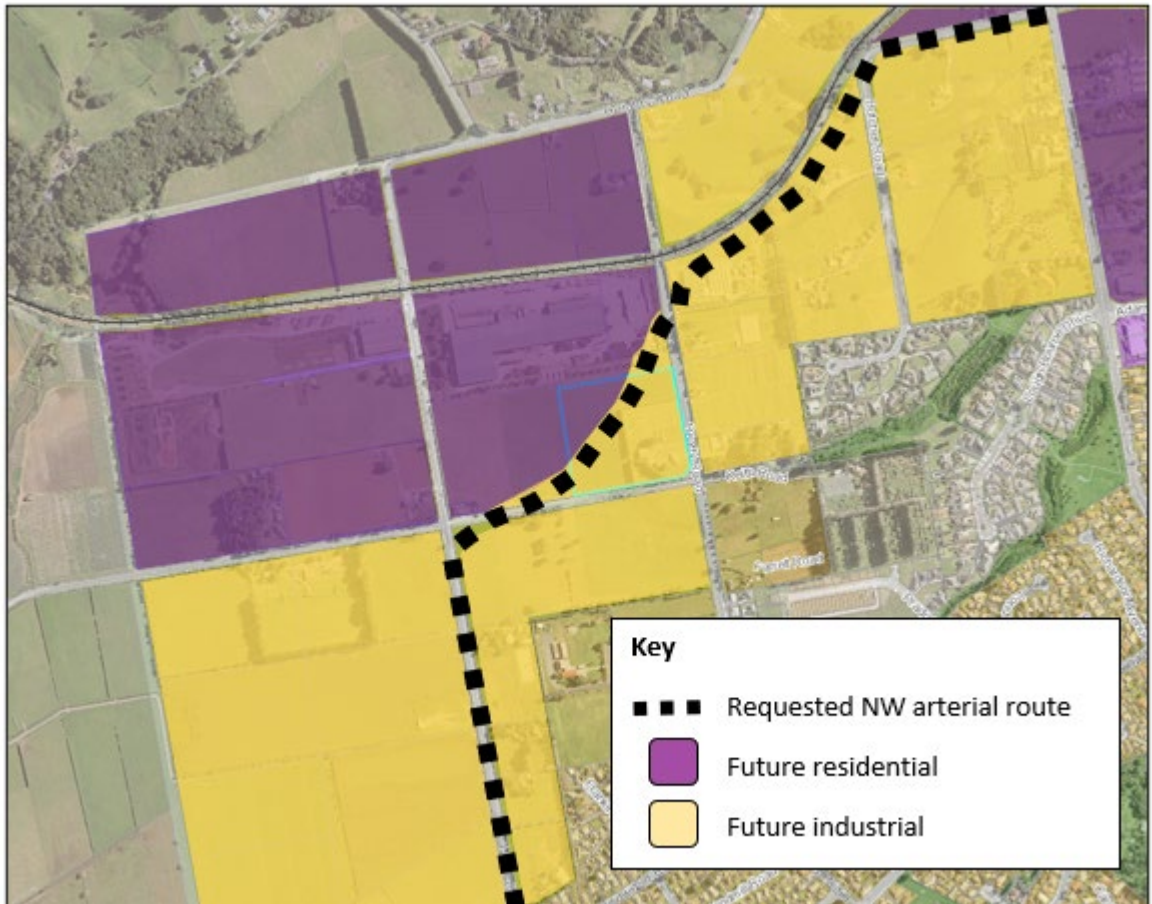
“Where possible, the new proposed industrial areas have been separated from existing or proposed residential areas by existing or proposed roads or the Main Trunk Railway Line.”

The structure plan also states that:

“Future plan changes will need to consider how interfaces and linkages between and within the structure plan areas and adjacent land are addressed in the following situations....

- between new business and new residential zoned land (page 39)
- ...
- consideration of road boundaries as zone interfaces (page 43)”

A map showing the requested alignment of the Pukekohe North West Arterial and the consequential land use changes is in the map below.



6. It is sought that Te Tupu Ngātahi make efforts to purchase the site at 106 Beatty Road immediately.

Submission on Eight Notices of Requirement for the Pukekohe Package lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991

TO: Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

SUBMISSION ON: Notices of Requirement ("**NoRs**") for the Pukekohe Package and Local Arterials

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: Mark Bishop
Regulatory & Policy Manager
Watercare Services Ltd
Private Bag 92 521
Wellesley Street
AUCKLAND 1141
Phone: 022 010 6301
Email: Mark.Bishop@water.co.nz

DATE: 13 November 2023

1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the eight NoRs for the Pukekohe and Local Networks lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**") in Auckland.
- 1.2 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future. Watercare is interested in all of the eight NoRs.
- 1.3 Watercare could not gain an advantage in trade competition through this submission.

2. WATERCARE – OUR PURPOSE AND MISSION

- 2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.
- 2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated water and wastewater infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.
- 2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.¹
- 2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy.
- 2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.²

3. PLANNED AND EXISTING WATERCARE ASSETS

- 3.1 Some of the NoRs interact with existing Watercare water and wastewater assets. The Assessment of Effects on the Environment for the NoRs states that Watercare assets are within the project areas for NoR 1,2 and 5-8.³
- 3.2 Some of the project areas for the NoRs are within areas where Watercare has planned for future infrastructure development. Water and wastewater infrastructure to be developed within the areas covered by the NoRs broadly falls in two categories; developer-led infrastructure to service growth at a local network level, and Watercare-led infrastructure to service growth at a bulk level.
- 3.3 Watercare may have some awareness of developer-led infrastructure projects within the covered areas, but it is important to clarify that Watercare is not responsible for and does not have direct control over these projects until they are finished and officially vested. It is also worth noting that Watercare has limited insight into the details of developer-led infrastructure projects, however as previously noted, wishes to remain involved in future engagement to ensure alignment between infrastructure providers.

¹ LGA, s 59.

² Local Government (Auckland Council) Act 2009, s 57.

³ Assessment of Effects on the Environment for the NoRs (dated September 2023) at Table 11-7.

3.4 Specific commentary regarding known projects within Watercare’s Asset Management Plan to service growth at a bulk level is outlined below. Solutions and alignments/locations are subject to change as we learn more, progress our projects and the area develops. There is also potential for new needs to surface, necessitating further bulk infrastructure. Ongoing engagement is critical to maintain alignment.

(a) **NoR Pukekohe: Drury West Arterial⁴ ("NoR 1") (Auckland Transport)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 1.

(b) **NoR Pukekohe: Drury – Pukekohe Link⁵ ("NoR 2") (Waka Kotahi)**

- The current concept for Watercare’s Wesley/Paerata Watermain has it travelling west along Karaka Rd from Runciman Rd. The alignment is yet to be finalised but there is a high likelihood it will intersect with NoR 2.
- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 2.

(c) **NoR Pukekohe: Paerata Connections⁶ ("NoR 3") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 3.

(d) **NoR Pukekohe: Pukekohe North-East Arterial⁷ ("NoR 4") (Auckland Transport)**

- Watercare plans to install a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd and while it is yet to be finalised, there is high likelihood it will intersect with NoR 4.

(e) **NoR Pukekohe: Pukekohe South-East Arterial⁸ ("NoR 5") (Auckland Transport)**

⁴ A new transport corridor with active mode facilities in Drury West, extending south from the intersection of State Highway 22 and Jesmond Road to the edge of the Future Urban Zone near Runciman Road, Drury

⁵ A new state highway including a shared path from Great South Road, Drury in the northeast, connecting State Highway 22 in the west, and the area in the vicinity of Sim Road/Cape Hill Road, Pukekohe in the south.

⁶ Two new transport corridors including active mode facilities. One between the two extents of Sim Road, Paerata across the North Island Main Trunk Rail Line. The second between Paerata Rail Station and Sim Road, Paerata.

⁷ A new transport corridor including active mode facilities between State Highway 22, Paerata on the north west and Pukekohe East Road, Pukekohe in the south east.

⁸ Upgrade part of Pukekohe East Road and Golding Road, and a new connection from Golding Road to Svendsen Road, Pukekohe across Station Road and the North Island Main Trunk Rail Line - including active mode facilities.

- Watercare is working through detailed design of a new Bulk Supply Point (Pukekohe East BSP) at 88 Pukekohe Rd, which is within NoR 5.
- Watercare plans to install a new wastewater rising main, which would run south down Station Rd before heading west under the NIMT and along Svendson Rd. Parts of this will fall within NoR 5.

(f) **NoR Pukekohe: Pukekohe South-West Upgrade⁹ ("NoR 6") (Auckland Transport)**

- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 6.

(g) **NoR Pukekohe: Pukekohe North-West Upgrade¹⁰ ("NoR 7") (Auckland Transport)**

- Watercare is installing a new wastewater pump station in Paerata which will convey flows to Pukekohe via a rising main, which is also yet to be built. It is assumed the rising main will be installed along Paerata Rd however this is yet to be finalised so there is potential for it to intersect with NoR 7.
- The current concept for Watercare's Waikato 2 Watermain has it travelling north up Queen St before heading west and northwest along Harris St and Helvetia Rd. Work is planned to commence shortly to identify the preferred route and work through a NoR process for the watermain. There is a likelihood it will fall within NoR 7.

(h) **NoR Pukekohe: Mill Road and Pukekohe East Road Upgrade¹¹ (NoR 8) (Waka Kotahi)**

- Watercare has no planned projects at this time that intersect with NoR 8, although may have future developments where requirements change due to growth.

4. SUBMISSION POINTS AND RELIEF SOUGHT

4.1 This is a submission on the eight NoRs (summarised above) that were lodged on 2 October 2023 and publicly notified on 13 October 2023.

4.2 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies,

⁹ Upgrade specific intersections and regrade specific driveways on Nelson Street, Ward Street, West Street and Helvetia Road for active mode facilities.

¹⁰ Upgrade Helvetia Road, Pukekohe in the south-west and a new corridor from Helvetia Road to SH22 Paerata in the north-east including active mode facilities.

¹¹ Upgrade of Mill Road (Bombay) in the east for additional vehicle lanes and a shared path and an upgrade of Pukekohe East Road, Pukekohe in the west for a shared path.

or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

Early engagement

- 4.3 Watercare seeks to ensure that there is a live and continual process planned forward to recognise that asset management and construction plans are constantly updating and changing.
- 4.4 Watercare acknowledges the proactive approach to engagement shown by the requiring authorities to date. Watercare has been in discussions with the Supporting Growth Alliance, and has had discussions through the preceding 'future urban land use strategy' project work. Watercare has also had independent engagement with Waka Kotahi and Auckland Transport during the development of these NoR's.
- 4.5 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as the projects develop.
- 4.6 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including engagement prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare, this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).
- 4.7 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future (these assets, and planned projects are detailed in paragraph [3.4] above). Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

Specific amendments to conditions

- 4.8 Watercare has filed evidence, and attended, recent NoR hearings for other Supporting Growth Alliance projects (the North West Strategic Network, and the Airport to Botany Bus Rapid Transit Project). The conditions proposed for the NoRs by the requiring authorities for these NoRs are similar to those which have been proposed at the recent North West Strategic Network hearing (in rebuttal evidence).
- 4.9 Watercare supports the intention of conditions proposed by the requiring authorities which seek to ensure that there is engagement with relevant stakeholders during the development of the eight NoRs (ie the conditions which require a Network Utility Management Plan ("**NUMP**"), Stakeholders Communication and Engagement Management Plan ("**SCEMP**"), and Land use Integration Process ("**LIP**")).
- 4.10 That said, Watercare considers further amendments to the conditions are required to address matters raised in this submission, so that the conditions for the eight NoRs

adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.

- 4.11 Watercare seeks that a new condition requiring the preparation of a "Network Utility Strategic Outcomes Plan" be added to all eight NoRs to futureproof assets in consultation with network utility operators such as Watercare:

Network Utility Strategic Outcomes Plan (NUSOP)

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.
- (c) The NUSOP shall:
 - i. consider expected asset life of existing assets;
 - ii. consider expected asset capacity increases or changes; and
 - iii. demonstrate how city and national strategic plans are considered.
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.

- 4.12 If the above condition is not included in the NoRs, Watercare seeks the following amendments (shown in underline) to the NUMP condition for all eight of the NoRs:

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work~~.
- ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s177 consents required for works affecting prior Designations and Watercare "Works Over Approvals".
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they

have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

4.13 Watercare also seeks that the LIP condition is included in all of the NoRs (including the NoRs lodged by Waka Kotahi), as opposed to only being included in the Auckland Transport NoRs as is currently proposed.

5. RECOMMENDATION SOUGHT

5.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the conditions of the NoRs, as set out above in its submission (and any other conditions), to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

5.2 Watercare wishes to be heard in support of this submission.

5.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Form 21

Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991

Date: 13 November 2023

To: Te Tupu Ngātahi – Supporting Growth Alliance

Name of Submitter: Te Tāhuhu o te Mātauranga | Ministry of Education

Address for Service: Woods
8 Nugent Street
Grafton, Auckland

Attention: Emma Howie, General Manager – Planning & Urban Design

Phone: 027 572 2220

Email: emma.howie@woods.co.nz

Submission on eight Notices of Requirement for Te Tupu Ngātahi Supporting Growth for the Pukekohe Transport Network

SUMMARY

- 1) The Ministry of Education (“**the Ministry**”) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education.
- 2) Te Tupu Ngātahi Supporting Growth Alliance (“**Te Tupu Ngātahi**”) has lodged eight Notices of Requirement (“**NoR**”) for the Pukekohe within the Pukekohe, Paerata and Drury West areas:
 - NoR 1 – Pukekohe: Drury West Arterial
 - NoR 2 – Pukekohe: Drury – Pukekohe Link
 - NoR 3 – Pukekohe: Paerata Connections
 - NoR 4 - Pukekohe: Pukekohe North-East Arterial
 - NoR 5 - Pukekohe: Pukekohe South-East Arterial
 - NoR 6 - Pukekohe: Pukekohe South-West Upgrade
 - NoR 7 - Pukekohe: Pukekohe North-West Upgrade
 - NoR 8 - Pukekohe: Mill Road and Pukekohe East Road Upgrade
- 3) This submission relates to all eight NoRs lodged by Te Tupu Ngātahi.
- 4) There are a number of existing schools in proximity to the NoRs. There is potential for these schools, or any future schools developed in this area, to be affected by traffic, noise and other nuisance effects arising from future construction works of this transportation network. The Ministry is seeking to ensure that appropriate conditions are included in the designations to mitigate any adverse effects associated with the construction of the Pukekohe transport network.

-
- 5) The Ministry supports the provision of active transport modes (walking and cycling) as proposed through the Pukekohe Transport Network.
 - 6) Overall, the Ministry's submission is neutral on the NoRs subject to the following request for changes being made to the conditions including:
 - Updating acronym/terms and conditions within the Designations to be consistent with other conditions Te Tupu Ngātahi have agreed to on other NoRs through the Supporting Growth Programme;
 - Amendments to the Stakeholder Communication and Engagement Management Plan ("**SCEMP**") to include reference to schools within proximity to the Pukekohe Transport Network; and
 - Amendments to the Construction Traffic Management Plan ("**CTMP**"), to avoid using any roads around schools during the AM and PM peak periods.
 - 7) The Ministry wishes to be heard in support of its submission.

OVERVIEW OF THE MINISTRY'S RESPONSIBILITIES & LAND INTERESTS

- 8) The Ministry is the Government's lead advisor on the New Zealand education system. The Education and Training Act 2020 sets out the obligations and responsibilities of the Ministry. The Ministry have responsibility for the education outcomes of students across the full spectrum of the education sector, including pre-school, primary and secondary levels.
- 9) The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.
- 10) The Minister of Education is a Requiring Authority under the Resource Management Act 1991 ("**RMA**") and has over 400 education purposes designations in the Auckland Unitary Plan: Operative in Part ("**AUP:OP**").
- 11) The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.
- 12) The Ministry is therefore a considerable stakeholder and social infrastructure provider in terms of activities that may impact existing and future educational facilities and assets in the Auckland region.
- 13) The Ministry has multiple education sites within the Pukekohe, Paerata and Drury West area including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School.
- 14) The location of each NoR in relation to the Ministry's existing assets is shown in Figure 1.

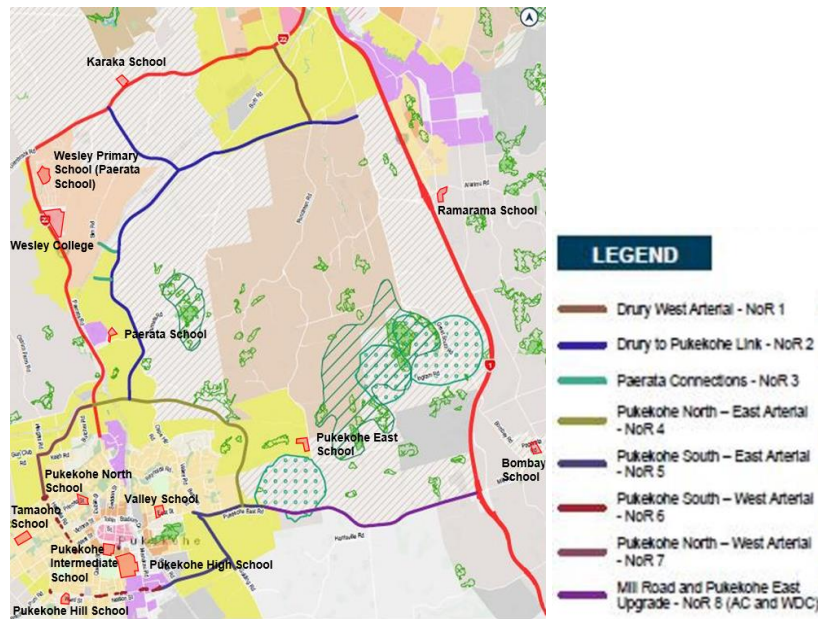


Figure 1: Project Overview – Location of Eight NoRs (identified in the legend) in relation to the Ministry of Education’s School Network (outlined in red)

MINISTRY OF EDUCATION’S SUBMISSION

- 15) Under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.
- 16) The eight NoRs to designate land for future strategic transport corridors in Pukekohe, Paerata, and Drury West areas, enable the future construction, operation, maintenance of transport infrastructure to support anticipated growth within Auckland’s future urban zoned area over the next 10 – 30 years. The project supports improved walking and cycling, public transport, and general traffic connections. The key reasons for this investment are to improve safety, better integrate transport and land use, improving accessibility, transport resilience, and promoting travel choice.
- 17) The Ministry broadly supports the Project aim to plan transport investment in Auckland’s future urban zoned areas. The project will improve active mode facilities, enhancing the safety of students walking and cycling to and from school.
- 18) The Ministry supports the provision of shared pathways, bi-directional cycle ways, upgrading of intersections, that will provide safe access to the current and future wider school network. Encouraging mode shift will provide significant health benefits for students and staff, reducing traffic generation at pick up and drop off times. Schools should be well serviced by safe and accessible pedestrian and cycling links as well as public transportation facilities, and it is considered that the proposed upgrades will provide adequate cycling and walking infrastructure to the surrounding area.
- 19) The Pukekohe project is a large programme of works. The quantum of construction required to deliver the projects will likely have temporary adverse effects on the surrounding environment. There are several schools in proximity to the NoRs. There is potential for these schools to be affected by traffic, noise and other nuisance effects arising from future construction works. The construction timing and staffing is yet to be determined, so there is uncertainty regarding the construction methodology, including the routes for construction vehicles and the location of construction laydown areas.

-
- 20) The Ministry seeks to appropriately address and manage construction related effects and the ongoing potential effects the project may have on the operation and management of the schools for NoRs 2, 4, 5, 6, 7 and 8. Additionally, as the project is planned for works over the next 10 to 30 years, the Ministry is also submitting on NoRs 1 and 3 in the event any new schools are developed in the project area.
- 21) The key issues that the Ministry has concerns about in relation to the NoRs include construction traffic effects and stakeholder engagement which are outlined below. Consequential changes are also sought to the acronyms/terms and conditions of the NoRs for consistency with other Te Tupu Ngātahi designations. The requested changes are included in **Appendix 1** to this submission.

Construction traffic effects

- 22) The surrounding schools (and any future schools) will potentially be affected by an increased volume of heavy vehicles to access the construction area of the NoRs. This is a traffic safety concern for students walking and cycling to school at peak pick up and drop off times.
- 23) Condition [17] requires the preparation of a CTMP prior to the start of construction. The Ministry supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
- 24) Amendments made to conditions are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing¹ and to conditions agreed through the Te Tupu Ngātahi Airport to Botany Bus Rapid Transit Project NoRs².

Stakeholder engagement

- 25) The Ministry supports the establishment of SCEMP as proposed condition [8]. The Ministry considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools. Amendments made to conditions are requested to identify schools within proximity to the project and to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.

RELIEF SOUGHT

- 26) In principle, based on the above, the Ministry supports the proposed walking and cycling facilities proposed in each NoR application providing improved active mode connectivity is essential to provide existing and future communities with a sustainable means of accessing education facilities in Pukekohe, Paerata, and Drury West.
- 27) To ensure effects associated with the NoRs on the Ministry are appropriately managed, it is requested that appropriate conditions are imposed on the designations in accordance with the RMA. It is requested that amendments to conditions as set out in **Appendix 1** are adopted by Te Tupu Ngātahi. The amendments sought include:
- a) Amendment to the acronym/terms to be consistent with other Te Tupu Ngātahi designations to include a definition of 'educational facilities' and 'stakeholders';
 - b) Inclusion of the Ministry and schools in the SCEMP; and
 - c) Inclusion of the Ministry and schools as stakeholder in the CTMP.

¹ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

² In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

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- 28) Overall, the submission is neutral subject to the above changes being made to the designation conditions.
 - 29) Such other consequential amendments to the NoRs may be necessary to give effect to the relief sought through this submission.
 - 30) The Ministry wishes to be heard in support of its feedback.

APPENDIX 1: AMENDMENTS SOUGHT TO CONDITIONS

Amendments are sought to the proposed abbreviations and definitions along with conditions to be included in all of the NoRs (NoR 1 – 8). Changes to these provisions sought by the Ministry are noted below.

PROPOSED ABBREVIATIONS AND DEFINITIONS

Acronym/terms for all Te Tupu Ngātahi Pukekohe Transport Network designations changes sought to conditions identified as - <u>Underlined</u> and strikethrough		
Acronym/Term	Definition	Submission Comment
<u>Educational Facilities</u>	<p>Facility used for education to secondary level.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> ▪ <u>Schools and outdoor education facilities; and</u> ▪ <u>Accommodation, administrative, cultural, religious, health, retail, and communal facilities accessory to the above.</u> <p><u>Excludes:</u></p> <ul style="list-style-type: none"> ▪ <u>Care centres; and</u> ▪ <u>Tertiary education facilities</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing³.</p>
<u>Stakeholders</u>	<p><u>Stakeholders to be identified in accordance with Condition [x], which may include as appropriate:</u></p> <ol style="list-style-type: none"> a) <u>Adjacent owners and occupiers;</u> b) <u>Adjacent business owners and occupiers;</u> c) <u>Central and local government bodies;</u> d) <u>Community groups;</u> e) <u>Developers;</u> f) <u>Development agencies;</u> g) <u>Educational facilities; and</u> h) <u>Network utility operators.</u> 	<p>Inclusion requested</p> <p>The requested term and definition are consistent with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>

³ In the Matter of Notices of requirement for designations by Auckland Transport collectively known as the Warkworth Package - Chris Scrafton Statement of Rebuttal Evidence on behalf of Auckland Transport – Strategic Planning and Conditions dated 26 October 2023.

PROPOSED CONDITIONS

Proposed conditions as per other Te Tupu Ngātahi designations		
<u>Underlined and strikethrough</u> – changes proposed for all NoRs		
No.	Condition	Submission Comment
General Conditions		
[x]	<p>Stakeholder Communication and Engagement</p> <p>(a) <u>At least 6 months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall identify:</u></p> <p>(i) <u>A list of Stakeholders;</u></p> <p>(ii) <u>A list of properties within the designation which the Requiring Authority does not own or have occupation rights to; and</u></p> <p>(iii) <u>Methods to engage with Stakeholders and the owners and occupiers of properties identified in (a)(i) – (ii) above.</u></p> <p>(b) <u>A record of (a) shall be submitted within an Outline Plan for relevant Stage of Work.</u></p>	<p>Inclusion requested</p> <p>The condition is requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p>
Pre-construction Conditions		
8	<p>Stakeholder Communication and Engagement Management Plan (SCEMP)</p> <p>(a) A SCEMP shall be prepared in consultation with Stakeholders, community groups and organisations prior to the Start of Construction any Outline Plan being submitted.</p> <p>(b) The objective of the SCEMP is to identify how the public Stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. To achieve the objective of the SCEMP shall include:</p> <p>(i) <u>a list of stakeholders;</u></p> <p>(ii) <u>a list of properties within the designation which the Requiring Authority does not own or have occupation rights to;</u></p> <p>(iii) <u>methods to engage with Stakeholders and the owners of properties identified in (b)(ii) above;</u></p> <p>(i) At least 18 months prior to any Outline Plan being submitted, the Requiring Authority shall identify:</p> <p>A. The properties whose owners will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and business who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers whose access is directly affected</p> <p>(ii) The SCEMP shall include:</p> <p>A. Detailed of (b)(i)A to C;</p> <p>(iv) The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>A list of schools to be engaged with has also been included in the condition as they are located in proximity to the Pukekohe Project and may be subject to construction traffic effects associated with the works.</p>

	<p>(v) The procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>(vi) Methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>(vii) <u>Methods and timing to engage with landowners and occupiers whose access is directly affected;</u></p> <p>(viii) <u>Methods for engaging with the Ministry of Education (MoE), surrounding schools (including Karaka School, Wesley Primary School, Wesley College, Paerata School, Pukekohe East School, Pukekohe North School, Tamaoho School, Pukekohe Intermediate School, Pukekohe High School, Valley School, and Pukekohe Hill School), and any future schools. The MoE and Schools must be contacted ten days prior to the start of any construction within 500 metres of the school boundary. Contact details of the construction manager must be shared with the Ministry of Education, Schools, and future schools (should the school have any safety concerns during construction).</u></p> <p>(ix) Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (b)(i) and (ii) above; and</p> <p>(x) Linkages and cross references to communication and engagement methods set out in other conditions and management plans where relevant.</p> <p>(c) Any SCEMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.</p>	
Construction Conditions		
17	<p>Construction Traffic Management Plan (CTMP)</p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects.</p> <p>To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours <u>(for example on roads servicing educational facilities during pick up and drop off times)</u> to manage vehicular and pedestrian traffic near <u>educational facilities</u> schools or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p>	<p>Amendment requested</p> <p>Amendments are requested to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing.</p> <p>Additionally, wording has also been amended to reflect changes made to the Te Tupu Ngātahi Airport to Botany Bus Rapid Transport conditions as included in the Primary Evidence prior to the Council hearing⁴.</p>

⁴ In the Matter of Notices of Requirement for designations by Auckland Transport collectively known as the Airport to Botany Bus Rapid Transit Project – Requiring Authority Primary Evidence Appendix B -ref: EV148B RA.

	<ul style="list-style-type: none"> (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, <u>including public transport service, including pedestrians and cyclists, on existing roads;</u> (vi) methods to maintain vehicle access to <u>and within</u> property and/or private roads <u>for all transport modes</u> where practicable, or to provide alternative access arrangements when it will not be; (vii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads; (viii) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services); (ix) <u>auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</u> (x) <u>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</u> (xi) <u>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded;</u> 	
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13 November 2023

By email to: unitaryplan@aucklandcouncil.govt.nz

Submission on Pukekohe Notices of Requirement 1-8

1 Introduction

- 1.1 Counties Energy thanks you for the opportunity to provide a submission concerning the Pukekohe Notices of Requirement 1 to 8. This submission applies to all Notices of requirement. Specific comments concerning individual NoRs are made in addition to the general comment where required.

2 About Counties Energy

- 2.1 Counties Energy Limited (CEL) is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act. CEL is a requiring authority in respect of its electricity network. The Civil Defence and Emergency Management Act also cites electricity distribution as a lifeline utility.
- 2.2 CEL owns, manages and operates an electricity distribution network supplying nearly 45,000 homes, farms and businesses in the southern Auckland, northern Waikato and Hauraki District areas. Electricity is an essential infrastructure that enables development to occur. Much of the network supplying CEL's customers is overhead in the rural areas, with a mix of overhead and underground assets in the urban areas, particularly in the eastern part of the network which has and continues to experience high levels of growth.
- 2.3 CEL receives power from the national grid at Bombay and Glenbrook Grid Exit points, from where it is conveyed at either 110kV or 33kV (high voltage) to nine substations before being converted to either 22kV or 11kV (medium voltage) to be distributed via overhead lines, underground cables, transformers and associated equipment so it can be used by the customer, whether at 400V (low voltage) or at medium voltages for larger businesses.
- 2.4 Future proofing and protection of existing assets is key to meeting the needs of the communities and businesses CEL serves in light of pressures from urban growth. CEL sees NoRs 1-8 as providing



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

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potential network utility corridors and therefore opportunities for extension of its distribution network between substations and to accommodate the future demands of urban expansion in and around the Drury and Pukekohe area.

3 Submission Points

3.1 CEL is generally supportive of the alignment of the new roads indicated by the Proposed Designation Boundaries indicated on drawings SGA-DRG-STH-002-1000, 2000, 2100, 2200, 2300, 2400, 3000, 4000, 4100, 5000, 5100, 6000, 6100, 7000, 8000 and 8100.

3.2 The proposed NoR alignments offer opportunity for extension of the distribution network.

3.3 However, we note the following omissions across all the afore mentioned drawings:

Existing overhead infrastructure in existing road corridors and proposed designations

Medium voltage (11kV and 22kV) lines and low voltage lines

Fibre cable

Pole locations in urban areas where footpaths and cycleway upgrades occupy the back berm

Existing underground infrastructure in existing road corridors and proposed designations

Fibre

Low voltage cables

Equipment associated with underground electricity reticulation located in the berm e.g., pad mounted transformers, switchgear, link boxes and network pillars

3.4 CEL will require further consultation and detailed planning concerning parts of NoRs 1-8 which may impact the location and safe operation of the assets listed under paragraph 3.3.

3.5 CEL will also require further consultation and detailed planning where it is proposed to cut or fill in the vicinity of existing overhead or underground assets in order to maintain compliance with NZECP34:2001 New Zealand Electrical Code of Compliance for Electrical Safe Distances, and to maintain optimum operation and safety around equipment associated with underground electricity distribution and fibre cables.

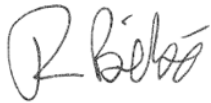
3.6 NoR 5, Drawing 5000 indicates the construction of a bridge over the rail corridor at Station Road, Pukekohe. This will impact the Pukekohe-Tuakau 110kV line which conveys electricity between the two zone substations. Early consultation and detailed planning will be required concerning works in the vicinity of this section of crucial infrastructure.

3.7 NoR 5, Drawing 5000 indicates alignment of a new road with associated cut and fill along the alignment of a section of the existing Bombay-Pukekohe 110kV line which is built within an easement between Station Road and Golding Road. Further detailed consultation will be required concerning the road design and construction round this line.

3.8 NoR 8, Drawing 8100, Mill Road. The alignment of the high voltage Bombay-Pukekohe (north) 110kV line is incorrect, where it crosses to the north side of Mill Road; and appears to be in area identified for future cut and installation of a culvert, both of which could compromise the safe operation of a critical asset. Further consultation and detailed planning is required.

CEL requests that Auckland Transport and Waka Kotahi respectively give consideration to the points raised above. We welcome the opportunity to discuss these matters further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bilbé', written in a cursive style.

Rachel Bilbé
Land and Easement Specialist

rachel.bilbe@countiesenergy.co.nz

027 622 5612

13 November 2023

Auckland Council
AUCKLAND

Sent via e-mail: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

NOTICES OF REQUIREMENT 1 THROUGH 8 - PUKEKOHE

The Campaign for Better Transport Incorporated (**CBT**) wish to put forward our submission in relation to the following Notices of Requirement:

- Pukekohe: Drury West Arterial (NoR 1)
- Pukekohe: Drury – Pukekohe Link (NoR 2)
- Pukekohe: Paerata Connections (NoR 3)
- Pukekohe: Pukekohe North-East Arterial (NoR 4)
- Pukekohe: Pukekohe South-East Arterial (NoR 5)
- Pukekohe: Pukekohe South-West Upgrade (NoR 6)
- Pukekohe: Pukekohe North-West Upgrade (NoR 7)
- Pukekohe: Mill Road and Pukekohe East Road Upgrade (NoR 8)

Background

The CBT is always cautious when it comes to the construction of roading projects, and our default position would be one of opposition unless a solid case existed for the construction of the specific project involved.

The CBT is also mindful that in the relevant area:

- The railway line to Pukekohe is being electrified, with suburban service expected to be restored in next year. Assuming the initial timetable is consistent with service provided before the line closed for electrification works in 2022, this would mean a twenty-minute frequency between Pukekohe and the Auckland Central Business District during peak and a thirty-minute frequency during off-peak.
- Existing road infrastructure is unlikely to be fit for purpose in the coming decades. There needs to be separation between arterial routes and non-arterial routes and having non-arterial uses on an arterial route is not desirable from either a transport or an urban design perspective.

We make brief comments below, first in the general sense and then in relation to specific projects.

Cycle Infrastructure

We are heartened to see that cycle infrastructure is forming a significant component of the proposed routes, including the Drury-Pukekohe Link, and fully support this component of the proposals.

Twenty Year Lifespan

We note the resource consent has a lifetime of twenty years, which we agree with. The lifespan ensures the corridor is preserved and not developed on, but also means the impacts of rail electrification can be observed prior to construction work being undertaken.

Should the rail electrification have a material impact on traffic levels along the existing routes far and beyond that anticipated, then we would hope that the specifics of these projects are reconsidered in light of the changed facts.

Drury-Pukekohe Link (Pukekohe Expressway)

We are neutral when it comes to the Pukekohe Expressway. The construction of this road would enable the existing State Highway 22 to be downgraded to a non-arterial route and used accordingly (the best example might be the relationship between Great South Road and the Southern Motorway, with the former being used for local purposes and the latter being used as the major through route). The choice of route along the outskirts of the planned urban area is useful – this ensures no division of the urban area by a major road.

Mill Road

We are in favour of the planned upgrade to Mill Road. This road forms the primary link between Pukekohe, the Southern Motorway and the Waikato Expressway and is likely to continue doing so even once the new Pukekohe Expressway has been opened. We also note the road is currently hazardous, having had its speed limit decreased from 100km/h to 80km/h to reflect the dangerous conditions posed by this road. We anticipate the upgrades would ensure the road would become fit for purpose and improve safety outcomes.

A case could be made for the third and fourth lanes proposed to have some sort of restriction on them similar to such lanes along State Highway 20B (Puhinui Road). This might for instance take the form of a transit and heavy goods lane. We are mindful the road is in a primarily rural area and so demand flows are different to that within an urban area where bus lanes and the like would be more appropriate.

Pukekohe North-West Arterial and North-East Arterial

We are neutral when it comes to these roads. We see the value of these roads as providing a connection between the upgraded Mill Road and the routes heading to points west of Pukekohe (for example Waiuku) without road traffic needing to go through Pukekohe residential and commercial streets. We hope the opportunity would be taken to change the nature of some roads through Pukekohe to make them friendly toward other uses (for example, decreasing the speed limit of some roads through the Pukekohe village)

Pukekohe South-East Arterial and South-West Upgrade

We are neutral when it comes to these roads. We see the value of the South-East Arterial as providing a connection between the upgraded Mill Road and the routes heading to Tuakau and the northern Waikato without road traffic needing to go through Pukekohe residential and commercial streets (in particular, the King Street/Massey Avenue/Manukau Road/East Street roundabout).



Campaign For Better Transport

If Auckland Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

We oppose to the Notice of Requirement.

The reasons for our views are:

Since 1999, our three families that have been living at 157 Beatty Road Pukekohe has operated a business here growing and producing quality tomatoes.

For 24 years, this location has been central to our livelihood. Hence, learning of the proposed new road planned by Waka Kotahi has been a deeply concerning revelation for us.

Our property, both home and income, seems to have been overlooked in the planning process. The entirety of our land has been designated within the boundary for the new road plan.

Our reasons for opposing this decision are as follows:

Economic Dependency: The cultivation and sale of tomatoes is our primary source of income. Without the glasshouse on our land, our means of providing for our family is severely jeopardised. We are uncertain about how the Council expects us to maintain our livelihood without this crucial facility.

Horticultural Importance: Horticulture is a cornerstone of New Zealand's primary industries. We take pride in delivering high quality tomatoes to the market. The potential loss of our production means consumers will miss out on a reliable source of this essential vegetable. We believe that too much high value land has been taken for housing.

While we are not entirely against the Council's plan, we urge reconsideration.

We hope for a revised proposal that respects our business and living conditions.

In light of the above, we recommend the following course of action for the Council:

Modify the boundary so that only the land essential for road construction is purchased. Ensure the remaining land, along with the glasshouse and residential structures, remains untouched.

I wish to be heard in support of my submission – Yes

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

