

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

Date: Monday 2 August, Tuesday 3 August and
Wednesday 4 August 2021
Time: 9.30am
Meeting room: Concert Chamber
Venue: Pukekohe War Memorial Town Hall
14-16 Massey Avenue
Pukekohe, Auckland

PRIVATE PLAN MODIFICATION 55
HEARING REPORT
PATUMAHOE SOUTH
ASKEW CONSULTANTS

COMMISSIONERS

Chairperson Lee Beattie
Commissioners Basil Morrison
Hugh Leersnyder

Bevan Donovan
HEARINGS ADVISOR

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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 applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure 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 applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant 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 chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

Please note

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PRIVATE PLAN MODIFICATION TO THE AUCKLAND UNITARY PLAN BY ASKEW CONSULTANTS

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Reporting officer, Chloe Trenouth, Planner (consultant)

Reporting on a proposed private plan modification to rezone 34.5ha of land from primarily Rural Production to Residential, Business, Open Space and Future Urban Zones; and apply I403 Patumahoe Precinct to the land, with amendments to Patumahoe South

APPLICANT: ASKEW CONSULTANTS

SUBMITTERS:	
Page 300	Tania Shine
Page 302	Joanne Ineson
Page 304	Karen Bright

Page 306	Barry John Stephens
Page 308	Deborah Tangney
Page 310	David Murray McLean
Page 312	David Hopkins
Page 314	William Thomas Colgan
Page 316	Doug Lloyd
Page 318	Michael Graeme Weck
Page 320	Kelven and Beverley Eastman
Page 322	Louise Brotherton
Page 325	Te Akitai Waiohua Waka Taua Incorporated
Page 327	Brad Michie
Page 329	Philippa Williams
Page 333	Karena Brady-Leathem
Page 335	Alison Askew
Page 337	Yvonne Wagner
Page 339	Nicola Ermens
Page 341	Anthony Roy Bellhouse
Page 343	Lyn Bellhouse
Page 345	Wayne and Brenda Hussey
Page 347	Lynette Frances Hickey
Page 350	Garry Neil McLean
Page 352	Brett and Bronwyn Hunter
Page 354	Peter Joseph Watt
Page 356	Tamsin Wilson
Page 358	Auckland Council
Page 366	Environmental Defence Society
Page 369	Kainga Ora
Page 374	Horticulture NZ
Page 381	David Walsh
Page 387	Auckland Transport
Page 406	Alpito Hill Ltd
Page 435	The Surveying Company
Page 446	KiwiRail
Page 452	Watercare
Page 459	Counties Power Ltd
Page 470	Federated Farmers of New Zealand
Page 474	David George Harper
Page 476	Ministry of Education
Page 478	Karam Dhadli

Page 483	Douglas Rex Embling
Page 485	Heritage New Zealand Pouhere Taonga
Page 490	Peter Hardy

FURTHER SUBMITTERS:

Page 492	Barry Stephens
Page 494	Auckland Transport
Page 499	Philippa and Todd Williams
Page 502	Kāinga Ora
Page 509	Kelven and Beverley Eastman
Page 513	Gary Neil_McClean
Page 516	Federated Farmers of New Zealand
Page 518	Peter Hardy
Page 519	Karam Dhadli (Karampreet Singh)
Page 529	Heritage New Zealand Pouhere Taonga
Page 533	Claire and Wayne Boyd



Hearing Report for Proposed Private Plan Change 55: Patumahoe South to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to:	Hearing Commissioners
Hearing Date/s:	2, 3 and 4 August
File No:	Hearing Report – Proposed Private Plan Change 55 (PC55)
File Reference	U:\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC055 - Patumahoe South
Report Author	Chloe Trenouth, Consultant Planner
Report Approvers	Craig Cairncross, Team Leader Central and South Planning, Plans and Places
Report produced	9 July 2021

Summary of Proposed Plan Change 55 (Private) Patumahoe South: Rezone approximately 34.5ha of land on the southern side of the Patumahoe Township from Rural Production Zone to Residential - Single House Zone, Business – Light Industry Zone, Open Space – Informal Recreation Zone, and Future Urban Zone; and apply I430 Patumahoe Precinct to the land, with amendments include specific precinct provisions to address landscape, staging, stormwater, reverse sensitivity and noise sensitive activities.

Plan subject to change	Auckland Unitary Plan (Operative in part)
Number and name of change	Proposed Plan Change 55 (Private) Patumahoe South
Status of Plan	Operative in part
Type of change	Private Plan Change.
Clause 25 decision outcome	1 October 2020
Parts of the Auckland Unitary Plan affected by the proposed plan change	<ul style="list-style-type: none"> • AUP Maps • Chapter I Precincts - South – I430 Patumahoe
Date of notification of the proposed plan change and whether it was publicly notified or limited notified	22 October 2020 Public notification
Submissions received (excluding withdrawals)	45
Date summary of submissions notified	3 December 2020
Number of further submissions received (numbers)	10
Legal Effect at Notification	None
Main issues or topics emerging from all submissions	<p>Transport matters, including transport infrastructure delivery, connectivity and access</p> <p>Water and wastewater servicing</p> <p>Reverse sensitivity (rural land uses)</p> <p>Noise-sensitive activities adjacent to rail corridor</p> <p>Physical extent of zones</p> <p>Loss of productive soils</p> <p>Appropriateness of Patumahoe for urbanisation</p> <p>Adequacy of consultation with mana whenua</p>

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Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
PC55, the plan change	Proposed Plan Change 55 (Private) Patumahoe South
RMA	Resource Management Act 1991
AUP	Auckland Unitary Plan
RPZ	Rural – Rural Production Zone
SHZ	Residential – Single House Zone
LIZ	Business – Light Industry Zone
The applicant	Askew Consultants Limited
FULSS	Future Urban Land Supply Strategy 2017
the council	Auckland Council
ITA	Integrated Transport Assessment

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EXECUTIVE SUMMARY

1. Proposed Plan Change 55 (Private) Patumahoe South (**'PC55'**) aims to rezone approximately 34.5ha of land from primarily Rural Production to Residential – Single House, Business – Light Industry, Open Space – Informal Recreation and Future Urban zones; and apply I430 Patumahoe Precinct to the land, with amendments to I430 Patumahoe Precinct.
2. Askew Consultants Ltd lodged a private plan change request to the Auckland Unitary Plan (Operative in Part) on 15 October 2019. On 1 October 2020 the private plan change was

accepted by Auckland Council ('council'), under Clause 25(2)(b) of Schedule 1 to the RMA.

3. Further information was sought from the applicant by the council in accordance with Clause 23 of Schedule 1 to the RMA on 19 November 2019. Clause 23 request and responses are attached at **Appendix 3**.
4. In response to Clause 23 information provided, Askew Consultants Limited agreed to modifications to the request in accordance with Clause 24 to Schedule 1 RMA on 30 June 2020. These modifications related to noise and vibration standards relative to the railway corridor, landscaping next to the railway corridor, front yard fencing and a roading hierarchy plan and supporting cross-sections.
5. PC55 was publicly notified on 22 October 2020 attached at **Appendix 1**. A total of 45 submissions were received. The summary of decisions requested was notified on 3 December 2020, with the period for further submissions closing on 17 December 2020. 10 further submissions were received. There were no late submissions. Submissions and further submissions are attached at **Appendix 4**.
6. In preparing for hearings on PC55, this hearing report has been prepared in accordance with section 42A of the RMA.
7. This report addresses the merits of PC55, with reference to an assessment of effects on the environment and the issues raised by submissions. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, the requestor and those persons or organisations that lodged submissions on PC55.
8. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
9. This report also forms part of council's ongoing obligations under section 32 of the RMA, to consider the appropriateness of the proposed provisions, and the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised in submissions on PC55.
10. A report in accordance with section 32 of the RMA was prepared by the applicant as part of the private plan change request as required under clause 22(1) of Schedule 1 of the RMA and is attached at **Appendix 2**. The section 32 evaluation report and associated documentation related to PC55 can be found on the council's website and should be considered in making decisions on the plan change.
11. On the basis of the information available at the time of preparing this report it is recommended that PC55 be declined, and the Auckland Unitary Plan not amended because the growth is not anticipated nor required to meet population growth in the southern sub-region and it does not achieve a quality compact urban form including the integration of land use and infrastructure. Although PC55 proposes 200-250 dwellings, it cannot be considered in isolation of strategic growth management within the sub-region and specifically on land not identified as providing for growth. The growth strategy is under pressure from private plan changes in the south that reflect uncoordinated growth and when considered cumulatively they have the potential to undermine the efficient integration of land use and infrastructure planning and funding. PC55 does not give effect to the NPS-UD or the AUP RPS, and it is not consistent with the Auckland Plan. Patumahoe is not well served by public transport and as such will increase private vehicle use on the wider

transport network, increasing vehicle kilometres travelled and is likely to increase carbon emissions which is contrary to the Te Tāruke-ā-Tāwhiri: Auckland's Climate Action Plan.

1. BACKGROUND

1.1. Site and surrounding area

12. The applicant has provided a description of the PC55 land and surrounds, set out in section 2.0 of the Plan Change Request. The Plan Change Request relates to 34.5ha of land located immediately south of the Patumahoe township (refer to Figure 1). I visited the site on 25 January 2021 and 23 June 2021.

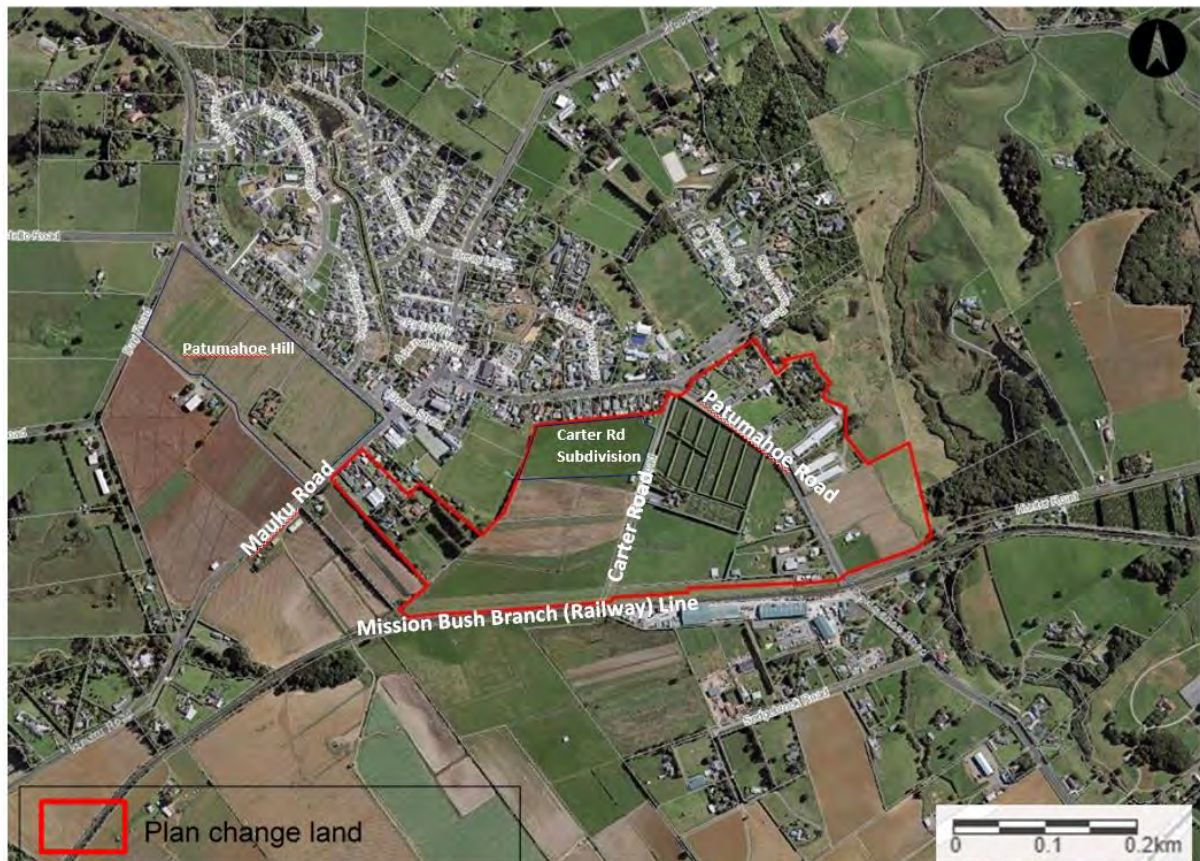


Figure 1: Site Context

13. Patumahoe is an established rural township located some 9km west of Pukekohe, consisting of a small town centre surrounded by low density residential activity zoned Residential – Single House. Patumahoe and the surrounding farmland have been significant agricultural and horticultural areas. The township has a distinct rural village character, with a relatively compact urban form around its central commercial area, schools and reserves.
14. The applicant identifies that based on the 2013 Census, the township comprises 850 dwellings. I note that the 2018 Census only identifies 822 occupied dwellings for Patumahoe but that this is likely to reflect inaccurate data and the well-known census problems that year rather than any reduction in occupied dwellings. The township has doubled in size over the last 10 years with expansion in the north-west along Woodhouse Road, and a new growth area to the west along Kingseat Road (currently under development).

15. The land subject to the private plan change request (**'plan change land'**) is contained in 26 individual records of title and comprises a range of rural and residential activities including grazing, cropping, horticulture, home occupations and ancillary farming activities as well as numerous dwellings. The land has a gentle contour that falls generally in a southerly direction.
- Land within the western section along Mauku Road comprises suburban residential sites and commercial activities.
 - Land within the central section along Carter Road comprises of paddocks for grazing and horticultural activities, including a kiwifruit orchard.
 - Land within the eastern section along Patumahoe Road comprises large lot rural residential development, an existing chicken farming activity, small avocado orchard and market gardens.
16. The plan change has road frontage to Patumahoe Road and Carter Road, as well as a small area of Mauku Road. Patumahoe and Mauku Roads are classified as Collector Roads. Carter Road is classified as a Local Road and it is an unsealed rural road (the northern end is currently being upgraded).
17. Immediately south of the plan change land is the Mission Bush Branch (Railway) Line, and beyond there are several industrial sites. The eastern and western extents of the plan change land are bounded by rural uses including horticulture and grazing. The eastern boundary is defined by a natural escarpment. To the north lies the Patumahoe Neighbourhood Centre and residential areas, separated by Patumahoe Road. Immediately northwest of the plan change land is Patumahoe Domain, an open space accommodating rugby fields.
18. Within the Auckland Unitary Plan (Operative in Part) 2016 (**'AUP'**), the plan change land is primarily zoned Rural – Rural Production, except for 8 sites that are zoned Single House (refer to Figure 2). The subject area is subject to the following controls:
- Natural Resources: High-Use Stream Management Areas Overlay
 - Natural Resources: High-Use Aquifer Management Areas Overlay - Glenbrook Kaawa Aquifer
 - Natural Resources: High-Use Aquifer Management Areas Overlay - Pukekohe North Volcanic
 - Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay - Franklin Volcanic Aquifer
 - Controls: Macroinvertebrate Community Index - Rural
 - Controls: Subdivision Variation Control - Urban, Patumahoe 800m² min site area within Single House Zone
19. The plan change land is identified within the New Zealand Land Resource Inventory ('NZLRI') as containing Land Use Capability ('LUC') Class 1 soils. LUC Class 1 land is "*the most versatile multiple-use land with minimal physical limitations for arable use*"¹. Class 1 soils fall within the definition of 'elite soils' in the AUP. The applicant considers that, based on site-specific investigations, the actual classification of the land is a combination of LUC Class 2 and 3, which are considered to have greater limitations for productive uses, and are classified as 'prime soils' rather than elite soils in the AUP.

¹ Land Use Capability Survey Handbook 3rd Edition, page 51

20. Patumahoe Hill, a recently subdivided area, is located opposite the plan change on Mauku Road. Within the plan change on land zoned Residential – Single House, at Carter Road (Lot 1 DP169130) a resource consent was approved for 30 residential allotments (Figure 2).
21. The land is bisected by an overland flow path and an associated 1% Annual Exceedance Probability ('AEP') flood plain, which follows an east-west alignment. Flood prone areas also exist in low lying parts of the site (refer to Figure 3).

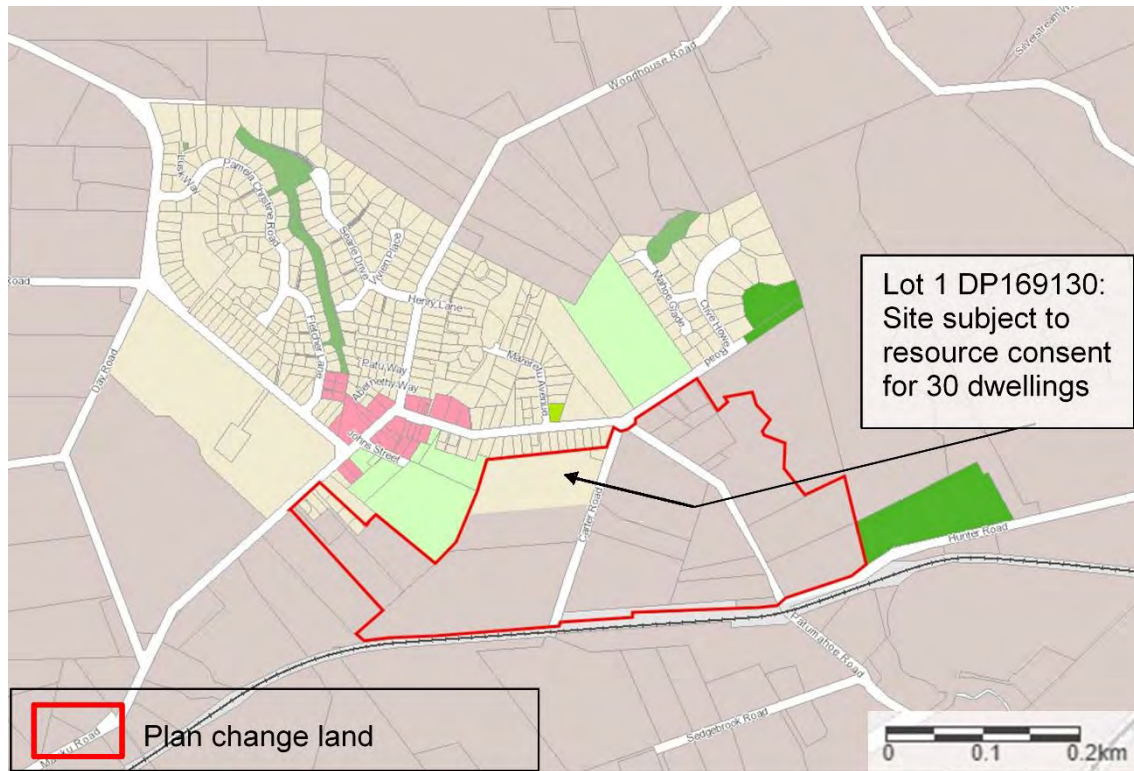


Figure 2: Existing zoning under Auckland Unitary Plan (Operative in Part) 2016



Figure 3: Overland flow paths, 1% flood plain, and flood prone areas

1.2. Proposed private plan change request

22. On 15 October 2019 the council received a private plan change request (PC55) from Askew Consultants Limited. The proposed plan change seeks to rezone 34.5ha of land at Carter Road, Patumahoe Road and Mauku Road from Rural Production to Residential – Single House, Business – Light Industry, Open Space – Informal Recreation and Future Urban Zones (refer to Figure 4) in the AUP. In addition, the plan change seeks to apply the operative Precinct I430 Patumahoe Precinct to the land, with additional provisions specific to the plan change land identifies as Sub-Precinct E.
23. The objective of the plan change, as stated by the applicant is to: *achieve a more sustainable and efficient use of the subject land, through the rezoning of rural land (that has limited productivity under its current zoning) to a mix of live and future urban zoning, that will support the growth and development of Patumahoe as a sustainable rural village.*²
24. The applicant has provided the following information to support the plan change request:

Table 1: Information submitted in support of plan change request

Plan Change Request, Section 32 and Assessment of Effects on the Environment and Attachments, prepared by Envivo and dated 26 June 2020 Attachments: 1: Subject Land Property Details 2: Watercare Correspondence 3: Auckland Transport Comments 4: Kiwirail Correspondence 5: Proposed Amendments to the Proposed Auckland Unitary Plan 6: Appendix 1 Auckland Unitary Plan Assessment 7: Section 32 Evaluation Table
Appendix 1A Cultural Assessment Report, prepared by Ngāti Te Ata Waiohū and dated January 2019
Appendix 1B: Cultural Assessment Report, prepared by Ngāti Tamaoho (not dated)
Appendix 2: Urban Design Assessment, prepared by Ian Munro and dated June 2019
Appendix 3: Landscape and Visual Assessment, prepared by Bridget Gilbert and dated June 2020
Appendix 4: Integrated Transportation Assessment, prepared by Stantec and dated June 2020
Appendix 5: Infrastructure Report, prepared by Tripp Andrews and dated 26 June 2020
Appendix 6: Earthworks and Sediment Control, prepared by Tripp Andrews (not dated)
Appendix 7: Preliminary Geotechnical Appraisal Report, prepared by Lander Geotechnical and dated 26 October 2018
Appendix 8: Soil and Resource Report, prepared by AgFirst and dated April 2019
Appendix 9: Horticultural Productivity Report, prepared by S. Scarrow and A. Barber and dated 16 September 2019
Appendix 10: Economic Assessment, prepared by Property Economics and dated September 2019

² p.38 Section 32 Assessment (Appendix 2)

Appendix 11: Stormwater Management Plan, prepared by Tripp Andrews and dated 29 June 2020

Appendix 12: Archaeological Assessment, prepared by CFG Heritage and dated 13 November 2018

1.3. Clause 23 Requests for Further Information

25. On 19 November 2019, prior to accepting PC55, the Council requested that the applicant provide further information in accordance with Clause 23 of Schedule 1 to the RMA. This request is attached as Appendix 3 to this report. The purpose of the further information request was to enable Council to better understand the effects of PC55 on the environment and the ways in which adverse effects may be mitigated.

26. The key information sought through the Clause 23 request related to the following matters:

- Planning, statutory and general matters
 - Infrastructure and funding delivery
 - Section 32 evaluation to demonstrate whether convenience retail, services and community facilities are sufficient to meet growth
 - Geospatial / mapping shape files and high-quality maps
 - General – Certificate of Titles for properties within plan change area
 - Subdivision standards 400m buffer area, and restricted discretionary activity status
 - Fencing strategy implementation
 - Indicative roads location and implementation
 - Noise and vibration standards application
 - Landscape buffer areas widths
 - Reverse sensitivity setback distances from chicken sheds
 - Mana Whenua consultation and how recommendations have been incorporated
- Traffic matters
 - Wider network effects for the future environment
 - Access information for vehicle access, pedestrian crossings, and new intersections
 - Transport improvements to demonstrate operate satisfactorily
 - Consistency of extent of plan change and zoning, widths and elements of proposed road cross sections
 - Road design specific cross sections to be included in precinct or not
 - Level crossing access from Carter Road across rail corridor, and Level Crossing Safety Impact Assessment
 - Pedestrian linkage location at Mauku Road
 - Walking and cycling provision
 - Carter Road intersection closure
- Economic matters
 - Residential growth assessment
 - Patumahoe Neighbourhood Centre adequacy to meet additional demand
 - Household numbers within existing urban area vs surrounding rural area
 - Surrounding land uses
 - Agricultural potential effects of loss
- Land productivity matters
 - Productivity difference between PPC and other potential areas for residential expansion
 - LUC Assessment clarification
 - Land ownership effects on viability of rural productive uses
- Land use capability
 - Mapping of LUC observations

- Groundwater information
- Reverse sensitivity impacts on rural productivity
- References to be provided
- Urban design matters
 - Concept master plan implementation
 - Land ownership implications for roads and walkable block sizes
- Landscape and visual effects
 - Buffer areas widths and planting requirements
 - Landscape Framework Strategy
 - Future Urban boundary extent
 - Retaining wall standards
 - Precinct Plan 3 demarcation of landscaped buffer
- Stormwater and flooding matters
 - Stormwater Planning, assessment against relevant statutory planning framework
 - Stormwater Management effects
 - Flood Risk and Hazard information
 - Regionwide Network Discharge Consent requirement for a Stormwater Management Plan
- Water supply and wastewater matters
 - Pump Stations location
- Geotech matters
 - Zone 3 suitability for development
- Parks and Open Space
 - Proposed open space location, configuration and sizes

27. Askew Consultants Limited responded to the Clause 23 request on 16 April 2020. Some additional responses were provided after this date, and these are also contained within Appendix 3 to this report. In response to the Clause 23 request, the applicant provided the following material:

- Planning response
- Land Productivity response
- Urban Design response
- Traffic response
- ITA response
- Stormwater and Flooding, Water and Wastewater response
- Proposed Zoning Map
- Proposed Precinct Map
- Parks and Open Space response
- Landscape and Visual Effects response
- Land Use Capability Map
- Geotechnical response
- Economics response

28. A Stormwater Management Plan was provided on 25 May 2021.

29. The plan change was initially assessed by Sanjay Bangs at Auckland Council. Mr Bangs made the request for future information under Clause 23 and reviewed the RFI response from the applicant. Mr Bangs determined that the further information requests had been satisfied, relying on advice of the technical experts.

2. PROPOSED PLAN CHANGE PROVISIONS

3. The approach of the proposed plan change is to apply the standard zones along with existing precinct provisions, identifying a new sub-precinct E with additional provisions.

3.1. Proposed Zones

30. The proposed zoning layout is shown on Figure 4 below. The plan change seeks to rezone 34.5ha of Rural Production Zone land for urban development, which will comprise:

- Approx. 20 ha Residential - Single House Zone (SHZ);
- 2.5ha Business - Light Industry Zone (LIZ);
- Approx. 3 ha Open Space – Informal Recreation Zone (IRZ); and
- 9ha Future Urban Zone (FUZ).

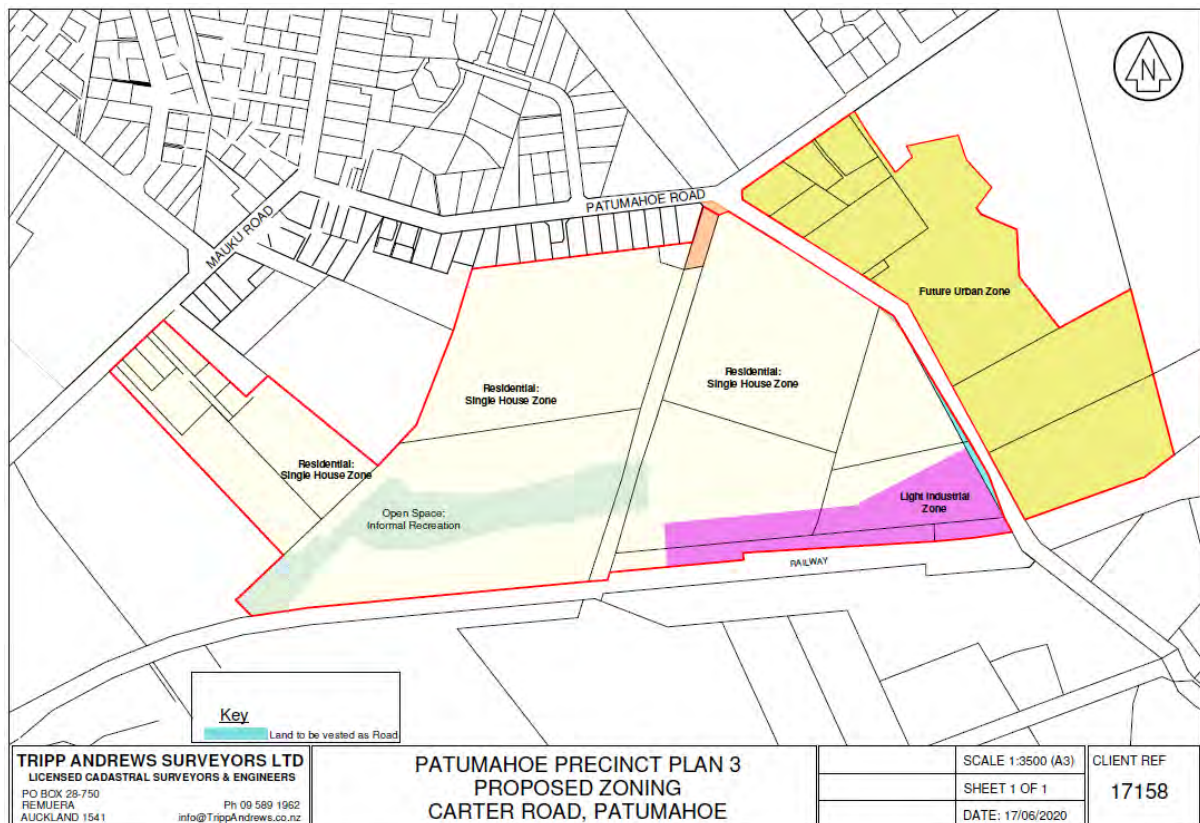


Figure 4: Proposed zoning sought under plan change request (Clause 23 response)

3.2. Precinct Provisions

31. A new Sub-precinct E is proposed to be included in I430 Patumahoe Precinct that applies to the plan change area, with specific precinct provisions (as set out in Appendix 1). The precinct provisions are described in Section 6 of the plan change request (Appendix 2). A precinct plan (Figure 5) is included, as well as a roading hierarchy plan and road cross sections.

32. It is proposed to amend the description of the Patumahoe Precinct to include Sub-precinct E. No amendments are proposed to the objectives and policies of the precinct. Seven specific precinct standards are proposed as part of the plan change relating to landscaping, minimum site area, neighbourhood park, staging, stormwater management, reverse sensitivity, fencing, railway noise and vibration.

33. Key differences introduced by the precinct provisions compared to the standard Auckland-wide and zone rules include:

- Buildings and subdivision are required to comply with the precinct specific standards, identifying that a subdivision that does not comply with relevant standards is a non-complying activity.
- Minimum net site area standards for sub-precinct E that reflect proximity to village centre (600m²) or railway line (1500m²), and 800m² everywhere else.
- Requirement for landscape buffer to create effective landscape buffers between different zones/activity areas, including buffers between residential and light industry zoned land, rural land (outside of the precinct), and the rail corridor.
- Requirement for a neighbourhood park to be established within the subject land prior to the occupation of any dwelling located more than 400m from the Patumahoe Domain.
- Specific infrastructure upgrades are required before any titles or building consents are issued, including a road from Patumahoe Road or from Mauku Road; a new road between Carter Road and Patumahoe Road and a shared path; and extension of the public wastewater and water supply networks.
- Requiring the construction of a suitably sized stormwater management pond to the southeast of the Patumahoe Domain prior to new titles being issued.
- Requiring dwellings within 200m of the chicken sheds located at 75 Patumahoe Road to implement reverse sensitivity measures to be implemented and dwelling within 200m – 400m to register “no complaints” covenants before the issue of new titles unless the use of the chicken sheds is discontinued.
- Requiring activities sensitive to noise within 100m of the railway network to be designed to achieve maximum noise levels indoors.
- Requiring a new roading structure to be delivered in the indicative location shown on Precinct Plan 3 prior to new titles being issued and designed to specific standards proposed (by way of cross sections) within the precinct.

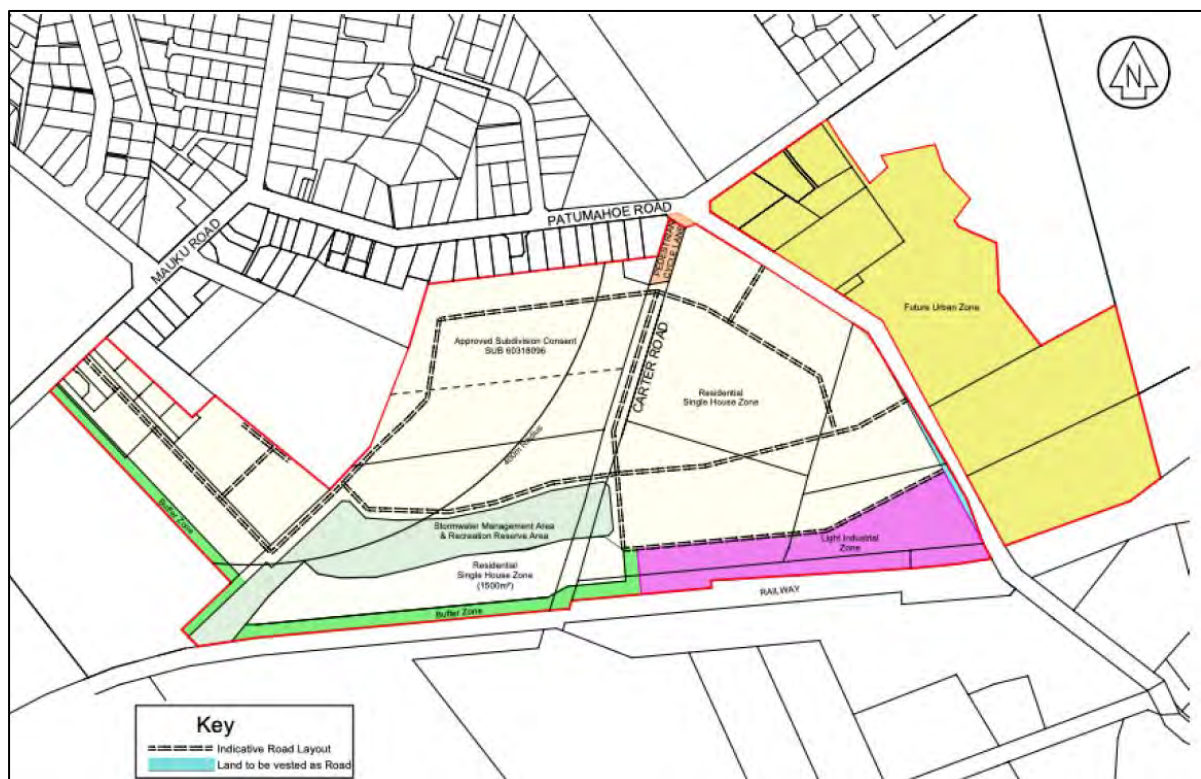


Figure 5: Proposed Precinct Plan 3 in the Patumahoe Precinct (as notified)

4. EXISTING PLAN PROVISIONS

34. Applying the standard zones and Precinct I430 Patumahoe will result in the existing plan provisions applying, subject to amendment through the amendments proposed to the precinct. The following describes key provisions of the zones and precinct provisions that would apply to the plan change.
35. The SHZ is low-density residential zone providing single detached houses generally characterised by one to two storey high buildings with a suburban built character. The purpose of the SHZ is to maintain and enhance the amenity values of established residential neighbourhood but may also be applied in greenfield developments. In summary, some of the key provisions of the SHZ:
- One dwelling per site permitted, more than one dwelling requires resource consent as a non-complying activity;
 - One minor dwelling permitted per site up to 65m² floor area;
 - Integrated residential developments are a discretionary activity;
 - Maximum building height of 8m;
 - Maximum building coverage of 35 per cent, maximum impervious surface of 60 per cent and minimum landscaping of 40 per cent;
 - Height in relation to boundary standard of 2.5m plus 45 degrees, at the boundaries of sites zoned Residential – Single House, Residential – Mixed Housing Suburban or sites less than 2,000m² with and Open Space Zoning;
 - Minimum yards, including 3m front yard, 1m side and rear yards;
 - Vacant lot subdivision is a discretionary activity where the parent lot is greater than 1 ha, and minimum net site area of 480m², average minimum average net site area 600m², and maximum average net site area of 720m²; and
 - Minimum net site area of 800m² for sites identified in the Patumahoe Subdivision Variation Control as a restricted discretionary activity.
36. The LIZ anticipates industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. Key provisions of the LIZ:
- Buildings are permitted;
 - Maximum building height of 20m;
 - Height in relation to boundary standard of 6m plus 35 degrees, at the boundaries of residential zones;
 - Minimum yards, including 2m front yard, 5m side and rear yards where adjoins residential zone;
 - Vacant lot subdivision minimum net site size is 1,000m².
37. The FUZ is applied to greenfield land that has been identified as suitable for urbanisation as a transitional zone. Land is able to be used for general rural activities but cannot be used for urban activities until the site is rezoned for urban purposes.
38. The IRZ applies to open spaces that range in size from small local parks to large regional parks. Areas are generally used for a variety of outdoor informal recreation activities and community uses, walking and cycling, relaxing and enjoying the environment.
39. Key provisions of the I430 Patumahoe Precinct relevant to sub-precinct E:
- Standards for light reflectivity for building materials, retaining walls, paving materials.

- Stormwater standard requiring all stormwater from impervious areas to be mitigated to achieve flow attenuation by one or a combination of stormwater soakage pits, or rain tanks to provide generally for rainwater harvesting.

5. HEARINGS AND DECISION-MAKING CONSIDERATIONS

40. Clause 8B (read together with Clause 29) of Schedule 1 of RMA requires that a local authority shall hold hearings into submissions on its proposed private plan change.
41. Auckland Council's Combined Chief Executives' Delegation Register delegates to hearing commissioners all powers, duties and functions under s34 of the RMA. This delegation includes the authority to determine decisions on submissions on a plan change, and the authority to approve, decline, or approve with modifications, a private plan change request. Hearing Commissioners will not be recommending a decision to the council but will be making the decision directly on PC55.
42. In accordance with s42A (1) of the RMA, this report considers the information provided by the applicant and summarises and discusses submissions received on PC55. It makes recommendations on whether to accept, in full or in part; or reject; each submission. This report also identifies what amendments to the PC55 provisions are recommended, if any, to address matters raised in submissions. This report makes a recommendation on whether to approve, decline, or approve with modifications PC55. Any conclusions or recommendations in this report are not binding on the Hearing Commissioners.
43. The Hearing Commissioners will consider all the information submitted in support of PC55, information in this report, and the information in submissions together with evidence presented at the hearing.
44. This report relies on the reviews and advice from the following experts on behalf of the council and specialist Auckland Council officers. These assessments are attached in Appendix 7 to this report.

Table 2: Specialist input to s42A report

Matter	Reviewing specialist
Strategic Planning	Alyssa Jones, Growth and Spatial Strategy; Megan Howard, Infrastructure Strategy; Szeing Ooi, Transport Strategy
Economics	Susan Fairgray, Market Economics
Geotechnical	James Beaumont, Riley Consultants
Stormwater and flooding	Iresh Jayawardena and Nimal Gamage, Senior Healthy Waters Specialists, Healthy Waters
Land Use Capability	Reece Hill, Land Systems
Rural Productivity	Stuart Ford, Agribusiness Group
Landscape and Visual Effects	Ainsley Verstraeten, Auckland Design Office
Parks and Open Space	Ezra Barwell, Senior Policy Advisor, Parks and Recreation Policy
Traffic and Transport	Wes Edwards, Arrive Ltd; David Russell, Regulatory Engineering South
Urban Design	Nicole Bitossi, Motu Design
Water supply and Wastewater	David Russell, Regulatory Engineering South

6. STATUTORY AND POLICY FRAMEWORK

45. Private plan change requests can be made to the council under Clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as council-initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 and clause 22(1) in Schedule 1 of the RMA.³
46. The RMA requires territorial authorities to consider a number of statutory and policy matters when developing proposed plan changes. PC55 matters only affects district plan matters.
47. A list of the relevant statutory matters is included in Appendix 6. The following sections comments on the statutory and policy framework, relevant to PC55.

6.1. Resource Management Act 1991

48. The key directions of the RMA with regard to consideration of private plan changes is set out in the below paragraphs, including the mandatory considerations in the development of a proposed plan change to district plans and rules.

Table 3: Sections of the RMA relevant to private plan change decision making

RMA Section	Matters
Part 2	Purpose and intent of the Act
Section 31	Outlines the functions of territorial authorities in giving effect to the RMA
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal.
Section 67	Contents of regional plans – sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.
Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan
Section 74	Matters to be considered by a territorial authority when preparing a change to its district plan. This includes its functions under section 31, Part 2 of the RMA, national policy statement, other regulations and other matter.
Section 75	Contents of district plans – sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with.
Section 76	Provides that a territorial authority may include rules in a district plan for the purpose of (a) carrying out its functions under the RMA; and (b) achieving objectives and policies set out in the district plan.
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications.

³ Clause 29(1) Schedule 1 of the RMA provides “*except as provided in subclauses (1A) to (9), Part 1, with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)*”.

49. The mandatory requirements for plan preparation are comprehensively summarised by Environment Court in *Long Bay-Okura Great Park Society Incorporated and Others v North Shore City Council* (Decision A078/2008), 16 July 2018 at [34] and updated in subsequent cases including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55 at [17]. When considering changes to district plans, the RMA sets out a wide range of issues to be addressed. The relevant sections of the RMA are set out in Table 3 above and the statutory tests that must be considered for PC55 are set out in Box 1 below.

Box 1

A. General requirements

1. *A district plan (change) should be designed to accord with, and assist the territorial authority to carry out its functions so as to achieve, the purpose of the Act.*
2. *When preparing its district plan (change) the territorial authority must give effect to any national policy statement or New Zealand Coastal Policy Statement.*
3. *When preparing its district plan (change) the territorial authority shall:*
 - (a) *have regard to any proposed regional policy statement;*
 - (b) *not be inconsistent with any operative regional policy statement.*
4. *In relation to regional plans:*
 - (a) *the district plan (change) must not be inconsistent with an operative regional plan for any matter specified in section 30(1) [or a water conservation order]; and*
 - (b) *must have regard to any proposed regional plan on any matter of regional significance etc.;*
5. *When preparing its district plan (change) the territorial authority must also:*
 - *have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations; and to consistency with plans and proposed plans of adjacent territorial authorities;*
 - *take into account any relevant planning document recognised by an iwi authority; and*
 - *not have regard to trade competition;*
6. *The district plan (change) must be prepared in accordance with any regulation (there are none at present);*
7. *The formal requirement that a district plan (change) must also state its objectives, policies and the rules (if any) and may state other matters.*

B. Objectives [the section 32 test for objectives]

8. *Each proposed objective in a district plan (change) is to be evaluated by the extent to which it is the most appropriate way to achieve the purpose of the Act.*

C. Policies and methods (including rules) [the section 32 test for policies and rules]

9. *The policies are to implement the objectives, and the rules (if any) are to implement the policies;*
10. *Each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:*
 - (a) *the benefits and costs of the proposed policies and methods (including rules); and*
 - (b) *the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

D. Rules

11. *In making a rule the territorial authority must have regard to the actual or potential effect of activities on the environment.*

E. Other statutes:

12. Finally territorial authorities may be required to comply with other statutes. Within the Auckland Region they are subject to:

- the Hauraki Gulf Maritime Park Act 2000;
- the Local Government (Auckland) Amendment Act 2004.

6.2. National Policy Statements

50. Pursuant to Sections 74(1)(ea) and 75 of the RMA the relevant national policy statements (NPS) must be considered in the preparation, and in considering submissions on PC55. There are two NPS of relevance to PC55 being the National Policy Statement on Urban Development, the National Policy Statement on Freshwater Management.

6.2.1. National Policy Statement on Urban Development

51. The National Policy Statement on Urban Development (NPS-UD) came into force on the 20 August 2020, after PC55 was accepted by the council. The details of the policy statement are addressed below. At a strategic level, the NPS-UD reinforces the need for RMA plans to provide sufficient capacity to accommodate the next 10 years growth, taking into account what is feasible and likely to occur. Infrastructure must be co-ordinated with this capacity.

52. The applicant provides an assessment against the NPS for Urban Development Capacity (the precursor to the NPS-UD) identifying that PC55 could have a negligible influence on the council's ability to meet the development capacity required. However, the development capacity provided would make a significant contribution at a local level to meet the foreseeable needs of the local community.

53. The NPS-UD requires that planning decisions contribute to well-functioning urban environments that have a variety of homes, and well located sites for business, good accessibility for all people, support the complete operation of land and development, and support reduction in greenhouse gas emissions and are resilient to the effects of climate change.

54. Auckland Council is a tier 1 local authority, and therefore at least sufficient development capacity is required to meet expected demand for housing and business land over the short to long term. Local authorities must also be responsive to plan changes that are unanticipated or out of sequence that would add significantly to development capacity and contribute to well-functioning urban environments.

55. A recent decision of the Environment Court *Eden Epsom Residential Protection Society Incorporated v Auckland Council* [2021] NZEnvC 082 determined that the NPS-UD mandatory requirements for intensification do not apply to private plan changes until the council initiates its own plan changes to implement the NPS-UD. This decision is not relevant to PC55 because it is not within a walkable catchment for a city centre or metropolitan centre zone, or rapid transit stop where intensification is anticipated.

56. PC55 is located adjacent to the existing village supporting with good local accessibility, an existing bus service services the area to Pukekohe (although not frequent) providing an alternative to using private vehicles. However, it's location away from good public transport does not support reductions in greenhouse gas emissions. PC55 presents unanticipated growth that is not well integrated with infrastructure planning and funding decisions, and therefore does not contribute to a well-functioning urban environment.

Therefore I do not consider PC55 to give effect to the NPS-UD in relation to Objectives 1, 6 and 8 and Policies 1, and 8.

6.2.2. National Policy Statement for Freshwater Management

57. The National Policy for Freshwater Management (NPS-FM) is relevant to PC55 because the overland flow path traversing the area is identified on the council's GeoMaps as a stream, and the area discharges to the Mauku Stream. The area is identified within the High-Use Stream Management Area of the AUP and is underlain by the Glenbrook Kaawa Aquifer (High-Use). The area is also underlain by the Pukekohe North Volcanic and Franklin Volcanic Aquifers (High-Use).
58. The NPS-FM requires that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people, and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
59. The plan change request does not address the NPS-FM not identifying and streams within the area. The applicant's Stormwater Management Plan provides for groundwater recharge and water quality treatment of 100% of impervious surfaces to avoid effects on the receiving environment. I consider PC55 to give effect to the NPS-FM by achieving integrated management of land use and freshwater to consistent with Objective 1, and Policies 2, 3 and 15.

6.3. National environmental standards or regulations

60. Under section 44A of the RMA, local authorities must observe national environmental standards (NES) in its district / region. No rule or provision may be duplicated or in conflict with a national environmental standard or regulation.
61. The applicant has not assessed PC55 against any national standards. The relevant NES are identified to be:
- NES for Freshwater (NES-FM)
 - NES for assessment and managing contaminants into soil to protect human health (NES-CS)
62. In terms of the NES-FM there are no wetlands identified on the site. The existing farm drainage channel is identified as a stream / overland flow path. As already discussed, impacts on freshwater are addressed through the proposed stormwater management approach. Resource consents will be required for any reclamation of streams and culverts that do not meet the conditions under the NES-FM.
63. In terms of NES-CS, although no Preliminary Site Investigation has been provided as part of the plan change material there is nothing to indicate that the plan change area is unsuitable for future urban development. Should the plan change be approved, future detailed investigations and resource consents may be required under the NES-CS.
64. No proposed plan provisions duplicate or are in conflict with the NES.

6.4. Auckland Unitary Plan – Regional Policy Statement

65. Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement (RPS).

66. The applicant provides an assessment against the RPS provisions in Attachment 5 to the plan change request (Appendix 2). I agree with the identification of key provisions relating to urban growth, but no assessment is provided in relation to infrastructure or the rural environment provisions.
67. The following discussion addresses the most relevant RPS provisions to determine whether PC55 gives effects to the RPS.

6.4.1. B2 Urban Growth and Form

68. I agree with the assessment provided the applicant in terms of Chapter B2, in so far as PC55 promotes a quality compact urban form at a local level. However, I am not satisfied that adequate consideration has been provided in terms of the strategic approach to growth that is set out in the RPS.
69. Chapter B2.1 establishes the growth management strategy to achieve a quality compact urban form where urban growth is primarily accommodated within the urban area 2016. The RPS promotes urban growth and intensification within the existing urban area, enabling growth within the RUB and towns, but seeks to avoid urbanisation outside of these areas (Policies B2.2.2(1) and (4)). Also critical to the growth strategy, is the need to align growth with the provision of appropriate infrastructure (Objective B2.2.1(5)).
70. A strategic peer review prepared by Alyssa Jones for the council (Appendix 7) concludes that PC55 is inconsistent with the regional application of the quality compact approach to growth from a strategic perspective. PC55 will extend the existing rural town. Ms Jones considers that development of the PC55 area would significantly change the established character and amenity of the village.
71. I agree with the applicant that PC55 presents a logical extension of Patumahoe village, and I am satisfied that the urban extent will be sufficiently defensible enabling growth to be contained. While I accept that PC55 will provide for growth, it does appear that this growth is not required. I have concerns that the growth cannot be adequately serviced by infrastructure, particularly water and wastewater, and that it further exacerbates a car-dependent community. I do not consider the growth enables better use of existing infrastructure and efficient provision of new infrastructure, I disagree with the applicant that growth will support improved public transport and that there will be no public expenditure required to support the plan change. Therefore, do not consider PC55 to be consistent with Objectives B2.2.1(1), (2), (4) and (5), and Policy (4).
72. I consider PC55 to be inconsistent with Objective B2.2.1(3) and Policy B2.2.2(1) relating to sufficient development capacity. Although the growth is not required to enable the council to meet its requirement to provide sufficient development capacity for more than 7 years, it also doesn't undermine it.
73. In terms of the objectives and policies for residential growth in Chapter B2.4, I agree with the applicant that these are relevant. I agree that PC55 is consistent with Objective B2.4.1(2), (4), and (5), and Policies B2.4.2(1), (2), and (4) subject to appropriate precinct provisions to ensure that growth will be attractive and in keeping with the built character of the area, and the LIZ will provide additional employment opportunities to support the community. I am also satisfied that PC55 manages adverse reverse sensitivity effects in accordance with Policy B2.4.2(7).
74. In terms of Objective B2.4.1(6) I do not consider PC55 to be required to meet the minimum dwelling targets The AUP provides for significant growth within the southern sub-region,

at Drury and Pukekohe-Paerata. The Drury-Opaheke Structure Plan covers an area of 1900 ha and the Pukekohe-Paerata Structure Plan covers an area of 1200 ha. Patumahoe is only 9 km from Pukekohe where there is already a focus for enabling efficient growth to meet population demand in this area, where funding and investment in infrastructure is planned for. There is also existing capacity available at Patumahoe including at Patumahoe Hill (76) and the recent subdivision at Carter Road (30). However, I accept that it is also not contrary to Objective B2.4.1(6).

75. I generally agree with the applicant's assessment for Chapter B2.5 Commercial and industrial growth and support the provision of additional LIZ as part of the plan change to meet employment and industrial demands.
76. Growth in rural and coastal towns and villages is addressed specifically by the objectives and policies in Chapter B2.6. Importantly, Objective B2.6.1(1) enables growth and development of existing or new rural and coastal towns and villages in ways that avoid significant adverse effects, and Objective B2.6.1(2) requires rural and coastal towns and villages to have adequate infrastructure. The key provision is Policy B2.6.2(1) because it addresses the expansion of existing rural and coastal towns and villages and requires that all the following criteria must be met:

Policy B2.6.2

(1) Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:

- a) Maintains or enhances the character of any existing town or village;*
- b) Incorporates adequate provision for infrastructure;*
- c) Avoids locations with significant natural hazard risks where those risks cannot be adequately remedied or mitigated;*
- d) Avoids elite and avoids where practicable prime soils which are significant for their ability to sustain food production;*
- e) Maintains adequate separation between incompatible land uses;*
- f) Is compatible with natural and physical characteristics, including those of the coastal environment; and*
- g) Provides access to the town or village through a range of transport options including walking and cycling.*

77. I agree with the applicant's assessment against Policy B2.6.2(1) other than criteria (b) and (g). As previously discussed, I am not satisfied that PC55 incorporates adequate provision for infrastructure, and although there is an existing bus service the population will be heavily reliant on private vehicles use. Therefore, I do not consider all the criteria to be achieved to enable the expansion of Patumahoe in accordance with Policy B2.6.2(1).

6.4.2. B3 Infrastructure, transport and energy

78. Objective B3.2.1(5) and Policy B3.2.2(4) address the integration of land use and infrastructure planning and requires that this be achieved efficiently to avoid adverse effects on infrastructure. Watercare has raised significant concerns about the ability of PC55 to service the plan change area with both water and wastewater and therefore the additional growth would create additional pressure on the existing capacity of the network.
79. A strategic infrastructure peer review by Megan Howard for the council (Appendix 7), considering the efficiency of infrastructure provision and specifically the costs borne by the community. Where a developer pays to construct infrastructure that is then vested to the council, the community costs include ongoing operation and maintenance. Unanticipated development diverts funding from planned infrastructure investment causing inefficiencies,

which Ms Howard identifies must be very carefully considered considering the council's limited budget.

80. While PC55 does not itself appear to be a significant diversion from the council's growth strategy, being only 200-250 dwellings, it must be considered considering the cumulative impacts of multiple plan changes that the council is currently responding to. As at April 2021, 32 private plan changes had been notified since the moratorium on private plan changes to the AUP was lifted.
81. I agree with Ms Howard's assessment that PC55 does not provide a good example of efficient infrastructure and service provision. Ms Howard acknowledges that PC55 will be required to contribute to infrastructure costs via Development Contributions and Infrastructure Growth Charges but considers the ongoing costs of operation and maintenance to be more significant and ultimately be paid for by the community. Therefore, I consider PC55 does not currently meet Objective B3.2.1(5) and Policy B3.2.2(4).
82. Objective B3.3.1(1) and Policy B3.3.2(5) seek an effective, efficient and safe transport environment that is integrated, enables growth and facilitates transport choice. Policy B3.3.2(5) specifically seeks to improve the integration of development with transport. The key criteria of this policy are in my opinion:
- (a) *Ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
 - (b) *Encourage land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods.*
83. Although there is an existing local bus service to Pukekohe, this is not frequent nor a peak service. While I acknowledge that this location may be better than an alternative location with no bus service at all, it still results in additional growth in private vehicle use on the local rural road network. There are several upgrades planned within the strategic transport network to address existing constraints and planned growth. However, PC55 is not anticipated as part of this growth and therefore it is not integrated with planned, funded and staged transport infrastructure. I consider PC55 to be inconsistent with Objective B3.3.1(1) and Policy B3.3.2(5).

6.4.3. B9 Rural Environment

84. The Issues statement in B9.1 of the RPS specifically identifies that *"The outward expansion of urban areas and people's lifestyle choices and recreational activities place significant pressures on maintaining the amenity values and the quality of the environment in rural areas."* Specific issues identified in the Auckland region include *"protecting the finite resource of elite quality soils from urban expansion"*.
85. I consider the objectives and policies in Chapter B9 to be relevant to the consideration of whether the land is appropriately rezoned from rural to urban. Objectives B9.2.1(1)-(4) recognise the significant contribution of rural areas to the wider economic productivity and seek to protect rural areas from inappropriate development. I consider Policy B9.2.2(1) to be particularly relevant because it establishes that rural areas are for rural activities, and it is directive in its requirement to avoid significant adverse effects on and urbanisation of rural areas.
86. Objectives and policies relating to land with high productive potential are a subset of the more general outcomes for rural areas discussed above, and accordingly they are focused

on the management of soils in rural areas. Objectives B9.3.1(1) and (2) seek protection of land containing elite soils, and management of land containing prime soils, for primary production.

(1) Land containing elite soils is protected through land management practices to maintain its capability, flexibility and accessibility for primary production.

(2) Land containing prime soil is managed to enable its capability, flexibility and accessibility for primary production.

87. Policy B9.3.2(2) encourages activities that do not depend on using land containing elite and prime soils to locate outside these areas, thereby maintaining the productive capability of rural soils with high productive potential. This policy is not directive and recognises that you cannot make people utilise highly productive soils.
88. I note that Policy B2.6.2 refers the protection of elite and prime soils where they are significant for their ability to sustain food production, this threshold qualifier does not exist in relation to Objective B9.2.1(2). However, the policies for elite and prime soils are very much focused on the utilisation of soils within a rural environment. The productive potential of the subject soils is determined to be low, and therefore cannot be considered significant.
89. There is an obvious tension within the RPS in terms of providing for growth and also protecting elite and prime soils. This issue has been considered in the discussion document for the NPS-HPL by excluding land that has been identified for urban growth. Therefore, a strategic decision needs to be made first as to whether land is appropriate for urban growth, where the trade-offs will need to be made considering the significance and value of soils. This decision has not been made at a strategic level because the plan change area is not identified for growth in the Auckland Plan or FULSS. I consider PC55 to be inconsistent with the rural objectives and policies because it would urbanise rural land that is not identified as being appropriate for growth.

6.4.4. Conclusion

90. I am satisfied that PC55 is consistent with some of the relevant objectives and policies of the RPS, including residential growth and loss of productive soils. However, overall, I do not consider PC55 gives effect to the RPS because it is unanticipated growth that would not be adequately served by infrastructure and would increase reliance on private vehicle trips. The plan change proposal is not consistent with a quality compact urban form approach at a regional scale.

6.5. Any relevant management plans and strategies prepared under any other Act

91. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in considering PC55, pursuant to section 74(2)(b)(i) of the RMA.

6.6. Auckland Plan 2050

92. The applicant provides an assessment of PC55 against the Auckland Plan in Attachment 6 to the plan change request (Appendix 2). I do not agree with the applicant's assessment and make the following comments.
93. The Auckland Plan 2050 Development Strategy anticipates significant growth in certain areas, that is concentrated in the city centre, nodes, development areas and future urban areas. Only a small amount of growth is anticipated in the wider rural area. The

Development Strategy identifies a number of urban expansion areas in the southern sub-region, including Drury and Pukekohe (see Figure 6).

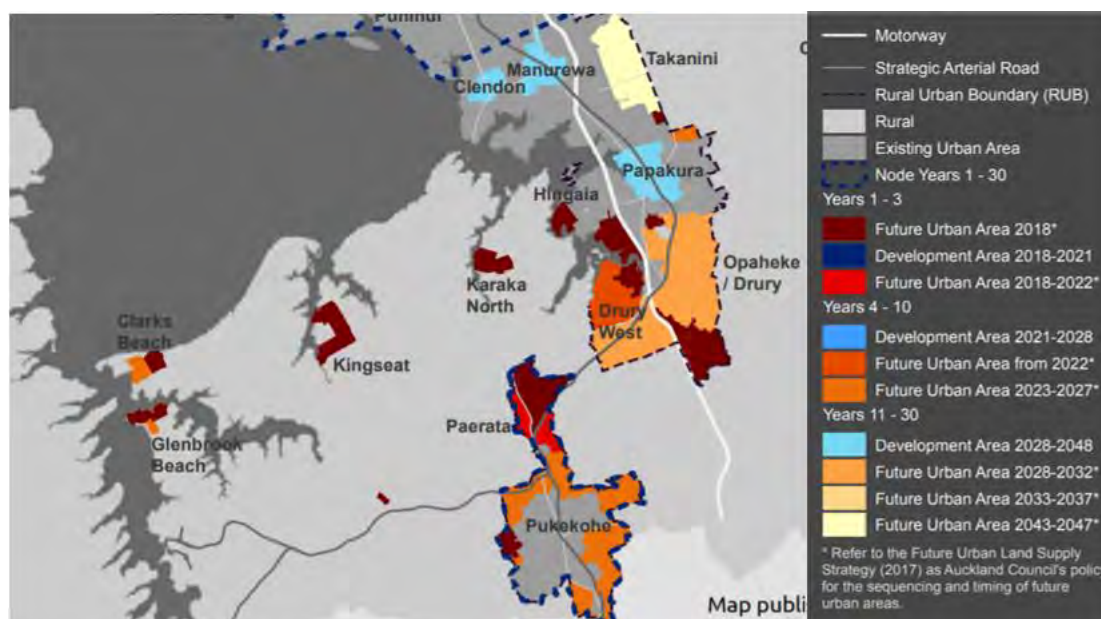


Figure 6: Auckland Plan - Development Strategy

94. Several rural settlement expansions are identified in the Development Strategy, at Clarks Beach, Kingseat, Karaka North, and Patumahoe (adjacent to where the plan change is located). The Patumahoe growth area is identified as Future Urban Area 2018 within years 1-3.
95. Residential growth in the rural area is focused in the rural nodes of Pukekohe and Warkworth, and the Development Strategy anticipates less growth in smaller towns and villages associated mainly with vacant lots within the existing urban extent. Rural areas are identified as being important for rural production, and the Development Strategy seeks that land fragmentation and reverse sensitivity issues are minimised to safeguard Auckland's land and soil resources.
96. I acknowledge that the Auckland Plan anticipates some growth in rural towns but there are several areas already identified, including Patumahoe. Incremental and ad hoc growth has the potential to undermine the strategy to achieve a quality compact urban form.

6.7. Future Urban Land Supply Strategy 2017

97. The Future Urban Land Supply Strategy 2017 (FULSS) sequences the release of future urban land with the supply of infrastructure over 30 years for the entire Auckland region. The FULSS has a regional focus and attempts to provide a sustainable path for greenfields expansion to the north, west and south of the Auckland urban area. The FULSS strategy sits alongside council's (and central government's) aspirations for considerable brownfields redevelopment.
98. The FULSS (and the Structure Plan Guidelines of the AUP) seek that structure planning occurs in accordance with the timing identified to coordinate funding of infrastructure with the timing of rezoning. Funding of the council investment in bulk infrastructure for future urban areas is confirmed through future Long Term Plans and includes the Regional Land Transport Plan and where relevant, Development Contributions policy.

99. In the southern sub-region, the FULSS identifies growth in large future urban areas, as well as rural settlements, providing for an anticipated dwelling capacity of 50,600 and an anticipated employment capacity of 30,300 (Figure 7).

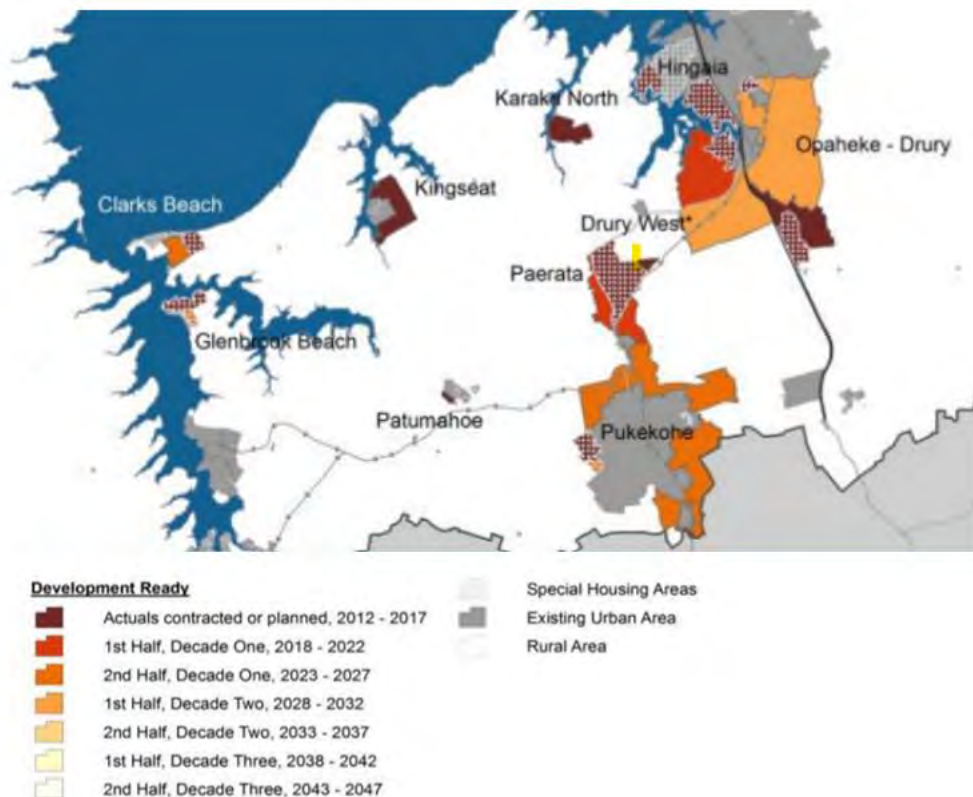


Figure 7: Future Urban Land Supply Strategy

100. Land to the west of the Patumahoe township known as Patumahoe Hill, zoned Single House in the AUP, is identified in the FULSS as being development ready immediately with capacity for 109 dwellings. Land within the plan change area is not identified within the FULSS for urban development. No additional areas for future urban growth around Patumahoe are identified.

101. I consider the plan change to be inconsistent with FULSS, because it is not an anticipated area for growth. There is insufficient capacity within the existing infrastructure networks to service development and the plan change potentially diverts funding and investment from other areas. Although the scale appears on the fact of it to be insignificant, I am concerned about the potential cumulative impacts of multiple private plan changes particularly in the southern sub-region undermining the FULSS.

6.8. Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan

102. The Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan was adopted by council in 2020. It is a roadmap to a zero-emissions, resilient and healthier region. The core goals are:

- To reduce greenhouse gas emissions by 50 per cent by 2030 and achieve net zero emissions by 2050
- To adapt to the impacts of climate change by ensuring we plan for the changes we face under our current emissions pathway

103. Carbon Dioxide emitted by road transport modes is identified as the primary greenhouse gas (GHG) impacting the Auckland Region. Carbon dioxide is a long-lived GHG, meaning it accumulates and has long-lasting implications for climate.
104. In terms of the built environment, the plan identifies that integrating land use and transport planning is vital to reduce the need for private vehicle travel and to ensure housing and employment growth areas are connected to efficient, low carbon transport systems. Our approach to planning and growth is identified as a priority action area, which aims to ensure our approach to planning and growth aligns with low carbon, resilient outcomes. In terms of transport, the plan seeks a 12 per cent reduction in total private vehicle VKT by 2030 against a 'business-as-usual' scenario through actions such as remote working and reduced trip lengths.
105. A strategic review by Szening Ooi for council (Appendix 7) assesses PC55 against the climate action plan, noting Patumahoe has very low access to employment compared to other areas where growth could be located. Although the development yield is relatively modest, because a significant majority of trips are likely to be by private vehicles this will add to the VKT. Therefore, PC55 is contrary to the Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

6.9. Long Term Plan

106. The Council's Long Term Plan (LTP) provides the 10-year budget for Auckland. The 2021-2031 LTP is called a recovery budget in response to the Covid-19 pandemic. The LTP was adopted by Council on June 2021.
107. The LTP identifies that the Council is investigating additional infrastructure requirements to support a large number of growth areas across Auckland. However, funding and financing new infrastructure in all those areas is a major challenge. The LTP states that the focus of limited infrastructure investment capacity will be in a few key areas:
- agreed with the government as part of the Auckland Housing Programme, including Mt Roskill, Māngere, Tāmaki, Oranga and Northcote
 - where significant government investment has been made, such as Drury in Auckland's south, and areas in Auckland's north-west
 - where investment in significant projects, such as the City Rail Link, is being made.
108. The LTP states that the council is not in a position to cover all the potential costs in the focused areas, and there will need to be prioritisation of projects within these areas. This focused approach will mean that the council will not be heavily investing in infrastructure to support other growth areas in the short to medium term beyond that which is already committed. Therefore, I consider PC55 to be inconsistent with the LTP.

6.10. Draft Regional Land Transport Plan 2021

109. The RLTP is the 10-year plan for Auckland's transport network. It details the areas that Auckland Transport, Waka Kotahi NZ Transport Agency and KiwiRail will focus on to respond to our region's transport challenges. It also outlines the proposed 10-year investment programme for specific transport projects.
110. The draft RLTP was endorsed by Auckland Council's Planning Committee on 24 June 2021. It will then need to be adopted by Auckland Transport Board. There is no specific provision for transport investment in the Patumahoe area.

111. In January 2020, Central Government announced the New Zealand Upgrade Programme (NZUP) package of investments. In June 2021 the Government announced a reset of the NZUP that revised some of the projects. Relevant Projects identified in the draft RLTP:

- Route protection for alternative corridor to existing SH22 (Waka Kotahi)
- Mill Road Corridor to provide an additional route from Manukau to Drury (NZUP)
- SH1 Papakura to Drury South widening to three lanes in each direction (NZUP)
- Papakura to Pukehohe electrification to allow electric services up to six trains per hour in each direction (NZUP)

I do not consider PC55 to be consistent with the draft RLTP because it is unanticipated growth that is not accounted for in the planned upgrades of the strategic transport network.

6.11. Franklin Local Board Plan 2020

112. The plan is focused on six key outcomes:

- Our strengths general local opportunity and prosperity
- Improved transport options and fit for purpose roads
- Fit for purpose places and facilities
- Kaitiakitanga and protection of our environment
- Cultural heritage and Māori identity is expressed in our communities
- A sense of belonging and strong community participation

113. Significant growth is anticipated in the Franklin Local Board area and the plan identifies initiatives to support both the existing population as well as the new population. There are no specific Patumahoe initiatives, the key initiatives that are relevant relate to economic prosperity and ensuring the community is well served by community facilities. I consider PC55 to be consistent with the local board plan because it will increase local employment opportunities through the identification of 2.5ha of industrial land and support the neighbourhood town centre contributing to local opportunity and prosperity and can utilise the existing network of community facilities.

6.12. Franklin District Growth Strategy

114. The applicant refers to the Franklin District Growth Strategy 2051 (FDGS), which was adopted by the legacy Franklin District Council in 2007. The FDGS identified Patumahoe as a potential area for growth to accommodate a total of 700 households and a population of 1640 people by 2051.

115. While I acknowledge that the FDGS had identified growth at Patumahoe, I do not consider this strategy to be relevant to the consideration of PC55 because since it was adopted the councils have been amalgamated and we have seen the adoption of two Auckland Plans, the FULSS, and the AUP.

7. CONSULTATION

116. A summary of consultation undertaken in preparation of PC55 is provided in the applicant's Plan Change Request, attached as Appendix 2 to this report.

7.1. Mana Whenua

117. The AEE identifies that Ngāti Tamaoho and Ngāti Te Ata Waiohua expressed support for the development of the subject land and requested opportunities for further engagement and involvement in the development process, including:
- Undertaking a site blessing prior to any work commencing;
 - Preservation of landscape features and the provision of park edges;
 - Roof water capture and reuse, and ground water recharge;
 - Low impact stormwater design and stormwater treatment from roads;
 - Naming rights for open spaces and roads.
 - Use of native trees for landscaping.
 - Riparian planting of waterways.
 - Adoption of Te Aranga principles (as summarised above).
118. It is also noted that Ngāti Te Ata stated that the Cultural Assessment represents only a starting point for initial engagement and will require further consultation and dialogue between Ngāti Te Ata Waiohua and the applicant. Further discussion will be needed around the implications of the project to identify information gaps in our thinking, raise issues or opportunities we had not foreseen, and clarify and reach agreement of those issues as identified in this assessment. It is intended that this assessment will assist with ongoing decision making from all relevant parties involved and ensure that Ngāti Te Ata Waiohua issues, concerns, interests and values are provided for, including resource consent requirements.
119. Ngāti Te Ata Waiohua indicates support for PC55 provided that environmental and cultural preferences to protect and mitigate against the potential adverse effects on the environment and our cultural heritage as a result of this subdivision (as outlined in this report) are provided for as part of the plan change and future development, including through decision making. Ngāti Te Ata Waiohua seeks ongoing involvement, including through cultural monitoring and seeks that iwi has first right to name any new roads and access ways to ensure the old names are retained and that the history is relevant to the area of Patumahoe.
120. I note that the applicant identifies consultation with Te Ākitai Waiohua is progressing and may result in further cultural considerations being raised through the planning process. No updates have been provided in terms of this consultation. Te Ākitai Waiohua have made a submission opposing the plan change in part because of a lack of consultation.

7.2. Affected landowners

121. The applicant advises that a number of neighbouring landowners were consulted in relation to the proposed Plan Change. In August 2018 a meeting was held at the Patumahoe Rugby Club, to garner support and understand neighbours views on the proposal. The applicant identified that neighbours were either in support or neutral on the Plan Change, however no contact was able to be made for the owners of 104 Patumahoe Road. Landowners were again updated of progress in September 2019 according to the application material.
122. No evidence of the engagement (emails/letters) were submitted as part of the application, nor a comprehensive list (address locations) of those affected landowners engaged with.

123. Correspondence on behalf of Mr Kraakman, Alpito Hill Ltd (submitter 34)⁴ was received in relation to discussions with the applicant that explicitly requested that the plan change not adversely affect his property at 28 Mauku Road. Ms Atkins considers the decision to accept the plan change for process under clause 25 was incorrectly made, and that it should have been rejected in part because of insufficient detail on consultation. Ms Atkins considers the recommendation and acceptance constitutes a significant error in law and process. Given that the plan change has been notified, Ms Atkins sought further information regarding the nature of consultation and the extent of local and community support.
124. On 17 May 2021, the then chair Mr Barry Kaye directed that the applicant specifically addresses the matters raised on behalf of the submitter in their evidence, and that the applicant meet with the submitter and for the outcomes of that meeting to be filed with the council by 18 June 2021.
125. On 18 June 2021, Mr Dawson for the applicant, filed a response with the council advising that a meeting had been held. However, the outcome of this meeting remains unclear. Mr Dawson indicated that there is no legal issue with including land not owned by applicant within the plan change, and that alternative are available to avoid impacts on the submitters land that are within the scope of the plan change.
126. I note that I have addressed the concerned raised by Alpito Hill Ltd in response to submissions.

7.3. KiwiRail

127. The applicant indicates that consultation has occurred with Kiwirail, and correspondence is included in the information supporting the plan change. Specifically, Kiwirail sought that building development be set back 5m from the railway corridor, and that the noise and vibration standards developed by Kiwirail should be applied.
128. Correspondence from Kiwirail indicates that the noise and vibration standards were provided to the applicant but a copy of these is not included in the application material.

7.4. Auckland Transport

129. Consultation was undertaken with Auckland Transport in late 2018 and early 2019 via email and a meeting. The applicant advises that the Traffic Report was discussed, with Auckland Transport providing written feedback provided as Attachment 3 to the plan change request (Appendix 2). This subsequently resulted in amendments to the Plan Change design and the finalised Integrated Traffic Assessment that was lodged as part of the application (Appendix 2). No further documentation/evidence on the changes made in light of Auckland Transport's feedback was provided.
130. Auckland Transport lodged a substantial submission (submitter 33), seeking further information and revisions to the precinct. These are addressed in response to submissions.

7.5. Watercare

131. The applicant met with Watercare in late 2018 which resulted in Watercare undertaking a water and wastewater capacity assessment for the subject site provided in Attachment 2 of the plan change request (Appendix 2). The assessment found that the proposed Plan Change (180 dwelling units) would have negligible effect on the existing wastewater

⁴ Atkins Holm Majurey, letter dated 14 December 2020.

network and no upgrades were necessary. However, additional storage capacity was required for water supply at the 6 Carter Road facility. The applicant identified that further work/discussions are required between the applicant and Watercare in order to resolve (in terms of potential costs, land and contributions) the water supply capacity requirements to support the development of the site.

132. The applicant's reports states that 200 - 250 dwellings are proposed over an 8 – 10 year development period. The wastewater network capacity is not fully explained, especially if more than 180 dwellings would necessitate substantial upgrades to the pumping station and the rising main to Pukekohe.
133. Watercare lodged a submission (submitter 37) opposing the plan change due to lack of capacity, which is addressed in response to submissions.

8. COMMENTS FROM LOCAL BOARDS

134. Franklin Local Board was briefed by Auckland Council Plans and Places staff on 23 October 2019 following lodgement of the plan change request.
135. Following notification of the plan change, Auckland Council Plans and Places staff sought the Franklin Local Board's feedback at a business meeting on 23 March 2021.
136. The Franklin Local Board discussed the plan change on 23 March 2021 and resolved to provide the local board's views on the private plan change and declined to appoint a local board member to speak to these at the hearing.⁵ The Franklin Local Board indicated has the following views:
- Are concerned at possible inappropriate development in areas of elite and high quality soils and the void that exists in the anticipation of the adoption of national policy guidelines on the issue but note the varying technical and possibly scientific views on this particular land holding and suggest the conflicting arguments are best determined by way of expert evidence produced at the scheduled hearing
 - Note previous planning decisions in Patumahoe that has allowed development adjacent to the site which may impact on the ability to allow soil types to be used for maximum benefit because of reverse sensitivity issues
 - Defer to expert input from Watercare, Auckland Council (Healthy Waters) and Auckland Transport staff will inform consideration of water supply, wastewater capacity, stormwater management and traffic and transport issues
 - Are concerned at the effects of cumulative stormwater discharge into the already compromised Whangamaire stream by way of this possible development and those already consented within the catchment in Patumahoe
 - Are concerned at the cumulative effects of increased traffic volumes on existing roading networks, in particular the railway level crossing and capacity of the village centre to accommodate extra vehicle use.
 - Note ongoing concern for the cumulative impact of greenfield development on unbudgeted local community facilities and social infrastructure and suggest that provision should be made to enable advancement of local projects to accommodate new residents (beyond the development footprint) e.g. extension of the Patumahoe Football Club facilities.

⁵ Franklin Local Board Meeting 23 March 2021, Resolution FR/2021/25.

137. Waitemata Local Board also met to discuss the plan change and resolved to provide feedback and to speak to the local board views at the hearing.⁶ The Waitemata Local Board has the following views:

- request that private plan change 55 be declined and that the current designation under the unitary plan, which is of rural - rural production over the bulk of the land be retained.
- understand that the fact that the bulk of the land is classified as Class 1, i.e. elite soil quality, and much of the land is being actively used for grazing, cropping and horticulture. The board believe that such production is vitally important for Auckland's food resilience provides a compelling reason for this use of this land to be protected rather than used for urban growth. Horticulture experts advise that the loss of such land from food production will increase the cost and availability of food in Auckland and the rest of New Zealand.
- as the National Policy Statement for Highly productive land will probably take effect within six months and is likely to provide strong requirements to retain such land for food production, the Board believe it would be premature to allow this plan change.
- believe that it would be contrary to the Auckland Council's climate mitigation strategy for this quality topsoil to be replaced by residential and light industrial use. This is particularly the case as the location is not connected to public transport and is remote from the major transport corridors namely rail and State Highway One and 27. This would result in a higher proportion of the people living there commuting to their work and recreational activities than from most other parts of the outskirts of the Auckland urban area and an unnecessarily high increase in climate change gas emissions.
- believe that it would be unnecessarily costly and disruptive to provide the necessary transport infrastructure for this currently relatively unconnected location.
- agree with the expressed concerns of Watercare Limited and asserts that it would be difficult to locate, and particularly resource intensive to provide, the necessary water, wastewater and stormwater infrastructure for this development.
- are concerned about the effects of reverse sensitivity from the new urban residents on the continuing primary production activities of what is a very well established and productive horticultural and agricultural area.
- are concerned that that there appears to have been inadequate consultation to date with mana whenua, and particularly with Te Akitai Waiohua, which asserts a close cultural connection with this area.
- assert that the principles and policies underlying the unitary plan are vitally important and should be adhered to. Urban residential development growth needs to prioritise areas such as the Waitemata Local Board area which have strong physical, community, cultural and economic infrastructure. Breaching the provisions of the Unitary Plan in Patumahoe area will tend to intensify climate change; be unnecessarily costly and resource intensive particularly for council; will nullify effective food production and security; and tend to create isolated and potentially alienated residential areas with inadequate provision to build strong and healthy communities.

⁶ Waitemata Local Board Meeting 8 December 2020, Resolution WTM/2020/138.

9. ANALYSIS OF THE SECTION 32 REPORT AND OTHER INFORMATION PROVIDED BY THE APPLICANT

138. Section 74 of the RMA requires that a plan change must have particular regard to an evaluation prepared in accordance with Section 32 of the RMA.
139. Section 32 of the RMA requires an evaluation report examining the extent to which the objectives of the plan change are the most appropriate way to achieve the purpose of the Act. Section 32 also requires the report to examine whether the provisions are the most appropriate way of achieving the objectives.
140. The applicant has prepared an assessment against Section 32 in the statutory assessment (Appendix 2). An assessment of alternatives is made in respect of the following options:
- Status quo / do nothing
 - PC55 zoning
141. I agree that the options for rezoning are reasonably practicable options to be evaluated. However, I consider the evaluation to be insufficient to demonstrate that the proposed rezoning meets achieves the purpose of the RMA. The costs of the plan change have not been adequately considered in terms of infrastructure and impact on the quality compact urban form from a regional context.
142. The risk of not acting is that a small amount of development capacity would not be enabled at Patumahoe. The risk of acting is that development capacity would result in significant infrastructure costs and would undermine the strategic approach to growth by allowing for incremental and ad hoc growth.
143. No evaluation is provided of the precinct provisions in support of the rezoning to determine whether they are the most appropriate methods to achieve the objectives. I therefore consider the status quo to be the most appropriate to achieve the sustainable management purpose of the RMA.

9.1. Assessment of Effects on the Environment (for private plan change requests)

144. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the Plan Change, taking into account clauses 6 and 7 of Schedule 4 of the RMA.
145. An assessment of actual and potential effects on the environment (“AEE”) is included in the plan change request and supporting documents.⁷ The submitted plan change request identifies and evaluates the following actual and potential effects:
- Land stability and geotechnical effects
 - Land disturbance effects
 - Soil capability and land productivity
 - Economic effects
 - Development capacity
 - Stormwater management effects
 - Transport effects

⁷ Plan Change Request, Assessment of Effects and Section 32 Assessment

- Visual amenity and landscape effects
- Urban design effects
- Heritage effects
- Positive effects

146. A review of the AEE and supporting documents, taking into account further information provided pursuant to Clause 23 of Schedule 1 RMA, is provided below. In addition to the topics addressed in the AEE, I consider it also necessary to review strategic planning issues associated with urban form, capacity for development, effects on Mana Whenua values, water and wastewater effects and reverse sensitivity effects.

9.1.1. Development Capacity

Application

147. The plan change request identifies the plan change will provide for 200-250 lots over an 8–10-year period providing for an additional population of 600-900 people. The provision of 2.5ha of LIZ will provide employment opportunities, creating approximately 80 new jobs directly through the provision of 8 new Lots for development.

148. Both the NPS-UD and the RPS require sufficient capacity to be provided and for that capacity to be integrated with adequate infrastructure. The AUP Structure plan guidelines require the future supply and projected demand for residential and business land to achieve an appropriate capacity to meet the sub-regional growth projections in the Auckland Plan.⁸

149. Development capacity is addressed in the applicant's assessment of the proposal against Appendix 1 Structure plan guideline, 1.4.1 Urban growth, and is assessed in the PEL Report (Appendix 2) and Clause 23 response from PEL (Appendix 3).

150. In terms of demonstrating demand for growth, the application relies on the FDGS, which identified that Patumahoe has the potential to accommodate additional development capacity and had identified a total of 700 households by 2051.

151. The application indicates that the provision of zoned land for additional dwellings at Patumahoe would contribute to addressing an existing shortfall between the FULSS and the Auckland Plan 2050. The proposed 200-250 dwellings would represent 0.05-0.06 per cent of the projected demand for housing by 2048 and 0.10-0.13 per cent of the minimum target to 2026. This would make a small positive contribution towards meeting the minimum dwelling target specified in the Auckland Plan 2050 – Development Strategy.

Analysis

152. RPS Objective B2.4.1(6) requires sufficient, feasible development capacity for housing to meet the following minimum dwelling targets:

- 189,000 in the short to medium term of 1 to 10 years (2016-2026)
- 218,500 in the long term of 11 to 30 years (2027-2046)
- 408,300 total number over 30 years (2016-2046)

⁸ AUP Appendix 1 Structure Plan Guidelines, 1.4 Matters to identify, investigate and address, 1.4(1) Urban growth.

153. While I acknowledge that the FDGS identifies some growth at Patumahoe, this document is no longer relevant within the current statutory context because it is over a decade old and was developed by the former Franklin District Council. The Auckland Plan (Development Strategy) and FULSS demonstrate how the minimum dwelling targets are to be achieved across the existing urban area and the future urban area (FUZ).

154. Development capacity has been addressed in the assessments of both Ms Fairgray in terms of economic effects and Ms Jones in terms of the council’s growth strategy. These assessments consider whether there is demand to support the additional capacity proposed, to understand whether growth is required. I rely on these assessments in my analysis below.

155. Council experts have used slightly different methods for calculating demand and supply. However, all the experts agree that the wider Patumahoe area is anticipated to grow from 1,050 to 1,650 households over the next 20-30 years. This indicates that there is demand for between 550 and 600 additional households within the urban and wider rural area. Due to the scale of the existing village, it is difficult to determine the proportion of anticipated growth that should be allocated to Patumahoe village itself. Patumahoe is only a small part of a much wider area that includes Glenbrook beach and the rural area in between.

156. The Franklin Local Board area is anticipated to grow significantly, accommodating 12 per cent of Auckland’s total growth. This reflects the large amount of Future Urban areas identified in the local board area, including Drury and Pukekohe. The population is anticipated to double, and the number of households is anticipated to more than double (Table 4). Employment growth is also anticipated to be significant, with approximately 22,000 additional jobs over the 30-year period (almost 9 per cent of regional growth).

	Franklin Local Board		
	2021	2051	30-year growth
Household	29,110	61,867	32,757
Population	76,592	153,058	76,466
Employment	24,163	46,466	22,303

Table 4: Franklin Local Board anticipated growth - 2021 to 2051

157. Ms Fairgray considers the total amount of additional development capacity (including PC55) to be comparable to the projected growth of approximately 700 dwellings identified in the FDGS. However, I do not consider the FDGS to be relevant to the current council’s growth strategy.

158. Table 5 below provides a summary of the estimated development capacity for Patumahoe provided by Ms Fairgray and Ms Jones. The current development capacity available at Patumahoe is estimated at 148 dwellings without PC55. When added to PC55 the development capacity increases to 398, which equates to approximately 70 per cent of the anticipated growth for the wider Patumahoe area. The level of growth proposed would increase the total number of dwellings to 778 dwellings over the next 20-30 years.
159. Ms Fairgray considers the total amount of additional development capacity (including PC55) to be comparable to the projected growth of approximately 700 dwellings identified in the FDGS. However, I do not consider the FDGS to be relevant to the current council's growth strategy.

Table 5: Estimated development capacity

	Census Area Unit		FULSS / Growth Model (MSM 590)
<i>Current capacity</i>			
		Carter Road	30
Patumahoe Hill	76	Patumahoe Hill	106
Carter Road	30	Glenbrook Beach	1050
Vacant lots	42	Vacant lots	42
	148		1228
<i>PC55</i>			
SHZ	170	SHZ	170
FUZ	80	FUZ	80
	250		250
Total capacity	778		1478

160. For the wider Patumahoe area, PC55 would increase development capacity to approximately 1500 dwellings compared to anticipated demand of 1257 under the Auckland Growth Model. Although the wider Franklin Local Board area is expected to experience significant growth pressure over the next 30 years, the capacity already planned for via the Auckland Plan 2050 (Development Strategy) and FULSS will be sufficient to accommodate this growth. Therefore, additional development capacity is not required to meet requirements under the NPS-UD or the RPS Policy B2.2.2(1).

9.1.2. Urban design

Application

161. Urban design effects are addressed in Section 10.9 of the applicant's AEE and is supported by an Urban Design Assessment prepared by Ian Munro, urban designer (Appendix 2).

162. The applicant's urban design assessment determines that the land is a logical expansion of Patumahoe village and is well-suited for residential land use from an urban design perspective. It will round-out the existing zoned area of Patumahoe, support the existing centre zone and be confined within obvious 'edges' to the settlement in growth management terms (notably the railway line to the south and an escarpment to the east). A limited area of Light Industrial zone is proposed adjacent to the railway line and an existing timber milling / processing activity; this is to complement the existing Patumahoe centre zone and provide for more local non-retail employment (such as mechanics / service station etc., which would not be appropriate in the centre zone).

163. Overall, the urban design assessment concludes that the proposed development:

- contributes to a quality compact urban form that supports and enhances the Patumahoe rural village;
- achieves an integrated built-form that is well-connected, attractive and enhances residential amenity;
- provides economic opportunities and employment to support the needs of the local rural community;
- maintains and enhances Patumahoe's character values and provides for adequate infrastructure to support the growth;
- integrates and connects open spaces together; and
- managed reverse sensitivity effects with adjacent land use and activities.

Peer review

164. The applicant's assessments and the proposed plan change have been reviewed by Nicole Bitossi, urban designer with Motu Design Limited. A copy of the review is set out in Appendix 7.
165. Overall, Ms Bitossi concludes that the applicant has undertaken a robust urban design assessment of the proposed plan change based on the site conditions when the report was undertaken in 2019.
166. Ms Bitossi considers the proposal has the potential to achieve a quality compact form at a local level that will promote walking and cycling if key connections are ensured in the Precinct Plan and provisions, for the following reasons:
- Housing within the walkable catchment of the neighbourhood centre, with good walking and cycling connections to services, open spaces and the school;
 - Employment opportunities within the Light Industrial area and services that will reduce the need to travel to other centres;
 - Increased vibrancy within the village centre with more retail and services available;
 - Improved activation and safety of the Domain.
167. The urban design assessment is based on a concept master plan that has not been carried through into the plan change. Precinct Plan 3 takes into account the approved subdivision, which impacts on the movement across the plan change are compromises the ability to provide a park-edge road adjoining the Domain.
168. While the southern and eastern boundaries are marked by strong defensible edges, made up of the rail line (south) and the steep escarpment (east), there is not topographical, landscape features or roads that define the south-western boundary. A stronger boundary is required to prevent further sprawl along Mauku Road. Therefore, Ms Bitossi recommends either a wider landscape buffer or realignment of the road connecting to Mauku Road.
169. Another key issue addressed by Ms Bitossi is how to implement the road connection to Mauku Road given the opposition by affected landowners. A number of alternative locations for the connection to Mauku Road were considered, and Ms Bitossi supports realigning the indicative road along the south-western boundary of 28 and 28B Mauku Road.
170. Ms Bitossi considers whether the plan change will impact the existing rural character, concluding that recent subdivision has already changed the village's character. PC55 will result in development similar to that which has occurred over the past 10 years and indicates that the greater population and traffic volumes will further impact on the rural character.
171. Precinct provisions are considered important for maintaining the rural village character. Specifically, the minimum lot sizes required under the precinct provisions are considered by Ms Bitossi to support the rural village character, with larger lots than would typically be found in the SHZ. Larger street trees are recommended to establish a rural village character because there is unlikely to be sufficient space within lots for large specimen trees.

Analysis

172. Modifications to the Precinct Plan are considered necessary to address road locations, as well as to provide a more robust delineation and rationale for the location of the western boundary in order to address urban boundary concerns and further strengthen the urban design outcomes anticipated from the plan change.
173. I agree with Ms Bitossi that indicative roads should be identified on Precinct Plan 3 to ensure key connections, park edge roads and the road buffer between the LIZ and SHZ are constructed. I note that Ms Bitossi also supports retention of the cross-sections (Figures 6-11 in the precinct). However, I do not consider cross sections need to be retained to achieve the appropriate form and function of the transport environment and the outcomes could be achieved through appropriate assessment criteria.
174. In terms of minimum net site area, I consider the precinct provision in Standard I430.6.7 does not override the subdivision variation control in Standard E38.8.2.4 on the existing SHZ land at Carter Road. Currently a minimum net site area of 800m² is required on this site in accordance with the subdivision variation control, and to go below this is a non-complying activity. Therefore, if both the precinct provision and the subdivision variation control apply to the site then there would be a conflict because within 400m of the village the precinct enables a minimum site area of 600m² as a restricted discretionary activity.
175. The precinct introductory text to the standards in I430.6 identifies that *“the overlay, zone and Auckland-wide standards apply in this precinct in addition to the following standards, unless otherwise specified below.”* Therefore, for the precinct provision to take precedence Standard I430.6.7 must specifically identify that Standard E38.8.2.4 does not apply. While this may seem unnecessary because the site has approved subdivision, there is nothing preventing the landowner from varying the existing consent or seeking a new consent in accordance with the precinct provisions. I consider such an amendment would provide greater clarity.
176. I am satisfied that from an urban design perspective at the local level that potential adverse effects can be managed through the combination of proposed precinct provisions, and the following changes recommended by Ms Bitossi:
- A precinct provision is added to limit the number of dairies and cafes within the Sub-Precinct E Light Industrial area to one of each;
 - The landscape buffer along the south-western boundary of the western sector is increased to 20m in width [this may be a landscaped road]; and
 - Large specimen trees are included within the road reserves of Sub-Precinct E.
177. The recommended changes to the Precinct Plan would ensure:
- a robust location and definition of the south-western boundary;
 - location of the connection from Mauku Road;
 - Domain frontage road;
 - East-west connection from Mauku Road to Patumahoe Road that links into the road layout for the approved subdivision area in the central sector.

9.1.3. Economic effects

Application

178. Economic effects are addressed in Section 10.5 of the applicant’s AEE and is supported by an economic assessment prepared by Property Economics Limited

(Appendix 2), examining the economic impacts of the plan change and associated rezoning of land.

179. The Property Economics Limited (PEL) Report is based on 200 new dwellings and 2.5 ha of industrial land. Potential negative economic impacts on the local economy from the plan change are identified as included the loss of direct local operational expenditure. Economic benefits are identified to occur in two phases, the development phase (construction costs) and then the on-going operations, including spending of residents and the creation of employment.
180. Initial development and construction are anticipated to generate approximately \$51m to the (former) Franklin District area and \$8 to the local Patumahoe market in economic activity. An additional 16 jobs over the period of construction and development are estimated. Post-construction, a further 80 industrial employees within the LIZ and the additional residents and associated businesses are anticipated to generate \$1.7m to spend within the local market resulting in an additional \$800,000 p.a. worth of local income and 17 new jobs.
181. In terms of business activities, the PEL Report indicates that small to medium offices and retail should continue to locate in the Patumahoe village centre. The proposed LIZ would capture additional activity within the broad industrial sectors (i.e. processing, farm machinery sales and servicing, construction services, manufacturing, trade stores, yard supplies). It is also anticipated that the LIZ is able to accommodate 1-2 cafes / eateries without any adverse effects on the village, provided that floor area is limited. Ancillary office is also considered appropriate.
182. The PEL Report makes the following recommendations relevant for the precinct provisions to enable the LIZ to efficiently function and retain an efficient distribution of activity within the village:
- Site sizes of between 1,000m² and 5,000m²;
 - Provisions for smaller ancillary offices up to 200m²;
 - Provision for trade retail supplies as these are not suited to the existing commercial area;
 - 1-2 cafes and retail up to 300m² per tenancy, and a maximum of two food related stores.

Peer review

183. The applicant's assessment and the proposed plan change has been reviewed by Susan Fairgray of Market Economics. A copy of the review is set out in Appendix 7. In summary, the actual or potential adverse effects identified and considered by Ms Fairgray are as follows:
- Appropriateness of location of urban growth;
 - Increased demand for local businesses;
 - Increased level of business activity within Patumahoe;
 - Large proportional increase in the number of dwellings;
 - Distribution of activity between business zones within Patumahoe;
 - Economic impact of construction activity; and
 - Reverse sensitivity effects.

184. It is Ms Fairgray's view that the applicant's assessment does not demonstrate significant economic benefits in terms of construction benefits, these are likely to have occurred elsewhere in the Franklin area and therefore represent transfer effects. However, economic benefits from the provision of LIZ and additional commercial demand from

households are demonstrated. There is sufficient capacity within the existing commercial centre zone to accommodate increased demand.

185. Ms Fairgray generally agrees with the PEL recommended precinct provisions as being appropriate, with the following exceptions:
- Floor space limits should reflect those in the AUP LIZ;
 - Provision should not be made for additional retail types beyond the AUP LIZ;
 - Ancillary office caps should remain at 100m² per site.
186. I note that the proposed precinct provisions do not contain any specific provisions for the LIZ, other than the landscape buffer standard. Therefore, the AUP LIZ provisions will apply (by default) as sought by Ms Fairgray in the first two bullet points described above, therefore, addressing those concerns.
187. Ms Fairgray has assessed the proportion of growth in household numbers and considers that this is likely to result in some change to the character of the village, but it would likely continue to function economically as a small rural village.
188. While the location of proposed FUZ represents an efficient location, Ms Fairgray does not consider the applicant to have demonstrated the need for additional future urban expansion. In relation to economic effects, Ms Fairgray considers PC55 would provide more capacity than the anticipated demand. The SHZ is consistent with anticipated growth, but there is no identified need for to identify the FUZ land from an economic perspective.
189. Because the growth is not identified in the FULSS, Ms Fairgray raises some concern around potential significant infrastructure costs (excluding those internalised by the development) as an adverse economic effect on the efficiency of growth. Ms Fairgray relies on the infrastructure assessment prepared by Mr Russell, Senior Development Engineer, which identifies that there is potentially significant infrastructure investment required to service the plan change area. These infrastructure costs are greater than if development were to occur in another more centralised location and therefore the growth is not considered to be efficient.
190. Ms Fairgray considers the applicant's assessment has not identified or assessed all economic effects and therefore has not fully established whether the subject land is an appropriate location for urban growth. The assessment was only taken from a local scale, within Patumahoe, and has not considered growth in the context of the wider Franklin area and whether Patumahoe is the most appropriate location for growth.
191. In summary, Ms Fairgray's specialist report concludes that:
- FUZ land is not required to meet development capacity demand;
 - The PC55 site is an appropriate location for growth if it is determined to be appropriate for Patumahoe to expand;
 - The LIZ and additional commercial demand from households will result in economic benefits provided floorspace size of various business activities is limited; and
 - If significant infrastructure investment is required (excluding that internalised by the development), then PC55 is unlikely to represent an efficient location for growth with likely corresponding adverse economic effects.

Analysis

192. Ms Fairgray identifies that there are a number of key employment locations in the wider area, with data presently showing that approximately 29% of those employed travel to

Pukekohe and over half to the wider southern Auckland rural area. I agree with Ms Fairgray that employment and residential activity does not need to be balanced at a highly localised level as there are opportunities within the southern sub-region, in addition, employment provided by the LIZ would also increase opportunities.

193. In terms of the LIZ, I am satisfied that the underlying LIZ AUP provisions will address any actual or potential adverse economic effects identified by Ms Fairgray.

194. I agree with Ms Fairgray that insufficient justification has been provided to support the need for the proposed FUZ and that the expansion of the Patumahoe village would result in adverse economic costs if infrastructure costs are significant and not able to be internalised by the applicant. Therefore, although its' location adjacent to the existing urban area is logical, the proposal may not be efficient.

195. In conclusion, Patumahoe is considered to be an appropriate place for growth from an economic perspective and any adverse economic effects of the plan change would be minor provided there are no significant infrastructure investments.

9.1.4. Land stability and geotechnical effects

Application

196. The applicant's AEE addresses land stability and geotechnical effects in Section 10.1, which relies on a preliminary geotechnical appraisal of the subject land prepared by Lander Geotechnical Consultants. Three geomorphic zones were identified across the subject land. The key geotechnical issues identified for the proposed PPC55 land are identified as slope stability and ground settlement potential. The assessment also describes earthworks and sediment control effects.

Peer review

197. The geotechnical assessment has been peer reviewed by James Beaumont of Riley Consultants (Appendix 7) and was determined to be sufficient to support the plan change. The key issue raised by Mr Beaumont was the land within Zone 3 (see Figure 8 below) which is along the eastern edge of the plan change area and is proposed FUZ.

198. Mr Beaumont indicates that Zone 3 is moderate to very challenging to develop, and much of the eastern slope will require some form of stability enhancement. While the scale of the stability enhancement measures is not known, at this stage Lander Geotechnical Consultants have shown that existing proven solutions are available to address the types of instability features identified. With appropriate site-specific investigation, design and construction, Mr Beaumont considers that instability issues can be mitigated and Zone 3 can be developable.

199. In addition, as Zone 3 is within the area proposed to be zoned FUZ, a further plan change is required to implement a live zone prior to urbanisation. Land topography and land stability would likely influence the future lot sizes (and zone density) in the proposed FUZ area to the east of Patumahoe Road, particularly towards the eastern escarpment. Further to that, geotechnical matters in relation to this zone can also be addressed at future resource consent stages.

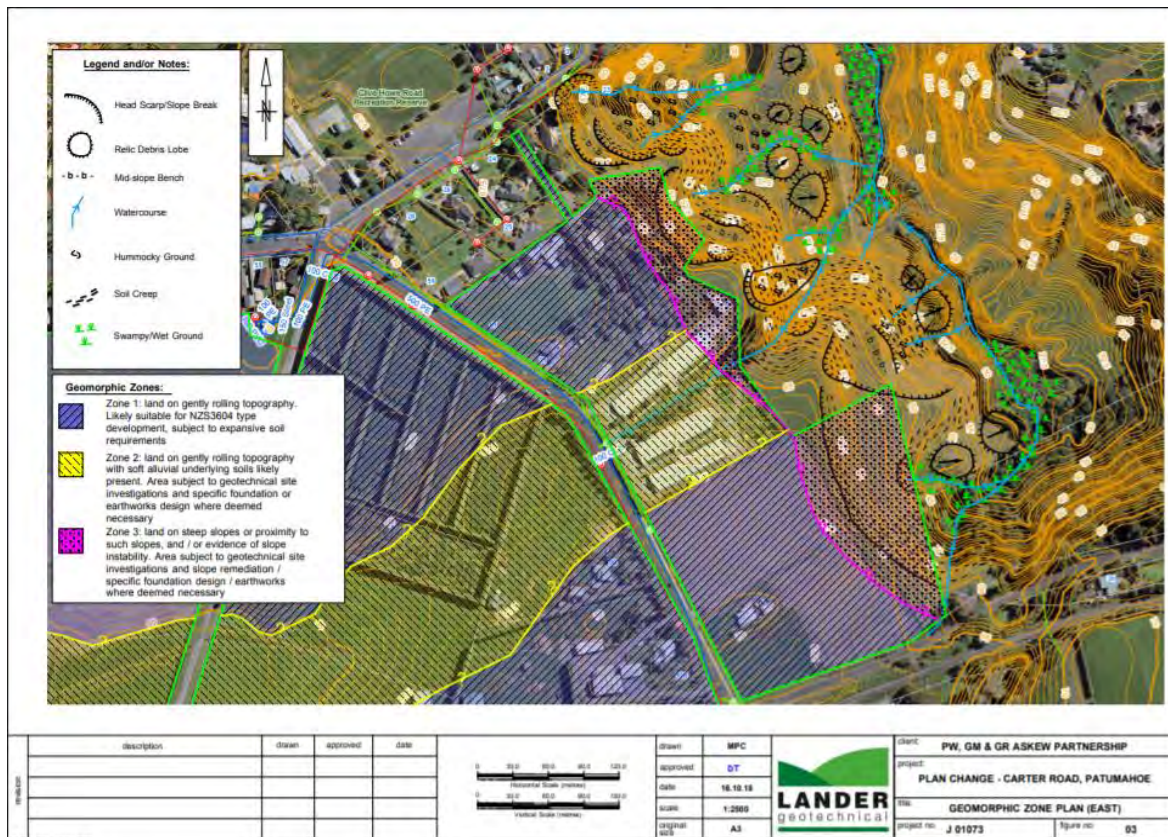


Figure 8: Geomorphic Zone Plan (Lander Geotechnical)

200. Mr Beaumont is satisfied that the information submitted in support of the plan change demonstrates that the site can accommodate the proposal from a geotechnical perspective. There are geotechnical solutions available to address the identified geotechnical risks (specifically instability within Zone 3) and for building foundation design, that have previously been successfully implemented across the Auckland region.

Analysis

201. From this analysis, I conclude that the land is capable of urban development. It would use conventional land stability enhancement development methodologies where softer ground or steeper slopes were encountered. I consider potential geotechnical risks in Zone 3 could be addressed through a future plan change process given the land is proposed FUZ.

9.1.5. Productive soils

Application

202. The applicant assesses soil capability in Section 10.3 and land productivity in Section 10.4 of the AEE (Appendix 2). Technical assessments are provided by AG First for soil capability and Fruition Horticulture for land productivity.

203. AG First has identified that there are no LUC Class 1 soils on the subject land, and as such, there are no “elite soils” within the subject land. Within the 26 titles, it is noted that 21 of them are currently used for residential, lifestyle and commercial purposes and do not

utilise their soils in a productive manner beyond general stock grazing and raising domestic poultry.

204. The assessment of land productivity prepared by Fruition Horticulture considers the constraints on productive use for horticultural uses, identifying that only approximately 3 ha of land at 95 Patumahoe Road is currently used for vegetable production, and the existing kiwifruit orchard (3.8 ha) is operating at very low yields that are not sustainable. A total of 23.2 ha of the subject land was identified to have productive potential, which is heavily constrained by fragmentation (small lots), occupied by buildings, and poor-quality soils.
205. The AEE determines that the plan change would have negligible effects because it would result in the loss of prime soils that are not significant for their ability to sustain food production. The 3 ha that is identified as productive will be decided through a future plan change as the land is proposed to be zoned Future Urban.

Peer review

206. A peer review of the soil capability analysis for Auckland Council was prepared by Dr Reece Hill, Land Systems. Land capability was peer reviewed by Stuart Ford, The AgriBusiness Group (Appendix 7).

Soil capability

207. Dr Hill sets out the AUP definitions of “land containing elite soils” (Elite Soils) and “land containing prime soils” (Prime Soils) and uses these as the basis for classifying elite and prime in his report. This is important for two reasons, firstly this reflects how the RPS objectives and policies are applied, and secondly this appears to be the key reason for the differing opinions of the soil experts on the identification and scale of elite and prime soils.
208. In terms of elite soils, Dr Hill reflects on the importance of the specific soils that are listed in addition to LUC 1 class. In terms of prime soils, Dr Hill identifies that these are LUC 2 and 3 provided it meets contributing factors such as those listed (i.e., readily receivable water, favourable climate and topography, good drainage).
209. Dr Hill highlights the importance of elite and prime soils in relation to the extent of land area in Auckland, the significant value that highly productive soils provide for market gardening and vegetable production, and the loss of land to urbanisation. The key issue therefore is the limited resource in Auckland of elite and prime soils and the fact that they are a non-renewable, finite resource that once lost are no longer available.
210. The pressure on highly productive soils is acknowledged nationally, recognising that highly productive land makes up a small proportion of all land in New Zealand and provides significant value locally and nationally. The importance of this resource is reflected through the Government’s plan to develop a National Policy Statement for Highly Productive Land (draft NPS-HPL). Dr Hill highlights that the discussion document for the draft NPS-HPL identified that from 2002-2016 the area of land in NZ previously used for vegetable growing decreased by 29 per cent, from nearly 100,000 ha to about 70,000 ha.
211. Dr Hill explains the Council’s change of approach to soil classification, from the NZLRI LUC classes to the FARMLUC classification classes, which refines the sub-classes to provide a more nuanced analysis at a more detailed scale. In South Auckland this revised approach results in predominantly LUC classes 1, 2 and 3 irrespective of the LUC classification used and overall increase in the proportion of LUC 1 (elite soils).

212. Dr Hill’s analysis identifies the soil types in the subject area and classifies these by property to provide a map of land containing elite, prime and other soils (Figure 9). In summary, Dr Hill identifies the following composition of the subject land in terms of soils:

- Elite soils = 23.5 ha or 63.9 per cent
- Prime soils = 7.4 ha or 20.1 per cent
- Other soils = 5.9 ha or 16 per cent

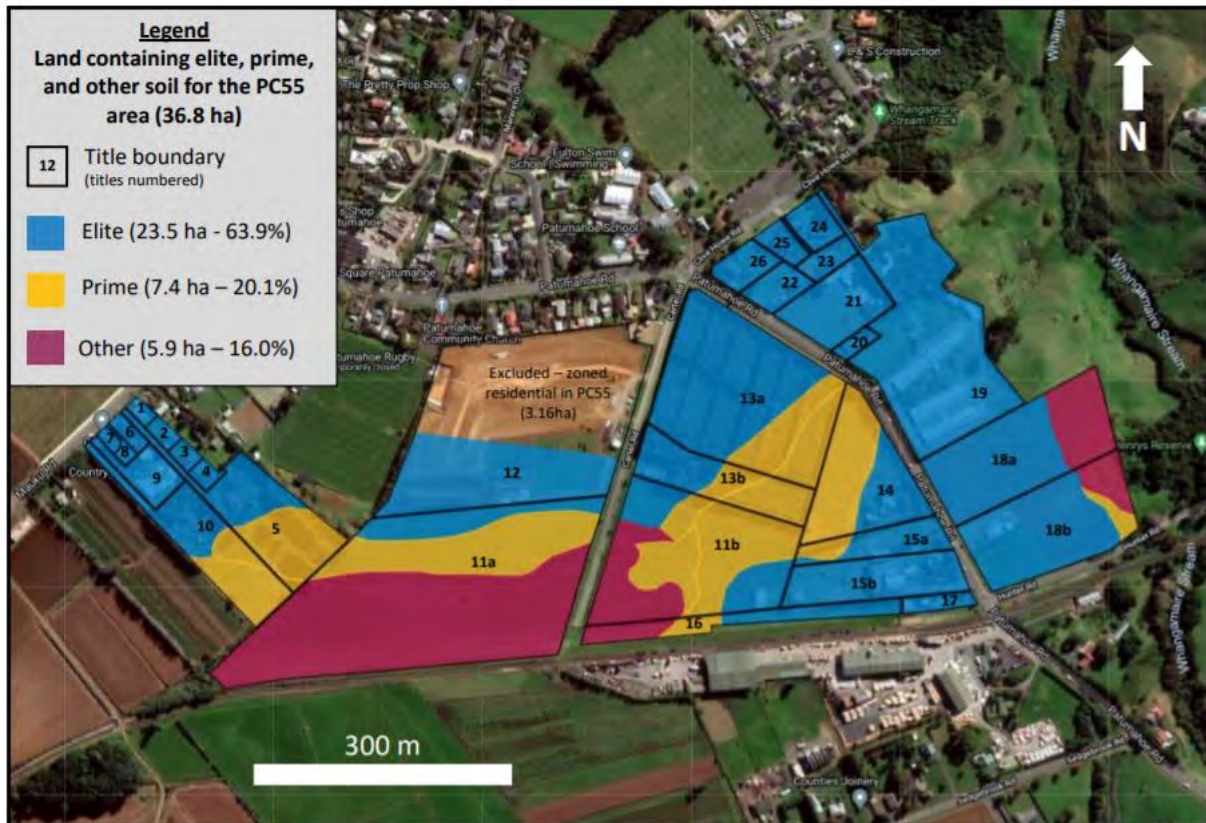


Figure 9: Distribution of land containing elite, prime, and other soils (Dr Hill)

213. Having identified the soil classifications across the site, Dr Hill then assesses the extent of arable land recognising that not all land is likely to be available for productive use when considering further constraints such as small parcel size. In summary, Dr Hill identifies that 18.7 ha is considered to be practicably available for productive use. Although less than the applicant had identified (23.2 ha) this is broadly consistent, and demonstrates limited land is likely to be available for productive use.

214. Although Dr Hill considers that all land identified as available for productive use is suitable for growing food production regardless of title size, he determines that of the 18.7 ha of land with productive potential only 13.7 ha comprises elite and prime. A total of 8.3 ha of elite soils is available year-round, and 5.4 ha prime soils with additional management could provide for seasonal food production. Dr Hill highlights that production can occur on smaller sites, as low as 12 ha, and that future viability is unknown. Therefore, the soils have value by way of the fact that it is highly productive, non-renewable, finite resource. Dr Hill concludes that:

“the areas identified as land containing elite or prime soil do require consideration with respect to their ability to produce food, as well as other uses (including commercial farming, forestry, and recreation) beyond horticulture alone. Consideration should also be given to the productive potential of the land to provide for present and future generations, irrespective of current land use and management.”

Land Productivity

215. Mr Ford has reviewed the Fruition Report and the AgFirst Report, and raises similar concerns to Dr Hill about the classification of Patumahoe Clay Loam as LUC 2. Mr Ford agrees with Dr Hill regarding the classification of Patumahoe Clay Loam as elite soil (LUC 1). This is identified as an issue because how the soil is classified has implications on the assessment of potential productivity. Mr Ford also raises a concern about the focus of the applicant's experts on current land use when considering potential productivity. Mr Ford's peer review relies on the soil capability assessment prepared by Dr Hill.
216. Mr Ford identifies that the key issues from a productivity perspective are the definition of soils in relation to the Elite and Prime classification, the interpretation of their productive capacity and the importance of their significance of their productive capacity in terms of their protection. Although the current land use should be taken into account, an objective view of the highest and best use of land should be assessed regardless of what the current landowner is achieving or thinks the productive potential of the land is.
217. Overall, Mr Ford considers the Fruition assessment does not provide an objective assessment because it accepts the findings of the AgFirst Report, relying on the relatively poor performance of the kiwifruit orchard as an example of why they support the detail of the report.
218. It is Mr Ford's opinion that the land and soil are suited to a very wide range of horticultural crops, including shallow rooting crops (salad greens, root vegetables, leafy greens and other vegetable such as tomatoes, corn and berries), with deep rooted plants limited to the elite soils.
219. In terms of the productive potential of the subject land, Mr Ford agrees with the applicant's experts that the trend is for growers to produce off large areas of land to gain economies of scale and the subject area would not be attractive for one of these growers to either buy or lease land because there is insufficient area of available soils. However, Mr Ford indicates that there is still the potential for one of the smaller growers to take up the land to grow vegetable crops.
220. In conclusion, Mr Ford does not consider the applicant's experts to have adequately demonstrated the 'inherent constraints' to using the subject land for vegetable production, other than the small potential area available (which they identify to be 3ha). Lack of irrigation is not supported as an issue because AgFirst maintains it is available from a shallow source.
221. Having determined that the soils are suitable for food production, Mr Ford's assessment then considers the scale and area of elite and prime soils to determine whether the area is worthy of protection. In determining how to assess the significance of the subject soils for food production, Mr Ford refers to the recent High Court decision on the Self Family Trusts appeal⁹, identifying that significance must be determined in the context of the total area of elite and prime soils in the Auckland Region. Mr Ford identifies that an overall balanced assessment is required to consider:
- what the soil classification system tells us
 - the attributes of the Elite soils generally, and
 - the future commercial viability of rural production activities, particularly horticulture.

⁹ 2020NZEnvC 214 Para 49

222. Table 6 below outlines the areas of LUC 1 – 3 across the Auckland Region under both the NZLRI classification and the FARMLUC. Across the LUC 1-3 classes there is approximately the same total amount of land (124,843 ha vs 123,444 ha). However, a greater proportion of the land is now identified as LUC 1 under the FARMLUC (5 per cent) compared to the NZLRI (1 per cent) with a corresponding lesser proportion identified as LUC 2 and 3. However, a significant proportion of this land is occupied through AUP zonings (including FUZ and Countryside Living Zone).

Table 6: Regional proportion of LUC1-3 NZLRI vs FARMLUC

Classification	NZLRI		FARMLUC		
	Area	Percentage total region	Area	Percentage total region	Percentage occupied by zones
LUC 1	4397	<1	21,011	5	34
LUC 2	55,356	12	38,606	9	38
LUC 3	65,090	15	63,827	14	19
	124,843	28	123,444	28	

223. Mr Ford calculates that the subject soils as a proportion of the total area of elite and prime soils within the Auckland region to be 0.040 per cent (LUC 1), 0.013 per cent (LUC 2), and 0.008 per cent (LUC 3). When combined with factors including the non-contiguous nature of the distribution of these soils and the fragmented land ownership, Mr Ford determines that these soils make an insignificant contribution.

224. While the issue of cumulative loss is also addressed by Mr Ford, this only marginally increases the proportion of elite and prime soils and they still remain less than 0.01 per cent. Therefore, it is Mr Ford's opinion that cumulative loss is not a relevant consideration.

Analysis

225. In determining whether the plan change area is a suitable location for growth, consideration must be given to the significance of the soils.

226. I acknowledge that there are differences between the applicant's soils assessment and Dr Hill's assessment, which is due to the way Patumahoe clay loam is classified. Therefore the applicant's expert has not identified any elite soils. I understand that the FARM LUC approach is available to the applicant, and that it addresses some of the concerns that were raised in relation to the outdated inventory mapping. These are indicative only and the detailed soils sampling and mapping addresses those concerns, with consideration of sub-categories to reflect constraints.

227. I rely on the analysis by Dr Hill, which identifies 30.9 ha of elite and prime soils across the subject land, which is 84 per cent of the land area. In my opinion, Dr Hill's methodology is more robust and Patumahoe clay loam should be identified as LUC 1. This is supported also by Mr Ford's assessment.

228. From the council expert's analysis, I conclude that the subject land has highly productive soils that are suitable for rural production. However, the effect of PC55 on the loss of elite and prime soils needs to be considered in accordance with the RPS policy framework discussed above.

229. I note that the discussion document on the proposed NPS-HPL proposes a definition of highly productive land to mean:¹⁰

- (a) land that has been identified as highly productive by a local authority in accordance with Policy 1 and Appendix A of this national policy statement; or*
- (b) where a local authority has not identified highly productive land in accordance with Policy 1 and Appendix A, a land parcel in a rural area that contains at least 50% or 4 hectares of land (whichever is the lesser) defined as Land Use Capability 1, 2 and 3 as mapped by the New Zealand Land Resource Inventory or by more detailed site mapping; but*
- (c) does not include urban areas or areas that have been identified as a future urban zone in a district plan or proposed district plan*

230. Applying the criteria in (b) above to Table 4 in Dr Hill's soil capability report only identifies one site that would not meet the definition of highly productive land. The site at 40 Carter Road (Lot 1 DP528517) has the largest land parcel at 6.31ha, but it only contains 33% LUC 1, 2 and 2 land. Generally, all other sites identified exceed the 50% threshold, with most identified to be 100% LUC 1, 2 and 3 through the detailed site mapping prepared by Dr Hill. However, in the identification of highly productive land consideration must also be given to the size and cohesiveness of the area of land to support primary production.¹¹

231. The draft NPS-HPL definition deals with the issue of fragmented land by identifying a threshold for the size of land that can be considered highly productive. While I accept that this is not yet a national policy it is useful information to understand whether the subject land would meet this threshold for protection. It also demonstrates that although LUC 1 – 3 soils are considered highly productive, that the discussion document does not see this as being the only threshold that would determine protection. The draft NPS-HPL indicates that criteria would be included in Policy 1 to identify highly productive land based on factors that support primary production such as capability and versatility, suitability of the climate, as well as size and cohesiveness of the area.¹²

232. I also acknowledge recent case law, which has determined that it is the significance of the land's ability to sustain food production that is to be protected and not simply the soil itself. Therefore, in addition to determining the extent of elite and prime soils affected by the plan change the consideration of productivity is relevant.

233. I accept that although the land is suited to a very wide range of horticultural crops, only 13.7ha of elite and prime soil are identified as potentially productive. Therefore, I agree with Mr Ford that the loss of these soils does not meet the threshold of being significant for their ability to produce food. Furthermore, the scale of the loss is insignificant in terms of their productive capacity within the Auckland Region and therefore any adverse effects would be negligible.

¹⁰ Valuing highly productive land: a discussion document on a proposed national policy statement for highly productive land (August 2019), page 50.

¹¹ Ibid, page 40.

¹² Ibid, page 38.

9.1.6. Stormwater management effects

Application

234. Stormwater management effects are addressed in Section 10.6 of the AEE and is supported by an Infrastructure Report and a Stormwater Management Plan (SMP) both prepared by Tripp Andrews (Appendix 2).
235. Stormwater within the subject land is currently serviced by a series of channel drains, open channels and piped networks, as detailed in the Infrastructure Report. It is proposed to service the future development area via new public stormwater reticulation designed to accommodate for a 10% AEP storm event, which will be located within the new roading network.
236. Stormwater runoff from all properties will drain through private connections linked into the public system and then discharge into the southwestern channel drain and overland flow paths. Stormwater runoff will be treated for volume and quality management prior to discharge to the downstream environment.
237. Flow treatment will primarily be managed via a communal wetland and detention basin and discharged to the channel drain via two outlet pipes. The stormwater wetland is proposed in the south-eastern corner of the plan change area and will be vested to Auckland Council.
238. Following further information requests from Council under Clause 23 of the RMA, and in consultation with Healthy Waters, a revised SMP was prepared and submitted in May 2021. The key change from the notified SMP is the provision for soakage to allow for recharge of groundwater.

Peer review

239. The proposed plan change and revised SMP have been reviewed by Irish Jayawardena and Nimal Gamage of Healthy Waters. A copy of the review is set out in Appendix 7.
240. In summary, Healthy Waters identifies the Mauku Stream, which is a High Use Stream Management Area in the AUP, as the downstream receiving environment.
241. Mr Jayawardena and Mr Gamage conclude that PC55 will be adequately served by stormwater reticulation, and that the management of existing overland flow paths, natural hazards and downstream flood-related risks can be adequately mitigated. The key stormwater management methods are:
- Stormwater on private lots will be managed through the precinct specific rules requiring up to 5m³ of stormwater retention per 100m² of roof area;
 - Full stormwater detention for the PC55 area will be achieved within the proposed wetland;
 - Flood attenuation up to 1% AEP storm event will be provided within the PC55 area using the proposed stormwater wetland;
 - Stormwater flow from roads to be managed by the proposed stormwater wetland;
 - Water quality to be managed by the proposed stormwater wetland.
242. Healthy Waters identifies that although the applicant has demonstrated the ability to provide full attenuation of the 1% AEP, it has not demonstrated the need to achieve this outcome. If full attenuation is not required then a smaller wetland could be provided, which

would remove any safety risks associated with a large dam. However, flood attenuation would be required if there are downstream properties with buildings at risk of flooding or road culverts/ bridges with insufficient capacity.

243. Healthy Waters supports the proposed precinct provisions, and specifically identifies the value of identifying the location of the stormwater wetland on Precinct Plan – 3 for the following reasons:

- It indicates the land area required to provide for large communal devices, such as the proposed stormwater wetlands as identified in the SMP at the future subdivision and development stages;
- It helps integrate communal stormwater devices with other infrastructure such as parks, open spaces or reserves for future development;
- It shows the devices will be located in a readily accessible location to provide for maintenance requirements.

244. Healthy Waters identifies that once the detailed stormwater management requirements have been determined, at development stage, the stormwater management area can be rezoned into open space. I understand that Healthy Waters does not see the need to identify the land for stormwater management as open space through the plan change, as the exact dimensions are unknown. But it would be appropriate for the land to be rezoned as open space once constructed and vested in Council. The asset would be operated and maintained by Healthy Waters.

245. At the time of preparing this s42A report, the revised SMP had not yet been provisionally adopted under the Council's regionwide Network Discharge Consent and discussions are on-going. An update on this process can be provided at the Hearing. However, Healthy Waters has indicated its support for the stormwater management approach and seeks amendment to the wording of Assessment Criterion I430.8.1(2)(d) to enable future applications to be assessed under either the existing Patumahoe Stormwater Network Discharge Consent or any other approved network discharge consent.

Analysis

246. Healthy Waters is satisfied that the applicant has adequately assessed the actual and potential effects of stormwater management on the receiving environment. The policy cascade for I430 Patumahoe Precinct Plan will apply to the PC55 area, as sub precinct E, including I430 Activity rules and standards to address stormwater management. Therefore, Healthy Waters supports PC55 from the perspective of stormwater management.

247. Precinct I430 includes an objective (I430.2(1)) that the provision of efficient infrastructure to service the needs of the precinct area. Policy I430.3(7) requires the use of water harvesting for non-potable uses for individual dwellings to manage stormwater and promote water conservation, as well as the integration of low impact stormwater management techniques.

248. Proposed amendments to Precinct I430 amends Policy I430.3(7) and Standard I430.6.5 to apply to sub-precinct E and requires stormwater on private lots to achieve 5m³ of stormwater attenuation per 100m² of roof area through soakage pits, and or rain tanks for reuse (rainwater harvesting). A sub-precinct E specific standard is proposed that requires construction of the stormwater management pond prior to the issue of certificates of title or building consents for new dwellings (I430.6.14).

249. Relevant existing assessment criteria require consideration of whether subdivision is in accordance with the Patumahoe Stormwater Network Discharge Consent. Proposed additional assessment criteria (I430.8.1(4)) include assessment of the following matters:

- (i) *Whether stormwater is directed to the Main Stormwater Treatment/Detention Pond;*
- (ii) *Whether stormwater flows from the Main Stormwater Treatment/Detention Pond are maintained at pre-development levels.*
- (iii) *Whether on-site stormwater detention is also required (such as soakage pits) except where it can be demonstrated that geotechnical conditions within sub-precinct E do not allow for on-site soakage.*
- (iv) *Whether the development uses water sensitive design techniques, including swales, grey water rainwater harvesting for outdoor use, rain gardens, and/or permeable paving etc.*

250. From the analysis and assessments, I conclude that PC55 adequately assessed the effects of stormwater management on the receiving environment. The existing precinct provisions and the proposed amendments, and the proposed revised SMP adequately address stormwater management.

251. I am satisfied that the applicant has demonstrated the ability to manage potential flooding effects on-site if required, and that this matter can be determined at the consenting stage. Therefore, I do not consider it necessary to identify the specific area for the stormwater wetland on the Zoning Map as Open Space, but rather to identify the approximate area as indicative on Precinct Plan 3.

9.1.7. Transport effects

Application

252. Transport effects are assessed in Section 10.7 of the applicant's AEE and is supported by an Integrated Transport Assessment (ITA) prepared by Stantec (Appendix 2), which examines the proposal's potential traffic effects on the existing road network and within the PC55 area extent.

253. In response to further information requests the applicant provided additional information (first response 26 June 2020 and second response 23 July 2020) on modelling of future transport environment, effects on the wider transport network, vehicular access, vehicle speed limits, safety improvements, part closure of Carter Road, and road cross-sections. An intersection design and truck tracking diagrams were also provided for the intersection of Woodhouse Road / Mauku Road / Patumahoe Road.

254. The analysis, assessments and findings of the ITA conclude the following:

- Pedestrian and cycle connections within the existing footpath network will be developed to provide active multi-modal transport options;
- Closure of the access from Carter Road to the Patumahoe Road/Clive Howe Road/Carter Road intersection due to limited visibility from the main road at this location. This section of Carter Road will be converted into a shared pedestrian and cyclist path;
- Four potential locations on Mauku Road and Patumahoe Road are suitable to provide safe intersections (A, B, C and D) for the additional traffic movements generated by the plan change;

- Safe and efficient operation of the surrounding road network will not be compromised by increased trip generation provided that appropriate right turning facilities are implemented at each intersection;
- A speed reduction in the area along with pedestrian and cyclist infrastructure improvements will provide a safer environment. Traffic calming measures such as urban gateways, narrower road cross sections or raised pedestrian crossings can be implemented to support speed reduction.

255. The ITA identifies that development can be built in two stages due to the ongoing negotiations with existing residents regarding road access at Intersection D off Mauku Road. Therefore development could be progressed with road links to Patumahoe Road initially. Catchments are identified in Appendix B to the ITA for each intersection proposed. While development could occur initially with access to Patumahoe Road, the ITA identifies that Intersection D is an important development link and will take a large proportion of future traffic heading towards Auckland.

256. Indicative road cross sections have been developed based on recognising the unique characteristics of the area, in addition to improvements to the local road network, including closing a short section of Carter Road to vehicular traffic (retaining it as a pedestrian / cycle linkage) to improve the Patumahoe Road / Clive Howe Road intersection.

257. Impacts on the wider network area are assessed in the ITA, identifying expected infrastructure upgrades including the Southern Motorway (Papakura-Drury), construction of a roundabout at the Glenbrook Road/SH22 intersection and other changes. Although SH22 (Karakā Road) is identified as nearing capacity in 2028, traffic volumes from the plan change represent less than 5% of the total volumes. Glenbrook Road and Waiuku Road are also determined to have excess capacity.

258. The applicant's assessment determines that the potential transport effects resulting from the proposed plan change will have less than minor effects to the existing road network in terms of its safety and functionality.

Peer Review

259. A peer review undertaken by Wes Edwards of Arrive Limited (transport consultants) has raised a number of issues with the plan change. A copy of the review is set out in Appendix 7.

260. Mr Edwards indicates that the assessment of effects on the local transport environment is considered to be adequate and the local transport upgrades proposed by the applicant to support the plan change area appear to be feasible, subject to being funded by the developer. However, Mr Edwards considers the assessment of effects on the rural road network surrounding Patumahoe as inadequate, particularly with respect to the impact of development on road safety and ascertaining what infrastructure may be required to address those effects. Potential upgrades within the wider network have not been identified and the funding is not addressed. The following issues are identified by Mr Edwards:

- The wider road network experiences significant traffic congestion and delay during peak times and this is projected to worsen because of growth already enabled in other areas. The proposed change would contribute to that congestion, and no mitigation is proposed;
- Growth is expected in other areas identified in strategic planning instruments. While some infrastructure projects are planned to address this growth, funding is not yet available for all projects required to support that growth. In addition, the

provision of transport infrastructure for these areas includes provision of substantially improved access to public transport, with high-capacity rail services forming the backbone of those services;

- The plan change area has poor access to public transport, and is located remote from other areas providing employment, education, and other services, increasing reliance on private vehicle travel which is at odds with the planning for growth in the region;
- While the planned infrastructure projects may provide sufficient residual capacity to accommodate the proposed changes, no evidence of that has been provided, and the effects on the wider network have largely been discounted on the basis they would form a small proportion of the volume on the network;
- The proposed rezoning does not meet the medium-term NPS-UD definition of “infrastructure ready” as infrastructure required for the proposed live zoning is not funded;
- The proposed rezoning is inconsistent with the RPS as the provisions do not enable development to be serviced efficiently by public transport.

261. Mr Edwards concludes that Patumahoe is a location serviced by several lower-quality high-risk rural roads and a low-frequency public transport service. Compared with other locations, development in Patumahoe appears to have poorer access to public transport, and increased reliance on private vehicle transport, including on lower-quality rural roads. This is contrary to transport strategy and plans for growth in Auckland.

262. Mr Edwards identifies that there would be increased traffic volume on the access roads, in some cases by a significant proportion with a corresponding increase in the risk of crashes. The ITA has not assessed these adverse transport effects and no mitigation for this increased risk is proposed.

263. With respect to traffic volumes and congestion within Patumahoe, Mr Edwards advises the roads are generally capable of accommodating the current and expected future traffic volumes without significant congestion and delays, although some delay may be experienced at some locations at times. When compared with congestion and delay experienced elsewhere in the region, Mr Edwards considers the congestion in Patumahoe is minor.

264. With respect to traffic volumes and congestion outside Patumahoe, Mr Edwards advises that arterial roads and intersections in the wider area currently experience significant congestion and delay during peak periods. This is expected to worsen in the future because of growth already enabled by the AUP, and by growth expected to be enabled by the AUP in accordance with regional strategies and structure plans.

265. Mr Edwards acknowledges that there is transport infrastructure planned to address growth in the wider southern sub-region, some of which is funded. However, planned infrastructure has not taken development in Patumahoe into account. While this does not necessarily mean there would be insufficient capacity to accommodate the plan change, Mr Edwards considers that sufficient capacity has not been demonstrated in the evidence provided to date.

266. The ITA provides no description of how the FUZ land could be accessed. Mr Edwards identifies that it is reasonable to assume that the FUZ land might be accessed from Clive Howe Road, Hunter Road, or Patumahoe Road, and at this point there appears to be no fundamental transport reason why some form of urban activity could not have sufficient access provided from one or more of these roads. Therefore, transport integration and

infrastructure planning could be undertaken to support the FUZ zoning if there were no other reasons for leaving the zone as Rural Production.

Carter Road

267. Mr Edwards supports the installation of a zebra crossing on Patumahoe Road west of Carter Road but does not consider the partial closure of Carter Road to vehicles as required to provide a safe environment for pedestrians. Safe pedestrian and cycling facilities can be provided alongside vehicle movements, and there are alternate methods available for addressing the poor sight distance at the Patumahoe Road / Carter Road intersection.
268. The primary benefit of closing the northern end of Carter Road to vehicles is simplifying the intersection from a crossroads to a T-intersection. Although Mr Edwards acknowledges that closure of Carter Road would simplify the intersection and make it safer, there is no evidence to suggest that closure is the only viable option or the most appropriate option. Mr Edwards indicates that there is evidence to support the assertion that crossroad intersections on busy roads are less safe than T-intersections unless an alternate form of control such as traffic signals or a roundabout is installed. No assessment was made by the applicant of alternate methods to address safety issues at this intersection on Carter Road and Patumahoe Road.
269. Mr Edwards states that the partial closure of Carter Road is subject to separate processes under the Local Government Act. These processes require appropriate justification to be provided and consultation with affected parties, and the provision of appropriate access, or some form of remedy, would be a part of that process. If parts of the road are to be stopped (no longer legal road) the process also addresses sale of the former road reserve. The plan change documents do not clearly state that the full 20m width of Carter Road would become a walkway and cycleway, or if that could be achieved by a 'pedestrian mall' rather than a road closure. Alternatively, only 10m width might be required, allowing disposal of the remaining land to an adjacent landowner.
270. Mr Edwards also identifies that irrespective of the additional processes involved with the proposed changes to Carter Road, the proposed closure would appear to impose an adverse effect on at least two adjacent landowners at 57 Patumahoe Road and 6 Carter Road (Figure 10), and it would be beneficial to understand how this might be addressed.



Figure 10: Properties with access from Carter Road

Mauku Road

271. A proposed connection to Mauku Road provides a reasonably direct connection between the western sector of the plan change area and transport options on Mauku Road, including the bus stops located near the northern end of Mauku Road. While a pedestrian connection through the reserve may be one option, a road connection is identified by Mr Edwards to be superior for several reasons, but particularly with respect to crime prevention.
272. The location of Intersection D is constrained by the recently constructed road access to the Patumahoe Heights subdivision, which is located opposite 18 Mauku Road. The need to maintain adequate separation (30m) between the two intersections would generally preclude a new road being provided to the north of the driveway providing access to 24, 24A, 24B and 24C. As a result, the position of the road connection shown on Precinct Plan 3 is close to the northern-most practical location for a new road (see Figure 11 below)
273. Mr Edwards considers that locations further to the south would appear not to be precluded by physical transport considerations, such as sight distance. However, the desire to provide short walking distances to and from bus stops and local services on Mauku Road would favour a connection relatively close to the location shown on the Precinct Plan. A location broadly through the centre of this part of the plan change area would provide the most efficient development of the land.



Figure 11: Precinct 3 - Indictive Roads

Conclusions

274. In conclusion, Mr Edwards does not support the plan change as notified. However, he recommends that if it is approved the following amendments are recommended:
- a) The Precinct Plan should contain only the essential infrastructure and requirements that need to be spatially defined. With respect to transport, this should include the land to be vested as road to provide for widening of Patumahoe Road;
 - b) The proposed cross-sections and road hierarchy diagrams should be removed as these do not currently align with Auckland Transport Standards (and potential cross-sections can be included at the time of subdivision);
 - c) A precinct standard should require the following transport infrastructure to be provided:
 - (i) A road connection to Mauku Road, with a threshold of around half of the residential development triggering the provision of that connection, including a through connection between Patumahoe Road and Mauku Road. This connection should provide a good standard of provision for cyclists to link the existing shared path on Mauku Road with the proposed facility on Patumahoe Road;
 - (ii) A road abutting the domain;
 - (iii) A (zebra) pedestrian crossing on Patumahoe Road near the school;
 - (iv) A cyclist facility along Patumahoe Road.
 - d) Include a matter of discretion to consider the impact on the road network, and what mitigation is proposed, specifically:
 - (i) Impacts on safety and efficiency at the intersection of Patumahoe Road, Mauku Road and Woodhouse Road;
 - (ii) Impacts on safety of the rural road network surrounding Patumahoe;
 - (iii) Impacts on safety and efficiency of the arterial road network linking Patumahoe to the wider Auckland Region, including effects on Glenbrook Road and Karaka Road.

Analysis

275. Mr Edwards concludes that the plan change should not proceed because there is insufficient information to determine potential adverse effects on the wider transport network. His concerns are also supported by comments from Ms Howard on long term infrastructure planning.
276. However, if the plan change does proceed then amendments are recommended by Mr Edwards to better address mitigation of safety and efficiency of the intersections, the surrounding rural road network and wider arterial road network.
277. Although Mr Edwards does not support the plan change, it appears that his concerns could be addressed through the provision of additional information and supporting precinct provisions that would coordinate growth with transport upgrades.
278. Standard I430.6.13 is identified by the applicant as a staging provision, which requires the following transport infrastructure to be constructed and completed prior to s224C or building consent:
- A new road access either from Patumahoe Road or Mauku Road into the precinct within 50m of one of the indicative locations on Precinct Plan 3;
 - A footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed;
 - For subdivision of existing land parcels 9as at 30 June 2020) resulting in the formation of access from Carter Road:
 - Formation of a new road access between Carter Road and Patumahoe Road;
 - Formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and
 - Provision of vehicle access to the Watercare facility at 6 Carter Road.
279. While this standard provides for the coordination of specific transport infrastructure, it does not stage development. However, Assessment Criterion I430.8.(4)(c)(i) sets out the transport matters to be assessed in the event that development in sub-precinct E is staged. That is whether the establishment of roading, footpaths, cycleways and landscaping in each stage is consistent with the precinct plan, codes of practices and Auckland Design Manual.
280. Given Mr Edwards concerns about the lack of consideration of the wider transport network I do not consider the proposed precinct provisions provide adequate recognition of potential network upgrades. Insufficient information has been provided to determine whether more detailed staging provisions are required, that may limit the extent of development that could occur until a certain upgrade is provided.
281. In terms of the proposed road connections from the plan change area to both Patumahoe Road and Mauku Road, Mr Edwards considers these desirable for the following reasons:
- provision of more than one access route provides redundancy of access in the event of a road being closed for maintenance or in the event of an emergency, and
 - access provided through two widely separated different roads is superior to that of two closely spaced connections to the same road.

282. I agree with Mr Edwards that the precinct plan does not need to identify three intersections on Patumahoe Road nor does it need to identify the closure of Carter Road to vehicles.
283. I note that Mr Edwards supports the provision of a pedestrian crossing on Patumahoe Road to provide access to the school and recommends that this be identified on the precinct plan. While I agree that a pedestrian crossing is warranted, it's location sits outside the precinct and therefore cannot be addressed through the precinct plan. I agree with the applicant's ITA that this matter can be addressed at the time of subdivision consent, including how it can be established in consultation with Auckland Transport. Provided the precinct provisions provide for this assessment I do not consider this issue to be significant.
284. A key concern regarding the proposed Mauku Road connection is the uncertainty that it could ever be implemented when it is located on properties that are not owned by the applicant. The properties at 22, 24A, 24B, 24C, 26, 26A and 26B Mauku Road are fully developed sites and would gain no additional development rights from the plan change. The site at 28 Mauku Road is a fully developed business site and would appear to gain little in a re-zoning from RPZ to SHZ. Construction of the road would result in losing a significant proportion of the site and having business premises disrupted. Proposed or indicative roads would be implemented through subdivision, and these properties have no incentive to subdivide and therefore no incentive to provide the road.
285. The only way the indicative road could be implemented would be by the developer acquiring land through willing seller willing buyer. I understand that Auckland Transport would not use a Notice of Requirement to designate the land and/or acquire it under the Public Works Act given that it is a local road.
286. I note that the location of the road on Precinct Plan 3 is 'indicative' and therefore it is not required to be in the exact location proposed. However, Standard I430.6.13(1)(a) only provides for the location to move by 50m. Therefore, if significant realignment were required to achieve this connection, then the application would become a non-complying activity.
287. Although there is a bus service available this is not frequent with only 5 services in the weekday. Route 396 travels between Pukekohe Station and Waiuku, it is an off-peak and weekend service. During the week, the first bus leaves Patumahoe to Pukekohe at 08:21 and the last return bus leaves Pukekohe at 17:38. The trip takes approximately 15 mins and is therefore reasonably good for those working in Pukekohe. However, the commute is more difficult if travelling beyond Pukekohe on the train and less likely to be practical.
288. Although the plan change is relatively small, its location on the urban fringe means that it is removed from employment centres and other key destinations. Coupled with a lack of any planned improvements to enable walking, cycling and public transport connections to the wider network, the plan change is likely to generate a high percentage of private vehicle travel by residents. This is not consistent with national and regional climate goals, such as those in Te Tāruke-ā-Tāwhiri – Auckland's Climate Action Plan, which seek to significantly reduce transport emissions by curbing private vehicle travel.
289. From the analysis and assessments, I conclude that PC55 does not adequately model or address some effects on the local and wider transport network. However, I accept that the plan change could potentially proceed with additional assessment and mitigation of those effects through appropriate precinct provisions.

9.1.8. Visual amenity and landscape effects

Application

290. Visual amenity and landscape effects are addressed in Section 10.8 of the applicant's AEE and is supported by a Landscape and Visual Impact Assessment prepared by Bridget Gilbert Landscape Architects (Appendix 2).
291. The applicant identifies that landscape and visual effects result from changes in the components, character, or quality of landscape. These are usually the result of landform or vegetation modification or the introduction of new structures, activities, or facilities into the landscape.
292. The Landscape and Visual Impact Assessment report (Landscape Assessment) indicates that due to the low-lying flat topography of the subject land the majority of the wider context, the visibility of plan change area will be limited to:
- Residential properties and Patumahoe Domain users (West and northeast)
 - Road users
 - Rail users
 - Timber Yard
 - Residential and rural residential properties (South and East)
293. The assessment of visual effects on these receivers are identified to be low, reducing to negligible or negligible. Screening effects of existing vegetation and the precinct provisions that ensure an attractive and leafy rural village character, will mitigate potential adverse effects.
294. The Landscape Assessment considers potential adverse effects on topographic, vegetative and hydrological features; the impact on settlement patterns, historic and cultural features, and the general landscape character or 'sense of place' of an area.
295. Although the plan change will result in the removal of existing vegetation associated with rural residential properties, these are not considered to have significant landscape or horticultural value. The proposed landscaping strategy for the plan change is considered to adequately mitigate the loss of vegetation and enhance the existing landscape amenity.
296. The landform of the site will not be significantly changed due to its relatively flat topography. The landscaping strategy is designed to reinforce the distinctive rural 'sense of place' associated with the Patumahoe village and does not detract from its existing rural-residential landscape character. The proposed extension boundaries support the fragmented development pattern south of the existing village and effectively 'fill in the gap' between the rail corridor and the existing village edge.
297. The applicants AEE identifies that the proposed landscape strategy, location-specific measures and planning development controls will assist the visual integration of built form and introduce an attractive cohesive 'leafy streetscape character' for newly urbanised areas that is consistent with the distinctive rural amenity experienced in Patumahoe. Potential adverse visual and landscape effects are determined to be low and will reduce to negligible once development is completed.

Peer review

298. The applicant's AEE, proposed plan change and Landscape and Visual Impact Assessment have been reviewed by Ainsley Verstraeten, Principal Landscape Architect with Auckland Council. A copy of the review is set out in Appendix 7.
299. Ms Verstraeten identifies that there are a number of design controls mentioned within the Landscape Assessment that are relied on which have not been carried through into the precinct provisions. The following development controls are included within the Landscape Assessment put not within the precinct provisions:
- a. Fast growing exotic species within the 5m wide landscape buffer;
 - b. Rural style streetscape typologies;
 - c. A landscape framework strategy;
 - d. Rural style fencing controls.
300. It is Ms Verstraeten's opinion that the key landscape effects that arise from the proposed plan change relate to rural character and amenity values. Specifically, whether the proposed plan change will be consistent with the local character of the village and surrounding area, whether the proposal adversely affects rural character, amenity and landscape values, and if these have been mitigated.
301. Ms Verstraeten agrees with the Landscape Assessment that the wider landscape is dominated by horticultural and agricultural land uses which reflects the high quality of soils. When considering landscape values, soil types are a key factor in this area's biophysical values. Other landscape features within the site that contribute to rural character are the tall shelterbelts, the areas of open landscapes between townships, open grass swales (as opposed to kerb and channel), undulating topography and dwellings being set back from the road by 10m – 30m.
302. Elements within the landscape that detract from the subject sites' rural character, identified by Ms Verstraeten, include footpaths along the eastern side of Patumahoe Road and northern side of Mauku Road, the scale of the timber yard (and associated area of car parking), and the site's proximity to residential properties (and an approved subdivision) along the northern edge of the site.
303. In terms of the proposed FUZ land, Ms Verstraeten accepts that once the western side of Patumahoe Road is rezoned residential, there is no defensible edge to ensure this character doesn't encroach to the eastern sector. To have a residential zone on one side of the road and rural on the other would detract from the rural character values and reduce the ability to defend the residential edges of the township. The key concern raised by Ms Verstraeten is the impact of development in the eastern sector due to the sensitivity of the escarpment and interface between the bush reserves. For these reasons, Ms Verstraeten does not support the proposed FUZ.
304. Ms Verstraeten agrees that the rail line provides a clear defensible southern edge and considers the urban extent to be contained and consistent with the spread of residential development throughout Patumahoe in north, north-west and south-west directions.
305. Landscape buffers are proposed as mitigation measures as a way of containing the site or filtering views towards the site as well as separation between the SHZ and light industrial uses. Ms Verstraeten supports the 5m buffer along the southern boundary of the SHZ. The 10m wide buffer proposed along the western edge at Mauku Road, is intended to act as a defensible edge to development. However, Ms Verstraeten is unconvinced with the location, width and purpose of this buffer for the following reasons:
- a. The landscape buffer on the opposite side of the Mauku Road is 20m.

- b. The requirement of indigenous trees is likely to mean that these plants will be slow growing and take some time to form any kind of visual buffer.
 - c. There is no rationale for why the proposed edge to the precinct has been located here and not further west, although the current location does contain the spread of residential development further down Mauku Road.
306. Ms Verstraeten considers that a landscape buffer consistent with that at Patumahoe Hill (Sub-precinct B) would be more appropriate and act as a more defensible edge.
307. Effects on views from rural and residential properties to the east are considered by Ms Verstraeten to be moderated by distance, but still significant because of the change in character from rural to residential. Therefore, landscape effects are likely to be moderate. Ms Verstraeten is specifically concerned about the extension of SHZ along Patumahoe Road as this will adversely affect rural character and sense of place. The plan change will result in a significant visual change on Patumahoe Road that will adversely affect the amenity values of the Patumahoe village. This is one of the main roads in and out of the village and will have an impact on how road users (visitors and residents) perceive this landscape. Ms Verstraeten does not consider the proposed precinct provisions will mitigate this visual change, and they are not consistent with rural character or respond to sense of place.
308. Ms Verstraeten indicates that effects on rural character along Patumahoe Road could be mitigated by precinct provisions to require deeper front yard setbacks, reduced building coverage, rural fence typologies and the requirement for at least one specimen tree to contribute to the leafy character. Beachland 1 Precinct is highlighted as an example of appropriate precinct provisions.
309. Overall, Ms Verstraeten disagrees with the applicant's Landscape Assessment, that the plan change will result in an 'attractive, relatively low key and leafy rural village typology'. It is Ms Verstraeten's opinion that the plan change would result in moderate adverse effects on rural character and amenity values. However, if the plan change is approved the following change would be required to mitigate adverse effects:
- Specific development standards for lots fronting Patumahoe Road to establish a rural character (i.e. 6m front yard, 2m side yard, 30% building coverage, rural fence controls);
 - Inclusion of a landscape concept plan in the precinct or a requirement for some form of landscape framework at the time of subdivision, which could also include a Te Aranga Māori Design Matrix.

Analysis

310. With respect to the potential impact of the FUZ on landscape values, I acknowledge Ms Verstraeten's concerns, but consider this issue can be adequately addressed at the time of any future plan change. This process is likely to identify the need for larger lot sizes in proximity to the escarpment and potential landscaping to mitigate the impacts of development on visual and landscape character.
311. In terms of the western sector (south-western boundary) I rely on the assessment of Ms Verstraeten. I agree that proposed 10m landscape is not a particularly strong boundary and note that Ms Bitossi from an urban design perspective also recommends that this buffer be increased to 20m to provide a more defensible boundary.
312. I agree with Ms Verstraeten that the plan change as notified would not establish a character that is entirely consistent with rural amenity. I acknowledge that the precinct

requires larger minimum lot sizes than the underlying SHZ to address in part effects on character. Generally, the form of development is consistent with other recent development areas within Patumahoe, and therefore appropriate for the changing rural character of the area. Inherently, there will always be visual changes because land use moves from rural to urban.

313. I consider the plan change to address some of the potential landscape effects through the establishment of landscape buffers in accordance with Precinct Plan 3 (Standard I430.6.9(2)-(4)). I support a wider landscape buffer along the south-western boundary adjacent to 28B Mauku Road to be consistent with Sub-precincts B. However, I also note that Standard I430.6.9(2) does not preclude this as it requires a landscape buffer area with an average width of 'no less than 10m'. This standard would allow, at the time of subdivision (as a restricted discretionary activity) an opportunity to consider whether this width was sufficient, with a larger width potentially required to reflect development across Mauku Road. The assessment criteria includes how the landscape character and amenity of the area will be enhanced (1)(e).

314. I agree with Ms Verstraeten that additional precinct provisions would be required to mitigate adverse effects on visual amenity and landscape. The inclusion of a landscape concept plan character would ensure that the 'leafy' character intended, and the inclusion of development controls along Patumahoe Road would establish a more rural character. These recommendations are discussed further in relation to submissions. Provided the precinct is amended to address these landscape effects, I consider adverse effects on landscape character to be minor.

315. I note that the version of Precinct Plan 3 contained within the notified precinct provisions differs from that submitted in response to further information requested under Clause 23 (Figure 12). The applicant has confirmed that the Clause 23 version is the latest version, and it would be helpful if this matter was addressed in their evidence.

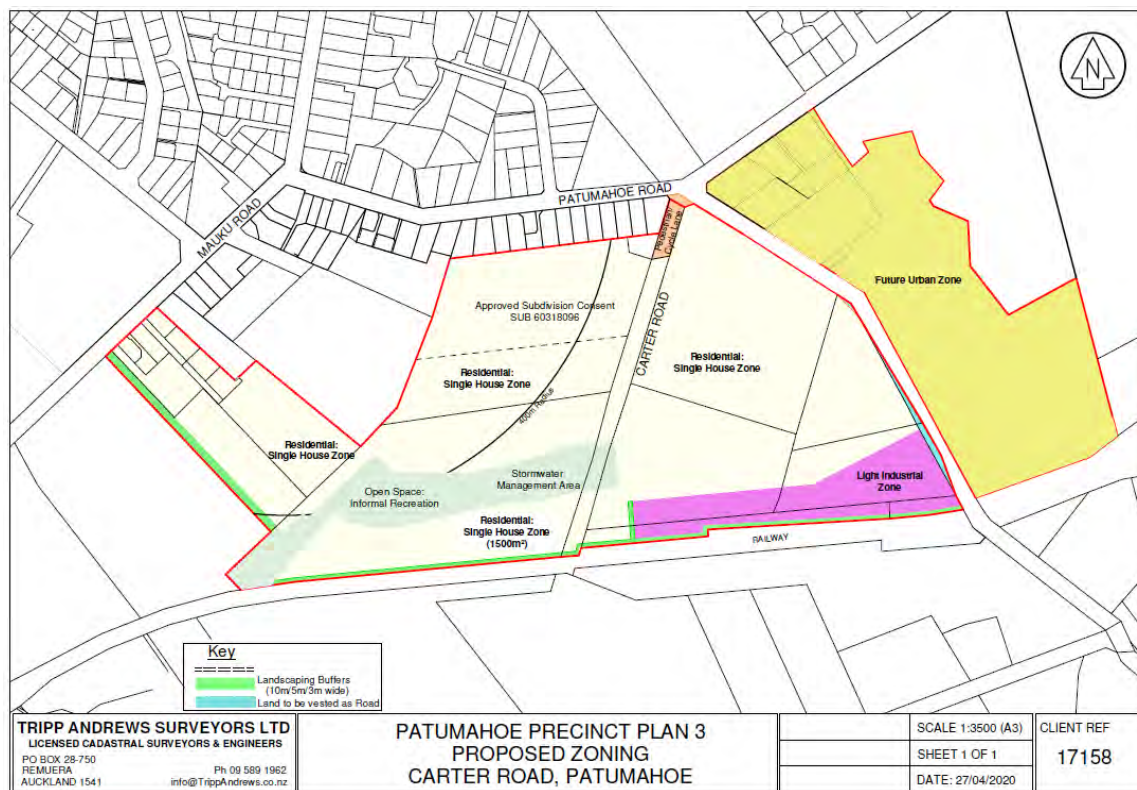


Figure 12: Revised Precinct Plan 3 provided in response to Clause 23 request for further information

9.1.9. Heritage effects

Application

316. Heritage effects are address in Section 10.10 of the AEE and is supported by an Archaeological Assessment prepared by CFG Heritage (Appendix 2).
317. The Archaeological Assessment identifies eight recorded archaeological sites within 5km of the plan change area. Seven of these are related to pre-European Maori occupation and land use, with the remaining being a cemetery/urupa dating from the 1850s. No archaeological sites or significant 20th century heritage was discovered within the plan change area. However, it is noted that land disturbance works will be undertaken in accordance with accidental discovery protocols and obtain authority from Heritage New Zealand in any case of accidental discovery.
318. The applicant indicates that local iwi was extensively consulted with in preparation of the plan change. Ngāti Te Ata Waiohū and Ngāti Tamaoho each prepared a Cultural Assessment for the plan change.

Analysis

319. I accept that the Archaeological Assessment found no archaeological evidence and no sites are identified in the Cultural Assessments. I agree that the AUP provisions require that all land disturbance activities comply with the accidental discovery protocols, mitigating the risk of accidental discovery. Therefore, no peer review was required.
320. I concur with the assessment of heritage effects provided in Section 10.10 of the AEE, other than the statement that local iwi was extensively consulted. I acknowledge that Ngāti Te Ata Waiohū and Ngāti Tamaoho provided Cultural Assessments, but also that Te Ākitai Waiohū have made a submission stating that they have not been adequately consulted.

9.1.10. Effects on Mana Whenua values

Application

321. Actual and potential effects on cultural values have been assessed in the Cultural Assessment prepared by Ngāti Te Ata Waiohū and Ngāti Tamaoho Mana Whenua (Appendix 2). The applicant addresses the cultural values identified in the Cultural Assessments in Section 7.3 of the AEE. However, these effects are not assessed by the applicant.
322. In response to the Clause 23 request for further information (Appendix 3), the planning response indicates that the recommendations of Ngāti Te Ata Waiohū and Ngāti Tamaoho have informed the design response in respect of a number of Te Aranga principles, including:

- Stormwater management to remove contaminants
- Stormwater ground recharge
- Stormwater discharge at a rate no greater than pre-development levels
- Planting schedules feature 100% native species (ecosourced if possible)

- Further consultation at the time of subdivision and earthworks, including cultural blessing, monitoring of site works, incorporation of Mahi toi, design of parks and open spaces, and incorporation of Māori names within the development
- Accidental discovery protocol
- Potential incorporation of sustainable design features at the time of subdivision

Analysis

323. From my review of the plan change, I do not consider cultural values to have been specifically implemented through the proposed precinct provisions and this appears to be largely left up to consultation at the time of subdivision. However, a number of provisions do align with the recommendations of the Cultural Assessments – particularly in relation to stormwater and planting.

324. A number of issues identified in the Cultural Assessments will be addressed through application of the AUP Auckland-wide rules, and therefore do not need to be addressed in the precinct plan and provisions. These include the accidental discovery protocol for any permitted earthworks or land disturbing activity (Standard E12.6.1); and best practice erosion and sediment control measures for all earthworks activities (Standard E11.6.2(2)).

325. With respect to provision of eco-sourced native trees, proposed Standard I430.6.9 Landscape buffers requires a mixture of indigenous trees and shrubs. Assessment criterion I430.8.1(4)(d) provides for the assessment of the extent to which landscaping consists of ecologically sourced native plants.

326. There is no specific provision for adoption or incorporation of Te Aranga Principles, other than a commitment for ongoing engagement with Mana Whenua. This may be sufficient, as it can be anticipated that through engagement at the time of subdivision Mana Whenua have an opportunity to incorporate Te Aranga Principles.

327. Ngāti Te Ata Waiohua state that they do not support alteration of natural watercourses. The applicant identifies that the watercourse traversing the site is a Farm Channel Drain. This watercourse will form the basis of the stormwater management pond or wetland for the treatment of stormwater runoff.

328. I conclude that further engagement and implementation of Te Aranga design principles will be required if the plan change is to proceed. This could occur through amendments to the precinct plan provisions or as part of the land development and subdivision processes.

9.1.11. Water and wastewater effects

Application

329. Water and wastewater effects are addressed in Sections 5.4.2 and 5.4.3 of the applicant's AEE and is supported by an Engineering Infrastructure Assessment prepared by Tripp Andrews (Appendix 2).

330. The subject land is identified as being currently serviced by public wastewater and water supply networks, and it is proposed to extend existing public networks and to install new infrastructure to service the proposed plan change area.

331. The existing Patumahoe water reservoir is located in the northern end of the plan change area, which is proposed to be upgraded with additional water storage to service

the new growth. The application identifies that Watercare's Long Term Plan identifies upgrades to existing reservoirs.

332. The Infrastructure Report advises that discussions with Watercare confirms that the local wastewater network has capacity for 180 dwellings. Correspondence from Watercare provided with the application indicates that the developer will not need to carry out works outside the plan change area. However, Watercare has advised that additional water storage will be required at the developers cost.

Peer review

333. The applicant's infrastructure assessment and design and the proposed plan change have been reviewed by David Russell, Senior Development Engineer with Auckland Council. A copy of the review is set out in Appendix 7.

334. Mr Russell notes Watercare made a submission on the plan change that has a contrary view to the correspondence attached to the application. Watercare has requested significant additional information because the plan change allows significantly more development than the 180 dwelling unit equivalent (DUE) originally assessed. Therefore, Mr Russell concludes that there is insufficient information to fully assess the effects of the plan change on the Watercare infrastructure. Mr Russell considers resolution of these issues with Watercare would give confidence that there is a way forward for the development to proceed.

335. The biggest issue identified by Mr Russell is the potential requirement to upgrade the existing wastewater pump station and the trunk line back to Pukekohe because the costs of such upgrades would be very significant. Mr Russell identifies that there are no calculations provided for the FUZ. An assessment needs to be made about the capacity of the main pump station and rising main to handle a significant increase in wastewater, and the costs of any upgrades that may be required.

336. Other issues identified by Mr Russell include, whether there would be sufficient space to upgrade the Patumahoe water reservoir due to the recent subdivision adjoining the site. Although the site could theoretically be expanded, the adjacent site is under development and could result in a potential constraint to potential expansion / upgrade.

337. Mr Russell does not support the plan change without certainty regarding the necessary infrastructure upgrade works required by Watercare, and that the plan change landowners are fully aware of the cost implications outside of the development area.

Analysis

338. The applicant has undertaken capacity assessments for water supply and wastewater and provided correspondence from Watercare (November 2018) that 180 dwellings could be serviced. Watercare had stated that there would be negligible impact on the existing wastewater network, in relation to the 180 dwellings proposed under the SHZ and that the developer would need to contribute funding and land for additional water storage.

339. Mr Russell has reviewed the proposed plan change and Watercare's submission and concludes that there is insufficient information to determine whether there is sufficient capacity for water and wastewater to service the plan change area. Although Watercare had confirmed that the existing wastewater network has capacity for 180 dwellings, the applicant has not provided adequate information to determine the full requirements for potential development within the plan change area.

340. The peer review by Mr Russell largely relies on the submission from Watercare to identify the key concerns with the plan change. I therefore also rely on Watercare's submission to determine whether there is adequate capacity in the water and wastewater networks, or whether upgrades are feasible.
341. Watercare identifies that a water storage assessment has determined that an upgrade to the existing Patumahoe water reservoir would be required to enable the development. The developer will need to provide suitable land adjacent to the current reservoir to meet the appropriate hydraulic grade line and provide funding to expand the existing asset in order for water supply to be provided to the plan change area. I note that the existing site of the Patumahoe water reservoir (6 Carter Road) is only 838m², and I agree with Mr Russell that the recently approved (adjacent) subdivision could compromise the ability to expand / upgrade the reservoir.
342. Watercare is concerned that the plan change could enable more than 180 DUE and would trigger upgrades to the existing pump station and rising main through to the Pukekohe network. I agree that the plan change provides for development capacity of greater than 180 DUE because the underlying SHZ provides for minor dwellings (Rule H3.4(A5)) as a permitted activity. Future development of the proposed FUZ also increases the total potential development capacity.
343. The proposed plan change is essentially relying on 'first come, first served' for access to the existing wastewater capacity. I consider this to be possible where there are no other competing claims from zoned and planned development. Watercare has confirmed that there is capacity for 180 dwellings with negligible adverse effects. Therefore, more than 180 dwellings would have at least minor adverse effects and depending on the scale of development significant adverse effects. Without a full understanding of the full development potential of the plan change it is not possible to ascertain the scale of adverse effects.
344. Subdivision is a restricted discretionary activity provided it complies with the precinct standards. Standard I430.6.13(1) addresses staging, and requires that before any s224(c) certificate or building consents for new dwellings (excluding already consented development):
(d) an extension of the public wastewater network and water supply networks with sufficient capacity to service the proposed allotments and any future subdivision stages.
345. Provision of public water supply and wastewater networks in sub-precinct E is identified as a matter of discretion for subdivision (I430.8(2)(k)). Assessment criteria for subdivision in each sub-precinct (in the event that development is staged), provides for the assessment of whether public water supply and wastewater networks can be extended to each stage (I430.8.1(4)(c)(ii)).
346. Where a subdivision does not meet Standard I430.6.13(1)(d) as described above, then it becomes a non-complying activity. The intention of the standard appears to be that no development, beyond what is already approved by resource consent, occurs until the sufficient capacity is available for water and wastewater. In the event that subdivision becomes a non-complying activity, there is an objective and policy that require all lots to be connected efficiently and cost effectively to the existing public water and wastewater networks (Objective I430.2(2) and Policy I430.3(6)). The policy also identifies that *the council may enter into such arrangements as are appropriate with any developer to ensure this happens in a timely manner.*

347. I am not satisfied that Standard I430.6.13 adequately manages the coordination of subdivision with the implementation of necessary infrastructure. As currently drafted a resource consent for subdivision could be approved prior to an extension being in place, but certificates of title could not. This approach relies on imposing conditions on consent and determination at s224c stage or engineering approval.
348. While I acknowledge that the intention of the precinct provisions appears to be coordination of development and water and wastewater infrastructure, I do not consider the approach to be sufficiently certain. At the plan change stage it is important to understand whether any infrastructure upgrades are feasible, this includes whether a developer would be able to fund them or whether they are publicly funded. Live zoning land that is not 'infrastructure ready' is inefficient. Insufficient information is available to determine whether upgrades are required to the public wastewater network, and if there are what the costs of these are. Therefore it is unknown when development could be served by efficient and cost effective water and wastewater infrastructure.
349. It could be that a certain amount of development could occur without significant expansion, and a staging provision could address this threshold. Alternatively, the standard should be more certain by stating that no subdivision or development can occur until the necessary upgrades to the public network are in place.
350. Water supply storage (land and funding) and wastewater capacity issues may be able to be resolved by the applicant, to allow the re-zoning to proceed as 'infrastructure ready', but at this point they are relying on water supply and wastewater being subdivision engineering detail matters. I do not consider the precinct provisions to mitigate the potentially significant adverse effects on water and wastewater infrastructure.
351. From the applicant's assessment and correspondence, the submission from Watercare and Mr Russell's review, I am unable to conclude that the plan change area is 'infrastructure ready' in terms of water supply storage and wastewater network infrastructure. Watercare may be able to provide additional evidence of these shortcomings at the hearing, or alternatively the applicant may be able to provide evidence that these issues have been resolved with Watercare. I am unable to find any evidence that the applicant's assertion that Watercare's Long Term Plan provides for upgrade of the reservoir and this appears to be inconsistent with Watercare's submission.
352. I consider the issue of the water and wastewater infrastructure capacity and the impacts of growth on the trunk network to be a significant gap in the information supporting the plan change. If the applicant cannot address these matters, then in my opinion the plan change would not give effect to the NPS-UD and the RPS in terms of integrating land use and infrastructure.
353. While I accept that there are local infrastructure upgrades (within the plan change) that will be dealt with at the time of subdivision, the provision of network upgrades cannot be addressed by the developer unless they are prepared to fund them. If left to the subdivision stage, then it could be that the land simply cannot be developed. However, I consider these issues could be addressed by the applicant providing additional information and the inclusion of appropriate staging provisions that limit development to the extent of capacity available until necessary upgrades are implemented.

9.1.12. Reverse sensitivity effects

354. Reverse sensitivity effects are addressed in the assessment of urban design, in Section 10.9 of the AEE and is supported by the Urban Design Assessment prepared by

Ian Munro (Appendix 2). The purpose of the plan change identifies that the objectives of the Patumahoe Precinct acknowledge the need to minimise reverse sensitivity with adjoining rural activities.

355. References to reverse sensitivity effects are also identified in the assessment of soils and land capability in terms of the impacts of existing residential land on potential productivity. The applicant's Soil Productivity Report identifies existing reverse sensitivity constraints, due to the proximity of the existing houses, sensitive receivers and the settlement as having a contributing impact on the productive potential of the subject land.

356. The Urban Design Assessment identifies the following key urban design constraints that raise potential reverse sensitivity issues:

- The railway line acts as a hard southern boundary to any expansion of the village and presents various nuisance effects that would need to be managed;
- The existing timber milling / light industrial activity presents noise and other operational effects that would need to be managed.

357. Although not identified as a key urban design constraint in the Urban Design Assessment, the site analysis identifies that the eastern sector of the plan change (9.09ha) comprises of a mixture of rural-residential use, crops, and a chicken shed operation. This is also acknowledged in the discussion on the design process, whereby the presence of the chicken-farming operation is identified to be residentially incompatible and therefore contributes to the reasoning for applying the FUZ. A FUZ is identified to signal future suitability for urban use and may start a market-based process of winding down the chicken farm.

358. Site specific consideration has been given to the placement of residential activity along the railway line edge north of the timber processing facility. Placement of a LIZ was determined to be a useful and effective means of compatibly managing that edge.

359. Methods applied in the plan change to address potential reverse sensitivity effects include:

- Using larger-lot residential and LIZ as a buffer along the railway edge, in particular in terms of the existing timber processing facility;
- Landscape buffers to create visual and physical separation from the railway line;
- Use of FUZ to allow issues such as the existing chicken farming operation to be resolved while signalling the desirability of urban use in the foreseeable future.

360. The AEE identifies that the plan change manages reverse sensitivity effects with adjacent land use and activities because:

- New residential land adjoining the Patumahoe Domain (separated for the most part by road frontage) and existing residential activities are a very compatible like-for-like outcome that will not give rise to reverse sensitivity effects;
- It incorporates deeper lots and a landscape strip to mitigate potential effects along the interface between the Residential and Rural Production zones;
- It incorporates larger-lot residential uses (i.e. at a density lower than Single House zone) and a landscape buffer to create visual and physical separation from the railway line;
- The location of the proposed light industry zone is compatible with the existing railway line and nearby timber processing yard. This location is separated from residential activities on the northern and eastern sides by a road-width and street

landscaping. To the west, a double-landscape buffer is proposed, one on the side of the LIZ and one on the side of the larger-lot residential area;

- Controls are proposed on sensitive (i.e. residential) activities to manage reverse sensitivity effects within 400m of the chicken sheds located the eastern section of the subject land;
- A Future Urban zone is applied over the eastern section of the plan change area, to reserve the area for future urban use (and integration with the remaining plan change extent), while enabling the chicken farm to continue operating in the interim.

361. In addition to those methods described in the Urban Design Report, the AEE also identifies that the proposed plan change provides reverse sensitivity controls (at least for an interim period) for the existing chicken farming activity. Overall, the applicant considers that the plan change minimises impacts on existing land uses, both within and adjacent to the subject land, including by effectively managing reverse sensitivity effects.

Peer review

362. Several of council's experts considered reverse sensitivity effects, including Ms Bitossi's in relation to urban design, and Dr Hill and Mr Ford in relation to rural production potential (Appendix 7).

363. Ms Bitossi agrees that the proposed location of the LIZ is practical, as it reduces reverse sensitivity (i.e. dust and noise) by confining this area to a corner of the outer periphery of the village. Ms Bitossi also highlights the potential reverse sensitivity effects created by the LIZ on the proposed SHZ but accepts that the proposed road between the two zones will provide a buffer between land uses. Therefore, Ms Bitossi supports the identification of the road on Precinct Plan 3.

364. If the eastern sector of the plan change was to remain RPZ, then Ms Bitossi considers there would be adverse reverse sensitivity effects exacerbated by the proposed SHZ in the western sector. Although Ms Bitossi acknowledges that the proposed precinct provisions manage reverse sensitivity on the chicken sheds through a no-complaints convenient, she does not comment on the effectiveness of this method. However, she does consider the escarpment and gully would reduce reverse sensitivity effects between rural production beyond the eastern sector.

Analysis

365. There are reverse sensitivity management requirements included in the proposed precinct provisions. They are referred to in the AEE and there is coverage of reverse sensitivity management within the applicant's urban design assessment, mainly in relation to the existing timber yard and railway line, the proposed industrial zone and the existing chicken sheds.

366. The proposed landscape buffers play a role in managing reverse sensitivity effects, between industry and the railway line (3m width shelterbelt), between the SHZ and the railway line (5m width), and between SHZ and RPZ (10m width). These are identified on Precinct Plan 3 and are required to be implemented in accordance with the precinct plan and established by way of restrictive covenant or similar at the time of subdivision or development.

Rural production activities

367. A key area of concern in terms of reverse sensitivity is the SHZ east of Carter Road and opposite the rural production activities, including the existing chicken sheds.
368. Proposed Standard I430.6.15 manages reverse sensitivity effects on the existing chicken sheds (located at 75 Patumahoe Road) by requiring subdivision to implement a “no complaints” covenant or any other such method that satisfies the Council:
- within 200m a “no complaints” covenant is identified as an example; and
 - between 200m and 400m the standard requires registration of a “no complaints covenant” in Sub-precinct E.
369. The “no complaints” covenant is proposed to be applied on the new sites created within the areas identified, restricting the owners and occupiers from complaining about any offensive and objectionable odours or dust generated from the chicken sheds. If use of the chicken sheds has discontinued the standard this requirement does not apply.
370. Under the AUP, in Rural Zones the permitted activity for poultry sheds is H19.10.1(3), as follows:
- H19.10.1(3) Pens or areas used for intensive farming (excluding poultry hatcheries), or any effluent disposal system, including any area on which effluent is being disposed of by way of spray irrigation, or any treatment plant or ponds, or any composting area, must be at located least:*
- (a) 250m from any dwelling located on any site other than the site on which the activity is carried out; and*
 - (b) 100m from any boundary of the site on which the activity is located.*
371. I note that the Council has no record of any complaints relating to odour from the chicken sheds at 75 Patumahoe Road. However, continued operation of the chicken sheds could generate complaints from new residents and their visitors within the proposed PC55 residential areas. The creation of a “no complaints” covenant does not prevent the nuisance occurring, it merely prevents complaining about the nuisance. The main purpose of the “no complaints” technique is to allow a significant existing use to continue without the further uncertainty of complaint-driven pressure for the use to cease operating.
372. The AUP uses this technique sparingly, mainly in relation to noise from an existing quarry and its heavy vehicle traffic, airports, aircraft at Whenuapai, Ports of Auckland, and the marine industry in Wynyard Precinct. The covenant in those cases provides notice that there may be activity noise generated and the property purchaser can decide whether they will accept that noise without complaint and live with it, or alternatively not live there.
373. In my opinion, potential the adverse effects of odour created by the chicken farm will be the primary concern of nearby residents. It may be more difficult to assess in advance how bad the odour could be, as it is a consequence of malfunction or poor operation rather than a continuing operational effect. That is, the chicken shed will not have a consent to discharge the odour beyond the boundary of its site. Therefore, the chicken shed does not have existing use rights to emit odour.
374. The plan change does not seek to manage potential reverse sensitivity effects on other rural production activities in the eastern sector. Two sites on the corner of Patumahoe Road and Hunter Road (PT ALLT 49 1 Parish PUNI DISTRICT, ALLOT 50 1 Parish PUNI DISTRICT) have been used for cropping.

375. It appears that the primary method of managing potential reverse sensitivity effects on the rural productive land in the eastern sector is to rezone it FUZ and assumes a residential land use would be appropriate in the foreseeable future as a further logical extension of Patumahoe. I accept that changing the land use would resolve any reverse sensitivity issues between the rural productive activities and the future residents within PC55.

376. FUZ would confirm expectations of a future change of use but provide little support for some short and medium term rural land uses, including the chicken sheds, particularly where those rural activities can generate adverse effects on sensitive users (residents, school, etc). If PC55 were not to proceed with re-zoning the land west of Patumahoe Road, then the rural activities could continue. Although the chicken shed owner advises that contract with Tegal is almost complete, it is not clear whether the chicken sheds could have its contracts renewed if the buildings were upgraded, as there are increasing numbers of sensitive users close to the site. However, as the owner of the chicken farm has stated that the activity is unlikely to continue past its contract end, the "no-complaints" precinct rule would in my opinion provide an adequate technique for managing reverse sensitivity in the short-term. I consider Patumahoe Road would provide an adequately separation between the proposed SHZ and the rural productive uses and is not an uncommon occurrence albeit not ideal. However, as with the chicken sheds this is likely to be a short-term impact.

Railway noise and vibration

377. Another key issue in terms of reverse sensitivity effects are the noise and vibration effects from the railway line on residential land uses.
378. Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E is proposed requiring any new building within 100m of the railway network that contains an activity sensitive to noise to be designed to mitigate noise and vibration from the railway line. I note that this provision is being sought in a number of other plan changes and district plan reviews by KiwiRail in relation to the national railway network, which is also being consistently opposed by Kāinga Ora as being onerous.
379. I acknowledge that the applicant consulted with Kiwirail and has included provisions for managing reverse sensitivity to rail-generated noise and vibration as requested. Variants of the provisions have been promoted by KiwiRail and Waka Kotahi New Zealand Transport Agency for district plans and plan changes around New Zealand.
380. The existing railway line has limited utilisation, currently only serving the Glenbrook Steel Mill with 8-10 freight trains per day. There are no plans that I am aware of to increase the use of this line for freight or for passenger travel. I consider the key methods proposed by the applicant for managing reverse sensitivity effects in relation to the railway line to be the landscape buffers (5m along the southern boundary of the SHZ) and the requirement for lower density subdivision (minimum net site area of 1500m²). Therefore, I consider the proposed plan change to adequately mitigate potential reverse sensitivity effects from the railway line without the need for specific railway noise and vibration controls.

9.1.13. Open space

Application

381. The applicant's AEE does not specifically assess open space provision but proposes to rezone land part of the land within the central section as Open Space to provide for the stormwater management pond as well as informal recreation. Open space is considered in the Urban Design Assessment in terms of how the
382. Establishing new areas of public open space and enhancing interfaces with and linkages between existing areas of public open space is identified as contributing to the sustainable management purpose of the plan change.
383. The Zoning Map identifies the area to be zoned Open Space – Informal Recreation, and Precinct Plan 3 identifies this area as Stormwater Management Area and Recreation Reserve Area.
384. In relation to urban design effects, the applicant's AEE states that
- A linear stormwater area (i.e. ponds) integrated with the 'green corridor' is proposed to provide stormwater management and to extend recreational opportunities. The connected open spaces will provide better recreational, ecological and environmental opportunities for 'Patumahoe South'. This design approach enables continuous pedestrian / cycle movements with less interaction with vehicles.*
385. Standard I430.6.10 specifies that prior to occupation of any dwellings in Sub-precinct E that are located more than 400m from the Patumahoe Domain, a neighbourhood park shall be established in the general location identified in Precinct Plan 3.

Peer review

386. The application, including the Urban Design Assessment, has been peer reviewed by Ezra Barwell, Senior Policy Advisor at Auckland Council Parks Department (Appendix 7). Overall, Mr Barwell is not satisfied that all relevant matters have been considered in relation to the proposed recreational open space area.

387. Mr Barwell identifies the key issues for Council in relation to the plan change from an open space perspective as being:

- How development will interface with existing recreational open space
- Whether proposed recreational open space within the plan change area is consistent with Council's policy and is fit for purpose.

388. Mr Barwell highlights a number of specific concerns about the proposal, i.e. that a park edge road along the western boundary of the Patumahoe War Memorial Domain is not identified on Precinct Plan 3. A park-edge road is supported for its positive access and CPTED values and is consistent with council open space policy. The key issues raised by Mr Barwell are the lack of details around what is being proposed as recreational open space, and whether it is fit for purpose.

389. The proposed location of the recreational open space is not specifically identified on Precinct Plan 3, and therefore Mr Barwell indicates it cannot be assessed. It is identified as being located within the area also identified for the stormwater management area. Mr Barwell identifies that the walking catchment for a neighbourhood park is 600m, and the indicated open space would not service the entire plan change area and it may be more appropriate to be further east. Although the application does not specify the size of the proposed recreational open space, Mr Barwell confirms that a neighbourhood park of 3,000m² would be appropriate for the plan change area.

390. Mr Barwell raises two concerns regarding whether the land identified to be recreational open space is fit for purpose:

- The majority of the area would sit within a floodplain. The Council does not acquire recreational open space land in floodplains – even at no capital cost.
- No information to consider soil contamination levels and what remediation would be required.

391. In regard to the proposed standard requiring open space to be established prior to occupation of any buildings, Mr Barwell notes that the proposed trigger distance is not consistent with any relevant provision metric in the Open Space Provision Policy (2016); and he considers the standard *ultra vires* because it pre-empted the Council's decision-making process for acquisition.

392. In conclusion, Mr Barwell considers the applicant to have appropriately identified the provision of a park-edge road along the Patumahoe Domain; but has not provided adequate information in relation to the proposed recreational open space area to ascertain whether it is fit for purpose. Therefore, Mr Barwell does not support the proposed Open Space zone or the identification of the recreation reserve area on Precinct Plan 3. Mr Barwell recommends that the area be zoned SHZ to allow flexibility through the resource consent stage. Any land acquired by the Council for either stormwater management or recreational open space purposes can be rezoned post-acquisition by the Council.

Analysis

393. I agree with Mr Barwell that the plan change does not accurately identify the location or size of the recreational open space that is proposed. The area identified proposed as Open Space Zone appears to primarily reflect the scale of the proposed stormwater management pond. The extent of this area includes the confluence of underground stormwater network pipes and the overland flow paths all headed to an outfall into the pond, and also some land at the south-western corner where the pond outfall pipe traverses to discharge to the stream (see Figure 13).

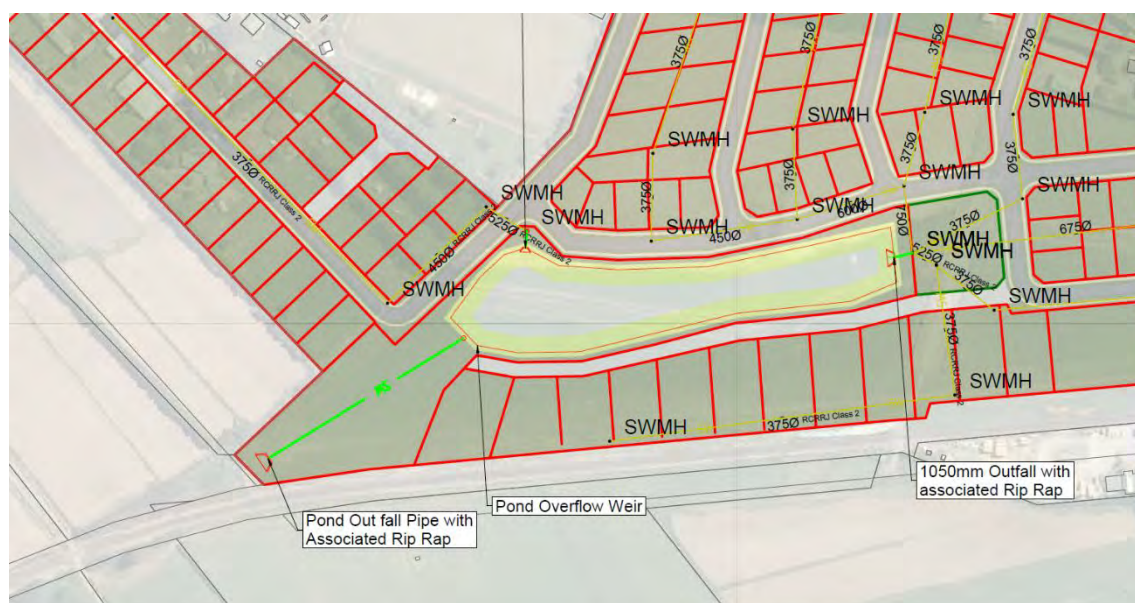


Figure 13: Stormwater Proposal (revised SMP)

394. I understand from Mr Barwell's analysis, that a neighbourhood park of 3,000m² is considered appropriate for this plan change and that it is likely that a more easterly location would be appropriate. The area identified is also clearly required for stormwater management and does not appear to be the most appropriate location for a recreation reserve. I therefore do not support the location of the recreational reserve identified on Precinct Plan 3. However, I do consider it helpful to identify that a neighbourhood park is required and this should be identified indicatively on Precinct Plan 3 in a more easterly location.

395. I agree with Mr Barwell that it is not appropriate to zone land Open Space Zone – Informal Recreation until it is determined what land is required by Council, and that this can occur once vested. Therefore, I do not support the area identified as Open Space Zone to instead by SHZ. I consider it necessary for the applicant to consider this in their evidence, and to advise what minimum net site areas would be applied this this area given the boundary between the 600m² and 1500m² is the proposed Open Space.

396. I also agree with Mr Barwell that provision of a recreational reserve should not be identified as a trigger for development, and that acquisition can be addressed through negotiation between the landowner and the Council in the event that the plan change is approved. I understand that it is no longer Council practice to accept land in lieu of reserve contributions, instead these contributions are captured at the time of subdivision and used to acquire land that is fit for purpose in accordance with the Council's Open Space Provision Policy 2016.

9.1.14. Compact urban form

397. The issue of compact urban form is dealt with across a number of the topics in this AEE, primarily addressed by the applicant in terms of urban design. The purpose of this section is to identify the key issues and policy framework to be considered to determine whether the plan change delivers a compact urban form.

Growth

398. Auckland's growth strategy as set out in the Auckland Plan and the AUP RPS is to deliver growth through a quality compact urban form that provides sufficient development capacity through focusing growth within the existing urban area, and provides for growth within a Rural Urban Boundary, towns, and rural and coastal towns and villages.

399. The Auckland Plan identifies that 6 per cent of growth should occur within the rural area, and that this should be concentrated within larger rural nodes such as Pukekohe. I accept that significant development capacity has been provided for at Pukekohe and Drury in accordance with the Auckland Plan and FULSS to meet future population demand.

400. RPS Objectives B2.2.2(1) states that a quality compact urban 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.*

401. Similarly, the NPS-UD (Policy 1) requires planning decisions to contribute to well-functioning urban environments, which is described as including the provision of a variety of homes and sites for business, good accessibility including by public transport or active modes, and supports reductions in greenhouse gas emissions.

402. Patumahoe is a rural village located approximately 9 km west of Pukekohe and 10 km east of Waiuku. The village services the wider rural area and is surrounded by pasture and rural production. The urban form is focused on the northern edge of the existing village centre, which is located at the intersection of Patumahoe Road, Woodhouse Road and Mauku Road. Recently development has extended the urban form partway down Mauku Road to the south, as well as along Kingseat Road and Woodhouse Road in the north-west.

403. A peer review of the plan change in terms of Auckland's growth strategy is provided by Ms Jones, Growth and Spatial Strategy at Auckland Council (Appendix 7).

404. Ms Jones concludes that the applicant has applied the quality compact urban approach at a local scale but in doing so has removed it from its regional context. From a strategic perspective, Ms Jones indicates that the plan change is not consistent with the regional application of the quality compact approach to growth in the Auckland Plan and RPS.

405. While the zoning pattern proposed by the plan change is consistent with the zoning pattern of the existing Patumahoe area, Ms Jones is concerned that it would increase the size of Patumahoe by over 50 per cent. Therefore, the plan change has the potential to significantly change the established character and amenity of Patumahoe. Ms Jones is

also concerned that the plan change does not promote multi-modal linkages to employment areas outside Patumahoe.

Infrastructure

406. A peer review of the plan change is also provided by Megan Howard, Infrastructure Strategy in terms of the impacts on long-term infrastructure planning (Appendix 7).
407. Ms Howard assesses the plan change against policy framework for a quality compact urban form, identifying that the provisions contain two common aims relevant to this application to which she focuses on the second point:
- That new development can be adequately serviced by infrastructure; and
 - That infrastructure is efficiently provided, operated, maintained and upgraded.
408. Ms Howard discusses the challenges of private plan changes and the pressure that they place on infrastructure planning. It is important to determine whether the plan change delivers efficient infrastructure, recognising that it is usually less efficient to provide infrastructure in low-density, greenfield development. Auckland Council budgets are tight and the 2021 LTP directs funding towards the highest priority growth areas. Therefore, any new or unexpected growth may result in the displacement of investment currently prioritised and risks reducing committed levels of service
409. In conclusion, Ms Howard identifies that the infrastructure provision for PC55 is not entirely inconsistent with the relevant objectives and policies of the AUP but does not provide a good example of efficient infrastructure and service provision. The proposal is located adjacent to existing infrastructure networks and will comply with the requirements to contribute to the infrastructure costs that it is inducing via the charging of development contributions and the Infrastructure Growth Charge. However, the costs of infrastructure provision, operation and maintenance are likely to be much more significant than those captured and will, in one way or another, result in costs borne by the wider community.
410. Within the context of the council's current financial challenges, it is also worth noting that no costs are budgeted for this development and any additional, unanticipated, costs will require funds to be diverted from other investments that are currently prioritised. Alternatively, any costs generated by the development or to mitigate its effects may not reach the top of any prioritisation in the foreseeable future.

Analysis

411. Land use and infrastructure integration is a key tenant of the RPS, it is a key element of a quality compact urban form under Objective B2.2.1(1) and (5) and requires better use of existing infrastructure and efficient provision of new infrastructure. Objectives and policies in B2.6 Rural and coastal towns and villages also identify the need to provide for adequate infrastructure.
412. I agree with Ms Jones that the applicant has not considered the plan change within the regional context. I note that the applicant's urban design assessment indicates that based on the AUP Structure Plan guidance the urban design assessment indicates that due to the scale and significance of the site and its obvious opportunity to sit within the existing settlement's walkable catchment that there is no need to consider an area wider than the settlement itself.
413. The AUP Structure plan guidelines are provided in the AUP to promote structure planning for plan changes establishing new or significantly expanding existing rural and

coastal towns. I accept that the level of analysis needs to be commensurate with the type and scale of the development. However, this does not obviate the need to consider whether Patumaohoe is an appropriate location for growth.

414. I agree with Ms Howard that the plan change is not entirely inconsistent with the objectives and policies for integration of land use and infrastructure given its location proximate to the existing Patumahoe village. However, I remain concerned regarding the impacts of unanticipated growth on the council's strategy for a quality compact urban form – specifically in relation to adequacy of infrastructure.

10. NOTIFICATION AND SUBMISSIONS

10.1. Notification details

415. Details of the notification timeframes and number of submissions received is outlined below:

Date of public notification for submissions	22 October 2020
Closing date for submissions	20 November 2020
Number of submissions received	45
Date of public notification for further submissions	3 December 2020
Closing date for further submissions	17 December 2020
Number of further submissions received	10

All submissions were received on time. There are no late submissions. A summary of decisions requested by submissions, as well as copies of the submissions and further submissions are attached as Appendix 4 to this report.

416. below provides a list of submitters and further submitters.

Table 7: List of submitters and further submitters

Submitter		Further submitter	
No	Name	No	Name
1	Tania Shine	FS01	Barry Stephens
2	Joanne Ineson	FS02	Auckland Transport
3	Karen Bright	FS03	Philippa and Todd Williams
4	Barry John Stephens	Fs04	Kāinga Ora
5	Deborah Tangney	FS05	Kelven and Beverley Eastman
6	David Murray McLean	FS06	Gary Neil McLean
7	David Hopkins	FS07	Federated Farmers of New Zealand
8	William Thomas Colgan	FS08	Peter Hardy
9	Doug Lloyd	FS09	Karam Dhadli
10	Michael Graeme Weck	FS10	Heritage New Zealand Pouhere Taonga
11	Kelven and Beverley Eastman	FS11	Claire & Wayne Boyd
12	Louise Brotherton		
13	Te Akitai Waiohua Waka Taua Incorporated		
14	Brad Michie		
15	Philippa Williams		
16	Karena Brady-Leathem		
17	Midnight Orchard		
18	Yvonne Wagner		
19	Nicola Ermens		
20	Anthony Roy Bellhouse		
21	Lyn Bellhouse		
22	Wayne and Brenda Hussey		
23	Lynette Frances Hickey		
24	Gary Neil McLean		
25	Brett Robert Hunter and Bronwyn Hunter		
26	Peter Joseph Watt		
27	Tamsin Wilson		
28	Auckland Council		
29	Environmental Defence Society Incorporated		
30	Kāinga Ora		
31	Horticulture New Zealand		
32	David Walsh		
33	Auckland Transport		
34	Alpito Hill Limited		
35	The Surveying Company		
36	Kiwirail Holdings Limited		
37	Watercare Services Limited		
38	Counties Power Ltd		
39	Federated Farmers of New Zealand		
40	David George Harper		
41	Ministry of Education		
42	Karam Dhadli		
43	Douglas Rex Embling		
44	Heritage New Zealand Pouhere Taonga		
45	Peter Hardy		

11. ANALYSIS OF SUBMISSIONS

417. The following sections address the submissions received on PC55. It discusses the relief sought in the submissions and makes recommendations to the Hearing Commissioners.

418. The summary of decisions requested by submissions identifies specific submission points. I note that a submission point may address several topics and therefore it has not been possible to group submissions purely by topic. Instead, I have addressed the specific elements of submissions within the assessment of effects on the environment in Section 10.

419. For the purpose of identifying recommendations on the submissions, they are grouped under the following themes:

- Compact urban form
- Transport
- Productive soils
- Physical extent of zones
- Reverse sensitivity on rural production
- Noise-sensitive activities adjacent to rail corridor
- Linkage to Mauku Road
- Carter Road
- Mana Whenua values
- Infrastructure (other than transport)
- Precinct Provisions
- Miscellaneous issues

420. The submissions provide scope for revision of the precinct provisions, within a range between declining the plan change through to approving without any amendments.

11.1. Compact urban form

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
3.1	Karen Bright	Decline the plan change	
10.1	Michael Graeme Weck	Approve the plan change without any amendments	
12.1	Louise Brotherton	Decline the plan change	
16.1	Karena Brady-Leathem	Decline the plan change	
18.1	Yvonne Wagner	Decline the plan change	
19.1	Nicola Ermens	Decline the plan change	
21.1	Lyn Bellhouse	Decline the plan change	
22.1	Wayne and Brenda Hussey	Decline the plan change	
23.1	Lynette Hickey	Decline the plan change	
25.1	Brett and Bronwyn Hunter	Decline the plan change	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
28.3	Auckland Council	Decline the plan change [in relation to a compact urban form]	Karam Dhadli (FS09.8) Support in part Federated Farmers of New Zealand (FS07.3) Support in part Kāinga Ora (FS04.1) Oppose in part
28.4	Auckland Council	In the alternative, any other such relief that would align the plan change request with the Auckland Plan growth strategy and the FULSS.	
28.5	Auckland Council	Decline the plan change [in relation to the National Policy Statement on Urban Development]	
28.6	Auckland Council	In the alternative, any other such relief that would align the plan change request with the NPS-UD.	
40.1	David George Harper	Decline the plan change	

Discussion

421. A total of 15 submissions raised issues relating to a compact urban form, one submission is in support, and the rest seek that the plan change be declined. Concerns raised include impacts on valuable productive land, character of the village, local businesses and jobs, transport effects, reverse sensitivity on rural land, capacity of local school, increase carbon emissions, and growth not being needed.
422. Michael Weck (submission 10.1) supports the plan change because it centralises the township around the local school and shops and additional area for commercial/industrial buildings is needed in Patumahoe.
423. Auckland Council (submissions 28.3 – 28.6) identifies that the plan change does not support the AUP objectives in relation to a compact urban form, and it is not justified under the NPS-UD. If the plan change is not declined, Auckland Council seeks alternative relief that would align the plan change with the growth strategy of the Auckland Plan and FULSS.
424. The issue of whether the plan change achieves a compact urban form has been considered in relation to the statutory framework assessment (Section 6) of PC55 against the RPS Chapter B2 and the Auckland Plan. It is also addressed in the assessment of effects (Chapter 9). Overall, the assessment identifies that the plan change is not consistent with the RPS objectives and policies for a compact urban form at a regional context.
425. Some submitters raise specific concerns around employment and growth in a remote location, including transport and commuting implications. These submissions include Nicola Ermens (submission 19.1), Lyn Bellhouse (submission 21.1). The southern sub-region provides significant opportunities for employment and the plan change provides additional opportunities locally. However, the assessment of transport effects indicates that there is limited access to public transport therefore the plan change would result in increased vehicles on the road inconsistent with a quality compact urban form.
426. In particular a number of submissions raise concerns that the plan change would change the small rural character of the village and that growth should occur within the

large areas provided within Paerata and Pukekohe rather than Patumahoe. Submissions include Karen Bright (submission 3.1) and Karena Brady-Leathem (submission 16.1), Louise Brotherton (submission 12.1), Lynette Hickey (submission 23.1), and Brett and Bronywn Hunter (submission 25.1).

427. Change in character in terms of economic effects are not considered significant because Patumahoe would continue to function as a small rural village. The assessment of urban design and landscape effects in Section 10 identifies adverse effects on rural character can be mitigated by amendments to the precinct provisions as follows:

- Insert a new standard for lots fronting Patumahoe Road that requires front yard of 6m and side yards of 2m;
- Amend Standard I430.6.16 to require post-and-rail rural fence type fronting Patumahoe Road;
- Insert a new standard for lots fronting Patumahoe Road that limits building coverage to 30%;
- Amend Assessment Criteria I430.8.1(4)(d) to require a high proportion of large-scale street trees in and around sub-precinct E; and
- Amend Assessment Criteria I430.8.1(4) to include a Landscape Concept Plan for sub-precinct E.

Recommendations on submissions

428. That submissions 3.1, 12.1, 16.1, 18.1, 19.1, 21.1, 22.1, 23.1, 25.1, 28.3, 28.6, and 40.1 to decline the plan change are accepted for the following reasons:

- The plan change provides unanticipated growth that undermines the ability to achieve a quality compact urban form;
- The plan change is not well served by public transport and increases private vehicle on the roads; and
- The plan change is contrary to the objectives and policies of the RPS seeking a compact urban form.

429. That submissions 28.4 and 28.5 be accepted in part and submission 3.1 is rejected because it is recommended that the plan change be declined.

430. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address potential adverse effects on the rural character of Patumahoe. These amendments are set out in Appendix 8 to this report.

11.2. Transport

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
2.1	Joanne Ineson	Approve the plan change with the amendments I requested	
2.2	Joanne Ineson	Seeks a new AT bus stop with a shelter on Patumahoe Road up by the school, and a shelter for the existing Mauku Road bus stop. Also seeks a better bus service for Patumahoe.	
28.11	Auckland Council	Decline the plan change [in relation to transport]	
28.12	Auckland Council	In the alternative, any other such relief that would mitigate effects on the wider transport network from the urbanisation proposed by plan change request.	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
32.1	David Walsh	Decline the plan change	
33.1	Auckland Transport	Decline the proposed rezoning of 9 hectare on the eastern side of Patumahoe Road from Rural Production to Future Urban zone	
33.3	Auckland Transport	Require more information about the impact of the development on the wider transport network, including if the infrastructure improvements identified as providing a contribution to the traffic impact associated with the Plan Change are not realised or not realised by the timeframes identified. If these infrastructure requirements are necessary to support the development to be enabled by this Plan Change in any way, then identify appropriate methods to address them, such as appropriate staging triggers.	
33.4	Auckland Transport	Require analysis with revised trip generation rates based on development level/quantum proposed and any additional mitigation required.	
33.5	Auckland Transport	Require wider network assessment of the effects of this development given that the strategic network assessment did not include the effects of this development and much of the strategic capacity is utilised by others.	
41.4	Ministry of Education	No specific decision requested but supports the proposed speed reduction to 30km/hr in the wider Proposed Plan Change area	
45.1	Peter Hardy	Seeks that the proposal recognises the long term transport requirements of Patumahoe Village.	

Discussion

431. A total of 11 submissions address matters relating to the impact of the plan change on the wider transport environment. Submissions generally seek to approve the plan change subject to amendments. Auckland Council (submissions 28.11 and 28.12) and David Walsh (submission 32.1) seek that the plan change be declined due to the demand for travel and impacts on the wider transport network.

432. Auckland Transport (submissions 33.1 and 33.3 – 33.5) is concerned about the impacts of the plan change on the wider transport network and considers that the Integrated Transport Assessment (ITA) does not provide sufficient analysis of the cumulative transport effects generated in combination with other planned developments.

433. Auckland Transport (submission 33.1) opposes the rezoning of the land proposed to be FUZ because it has not been considered in strategic planning, specifically it is not identified in the Auckland Plan – Development Strategy or FULSS, and the transport effects have not been appropriately assessed in the ITA. I consider this issue in relation to the strategic transport concerns for the plan change as a whole.

434. Transport effects are assessed in Section 10, Mr Edwards' specialist traffic assessment concluded that the road infrastructure will be adequate within Patumahoe, but that more assessment of network and intersection improvements on the wider road

network was required. If supported, then the amendments to the precinct provision would be required to consider the impact on the wider road network at the time of subdivision.

435. Mr Edwards identifies that there is insufficient evidence provided to demonstrate that sufficient capacity is available from planned infrastructure, and no evidence is provided to show that the provision of additional capacity would be practicable to provide. While the provision of adequate infrastructure beyond the plan change is the responsibility of infrastructure providers such as Auckland Transport, linking the timing of development to the provision of infrastructure is a method commonly employed throughout the AUP. It is also noted that the applicant does not have control of all the land within the plan change area. Mr Edwards considers the method of including staging provisions within the precinct has some weaknesses, but in the absence of a superior alternative supports seeking development staging and infrastructure timing links.

436. As discussed in Section 10, the precinct provisions as notified do not contain adequate staging and it is recommended that the applicant address issues regarding sufficient of information on the potential impacts on the wider transport network and provide appropriate staging provisions. Such provisions should identify any network upgrades that need to be in place before development, or a certain level of development can occur.

437. Some network and intersection improvements are already proposed but not all are currently funded. The new lots created in Sub-precinct E will each be required to provide a transport Development Contribution, some of which may be used to contribute to transport infrastructure further from the sites. Auckland Transport may wish to address this nexus between the new development and a proportionate contribution to transport network improvements it its evidence.

438. Several submissions raise concerns around employment and growth in a remote location, including transport commuting implications such as effects on carbon emissions due to poor access to public transport. Joanne Ineson (submissions 2.1 and 2.2) seeks that additional bus stops and services also be provided.

439. As it is not anticipated to provide bus services through the plan change area it cannot be expected that the applicant provides additional bus stops and services, which are the responsibility of Auckland Transport. I consider concerns about the remote location and impacts on transport commuting to be valid. Assessment of PC55 against the council's climate action plan is provided in Section 6, determining that it would increase vehicle kilometres travelled (VKT) and therefore undermine the ability to meet actions to reduce VKT and correspondingly GHGs.

440. When compared with identified growth areas, Patumahoe will have poorer access to public transport due to the small population generating relatively low demand for public transport services that are more costly to provide due to the long route length and low population density. The plan change would not be well served by public transport and would therefore lead to an increase in private vehicle travel, particularly when compared with other growth areas. Therefore, it is likely result in some increase in carbon emissions.

Recommendations on submissions

441. That submissions 28.11, 32.1, 33.1, 33.3, 33.4 and 33.5 to decline the plan change are accepted and submissions 28.12 and 45.1 be accepted in part for the following reasons:

- Insufficient evidence is provided to demonstrate that PC does not have significant adverse effects on the wider transport network;

- The area is not well served by public transport and therefore requires commute by private vehicles with corresponding increases in VKT and GHGs.

442. That submissions 2.1, 2.2 and 41.4 are rejected because it is not the responsibility of the applicant to provide bus shelters or bus services or reduce the speed limit on local roads.

443. If the Panel determine to approve PC55 then I consider amendments to the precinct provisions are required. These amendments are set out in Appendix 8 to this report.

11.3. Productive soils

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
1.1	Tania Shine	Decline the plan change	
5.1	Deborah Tangney	Decline the plan change	
6.1	David Murray McLean	Decline the plan change	
7.1	David Hopkins	Decline the plan change	
17.1	Midnight Orchard	Supports the proposal	
26.1	Peter Joseph Watt	Decline the plan change	
27.1	Tamsin Wilson	Decline the plan change	Karam Dhadli (FS09.7) Oppose in part
28.1	Auckland Council	Decline the plan change to avoid urbanisation on elite and prime soils.	Federated Farmers of New Zealand (FS07.1) Support in part
28.2	Auckland Council	In the alternative, any other such relief that would protect and retain the high productive potential of the soil within the plan change boundary.	Federated Farmers of New Zealand (FS07.2) Support in part
29.1	Environmental Defence Society Incorporated	Decline the plan change	Karam Dhadli (FS09.11) Oppose in part
43.1	Douglas Rex Embling	Decline the plan change	

Discussion

444. Eleven submissions have been grouped under the topic productive soils. Midnight Orchard (submission 17.1) supports the plan change because the existing kiwifruit orchard is declining in economic output. Overall, submissions seek that the plan change be declined because of the reducing the amount of fertile, productive horticultural land available for food production. Auckland Council (28.1) seeks that the plan change be declined to avoid urbanisation on elite and prime soils. Environmental Defence Society Incorporated (submission 29.1) states that there is a need to protect productive soils, and the plan change fails to give effect to B9 Rural Environment of the RPS.

445. A further submission from Federated Farmers (FS07) identifies that their original submission (39.1) supporting the plan change was based on the applicant's soils assessment, which identified there would be no loss of elite soils. The further submission from Federated Farmers supports in part Auckland Council's submission (28.1) to decline the plan change or an alternative relief because of concern about the loss of elite soils.

446. Further submissions from Karam Dhadli (FS09) opposes submissions because the productivity of land needs to be assessed on a case-by-case basis, particularly where this involves existing small, uneconomic lots. The further submitter also considers that it may be appropriate to rezone rural land where this meets the purpose of the RMA, for instance where rural productivity is constrained and rezoning it would provide for sustainable growth of the rural village.

447. Midnight Orchard (submission 17.1) supports the plan change because the 4.5 hectare kiwifruit orchard is not profitable. The bottom third of the property floods regularly and the vines are in decline from wet feet and phytophthora (root rot). Timing of horticultural spray application is also difficult as there is a school opposite. Overall, the submitter considers that the site is not suitable for horticultural use, and the residential proposal would be a better use of the land. Dr Hill has considered this submission and notes that the Patumahoe clay loam soils are not suited to some horticulture land uses, such as kiwifruit and viticulture. However, this does not exclude these soils for other shallower rooted intensive food production uses.

448. Productive soils are discussed in Section 10 of this report, identifying that the soils are classified as land containing elite and prime soils in accordance with the AUP definition and are therefore considered highly productive. Although there is disagreement between the soil experts on the classification of soils (LUC 1 vs LUC 2), there is general agreement between all the experts that the subject land is not significant for its ability to sustain food production.

449. I note that the Horticulture NZ (submission 31.1) does not oppose the plan change based on the applicant's analysis of productive potential. The submitter instead seeks amendments to ensure that potential reverse sensitivity effects are adequately mitigated. This submission is addressed under the topic reverse sensitivity on rural production.

Recommendations on submissions

450. That submissions 1.1, 5.1, 6.1, 7.1, 26.1, 27.1, 28.1, 28.2, 29.1 and 43.1 are accepted in part and that submission 17.1 be rejected, because the plan change is recommended to be declined but not because of loss of productive soils.

451. There are no amendments associated with this recommendation.

11.4. Proposed zones

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
4.1	Barry John Stephens	Approve the plan change with amendments (see 4.2)	FS01.1 Barry Stephens Support
4.2	Barry John Stephens	Re-zone 75 Patumahoe Road to a live zoning rather than FUZ	FS01.2 Barry Stephens Support FS02.1 Auckland Transport Oppose
8.1	William Thomas Colgan	Approve the plan change with amendments (see 8.2)	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
8.2	William Thomas Colgan	Include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone	FS02.2 Auckland Transport Oppose
28.14	Auckland Council	If the proposed Plan Change is accepted, then PC55 be amended to align the amount and location of open space to be provided with Council's Open Space Provision Policy 2016.	
34.1	Alpito Hill Limited	Decline the plan change as it relates to the rezoning of 28 Mauku Road and surrounds to Single House Zone unless provisions are put in place to protect the site's land use activities from the effects of Single House development and use (ie reverse sensitivity).	Karam Dhadli (FS09.15) Oppose in part
42.1	Karam Dhadli	Approve PPC55 subject to - i. confirming the zoning of land abutting the rear boundary of the Submitter's site as Open Space zoned land; and ii. reviewing and, if necessary, refining the extent of the plan change area to ensure this best achieves sustainable growth and the efficient use of land and is the most appropriate method to achieve the purpose of the Resource Management Act 1991; and	

Discussion

452. Seven submissions seek alternative zoning to that proposed by PC55. Submitters are generally concerned about managing potential reverse sensitivity effects on rural productive or industrial activities.

453. Alpito Hill Limited (submission 34.1) is concerned about impacts on the existing consented industrial storage activities at 28 Mauku Road that the owner wishes to continue. The submitter does not want a residential zone and seeks to retain the RPZ. While it is acknowledged that the business can continue operating because it has consents, but it may be more difficult to expand. The applicant has not considered alternatives for this site other than the status quo, but not specifically in relation to the activities that are currently occurring on this site.

454. Alternatives to achieve the relief sought by the submitter would be to either retain it as RPZ or to rezone as LIZ to reflect the current use. I do not support LIZ because it would be a spot zone surrounded by SHZ (existing and proposed) which would not be consistent with the AUP zoning approach. The site is already bounded by SHZ on its northern two sides, and the activity of storage does not in my opinion require an industrial zoning. Given that the activity has consent, the key issue appears to be the location of the indicative road across the submitters site, which is discussed in relation to submissions on the linkage to Mauku Road.

455. Barry Stephens (submissions 4.1 and 4.2) and William Thomas Colgan (submission 8.1 and 8.2) seek approval of the plan change subject to amendments that would apply a live urban (residential) zone to the eastern sector rather than FUZ. Both submitters do not consider the proposed FUZ would allow continued rural production.

456. Mr Stephens owns the chicken sheds at 75 Patumahoe Road and indicates that the chicken farm is nearing the end of its contract and useful life. The submitter considers

other rural uses would not be productive and would be constrained by nearby residential land uses and the school. Reverse sensitivity by new residents to the continued operation of the chicken farm is the primary reason for Mr Stephens seeking a change of zoning from RPZ to a residential zone.

457. Mr Colgan has an agricultural cropping block at 95 Patumahoe Road, adjacent to the chicken farm. Mr Colgan is concerned that rural production activities cannot continue on the eastern side of Patumahoe Road if the western side changes to residential use.

458. I refer to assessment of development capacity in Section 10, where Ms Fairgray determines that additional development capacity is not required to meet population projections for Patumahoe. Overall, the council's experts accept the escarpment and gully as a defensible boundary and that rezoning the land would address ongoing reverse sensitivity concerns. The applicant has not provided sufficient justification for the FUZ land, and there is no assessment provided to support a live zone. No assessment of alternatives other than the status quo is provided by the applicant.

459. Given there is no demonstrable need for the development capacity provided by the proposed FUZ, I do not support live zoning the land as part of PC55. If the FUZ was supported, then there are a range of issues relating to the eastern sector that would need to be addressed by a future plan change. Issues include, water and wastewater capacity, transport effects, and landscape effects. Therefore, I do not support the relief sought by submitters.

460. Karam Dhadli (submission 42.1) supports the plan change provided land adjoining the rear boundary of the site at 30 Mauku Road is zoned open space. The Zoning Map identifies this area as open space, but an indicative subdivision layout identifies this as a large lot which also contains the stormwater management pond (Revised SMP, Appendix 2, Drawing No. GEN001 Rev A).

461. Auckland Council (submission 28.14) identifies that if the plan change is approved that it seeks one 3,000m² neighbourhood park to support the land in the SHZ but does not support acquisition of the land identified on Precinct Plan 3 as "Recreation reserve area". The amount and location of open space is required to comply with Council's Open Space provision policy 2016 and the submitter identifies that Community Facilities – Parks do not want the stormwater management area (pond and wetland and outfalls) for a park as it would not have high recreational value.

462. Open space is addressed in section 10, and the peer review of Mr Barwell concludes that insufficient information is provided to assess the suitability of the proposed recreational land. Mr Barwell does not support the identification of recreational open space on Precinct Plan 3, the proposed Open Space Zone, or Standard I430.6.10(2). However, Mr Jayawardena for Healthy Waters supports the area required for the stormwater management area being zoned open space once it has been vested.

463. Given the experts recommendations it is not certain that the land adjoining 30 Mauku Road would be zoned open space nor is it clear whether it would be required for the stormwater management area. A pond outfall pipe is identified in the revised SMP discharging to the stream, but no further details are provided regarding use of this area and from Mr Barwell's assessment it is unlikely that this land would be acceptable as open space reserve.

464. If the plan change is supported, then the following amendments to the plan change would be required:

- Amend Standard I430.6.10 Public open space in sub-precincts B, C, D and E to delete the requirement that a neighbourhood park be established prior to occupation of any building.
- Amend Precinct Plan 3 to delete 'Recreation Reserve Area' from the stormwater management area.
- Amend Precinct Plan 3 to identify an indicative location for a neighbourhood park in the eastern area of the SHZ.
- Delete Open Space Zone – Informal Recreation and replace it with SHZ.

465. Precinct Plan 3 identifies a 10m landscape buffer, which council's landscape and urban design experts support and recommend that it should be increased to 20m to provide a stronger buffer consistent with Patumahoe Hill (sub-precinct C and D). This is discussed below in relation to submissions on reverse sensitivity effects. I consider this to be the primary method for managing potential reverse sensitivity effects if this is the concern of Mr Dhadli.

Recommendations on submissions

466. That submissions 4.1, 4.2, 8.1, and 8.2 are rejected for the reasons that a live residential zone is not supported for the land on the eastern side of Patumahoe Road because there is no demonstrated need for residential growth and potential adverse effects have not be adequately assessed.

467. That submission 28.14 be accepted and submission 42.1 be rejected in part because the plan change is recommended to be declined.

468. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address provision of open space. These amendments are set out in Appendix 8 to this report.

11.5. Physical extent of zones

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
35.1	Scott and Judith Gavin	Decline the plan change, but if approved, make the amendments requested (see 35.3)	FS01.3 Barry Stephens Support
35.2	Scott and Judith Gavin	Withdraw the plan change, then structure plan with consultation and prepare a replacement plan change	FS01.4 Barry Stephens Support FS09.17 Karam Dhadli Support in part
35.3	Scott and Judith Gavin	Include 23 Clive Howe Road within the private plan change area and the Patumahoe Precinct	FS01.5 Barry Stephens Support
35.4	Scott and Judith Gavin	Re-zone 23 Clive Howe Road and adjoining site 75 Patumahoe Road to Residential – Large Lot, with minimum site size 2,000m ² and minimum average size of 4,000m ²	FS01.6 Barry Stephens Support
35.5	Scott and Judith Gavin	Decline plan change, or if approved then re-zone 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road to Residential – Single House	FS01.7 Barry Stephens Support FS02.5 Auckland Transport Oppose
35.6	Scott and Judith Gavin	Decline plan change, or if approved then any alternative relief that will allow 23 Clive Howe Road	FS02.6 Auckland Transport Oppose

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
		and adjoining/surrounding sites to be used for urban residential use	FS01.7 Barry Stephens Support
42.2	Karam Dhadli	Approve PC55 and apply Sub-precinct E, subject to re-zoning Submitter's site as Future Urban or Residential – Single House or Business – Light Industry	FS02.7 Auckland Transport Oppose

Discussion

469. A total of seven submissions from two submitters seek to include and rezone additional land that is outside the plan change extent.

470. Scott and Judith Gavin (submission 35.1 - 35.6) oppose the plan change because they seek that additional land be included in the plan change, to rezone 23 Clive Howe Road as Residential – Large Lot with minimum lot size 2000m² and average lot size a minimum of 4000m²; and rezone 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road as Residential – Single House. The submitter considers that Clive Howe Road already has an urban or suburban character from recent subdivisions, and there are not productive rural uses on Clive Howe Road or at the corner with Patumahoe Road.

471. The sites at 24, 25, 26 and 28 Clive Howe Road and at 59, 61 and 71 Patumahoe Road range in area from approximately 1,000m² to 8,000m². Although zoned RPZ, these sites have a character consistent with Residential – Large Lot or Rural – Countryside Living. The site at 23 Clive Howe Road has an area of 5.6414 hectares and forms a large part of the steeper north-eastern escarpment. Council specialist Landscape Architect, Ainsley Verstraeten, identifies that 23 Clive Howe Road contains the eastern escarpment and considered the value of this landscape feature to be too high for future urbanisation.

472. Karam Dhadli (submission 42.2) seeks that their property at 30 Mauku Road, zoned RPZ at the south-western edge of the plan change area, be included because it is directly opposite Sub-Precinct B and has similar qualities and further expansion will help meet growth projections.

473. Ms Verstraeten considers this submission and indicates that the submission raises valid issues with regards to where the appropriate edge of the precinct should be located, which have not been addressed by the applicant. Development capacity is addressed in Section 10 and Ms Fairgray determines that the SHZ component of PC55 together with the existing capacity provides sufficient capacity to cater for the projected growth. Including additional land as sought by Mr Dhadli therefore raises the following significant issues:

- where would the urban extent or defensible boundary be located;
- there is no justified demand for further growth;
- additional development capacity would further increase pressure on the existing infrastructure networks that has not been assessed; and
- loss of productive soils.

474. The fundamental issue with submissions seeking additional land be included in the plan change is that this outcome is not within the scope of the plan change and therefore legally cannot be considered. The plan change would have to be withdrawn and re-notified to include this additional land as sought by Scott and Judith Gavin (submission 35.2).

Recommendations on submissions

475. That submissions 35.1 – 35.6 and 42.2 are rejected for the following reasons:
- They are not within the scope of the notified plan change;
 - Additional development capacity is not required;
 - No consideration to the urban extent is provided to establish a defensible boundary;
 - No assessment provided on impacts on existing infrastructure networks from additional development capacity; and
 - Loss of productive soils.
476. There are no amendments associated with this recommendation.

11.6. Reverse sensitivity on rural production

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
28.7	Auckland Council	Decline the plan change [in relation to reverse sensitivity]	Karam Dhadli (FS09.8) Support in part Federated Farmers of New Zealand (FS07.3) Support in part Kāinga Ora (FS04.1) Oppose in part
28.8	Auckland Council	In the alternative, any other such relief that would remove potential for reverse sensitivity effects on established rural production activities.	Karam Dhadli (FS09.9) Support in part Federated Farmers (FS07.1) Support in part
28.13	Auckland Council	If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to these imposed in other areas around Patumahoe, with a greater use of native species.	Kāinga Ora (FS04.2) Oppose in part Karam Dhadli (FS09.10) Support in part
31.1	Horticulture New Zealand	Amend the proposed precinct provisions so that: - an additional 5m to afford further separation distance to better assist in avoiding reverse sensitivity issues - landscaping includes shelter belts to ensure avoidance of any risk of reverse sensitivity arising from sprays, noise and smell, and - public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity	Kāinga Ora (FS04.3) Oppose in part Karam Dhadli (FS09.12) Support in part
39.1	Federated Farmers	Accept the Proposal as a whole, while taking proper account of reverse sensitivity matters.	Kāinga Ora (FS04.18) Oppose Karam Dhadli (FS09.19) Support in part
42.3	Karam Dhadli	In the event that the PPC55 is approved without inclusion of the Submitter's site within the plan change area, require – i. the imposition of a sufficiently wide, planted Landscape Buffer adjoining the entire	Kāinga Ora (FS04.19) Oppose in part

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
		boundary of the Submitter's site; and ii. the registration of a 'no complaints' covenant on those residential sites along the western boundaries of Sub-Precinct E adjoining the Submitter's site in respect of the effects of lawful activities undertaken on its land to create separation at the zone interface and ensure protection against reverse sensitivity effects.	
42.4	Karam Dhadli	Seeks consequential amendments as necessary to achieve the relief sought above [Submission points 42.1, 42.2 and 42.3].	

Discussion

477. Eight submissions seek to either decline or amend the plan change because of reverse sensitivity effects. Amendments included a wider landscape buffer along the south-western boundary of the plan change to manage reverse sensitivity effects on the adjacent RPZ land. Further submission from Kāinga Ora (FS04) seeks less buffer widths generally, being more concerned about efficient use of residential land.
478. Auckland Council submission (28.13) seeks landscape buffers of a width consistent with others required by the Patumahoe Precinct provisions, which include a 20m wide landscape buffer to the southwestern edge of sub-precinct B where the residential development will adjoin rural production land. That 20m wide buffer is in response to the rising topography of the Patumahoe Hill subdivision, making it more visible in the landscape, and also includes a walking/cycling connection between Mauku Road and Day Road.
479. Karam Dhadli (submission 42.3) seeks amendments to the plan change if the submitters land at 30 Mauku Road is not included in the plan change and identified as SHZ in order to manage reverse sensitivity effects. The submitter seeks a sufficiently wide, planted buffer at the zone interface and also a "no complaints" covenant on adjoining residential sites. As discussed above, I am not recommending that the residential zone be extended.
480. Horticulture NZ (submission 31.1) supports the 10m landscape buffer strip where urban development adjoins remaining rural production land but also seeks an additional 5m to increase separation distance as well as including shelter belts to avoid reverse sensitivity effects. Horticulture NZ also seeks that public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity.
481. Landscape buffers are discussed in relation to the assessment of landscape effects and reverse sensitivity effects in Section 10. The proposed landscape buffers play an important role in managing reverse sensitivity (and amenity) effects between residential land and rural land. Standard I430.6.9(2) requires a landscape buffer area with an average width of no less than 10m to be established by way of restrictive covenant along the south-western boundary of the plan change area (as identified on Precinct Plan 3).
482. Council's landscape and urban design experts both consider a wider landscape buffer is required on the south-western boundary to support a more defensible boundary and to mitigate landscape and visual effects. I consider a widened landscape buffer of 20m would

also better mitigate potential reverse sensitivity effects on the adjacent rural productive land to address the concerns raised by submitters.

483. The landowner at 30 Mauku Road seeks a “no complaint” covenant on adjacent land in addition to the widened landscape buffer. I acknowledge that the precinct includes a “no complaints” covenant requirement in relation to the existing chicken sheds. However, in my opinion if the plan change is approved the proposed landscape buffer on the south-western boundary should be widened or include a road that would provide over 20m separation distance to address reverse sensitivity effects. I therefore do not consider it necessary to include a requirement for a “no complaints” covenant.

Recommendations on submissions

484. That submission 28.7, 28.8 and 28.13 be accepted in part, and submissions 31.1, 33.2, 39.1, 42.3, and 42.4 are rejected because the plan change is recommended to be declined but not because of reverse sensitivity effects.

485. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address potential adverse reverse sensitivity effects on the rural production activities. These amendments are set out in Appendix 8 to this report.

11.7. Noise-sensitive activities adjacent to rail corridor

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitters	Further Submissions
30.1	Kāinga Ora	Remove Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E in its entirety from the precinct provisions	
30.2	Kāinga Ora	Seeks any consequential relief necessary to satisfy Kāinga Ora’s concerns	
33.2	Auckland Transport	Retain the proposed rezoning of 2.5 hectares at the southern end of the development from Rural Production and Strategic Transport Corridor to Light Industrial.	
36.1	Kiwirail Holdings Limited	Support I1430.1 Precinct Description, with amendment to read: “...The Paerata-Waiuku <u>Mission Bush</u> Branch railway line forms the southern boundary of the precinct...”	
36.2	Kiwirail Holdings Limited	Retain I430.2. Objectives (1), (3) and (4) as notified	
36.3	Kiwirail Holdings Limited	Retain I430.10.2 Patumahoe: Precinct plan 3 - Sub-Precinct E, with amendment: Add a notation to Precinct plan 3 – Sub-Precinct E to show the location of the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E, adjoining the railway, referred to in I430.6.9 (4).	
36.4	Kiwirail Holdings Limited	Retain Table I430.4.2 Activity table, as notified	
36.5	Kiwirail Holdings Limited	Retain Standard I430.6.9. Landscape buffers in sub-precincts B, C, and D and E clauses (3) and (4) relating to sub Precinct E, as notified	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitters	Further Submissions
36.6	Kiwirail Holdings Limited	Retain Standard I430.6.17, with amendment as follows: 1. Insert after the Table in (1); <u>or;</u> <u>is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u>	
36.7	Kiwirail Holdings Limited	Amend Standard I430.6.17 clause (b) as follows: (b) Compliance may be achieved by adopting the following construction schedule specified by Kiwirail (refer to Schedule XX Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions October 2018.	
36.8	Kiwirail Holdings Limited	Within Standard I430.6.17, insert a construction schedule for indoor noise [Refer to page 4 of submission for construction schedule].	
36.9	Kiwirail Holdings Limited	Within Standard I430.6.17, insert a new clause: <u>(xx) Mechanical ventilation</u> <u>If windows must be closed to achieve the design noise levels in clause 1, the building is designed, constructed and maintained with a mechanical ventilation system that:</u> <u>(a) For sleeping rooms, achieves the following requirements:</u> <u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code;</u> <u>and</u> <u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u> <u>iii. provides relief for equivalent volumes of spill air;</u> <u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C;</u> <u>and</u> <u>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u> <u>(b) For other habitable spaces, is as determined by a suitably qualified and experienced person.</u>	
36.10	Kiwirail Holdings Limited	Within Standard I430.6.17, insert after proposed clause (2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95); <u>or</u> <u>(b) is a single storey framed residential building with:</u> <u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in</u>	Kāinga Ora (FS04.14) Oppose

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitters	Further Submissions
		<u>accordance with the supplier's instructions and recommendations; and</u> <u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u> <u>iii. no rigid connections between the building and the ground.</u>	
36.11	Kiwirail Holdings Limited	Within Standard I430.6.17, insert a new clause referring to all preceding clauses; <u>(xxx) A report is submitted to the council demonstrating compliance with the clauses above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.</u>	Kāinga Ora (FS04.15) Oppose
36.13	Kiwirail Holdings Limited	Retain I430.8. Assessment – restricted discretionary activities clause (2) (n) with amendment to clause (2) (n) to add sub criteria as follows: (n) Compliance with Railway Noise and Vibration Standards in Sub-precinct E <u>including;</u> <u>(i) Whether the sensitive activity could be located further from the railway corridor;</u> <u>(ii) The extent to which the noise and vibration criteria are achieved and the effects of any noncompliance;</u> <u>(iii) Special topographical, building features or ground conditions which will mitigate vibration impacts</u>	Kāinga Ora (FS04.16) Oppose
33.7	Auckland Transport	Amend Objective 4 as follows: '(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses <u>and the railway network.'</u>	Kāinga Ora (FS04.4) Oppose
33.9	Auckland Transport	Amend I430.3 to add a policy that recognises the requirements to protect development in Sub-precinct E from railway noise and vibration.	Kāinga Ora (FS04.5) Oppose

Discussion

486. A total of 17 submissions raise concerns about noise and vibration effects associated with the Mission Branch Line. The majority of submissions (12) are from KiwiRail and seek amendments to the notified precinct provisions. Kāinga Ora oppose precinct provisions and seek that they be deleted. Auckland Transport also seek minor amendments to the precinct provisions.

487. KiwiRail (submission 36.1) supports the plan change subject to the amendments proposed in their submission. The submitter identifies that KiwiRail has an interest in protecting its ability of the Mission Bush Branch Line (railway line) to continue operating and to enhance the safety, health and amenity of nearby residents. KiwiRail seeks retention of the objectives, activity table, and standard for landscape buffers applying to railway edge. Amendments sought aim to provide alternate pathways to achieving compliance and to ensure that adequate ventilation is provided. Auckland Transport (submissions 33.7 and 33.9) seek to amend the Objective 4 and Policy 3 to support the precinct provisions addressing railway noise and vibration.

488. KiwiRail indicates that the proposed provisions are largely supported and reflect the integrated approach to planning to enable development to occur near the railway corridor.

It is the opinion of the submitter that for new buildings it is relatively straight forward to control internal sound and vibration through building location, design and provision of adequate ventilation systems.

489. Kāinga Ora (submissions 30.1 and 30.2) opposes Standard I430.6.4.17 and seeks that it be removed, or such consequential relief necessary to satisfy concerns. Kāinga Ora is concerned that the noise and vibration provisions apply a blanket 100m corridor to all residential buildings which is overly onerous, and the cost and benefits arising from the proposed standard have not been assessed according to section 32 of the Resource Management Act 1991.
490. The issue of reverse sensitivity from noise and vibration associated with the existing railway is discussed in Section 10. Through consultation with the applicant prior to notification of the plan change, KiwiRail sought that the provisions be included in the precinct to address their concerns. However, the plan change does not include a s32 evaluation for the proposed provisions.
491. I note that in other district plan and plan change settings around New Zealand, KiwiRail have provided evidence demonstrating the need for such noise and vibration provisions, in accordance with a problem definition and issue to be resolved as well as the s32 evaluation demonstrating the costs and benefits and preferred approach. So far, they have met with little success, having only parts or modified versions included or reversion to earlier physical separation distances.
492. In this case KiwiRail may be able to provide such evidence to the hearing. However, at this stage and in relation to the limited freight use of this branch of the rail network and the likely separation distances to dwellings on larger single house sites, the proposed provisions are not supported.
493. The applicant did not provide a s32 evaluation of the proposed railway noise and vibration provisions and they are not supported by a technical assessment for this plan change. The council requested the applicant to consider providing supporting technical advice in response to submissions. However, the applicant declined to do so. Therefore, the appropriateness of these provisions to achieve the intended outcome in terms of noise and vibration has not been justified by any expert assessment. Without technical assessment, or even explanation as to why they are included in the plan change, I am not satisfied that the provisions are efficient and effective to mitigate noise and vibration effects.
494. In the event that KiwiRail provides evidence that supports the inclusion of provisions to address railway noise and vibration, including the relief sought through their submission and the plan change is supported, I have considered the specific amendments below.
495. KiwiRail (submission 36.4) seeks to retain Activity Table I430.4.2 because it provides for subdivision which observes the proposed standards in Precinct E as a restricted discretionary activity and where not, as a non-complying activity. I note that Standard I430.6.17 does not relate to subdivision but manages new buildings and alterations to an existing building. The Activity Table identifies buildings as 'blank', which means that the underlying zone provisions apply in terms of the activity status. Under the SHZ one dwelling per site is a permitted activity. Therefore, Standard I430.6.17 applies as a permitted standard and non-compliance would be a restricted discretionary activity in accordance with C1.9. While I accept retention of the Activity Table, this is not for the reasons identified by KiwiRail.

496. KiwiRail (submission 36.6) seeks to include an alternative method to address noise in Standard I430.6.17(1). I do not consider the wording as proposed by KiwiRail to be sufficiently clear. I consider the standard would need to be redrafted into two parts to clearly identify the two pathways in Standard I430.6.17(1):
- a) Any new building or alteration within 100m would be designed to meet the noise standards set out; or
 - b) Any new building or alteration is at least 50m away from the railway corridor and a noise barrier is constructed to mitigate noise.
497. I am not convinced that the proposed amendment provides an alternative pathway to address noise, that is not already enabled within 100m. I am not able to test this because there is no expert assessment available to understand how the noise standards have been determined (whether they are appropriate), or what type of mitigation measures would be required to achieve the standards. I expect a building could potentially locate within 50m of the railway corridor if a noise barrier were constructed to achieve the internal noise standards.
498. KiwiRail (submission 36.7 and 36.8) seeks to amend Standard I430.6.17(1)(b) to provide further guidance on compliance with noise standards to include KiwiRail's construction schedule for indoor noise. I do not support including the detailed construction schedule proposed by KiwiRail into the standard. The existing text appears to be an advice note on how compliance may be achieved, which references KiwiRail's construction schedule. While I accept that this is intended to assist the developer, I consider it to be detail that is not required to be in a plan. KiwiRail may wish to provide guidance to developers when consulted. Alternatively, there may be many other ways in which compliance could be achieved.
499. KiwiRail (submission 36.9) seeks to amend Standard I430.6.17 to include requirements for mechanical ventilation where windows are required be closed to achieve indoor noise standards. It is unclear whether this is a standard or an advice note. If mechanical ventilation is not being sought as a standard for development, then I do not consider it necessary to include this detail in the plan. If it is determined that to meet the noise standards that all windows must be closed, then I expect this issue at least in part be addressed by the New Zealand Building Code.
500. I have referred to D24 Aircraft Noise Overlay for guidance on how noise is addressed with regards to requiring mechanical ventilation. I note that provisions are included, and these differ to what is proposed by KiwiRail in terms of the extent and level of detail. I am not opposed to provisions that address mechanical ventilation, as this is not an uncommon method. However, I am not satisfied that the wording as proposed is justified. I note that the Airport Noise Overlay requires a ventilation system to be provided in relation to Ardmore Airport under Standard D24.6.2(1), and that this references the New Zealand Building Code Rule G4. The NZ Building Code requires adequate ventilation to all spaces in buildings and sets out provisions for outdoor air and extract ventilation. If to meet the indoor noise standards requires windows to be closed, then in order to meet the Building Code a building would need to be provided with mechanical ventilation. However, I acknowledge that these two requirements sit across different Acts and that it would be beneficial to identify this in the precinct. If this is the case, then it should be a standard, but it should be simplified.
501. KiwiRail (submission 36.10) seek to amend Standard I430.6.17(2) to include an alternative pathway to comply with the vibration standard by enabling single storey framed residential buildings designed to minimise vibration. As with the alternative pathway for compliance with noise, discussed above, I am not convinced that this level of detail is necessary. The notified standard requires new buildings or alternations to existing

buildings located within 60m to be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3mm/s (Vw,95). I am assuming that the alternative pathway achieves this outcome, otherwise it would not be supported by KiwiRail. Therefore, is it not already enabled. I am unable to confirm this because there is no expert advice in regard to vibration.

502. KiwiRail (submission 36.11) seeks to amend Standard I430.6.17 to insert a new clause that requires a report to be submitted to Council demonstrating compliance with the requirements for noise and vibration prior to construction. Standard I430.6.17 is drafted as a permitted standard. The requirement for further information to be submitted prior to construction would in my mind be a condition of consent. If this material is required, then I consider it would be more appropriate to require the activity to be a restricted discretionary activity to enable conditions to be imposed and would also enable greater flexibility regarding methods to achieve the resource management outcome.

503. KiwiRail (submission 36.13) seek to amend the restricted discretionary activity matters of discretion to include sub-criteria. I consider these sub-criteria are better identified as assessment criteria, which appears to be the intention of the submitter. Therefore, if the amended provisions are supported, I recommend that these criteria be included under I430.8.1 Assessment criteria under (1) Development and infringement of development standards.

504. Auckland Transport (submissions 33.7 and 33.9) seeks to amend Objective 4 and include a new policy to support the noise and vibration precinct provisions. The noise-sensitive activity reverse sensitivity rules are not supported by evidence, so these amendments are not necessary. However, if KiwiRail provide evidence to justify the provisions then I do consider the provisions need to be supported by an appropriate objective and policy framework.

Recommendations on submissions

505. That submissions 30.1 and 30.2 and 36.1 are accepted in part, and submissions 33.7, 33.9, 36.1 - 36.11, and 36.13 be rejected for the following reasons:

- The proposed Railway Noise and Vibration provisions are not supported by evidence or a s32 evaluation;
- It is recommended to decline the plan change for reasons not including noise and vibration effects.

506. That submission 33.2 be accepted as the proposed LIZ is supported, although for the reasons that it provides a noise buffer to the railway line and local employment for transport benefits.

507. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to delete the Railway Noise and Vibration provisions subject to further evidence being provided to support them. These amendments are set out in Appendix 8 to this report.

11.8. Linkage to Mauku Road

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitters	Further Submissions
9.1	Doug Lloyd	Decline the plan change	Karam Dhadli (FS09.1) Oppose in part
11.1	Kelven and Beverley Eastman	Decline the plan change	Kelven and Beverley Eastman (FS05.1) Oppose [support] Karam Dhadli (FS09.2) Oppose in part
14.1	Brad Michie	Decline the plan change	Karam Dhadli (FS09.3) Oppose in part
15.1	Philippa Williams	Decline the plan change, but if approved, make the amendments I requested	Karam Dhadli (FS09.4) Oppose in part Philippa and Todd Williams (FS03.1) Support
15.2	Philippa Williams	Amend the plan change so that the new road placement (Intersection D) is reconsidered.	Karam Dhadli (FS09.5) Support in part Auckland Transport (FS02.2) Oppose Claire & Wayne Boyd (FS11.1) Support
24.1	Gary Neil McLean	Decline the plan change	Gary Neil McLean (FS06.1) Support Karam Dhadli (FS09.6) Opposed in part
34.2	Alpito Hill Limited	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.	Auckland Transport (FS02.4) Oppose Karam Dhadli (FS09.16) Oppose in part

Discussion

508. Seven submissions either seek to decline or amend plan change because of the proposed road connection to Mauku Road (Intersection D) across or close to properties at 22, 24A, 24B, 26A, 26B and 28 Mauku Road. A further submission from Auckland Transport (FS02) opposes some of these submissions on the basis that the connection is necessary. A further submission from Karam Dhadli (FS09) also opposes the submission but on the basis that access is desired to 30 Mauku Road.

509. Intersection D and the alignment of the indicative road linkage to Mauku Road is assessed in terms of transport effects and urban design in Section 10. Overall, if the plan change is supported then this connection is considered to be desirable. Mr Edwards notes that the ITA assessment has not assessed the impact on the performance of the local road network without this connection (Intersection D). Therefore any proposal to remove it would need to reassess the transport impacts.

510. From an urban design perspective, Ms Bitossi considers this link to provide a key west-east connection, providing an alternative route to travelling through the village centre and providing pedestrian connections that support a walkable neighbourhood. It is also noted that the bus-stop is located on Mauku Road.

511. I consider there may be a possible alternative alignment that could be more acceptable to the landowners, as it would not affect existing development. However, I note that this is

not as centrally located and may not be the most efficient in terms of land development. An alternative alignment would be along the driveways to 28 and 28B Mauku Road (Figure 14). This would also align with the boundary of the plan change and assist with providing separation between the remaining RPZ and SHZ along the south-western boundary.

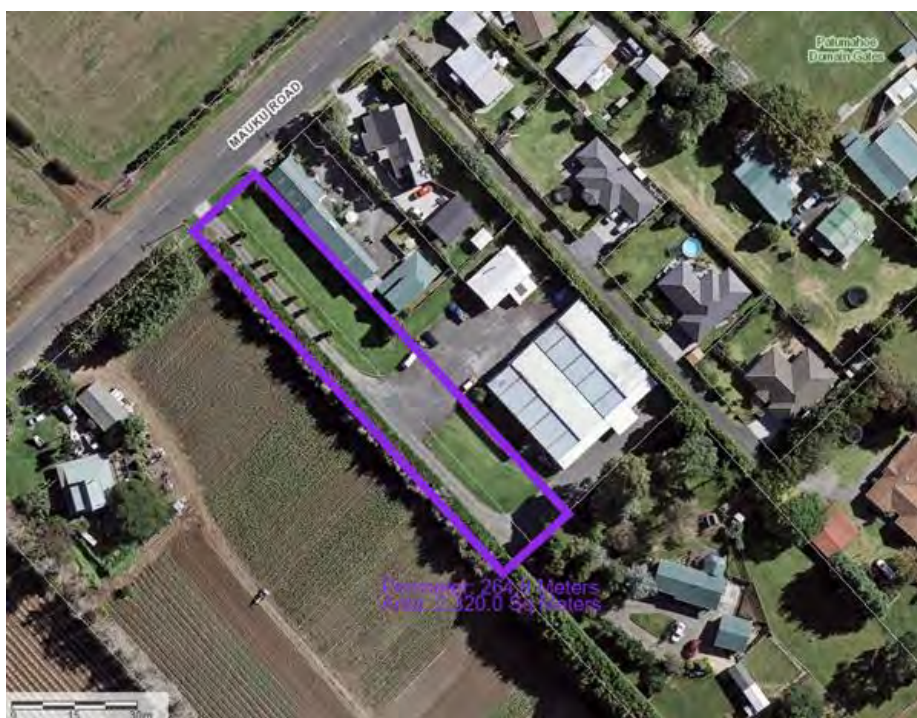


Figure 14: Potential realignment of western link road over 28 and 28B Mauku Road

512. Although some land would be needed from 28 Mauku Road this would not affect the existing built area. Implementing this connection would still be dependent on the affected landowner's willingness to participate in the development process, either through subdivision of 28B Mauku Road or negotiation to provide the road. I note that Claire and Wayne Boyd (FS11) are the owners of 28B Mauku Road, and their further submission supports submission 15.2 seeking that the location of Intersection D be reconsidered.
513. The benefit of this location is that 28B Mauku Road could realise development potential through this access. The site is approximately 1.2 ha in total, with a developable area of approximately 8,000m². Being within 400m of the village, a minimum net site area of 600m² enabling at least 10 residential sites. I therefore support the realignment of the connection to Mauku Road to the south-western boundary should the plan change be supported.
514. While I do not support approving the plan change, I do not consider the alignment of Intersection D to be a reason for it to be declined. If the plan change is supported, I consider a connection to Mauku Road to be very important, as it will provide connection to the bus-stop and enable traffic travelling north to avoid travelling through the village. Mr Edwards identifies that this connection is required but does not support an alignment on 22, 24A, 24B and 24C Mauku Road as it would be too close to the new road opposite 18 Mauku Road; all feasible locations for the road connection must cross or be adjacent to at least part of 28 Mauku Road. Therefore if the plan change is supported, I recommend that Precinct Plan 3 be amended to identify the indicative alignment along the south-western boundary. However, I consider this alternative still results in uncertainty that the connection will be provided. Therefore it would be helpful to understand the transport implications of not providing this link if it cannot be provided.

Recommendations on submissions

515. That submissions 9.1, 11.1, 14.1, 15.1, 15.2, 24.1 and 34.2 are accepted in part for the reason that the plan change is recommended to be declined but not because of the linkage to Mauku Road.

516. Should the Panel determine to approve the plan change I consider amendments to the precinct plan would be required to address alignment of Intersection D. These amendments are set out in Appendix 8 to this report.

11.9. Carter Road

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.20	Auckland Transport	Reword I430.6.13(1)(c)(iii) to clarify how vehicle access is to be provided to the Watercare facility at 6 Carter Road.	
33.21	Auckland Transport	Request clarification on the loss of access for Lot 12 DP83912 and ongoing provision of such if required.	
41.2	Ministry of Education	No specific decision requested but supports the proposed safety improvements to mitigate traffic effects on pedestrian safety	
41.3	Ministry of Education	No specific decision but supports the partial closure of Carter Road to be converted into a walking and cycling pathway	

Discussion

517. Four submissions raise issues regarding Carter Road. Ministry of Education (submission 41.2 and 41.3) supports the installation of a zebra crossing near Patumahoe School and the partial closure of Carter Road to provide school children with a safe pedestrian link into the proposed plan change area and to address the limited visibility at the intersection. Auckland Transport (submission 33.20 and 33.21) seeks further clarification of access to the Watercare property at 6 Carter Road and also to Lot 12 DP83912 (57 Patumahoe Road) which are accessed from Carter Road.

518. Carter Road is addressed in Section 10 in terms of transport effects, whereby Mr Edwards agrees with the concerns raised by Auckland Transport. I note that Mr Edwards does not consider the closure of Carter Road to be required, and that there may be alternate methods to address potential safety impacts at the intersection of Carter Road and Patumahoe Road. However, Mr Edwards does support a pedestrian crossing on Patumahoe Road near the school. I consider it possible to address these issues at the time of subdivision or development provided the precinct includes suitable assessment criteria.

519. Should the plan change be supported I note the following in regard to the precinct provisions:

- Assessment criterion I430.8.1(4)(b)(i) provides for the assessment of whether any works are required within Patumahoe Road to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels. I consider this would enable consideration of the pedestrian crossing.
- I consider requiring the closure of Carter Road to be *ultra vires* because it relies on a process that sits outside the RMA. Therefore if landowners object and the road is not closed, the developer will not be able to meet the precinct requirements.

- Standard I430.6.13(1)(c)(iii) requires the provision of vehicle access to the Watercare facility at 6 Carter Road otherwise a non-complying activity consent is triggered. I note that 57 Patumahoe Road has its main vehicle access from Patumahoe Road.
- Standard I430.6.13(1)(c)(ii) requires the formation of the shared path over the northern section of Carter Road. Given that there may be alternative methods to provide for pedestrian and cyclists, I do not consider it appropriate to identify this on Precinct Plan 3 or in the standard. However, I accept that pedestrian and cycle access along Carter Road is desirable and therefore Standard I430.6.13 should be amended to seek this outcome, and the assessment criteria to set out the matters to be considered.

520. I recommend the following amendments should the plan change be supported:

- Amend Precinct Plan 3 to remove the identified pedestrian and cycleway at the northern end of Carter Road.
- Amend Precinct Plan 3 to identify the location of cycle and pedestrian facilities where both are to be provided.
- Retain the requirement to ensure vehicle access is maintained to the 6 Carter Road Watercare site.

Recommendations on submissions

521. That submissions 33.20, 33.21, 41.2 and 41.3 are rejected for the reason that the plan change is recommended to be declined.

522. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address issues relating to Carter Road. These amendments are set out in Appendix 8 to this report.

11.10. Mana whenua values

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
13.1	Te Akitai Waiohua Waka Taua Incorporated	Decline the plan change	Heritage New Zealand Pouhere Taonga (FS10.1) Support
44.1	Heritage New Zealand Pouhere Taonga	Accept the proposed plan change with amendments to include appropriate provisions within the precinct plan to fully address Māori cultural heritage values identified and require the incorporation of Te Aranga principles into development through the resource consenting process.	

Discussion

523. Te Ākitai Waiohua (submission 13.1) opposes the plan change, in part due to insufficient consultation with Mana Whenua iwi but also because of the impacts on productive land. A further submission from Heritage NZ Poutere Taonga (FS10) supports the relief sought by Te Ākitai Waiohua.

524. Heritage NZ Poutere Taonga (submission 44.1) seeks amendments to the plan change include appropriate provisions within the precinct plan to fully address Māori cultural

heritage values identified and require the incorporation of Te Aranga principles into development through the resource consenting process.

525. I note that the Cultural Assessment from Ngāti Te Ata Waiohua identifies a range of design opportunities that are supported and provide an opportunity to incorporate and activate Te Aranga Principles. These include:

- Key connections and amenity improvements that the Askew Partnership Ltd may like to facilitate as part of the planned development work. In addition to the delivery of social, market and affordable homes key considerations are:
- Improving walking routes around Patumahoe.
- Improving the quality and safety of neighbouring reserves.
- Potentially adding additional reserve space.
- Improving the connectivity within the neighbourhood, especially for pedestrians and cyclists, through additional road and lane connections.
- Improving footpaths.
- Strengthening of Patumahoe town centre as high-quality urban environments offering easily accessed work, play, sense of community, living and transport opportunities.
- Enhancement and joining up of key greenway corridors connecting the town centre, to future open space

526. Ngāti Te Ata Waiohua seek that the proposal endorse the adoption of these principles as a way to incorporate Ngāti Te Ata Waiohua values and outcomes into the design elements of the project and expect these principles to be fundamental to be applied wherever possible to underpin their relationship to the area.

527. The applicant had indicated that ongoing consultation was occurring with Te Ākitai Waiohua. I am unclear from the submission what the specific concerns of Te Ākitai Waiohua are in relation to the plan change area, other than productive soils which were discussed previously. I am therefore unable to respond further to this submission. I anticipated that further information will be made available through the evidence of both the applicant and the submitter.

528. I have previously identified that the plan change does not specifically provide for the incorporation of Te Aranga design principles into the precinct provisions. Council's landscape expert recommends the inclusion of a landscape framework as an appropriate mechanism for including a Te Aranga Māori Design Matrix. If the plan change is supported, then I consider it appropriate to provide for the consideration of Te Aranga Principles at the time of subdivision and development. At a minimum, this could be achieved as a matter of discretion for restricted discretionary activities, to support the opportunity to incorporate these into future subdivision and developments.

Recommendations on submissions

529. That submission 13.1 be accepted in part, and submission 44.1 be rejected for the reason that the plan change is recommended to be declined but not because of Mana Whenua values.

530. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address Mana Whenua values, which may include as a minimum identifying Te Aranga principles as a matter of discretion. These amendments are set out in Appendix 8 to this report.

11.11. Infrastructure (other than transport)

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
20.1	Anthony Roy Bellhouse	Decline the plan change	
37.1	Watercare Services Limited	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.	Karam Dhadli (FS09.17) Support in part
37.2	Watercare Services Limited	Seeks that the following information be provided in order for it to adequately assess the effects of this Proposal: (a) How the additional water storage to service the Plan Change Area will be provided. (b) The availability of suitable land to accommodate the necessary upgrades to service the Plan Change Area, including identification of suitable land adjacent to the Patumahoe Reservoir to meet the appropriate hydraulic grade line to expand the existing asset in order to provide water supply to service the Plan Change Area. (c) An additional assessment of the full potential impacts of the rezoned land, including the proposed Sub-precinct E. (d) Any additional existing upgrades, and proposed wastewater infrastructure that will be required to accommodate additional flows. (e) Confirmation of how both the water and wastewater upgrades are intended to be funded.	Karam Dhadli (FS09.18) Support in part
38.1	Counties Power Ltd	Accept the Plan Change	
38.2	Counties Power Ltd	If the overhead lines are to remain, Counties Power Limited advises that clearance must be maintained between the overhead lines and any proposed street trees. These clearances are required under the Electricity (Hazards from Trees) Regulations 2003;	
38.3	Counties Power Ltd	Seeks consultation regarding the species of trees/shrubs proposed by any Standard in the vicinity of overhead lines in all Sub-precincts (to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the species of the tree.	
38.4	Counties Power Ltd	Retain provisions as notified/proposed, subject to submission points raised above: - I430.6.13 (1)(b) - I430.8 (2) - I430.8.1(4)(e)	
41.1	Ministry of Education	Requests regular engagement with Auckland Council and the developer to understand the housing typologies being proposed, the staging and timing of the subsequent development. This will allow the Ministry to	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
		appropriately plan for the potential impact of the development on the school network including the investigation of the provision of new schools and planning for interim and significant upgrades to existing schools.	

Discussion

A total of eight submissions address infrastructure matters that include water and wastewater, electricity, and schools. These are addressed in turn below.

Water and wastewater

531. Watercare Services Ltd (submissions 37.1 and 37.2) seeks that the plan change be declined unless adequate provision can be made for additional water supply storage and wastewater capacity. Watercare states that it is concerned with the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater network are appropriately considered and managed.

532. Watercare identify the following key issues that need to be resolved:

- How necessary additional water storage to service the plan change area will be provided;
- The availability of suitable land to accommodate upgrades required to service the plan change area;
- A comprehensive description of the development potential impacts of further subdivision and build out of the residential zoned land, as well as impacts of proposed Sub-precinct E;
- An assessment of wastewater infrastructure upgrades that might be required to service the additional development; and
- Confirmation of how those upgrades are intended to be funded.

533. The issue of water and wastewater is discussed in Section 10, concluding that there are potentially significant adverse effects on water and wastewater servicing.

534. It is accepted by all parties that an upgrade would be required to the Patumahoe water reservoir to service the plan change area. However, it is not clear whether this can be achieved. It is also unclear to whether the plan change will require upgrades to the wastewater network to service because Watercare identifies that there is only capacity within the existing wastewater network for up to 180 dwellings.

535. Precinct provisions could be designed to prohibit minor dwellings within sub-precinct E, so that only the proposed 180 dwellings could be built. However, minor dwellings are a significant component of housing choice and affordable (rental) housing. I therefore consider this to be a blunt approach to managing infrastructure. It also doesn't address the development capacity of the FUZ.

536. I acknowledge that these issues may be able to be resolved by the applicant, to allow the re-zoning to proceed as 'infrastructure ready', but at this point they are relying on water supply and wastewater being subdivision engineering detail matters. I do not consider the issue of water and wastewater capacity to have been adequately addressed to support the plan change.

Electricity

537. Counties Power Ltd (submissions 38.1 – 38.4) support the plan change provided concerns regarding sufficient clearance is maintained between overhead lines and proposed street trees. The submitter identifies that they have existing overhead infrastructure on the east side of Mauku Road and Patumahoe Road, and the west side of Carter Road.
538. It is noted that clearances from overhead power lines is addressed by the Electricity Act 1992, NZ Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) and Electricity (Hazards from Trees) Regulations 2003. Counties Power Ltd seeks that they are consulted any Standard involving selection of trees and shrubs near overhead lines and supports the following proposed precincts provisions:
- Standard I430.13(1)(b) Staging in sub-precinct E – requiring a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed;
 - I430.8(2)(f) and (g) Matters of discretion for subdivision and infringements of subdivision standards
 - Assessment criterion I430.8.1(4)(e) - whether plantings and other landscape features will result in a maintenance free mature landscape, insomuch as practical.
539. Matters of discretion I430.8(f) identifies the layout and design of any roads, vehicle access ways or pedestrian walkways are to be considered for subdivision as a restricted discretionary activity and refers to Figures 6-11 cross sections. Counties Power Ltd supports the cross sections as providing sufficient room in the back erm for underground reticulation but is concerned that this area is also identified for planting. power lines would extend along the road.
540. I note that the proposed road cross sections are not supported by Auckland Transport, as discussed above. Also discussed above in terms of character, it is recommended by the council's urban design specialist to provide larger specimen trees in the road reserves within sub-precinct E. These recommendations do not support the relief sought by Counties Power Ltd. I consider if the plan change is supported that there will need to be care in selection of street trees at the time of subdivision to address the concerns raised by Counties Power Ltd, whether the electricity lines are overhead or underground.

Schools

541. Ministry of Education (submission 41.1) supports the plan change and seeks ongoing engagement to enable planning for interim and significant upgrades to existing schools to accommodate growth at Patumahoe.
542. The applicant's Infrastructure Report deals with network infrastructure but not social infrastructure such as schools and community facilities. The Ministry of Education can initiate engagement with the council on development timings as part of its Auckland school infrastructure planning. The plan change gives a clear indication of the type and density of residential development anticipated, which should assist the Ministry in its planning.

Recommendations on submissions

543. That submission 20.1, 37.1, 37.2 are accepted for the reason that there is insufficient information to determine that adequate capacity for water and wastewater exists to service the plan change area.

544. That submissions 38.1 – 38.4 and 41.1 are rejected for the reason that the plan change is recommended to be declined.

545. There are no amendments associated with these recommendations.

11.12. Precinct provisions – objectives, policies, rules and standards

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.6	Auckland Transport	Amend Objective 3(a) as follows. '(3) Development and/or subdivision within the precinct facilitates a transport network that: (a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network; '	
33.8	Auckland Transport	Retain Policy 5.	
33.10	Auckland Transport	Amend the activity table I430.4.2(A5) to specifically identify the 'applicable building and development standards in I430.6'	
33.11	Auckland Transport	Amend the activity table I430.4.2(A7) as follows: (A7) 'Subdivision which does not comply with <u>one or more of</u> the subdivision standards listed in (A6) above'	
33.12	Auckland Transport	Amend Standard I430.6.3 to clarify the standard does not apply to roads to be vested in Auckland Council.	
33.13	Auckland Transport	Amend Standard I430.6.5(1) as follows: '(1) All stormwater from impervious areas <u>on sites</u> shall be mitigated to achieve flow attenuation, such that 5m ³ /100m ² of roof area and 3m ³ /100m ² of other impervious areas are attenuation by one (or a combination) of the following methods: ...'	
33.14	Auckland Transport	Amend Standard I430.6.13(1) as follows: '(1) Before any S224(c) certificates <u>for subdivision or building consents</u> for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130 <u>in accordance with SUB60318096 and LUC60329723 (while those consents remain valid)</u> , the following works shall be constructed and completed to the Council's satisfaction:'	
33.15	Auckland Transport	Amend Standard I430.6.13(1)(a) as follows: '(a) A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of from the indicative locations shown on Patumahoe: Precinct Plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design); '	Karam Dhadli (FS09.13) Oppose in part
33.16	Auckland Transport	Reword Standard I430.6.13(1)(b) as follows: '(b) a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed; '(b) <u>the width of the road from the property boundary of the proposed site to the kerb on the opposite site of the road</u> .'	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.17	Auckland Transport	Reword Standard I430.6.13(1)(c) as follows: '(c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road: '(c) <u>'subdivision creating sites with access from Carter Road'</u>	
33.18	Auckland Transport	Reword Standard I430.6.13(1)(c)(i) to clarify what road needs to be formed.	
33.19	Auckland Transport	Reword Standard I430.6.13(1)(c)(ii) as follows: '(ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and '(ii) <u>'the northern portion of Carter Road, which is identified as 'pedestrian / cycle lane' on Precinct Plan 3 is to be closed to vehicle traffic and formed with pedestrian access and separated cycle facilities'</u>	
33.22	Auckland Transport	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant, to require the vesting of land as road adjacent to Patumahoe Road as identified on Precinct Plan 3.	
33.23	Auckland Transport	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant including identification on Precinct Plan 3, to require the upgrade of Patumahoe Road frontage in conjunction with subdivision and development. This includes separated walking and cycling facilities to be provided along the western side of Patumahoe Road extending to Woodhouse Road and vesting of land to accommodate this infrastructure.	

Discussion

546. Fourteen submissions support the plan change subject to transport-related amendments to the precinct provisions relating to objectives, policies, rules and standards. Submission points that support the retention of a particular provision are not addressed except in the context of another submission that seeks to amend that provision.

547. I note that these submissions are addressed in the transport peer review report, and for the benefit of brevity I note the following key points:

- Objective I430.2(3)(a) is an operative objective and is not proposed by the plan change. While I agree it is unclear what or who the upgrades are referring to, I consider the outcome desirable to align development with upgrades to the surrounding network.
- Activity Table I430.4.2(A5) follows the standard approach of the AUP to leave activities blank where they rely on the underlying zone provisions.
- Standard I430.6.3 Paving materials in sub-precincts B, D, D and E is an existing standard specifying paving materials and it is not intended to apply to roads themselves. The issue of materials for public roads is specified in the relevant Auckland Transport code of practice/design standards. Rather than change the existing provision, it may be more appropriate to remove sub-precinct E from this standard if it is not supported by Auckland Transport.
- Standard I430.6.13 "Staging in Sub-precinct E" lists pre-requisites for the issuing of titles or building consents for dwellings to a level of detail that may not be necessary because there are sufficient processes both under the AUP subdivision

provisions and the Auckland Transport code of practice/design standards to address the issues highlighted by Auckland Transport.

- There may be benefits in simplifying the wording of clause(1)(b) but I note that Mr Edwards does not support the wording proposed by Auckland Transport. It is not necessary to exclude Lot 1 DP1692130 from the standard because it already has consents.
- Clause (1)(c) is intended to be a trigger for the subdivisions of existing Carter Road fronting properties to provide a new road access between Carter Road and Patumahoe Road, a shared path in the northern part of Carter Road, and vehicle access to the Watercare site on Carter Road. It is not intended to require all subsequent subdivisions to also create new road access linkages.
- A requirement to vest a sliver of land adjacent to Patumahoe Road (as identified on Precinct Plan 3) as road to allow the provision of an appropriate road cross-section should be included for lots that have frontage to Patumahoe Road. This could be addressed through an amendment to Precinct Plan 3 to identify a requirement to upgrade the western side of Patumahoe Road with pedestrian and cycling facilities extending along the western extent of the PC55 area from the intersection with Woodhouse Road to the railway level-crossing. Alternatively, this could be achieved through a specific standard such as by amendment to Standard I430.6.13 to require the upgrade and vesting of land required for road widening. The sliver of land is shown on the notified Precinct Plan 3 and subdivision of land is a non-complying activity if it does not implement the Precinct Plan 3.
- Mr Edwards does not support the closure of Carter Road to vehicular traffic and considers it appropriate to rely on the road stopping process to address access to existing sites. The standard should require pedestrian and cyclist facilities to be provided along the northern part of Carter Road (which could be implemented regardless of road closure). Mr Edward also recommends that the standard provide for upgrading the Patumahoe Road/Carter Road intersection as an alternative to closing Carter Road to vehicles.
- Amendment to Standard I430.6.5(1) to clarify that it refers to on-site management is supported by Healthy Waters but I do not support amending this provision because it applies is an operative provision that applies to sub-precincts A, B, C and D. The plan change does not seek to amend this provision other than to identify that it applies to sub-precinct E. This is appropriate as the revised SMP adopts this approach.

Recommendations on Submissions

548. That submissions 33.6, 33.8, 33.10 - 33.19, 33.22 and 33.24 are rejected for the reason that the plan change is recommended to be declined.

549. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address transport related precinct provisions. These amendments are set out in Appendix 8 to this report.

11.13. Precinct provisions – assessment criteria

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.24	Auckland Transport	Insert a new heading ' <u>I430.8.1A Matters of discretion</u> ' and renumber consequently if required.	
33.25	Auckland Transport	Reword I430.8(2) as follows: '(2) Subdivision and infringement of subdivision standards <u>other than those standards listed in (A2) and (A6)</u> '.	
33.26	Auckland Transport	Delete the matter of discretion at I430.8(2)(c) as follows: (c) 'Compliance with minimum site size requirements'	
33.27	Auckland Transport	Remove the matter of discretion at I430.8(2)(f) as follows: '(f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (roading Hierarchy) and Figures 6-11 (Cross Sections) below.' Insert a new matter of discretion for I430.8(2) as follows: <u>'(x) The adequacy of the transport infrastructure and services to provide for the subdivision'</u>	
33.28	Auckland Transport	Amend the matter of discretion at I430.8(2)(h) as follows: '(h) establishment of suitable <u>safe and efficient</u> road access from Patumahoe Road to Sub-precinct E and <u>the internal roading network including</u> , footpaths and cycleways within the Sub-precinct;'	
33.29	Auckland Transport	Amend the matter of discretion at I430.8(2)(i) as follows: '(i) need for and provision of road safety improvements to these sections of Patumahoe and/or Mauku Roads, <u>including at the intersection with Woodhouse Road, adjacent to</u> to mitigate the transport effects of development in Sub-precinct E;'	
33.30	Auckland Transport	Retain the matter of discretion at I430.8(2)(j)	
33.31	Auckland Transport	Remove Figures 5 – 11 in the Precinct Plan, showing the roading hierarchy and cross sections of roads and a shared path. Replace the cross-sections with an approach that identifies the minimum road reserve widths, functional requirements, and particular components such as separated cycle facilities.	Karam Dhadli (FS09.14) Oppose in part
33.33	Auckland Transport	Amend assessment criterion I430.8.1(1)(b) as follows: '(b) For Sub-precinct E, the extent to which an activity a development complies with the Patumahoe: Precinct Plan 3 and implements the identified transport infrastructure.'	
33.34	Auckland Transport	Amend assessment criterion I430.8.1(1)(c) as follows: '(c) For Sub-precincts A, B, C, and D and E whether the design of any roads, vehicle access ways or	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
		pedestrian walkways is consistent with the relevant Precinct Plan and relevant Figures 1- 4 or 5-9 above'.	
33.35	Auckland Transport	Amend assessment criteria at I430.8.1(2) as follows: '(2) Subdivision and infringement of subdivision standards other than those standards listed in (A2) and (A6)'	
33.36	Auckland Transport	Amend assessment criterion I430.8.1(2)(a) as follows: '(a) For Sub-precincts A, B, C, and D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant Precinct Plan and relevant Figures 1- 4 and 5-11 above.'	
33.37	Auckland Transport	Insert new assessment criterion for I430.8.1(2) as follows: '(x) For Sub-precinct E, the extent to which the subdivision implements the transport infrastructure identified on Precinct Plan 3'	
33.38	Auckland Transport	Delete assessment criterion I430.8.1(2)(b) as follows: '(b) Whether site sizes meet the minimum requirements in Standard I430.6.7 above.'	
33.39	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(i) as follows: '(i) Whether the subdivision will implement any works are required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and'	
33.40	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(ii) as follows: '(ii) Whether the subdivision will implement any safety improvements required to the local road network are facilitated by subdivision in order to safely accommodate the additional activity address any transport effects associated with development in Sub-precinct E.'	
33.41	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(iii) as follows: '(iii) Whether the subdivision provides for any safety improvements are required to maintain the safe operation of the railway level crossing on Patumahoe Road, and'	
33.42	Auckland Transport	Delete assessment criterion I430.8.1(4)(b)(iv) as follows: '(iv) Whether subdivision and development in Sub precinct E contributes proportionately to any required safety improvements to the level crossing.'	
33.43	Auckland Transport	Amend assessment criterion I430.8.1(4)(c)(i) as follows: '(i) Whether the establishment of roading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct Plan 3, Auckland Council Codes of Practice and the Auckland Design Manual'	

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.44	Auckland Transport	Insert two new criteria for I430.8.1(4)(c) as follows: '(x) Whether the staging of development is aligned with the delivery of transport infrastructure needed to service the development' '(x) Whether the establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure in existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.'	
33.45	Auckland Transport	Amend assessment criterion I430.8.1(4)(f) as follows: '(f) The extent to which subdivision design and associated provisions address ensure that the specific Standards I430.8(1)(b-d) and matters of discretion in I430.8(2)(b, c, f-l) applicable to Sub-precinct E achieve their respective purpose(s).'	
36.12	Kiwirail Holdings Limited	Retain I430.8. Assessment – restricted discretionary activities (2) clause (j) as notified	
36.14	Kiwirail Holdings Limited	Retain I430.8.1(4)(b)(iii) and (iv) as notified	

Discussion

550. A total of 22 submissions seek to either retain or amend the precinct assessment criteria. The majority of submissions are from Auckland Transport and seek transport related amendments to the assessment criteria. Two submissions are from KiwiRail seeking retention of specific matters of discretion and assessment criteria relating to the level crossing of the Mission Bush Branch (railway) line.

551. I note that these submissions are addressed in the transport peer review report, and for the benefit of brevity I note the following key points should the plan change be supported:

- Matters of Discretion I430.8(2) – Figures 5 (Roading hierarchy) and Figure 6 (road cross sections) are considered unnecessarily prescriptive and not essential for appropriate development of the land. Appropriate cross-sections are determined at the time of subdivision with reference to whatever standards might apply at that time.
- Assessment Criteria I430.8.1 - further clarity should be provided by amending criterion (2)(a) to provide greater clarity regarding the transport infrastructure that must be provided prior to development.
- Assessment Criteria I430.8.1(4)(b) – amend to provide additional roading criteria for subdivision in sub-precinct E to clarify the role of subdivision works in implementing safety improvements, and for integration of staging with transport infrastructure.
- Assessment Criteria I430.8.1(4)(b)(iii) – Although Auckland Transport seeks deletion, KiwiRail seeks retention and it should be retained to address their concerns regarding safety of the level crossing.

Recommendations on Submissions

552. That submissions 33.24 – 33.29, 33.31, 33.33 – 33.45, 36.12 and 36.14 are rejected for the reason that the plan change is recommended to be declined.

553. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address transport related precinct provisions. These amendments are set out in Appendix 8 to this report.

11.14. Precinct provisions – precinct plan

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.32	Auckland Transport	Amend the Precinct Plan to clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council.	
33.46	Auckland Transport	Amend Precinct Plan 3 to delete the section of 'indicative road layout' located adjacent to the south-west boundary of the Patumahoe Recreation Reserve. Amend Precinct Plan 3 to include other transport works required to support the proposal including: <ul style="list-style-type: none"> • Pedestrian crossings on Patumahoe Road • Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road • Pedestrian and potential cycling connection through Patumahoe Recreation Reserve • Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection • Additional bus stops on Patumahoe Road • Identification of roads for speed reduction measures. Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.	
33.47	Auckland Transport	Amend Precinct Plan 3 to remove one of the proposed intersections onto Patumahoe Road but retain the intersection adjacent to the industrial zone.	
33.48	Auckland Transport	Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.	
33.49	Auckland Transport	Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.	
33.50	Auckland Transport	Amend the Precinct Plan to require two pairs of bus stops meeting Auckland Transport standards to be provided along Patumahoe Road in conjunction with	

		subdivision and development of Sub-precinct E. The indicative location of the bus stops should be identified on Precinct Plan 3.	
33.51	Auckland Transport	Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.	

Discussion

554. Seven submissions from Auckland Transport seek amendments to Precinct Plan 3 to address transport issues. Auckland Transport seeks that the following matters are identified on the precinct plan:

- Pedestrian crossings on Patumahoe Road
- Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road
- Pedestrian and potential cycling connection through Patumahoe Recreation Reserve
- Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection
- Additional bus stops on Patumahoe Road
- Identification of roads for speed reduction measures.

555. I note that these submissions are addressed in the transport peer review report, and for the benefit of brevity I note the following key points should the plan change be supported:

- The applicant has confirmed that all roads shown on the precinct plan would be vested public roads.
- From a traffic engineering point of view, where there are different forms of road development that may be appropriate (i.e. JOAL) this indicates the road is not crucial and therefore does not need to be shown on the precinct plan. However, from an urban design and open space planning perspective there is benefit in identifying park-edge roads fronting open space.
- Where infrastructure requirements sit outside the plan change area it is difficult to identify these on a precinct plan although identification could assist within land use integration. The following is noted:
 - Upgrading and widening of Patumahoe Road from Carter Road to the railway level crossing can be achieved through identification on the Precinct Plan, and requirement to undertake works as part of any subdivision.
 - Upgrade of Patumahoe Road between Carter Road and Woodhouse Road, or the intersection of Patumahoe / Woodhouse / Mauku Roads cannot be achieved through the precinct plan. Public road upgrades are the responsibility of Auckland Transport and therefore development could be staged to align with these upgrades, if not in place, then consent would be required as a non-complying activity.
 - The pedestrian / cycling connection through the Patumahoe Recreation Reserve ('Domain') would need to be with the agreement of councils Parks Department and although providing a good outcome, would not be required provided road access to Mauku Road is implemented. Provision of pedestrian and cycling connections through PC55 to the reserve boundary could be identified on the precinct plan.

- The identification of roads for speed reduction measures is not supported as an item of required transport infrastructure to allow development because these matters are regulatory functions that are beyond the control of the applicant or developer.
- Removal of either Intersection A or Intersection B on Patumahoe Road is sought because having three intersections on Patumahoe Road would produce safety concerns in relation to proposed cycle facilities along Patumahoe Road. Two intersections on Patumahoe Road are considered sufficient. Plan provisions should identify either intersection as appropriate locations for a new road, and that both need not be provided, alternatively one intersection could be deleted from the precinct plan.
- Given subdivision not in accordance with the precinct plan would be a non-complying activity, only features that are essential to provide for development to occur should be identified.

Recommendations on Submissions

556. That submissions 33.32, and 33.46 – 33.51 are rejected for the reason that the plan change is recommended to be declined.
557. Should the Panel determine to approve the plan change I consider amendments to the precinct provisions would be required to address transport related precinct provisions. These amendments are set out in Appendix 8 to this report.

11.15. Miscellaneous issues

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
18.2	Yvonne Wagner	Use Lots 18 & 19 for community gardens and community vegetable allotments.	
28.9	Auckland Council	Decline the plan change [in relation to geotechnical issues]	
28.10	Auckland Council	In the alternative, any other such relief that would avoid, mitigate, or remedy geotechnical hazards.	

Discussion

558. Three submissions are identified as miscellaneous because they could not be easily grouped with other topics.
559. Yvonne Wagner (submission 18.2) seeks the use of Lots 18 and 19 [presumably of the recently consented subdivision SUB80318096] for community gardens and community vegetable allotments. This request is outside the scope of the proposed plan change and would only be able to be granted if public acquisition or rights of use were obtained to those lots. The subdivision has proceeded to earthworks development, independently of this plan change.
560. Auckland Council (submissions 28.9 and 28.10) is concerned that geotechnical risks should be viewed as an indication that development is not appropriate in this location and relies heavily on engineering solutions at the time of resource consent. If the plan change is not declined, the submitter seeks such relief that would avoid, mitigate, or remedy geotechnical hazards.

561. Evidence from the applicant's specialist and the peer review Geotechnical Engineering specialist is that the land can be developed using relatively conventional civil engineering techniques. Land topography and land stability may influence the lot sizes (and zone density) if the proposed FUZ area proceeds to the east of Patumahoe Road, particularly towards the eastern escarpment.

Recommendations on Submissions

562. That submission 18.2 be rejected as outside the scope of the plan change.

563. That submissions 28.9 and 28.10 be accepted in part for the reason that the plan change is recommended to be declined but not for geotechnical reasons.

564. There are no amendments recommended in response to these submissions.

12. CONCLUSIONS

565. Submissions have been received in support of and in opposition to PC55. A total of 143 submissions were received from 45 submitters. A total of 63 further submissions were received from 10 further submitters. The submissions seek the following outcomes:

- Six submissions support or support in part the plan change;
- 33 submissions seek that the plan change declined; and
- 104 submissions seek either to approve subject to amendments, or alternative relief should the plan change not be declined.

566. Based on the technical reviews and analysis of submissions, the plan change request raises a number of potential conflicts with the AUP RPS. While many of the issues considered can be easily addressed through the precinct provisions, I consider the key to be:

- Loss of productive soils
- Land use and transport integration
- Adequate provision of water and wastewater infrastructure
- Compact urban form

567. The plan change area is identified to contain highly productive soils, being land containing elite soils and prime soils as defined by the AUP. Although there is some difference between the soil experts regarding the quantity of elite and prime soils, the applicant identifying no elite soils, the productive potential of the land is generally agreed between the experts to be limited. Council's soils expert identifies that only 13.7 ha of the elite and prime soils within the plan change area would have productive potential. Council's land productivity expert concludes that although the soils are capable of growing, the potential productivity is not significant and loss of soils is also considered to be insignificant in the regional context.

568. I conclude that the majority of the plan change contains elite and prime soils but the fragmentation of sites and existing development constrains the productive potential. Policy B2.6.2(1) seeks the avoidance of land containing elite soils and where practicable land containing prime soils where they are significant for their ability to produce food. Loss of 13.7ha of highly productive soils in fragmented landownership is in my opinion not significant for its ability to produce food. Therefore, I do not consider the loss of productive soils to be a reason to oppose the plan change.

569. Auckland's growth strategy is reflected in the Auckland Plan 2050, the FULSS and the RPS Objective B.2.2.1(1) to achieve a quality compact urban form. Therefore, growth is

anticipated to be focused within the existing urban area and the future urban areas within the Rural Urban Boundary. However, some growth is enabled in rural towns and villages, and this is enabled through the AUP RPS Objective B2.6.1(1) and Policy B2.6.2(1). All the experts agree that the plan change represents a compact urban form in a local context, providing a logical expansion to Patumahoe village that is contained by defensible boundaries.

570. The key issue in terms of compact urban form, is whether Patumahoe is an appropriate location for unanticipated growth. Development capacity provided by the plan change is anticipated to be 200-250 dwellings making a small contribution to the sub-regional demand. Significant development capacity within the sub-region is already planned for via the Auckland Plan 2050 (Development Strategy), AUP zones, and the FULSS which is sufficient to accommodate anticipated growth in the sub-region. Therefore, additional development capacity is not required to meet requirements under the NPS-UD or the RPS Policy B2.2.2(1).

571. A quality compact urban form enables a range of outcomes, including higher-quality urban environments and greater productivity and economic growth. Key issues in regard to PC55 related to better use of existing infrastructure and efficient provision of new infrastructure and improved and more effective public transport. PC55 does not give effect to the RPS Objectives B2.2.1(1), (2), (5), and Objective B2.4.1(3) because it does not achieve a compact urban form. PC55 is not consistent with the Auckland Plan (Development Strategy) and the FULSS.

572. PC55 lacks integration with transport infrastructure, because although there is an existing bus service it is not frequent and therefore cannot support travel to work for a majority of the future population. The plan change will increase the number of private vehicles on the wider transport network and the planning and funding for growth in the sub-region does not account for this additional growth. When considered individually PC55 could be considered to have negligible effects on the wider transport network, it must be considered accumulatively with other development and pressure for plan changes in the sub-region. PC55 is not supported because it represents unanticipated growth that is not required and there are existing constraints within the wider transport network that will be exacerbated by approving the plan change. PC55 does not give effect to the RPS Objective B2.6.1(2) and Policy B2.6.2(1) for growth in rural villages, or Objective B3.3.1(1) and Policy B3.3.2(4) regarding the efficient integration of land use and transport infrastructure. PC55 is not consistent with the Auckland Plan (Development Strategy) and the FULSS.

573. Insufficient information has been provided to demonstrate that the plan change can be adequately serviced by water and wastewater infrastructure. Development capacity of 200-250 dwellings is proposed by PC55, which is significantly more development than the existing networks can accommodate. There are significant concerns regarding whether the water supply can be extended when the Patumahoe water reservoir site is constrained and there is lack of clarity regarding funding. In terms of the wastewater network, potential upgrades are significant and involve upgrading the wastewater pumpstation as well as the rising main to Pukekohe.

574. The applicant has not provided satisfactory information to address the wider implications of the plan change on network infrastructure. I acknowledge that these issues may in part be addressed through staging provisions within the precinct to align development with appropriate infrastructure upgrades. However, this would not address the fundamental concern that further expansion of Patumahoe does not represent efficient use of existing infrastructure. Therefore PC55 does not give effect to the RPS Objective

B2.6.1(2) and Policy B2.6.2(1) for growth in rural villages, or Objective B3.2.1(5) and Policies B3.2.2(1) and (2) regarding the efficient development, operation and upgrading of infrastructure. PC55 is not consistent with the Auckland Plan (Development Strategy) and the FULSS. I therefore do not support the plan change based on inadequate provision of water and wastewater infrastructure.

575. Patumahoe is not well served by public transport and as such will increase private vehicle use on the wider transport network, increasing vehicle kilometres travelled and is likely to increase carbon emissions which is contrary to the Te Tāruke-ā-Tāwhiri: Auckland’s Climate Action Plan.

576. I consider PC55 does not give effect to the NPS-UD (Objectives 1, 6 and 8 and Policies 1, and 8) because it does not contribute to a well-functioning urban environment that is integrated with infrastructure planning and funding decisions and does not support reductions in greenhouse gas emissions.

577. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that Plan Change 55 should be declined.

13. RECOMMENDATIONS

1. That, the Hearing Commissioners accept or reject submissions (and associated further submissions) as outlined in this report.
2. That, as a result of the assessment of the plan change request and recommendations on the submissions, I recommend that PC55 should be declined and the Auckland Unitary Plan not amended because the location for growth does not achieve a quality compact urban form and is not integrated with the adequate provision of infrastructure.
3. Should the Panel determine to approve the plan change to amend the Auckland Unitary Plan, I recommend that the amendments set out in Appendix 8 to this report.

14. SIGNATORIES

Name and title of signatories	
Authors	 Chloe Trenouth, Consultant Planner
Reviewer / Approver	 Craig Cairncross, Team Leader Central and South Planning, Plans and Places

APPENDIX ONE

PROPOSED PLAN CHANGE 55 (PRIVATE) PATUMAHOE SOUTH, AS NOTIFIED

I430. Patumahoe Precinct

(N.B. Includes PC4 Modifications to AUP:OIP)

I430.1. Precinct Description

Patumahoe Sub-precinct A consists of approximately 25 hectares of land located northwest of the existing Patumahoe settlement. The precinct is bounded to the east by Woodhouse Road and to the west by an existing residential area fronting Kingseat Road. To the south of the precinct is the Patumahoe town centre/commercial area, while to the north are horticultural and pastoral activities. The sub-precinct is bisected by an open watercourse that drains into the headwaters of the Taihiki River. A second, less significant watercourse is located in the western aspect of the precinct which includes the western wetland.

Sub-precincts B, C and D comprise approximately 9.93 hectares and are located on a weathered volcanic cone to the west of the Patumahoe town. The three sub-precincts are bounded by Mauku Road to the south east, Kingseat Road to the north east and Day Road to the north west. Land to the west and south of the precinct remain in rural/horticultural use.

The zoning of land within this precinct is Residential - Single House Zone and Open Space – Informal Recreation.

Sub-precinct E comprises approximately 33.5ha of land adjoining the southern edge of the existing settlement. The sub-precinct extends from the western side of Patumahoe Road across Carter Road to Patumahoe Domain and through to Mauku Road (opposite sub-precinct B). The Paerata-Waiuku Branch railway line forms the southern boundary of the precinct, with land to the south of the railway (outside of the precinct) remaining in rural land use.

The zoning of land within this precinct is Residential - Single House, Business – Light Industrial and Open Space – Informal Recreation.

I430.2. Objectives

- (1) Development provides a high standard of amenity, safety and convenience and contributes to a positive sense of place and identity for the Patumahoe area.
- (2) Efficient infrastructure is provided to service the needs of the precinct area.
- (3) Development and/or subdivision within the precinct facilitates a transport network that:
 - (a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network;
 - (b) facilitates transport choices by providing for pedestrians, cyclists, public transport facilities, and vehicles;

(c) is designed and constructed in a manner that is consistent with the requirements of Auckland Transport and any relevant code of practice or engineering standards.

(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses.

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

I430.3. Policies

(1) Require dwellings developed within the precinct, to make efficient use of land and infrastructure while achieving an overall pattern and intensity of development compatible with the rural character of Patumahoe.

(2) Enable a range of site sizes while maintaining a compact, centre focused urban form that is compatible with the current scale and development pattern of Patumahoe.

(3) Require subdivision and design of residential, open space, and infrastructure to enhance landscape amenity and recreational values associated with the principal watercourse including the bush gully and waterfall area at the north-western corner of the Sub-precinct A.

(4) Provide quality public open spaces which generally abut streets rather than residential sections and thus provide opportunities for passive surveillance and public amenity.

(5) Require subdivision and/or development within the precinct to provide for a transport network that:

(a) as a minimum, is in accordance with the transport network elements shown on Patumahoe: Precinct plans 1 *and* 3;

(b) supports safe and efficient movement of pedestrians, cyclists, public transport and vehicles;

(c) is designed and constructed in accordance with the requirements of Auckland Transport and any relevant code of practice or engineering standards.

(6) Require all lots within sub-precincts B, C, D and DE to be connected efficiently and cost effectively to the existing public sewerage and water supply networks in Patumahoe, and recognise that the council may enter into such arrangements as are appropriate with any developer to ensure this happens in a timely manner.

(7) Require the use of water harvesting within sub-precincts B, C, D and DE (i.e. roof water collection tanks) for non-potable uses for individual dwellings as a means of

achieving stormwater management objectives and to promote water conservation and efficiency.

- (8) Require low impact stormwater management techniques to be integrated into the design of the stormwater network in the area and stormwater management to occur in accordance with the Patumahoe Integrated Catchment Management Plan and associated Stormwater Network Discharge Consent

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

I430.4. Activity table

The provisions in any relevant overlays, zone and the Auckland-wide provisions apply in this precinct unless otherwise specified below.

Table I430.4.1 Activity table specifies the activity status of activities in the Patumahoe sub-precincts B, C and D pursuant to sections 9(3) and 11 of the Resource Management Act 1991. A blank table cell with no activity status specified means that the zone, Auckland-wide and overlay provisions apply.

Table I430.4.1 Activity table

Activity		Activity status
Development		
(A1)	Building	
Subdivision		
(A2)	Subdivision which complies with the subdivision standards I430.6.4 Vehicle parking and access in sub-precincts B, C and D, I430.6.7 Minimum net site area, I430.6.8. Maximum number of lots in sub-precincts B, C and D, I430.6.9 Landscape buffer in sub-precincts B, C, and D, I430.6.10 Public open space in sub-precincts B, C and D, I430.6.11 Staging in sub-precincts B, C and D and I430.6.12 Stormwater management in sub-precincts B, C and D;	
(A3)	Subdivision which does not comply with the subdivision standards I430.6.4 Vehicle parking and access, I430.6.7 Minimum net site area, I430.6.8. Maximum number of lots in sub-precincts B, C and D, I430.6.9 Landscape buffer, I430.6.10 Public open space, I430.6.11 Staging and I430.6.12 Stormwater management.	NC

Table I430.4.2 Activity table specifies the activity status of activities in Patumahoe sub-precinct E pursuant to sections 9(3) and 11 of the Resource Management Act 1991. A blank table cell with no activity status specified means that the zone, Auckland-wide and overlay provisions apply.

Table I430.4.2 Activity table

<u>Activity</u>		<u>Activity status</u>
<u>Development</u>		
<u>(A4)</u>	<u>Building</u>	<u>P</u>
<u>(A5)</u>	<u>Building which does not comply with the applicable building and development standards in I430.6.</u>	<u>RD</u>
<u>Subdivision</u>		
<u>(A6)</u>	<u>Subdivision which complies with the subdivision standards I430.6.7 Minimum net site area, I430.6.9 Landscape buffer in sub-precincts B, C, and D and E, I430.6.10 Public open space in sub-precincts B, C and D and E, I430.6.13. Staging in Sub-precinct E; I430.6.14. Stormwater management in Sub-precinct E; I430.6.15. Reverse Sensitivity in Sub-precinct E.</u>	<u>RD</u>
<u>(A7)</u>	<u>Subdivision which does not comply with the subdivision standards listed in (A6) above.</u>	<u>NC</u>

I430.5. Notification

- (1) Any application for resource consent for an activity listed in Tables I430.4.1 and I430.4.2 Activity table above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

I430.6. Standards

The overlay, zone and Auckland-wide standards apply in this precinct in addition to the following standards, unless otherwise specified below. All activities listed in Table I408.4.1 Activity table must comply with the following standards.

I430.6.1. Building design in sub-precincts B, C, D and DE

- (1) The finishing of external walls of buildings shall have a light reflectivity value of no more than 70%.
- (2) The finishing of roofs shall have a light reflectivity value of no more than 40% and the roof finishing shall be darker than the external walls of the building.

I430.6.2. Retaining walls in sub-precincts B, C, D and DE

- (1) The height of a single retaining wall shall not exceed 1.2m.

- (2) The use of more than one 1.2 metre retaining wall is permitted, provided this can be done by terracing a second wall behind the first. The space in between the two walls cannot be less than 0.75 metres and this intervening area must be landscaped in accordance with Figure 4 Retaining detail below.
- (3) At the base of each retaining wall landscape plantings shall be established in accordance with the Figure 4 Retaining detail below, to visually break up the appearance of the face of the retaining wall.
- (4) Retaining walls must be constructed of natural stone, or timber or designed with materials that match materials used on the exterior of a dwelling on the same lot. Crib or keystone are not permitted.

I430.6.3. Paving materials in sub-precincts B, C, D and DE

- (1) Paving materials must comprise either exposed aggregate concrete, concrete with charcoal oxide (6.0kg/m^3), natural stone, natural timber, or be undertaken with dark or earth toned pavers.

I430.6.4. Vehicle parking and access in sub-precincts B, C and D

- (1) No vehicle access to private lots is permitted from Kingseat Road. Vehicle access for properties with frontage onto Kingseat Road shall be from public roads or private lanes at the rear of properties.

I430.6.5. On-site stormwater mitigation in sub-precincts B, C, D and DE

- (1) All stormwater from impervious areas shall be mitigated to achieve flow attenuation, such that $5\text{m}^3/100\text{m}^2$ of roof area and $3\text{m}^3/100\text{m}^2$ of other impervious areas are attenuation by one (or a combination) of the following methods:
 - (a) Stormwater soakage pits where geotechnical conditions allow.
 - (b) Stormwater rain tanks where geotechnical conditions do not allow for effective soakage, or to provide generally for rainwater harvesting.

I430.6.6. Interface with Kingseat Road – all sites fronting Kingseat Road in sub-precincts B, C and D

- (1) That part of Standard H3.6.8 Yards specifying front yards does not apply.
- (2) Front yards: a front yard of not less than 4.0 metres, and not more than 5.0 metres must be provided.
- (3) That part of the front façade of a dwelling within 10m of the front boundary must contain glazing to a habitable room or habitable rooms that is cumulatively at least 10 per cent of the area of that part of the front façade.
- (4) Any retaining wall adjacent to the Kingseat Road boundary shall be a maximum of 1.2 metres high, as illustrated in Figure 3 Kingseat Road below, Landscaping shall be planted to the front of any such retaining wall facing Kingseat Road for its entire length.

I430.6.7. Minimum net site area

- (1) Standards E38.8.2.3 Vacant sites subdivisions involving parent sites of less than 1 hectare and E38.8.3.1 Vacant sites subdivision involving parent sites of 1 hectare or greater, do not apply.
- (2) Site sizes for proposed residential sites must comply with the minimum net site areas specified in Table I430.6.7.1 Minimum net site area.

Table I430.6.7.1 Minimum net site area

Sub-precinct	Minimum net site area
A	800m ²
B	950m ²
C	600m ²
D	700m ²
<u>E</u>	<u>600m² for lots either wholly or partially located within 400m of the SE corner of the intersection of Patumahoe Road and Mauku Road;</u> <u>1500m² for lots adjoining the Paerata-Waiuku railway;</u> <u>800m² for all other lots</u>

I430.6.8. Maximum number of lots in sub-precincts B, C and D

- (1) The total number of residential lots within sub-precincts B, C and D, including those containing the two existing dwellings shall not exceed 73.

I430.6.9. Landscape buffers in sub-precincts B, C, and D and E

- (1) A landscape buffer area with an average width of no less than 20m, shall be established by way of reserve to vest in the council or restrictive covenant/s (or similar) along the south western boundary of Sub-precinct B in accordance with Patumahoe: Precinct plan 1.
 - (a) The landscape buffer area must be planted with a mixture of indigenous trees, shrubs or ground cover plants (including grass) along the full extent of the landscape strip.
 - (b) A recreation trail must be established within the landscape buffer area and have a minimum width of 2 metres.
- (2) A landscape buffer area with an average width of no less than 10m, shall be established by way restrictive covenant/s (or similar) along the western boundaries of Sub-precinct E adjoining rural zoned land in accordance with Patumahoe: Precinct plan 3.
 - (a) The landscape buffer area must be planted with a mixture of indigenous trees and shrubs along the full extent of the landscape strip.

(3) A landscape buffer area with an average width of no less than 5m, shall be established by way of restrictive covenant/s (or similar legal mechanisms) on Single House zoned lots along the southern boundaries of Sub-precinct E and between the Light Industrial and Single House zone land mid-way along the south boundary, in accordance with Patumahoe: Precinct plan 3.

(a) The landscape buffer area must be planted with a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs along the full extent of the landscape strip.

(4) A landscape buffer area with an average width of no less than 3m, shall be established by way restrictive covenant/s (or similar) along the southern boundaries of the Single House and Light Industrial zone of Sub-precinct E adjoining the railway in accordance with Patumahoe: Precinct plan 3.

(a) The landscape buffer area must be planted with a mixture of fast-growing exotic shelterbelt species and/or indigenous specimen trees and shrubs along the full extent of the landscape strip.

I430.6.10. Public open space in sub-precincts B, C, and D and E

(1) A neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 1.

(2) Prior to the occupation of any dwellings in Sub-precinct E that are located more than 400m from the Patumahoe Domain a neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 3.

I430.6.11. Staging in Sub-precincts B, C and D

(1) Before any S224(c) certificates of building consents are granted for any stage of development, the following works shall be constructed and completed to the council's satisfaction:

(a) the central spine road – major as shown on Patumahoe: Precinct plan 1;

(b) a shared footpath, appropriate kerb and channel, berm and street trees; and

(c) a services corridor along the frontages of Day Road, Mauku Road and Kingseat Road, where they are adjacent to the portion of land being developed.

I430.6.12. Stormwater management in Sub-precincts B, C and D

(1) Before S224(c) certificates or building consents are granted for development within Stage 2, either:

(i) a stormwater management pond shall be constructed and completed to Council's satisfaction within Sub-precinct D at the corner of Kingseat and Day roads; or

(ii) any upgrades necessary to the Western Pond within Sub-precinct A shall be constructed and completed to the council's satisfaction.

- (iii) The works outlined above shall be undertaken in accordance with the Patumahoe stormwater network discharge consent.

I430.6.13. Staging in Sub-precinct E

- (1) Before any S224(c) certificates or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130, the following works shall be constructed and completed to the Council's satisfaction:
- (a) A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of the indicative locations shown on Patumahoe: Precinct plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design);
 - (b) a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed;
 - (c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road:
 - (i) formation of a new road access between Carter Road and Patumahoe Road;
 - (ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and
 - (iii) provision of vehicle access to the Watercare facility at 6 Carter Road – Lot 13 DP83912;
 - (d) an extension of the public wastewater network and water supply networks with sufficient capacity to service the proposed allotments and any future subdivision stages.

I430.6.14. Stormwater management in Sub-precinct E

- (1) Before S224(c) certificates or building consents for new dwellings are issued for development within Sub-precinct E:
- (i) a stormwater management pond suitably sized for the relevant stage(s) shall be constructed and completed to Council's satisfaction within Sub-precinct E to the southeast of the Patumahoe Domain as shown on Precinct Plan 3.
 - (ii) The stormwater management system shall be designed and implemented in accordance with the applicable stormwater network discharge consent.

I430.6.15. Reverse Sensitivity in Sub-precinct E

- (1) Before any subdivision of land in Sub-precinct E enabling dwellings to be located within 200m of the poultry sheds located at 75 Patumahoe Road (Lot 2 DP 2119808) either:
- (a) Use of the poultry sheds shall be discontinued; or

- (b) Reverse sensitivity measures shall be implemented to Council's satisfaction, for example the registration of a "no complaints" covenant on the respective sites restricting the owners and occupiers of such land from complaining about any offensive and objectionable odours or dust within the buffer area generated by the poultry sheds.
- (2) Before any subdivision of land in Sub-precinct E enabling dwellings to be located between 200m and 400m away from the poultry sheds located at 75 Patumahoe Road (Lot 2 DP 2119808) reverse sensitivity measures shall be implemented to Council's satisfaction by requiring the registration of a "no complaints" covenant on the respective sites restricting the owners and occupiers of such land from complaining about any offensive and objectionable odours or dust within the buffer area generated by the poultry sheds.

I430.6.16. Fencing in Sub-precinct E

- (1) Fences within the front yard must not exceed a height of 1.4m (measured from ground level at the boundary) and must be a minimum 50% visually open as viewed perpendicular to the front boundary.
- (2) Side/Rear fences adjoining an Open Space zone must not exceed a height of 1.8m (measured from ground level at the boundary) and if more than 1.4m in height must be a minimum 50% visually open as viewed perpendicular to the boundary.

I430.6.17. Protection from Railway Noise and Vibration in Sub-precinct E

- (1) Any new building or alteration to an existing building located within 100 metres of the railway network (located within the Strategic Transport corridor zone) that contains an activity sensitive to noise shall be is designed, constructed and maintained to achieve indoor design noise levels not exceeding the maximum values in the following table:

<i>Building type</i>	<i>Occupancy/activity</i>	<i>Maximum railway noise level LAeq(1h)</i>
<i>Residential</i>	<i>Sleeping spaces</i>	<i>35 dB</i>
	<i>All other habitable rooms</i>	<i>40 dB</i>

N.B.

- a) Railway noise is assumed to be 70 LAeq at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres
- b) Compliance may be achieved by adopting the construction schedule specified by Kiwirail (refer to Schedule XX Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions October 2018).
- (2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and

maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95).

I430.7. Assessment – controlled activities

I430.7.1. Matters of control

There are no controlled activities in this precinct.

I430.7.2. Assessment criteria

There are no controlled activities in this precinct.

I430.8. Assessment – restricted discretionary activities

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

(1) Development and infringements of development standards:

- (a) *for sub-precincts A, B, C and D* consistency with Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
- (b) *for sub-precinct E consistency with the Patumahoe: Precinct plan 3.*
- (c) the location of any buildings and earthworks;
- (d) protection and planting of vegetation.

(2) Subdivision and infringements of subdivision standards:

- (a) *for sub-precincts A, B, C and D* consistency with Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
- (b) *for sub-precinct E consistency with the Patumahoe: Precinct plan 3.*
- (c) Compliance with minimum site size requirements;
- (d) the location of any building envelopes shown on the plan of subdivision;
- (e) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on the Patumahoe: Precinct plan 1 and on Figures 1 – 4 below;
- (f) *the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (Roading Hierarchy) and Figures 6 – 11 (Cross Sections) below.*

- (g) protection and planting of vegetation;
- (h) establishment of suitable road access from Patumahoe Road to sub-precinct E and internal roading, footpaths and cycleways within the sub-precinct;
- (i) need for and provision of road safety improvements to those sections of Patumahoe and/or Mauku Roads adjacent to sub-precinct E;
- (j) need for and provision of safety improvements to the railway level crossing on Patumahoe Road.
- (k) provision of public water supply and wastewater networks in sub-precinct E;
- (l) establishment of stormwater management and reticulation in sub-precinct E;
- (m) **Compliance with fencing standards in sub-precinct E;**
- (n) **Compliance with Railway Noise and Vibration Standards in Sub-precinct E.**

Figure 1: Minor roads

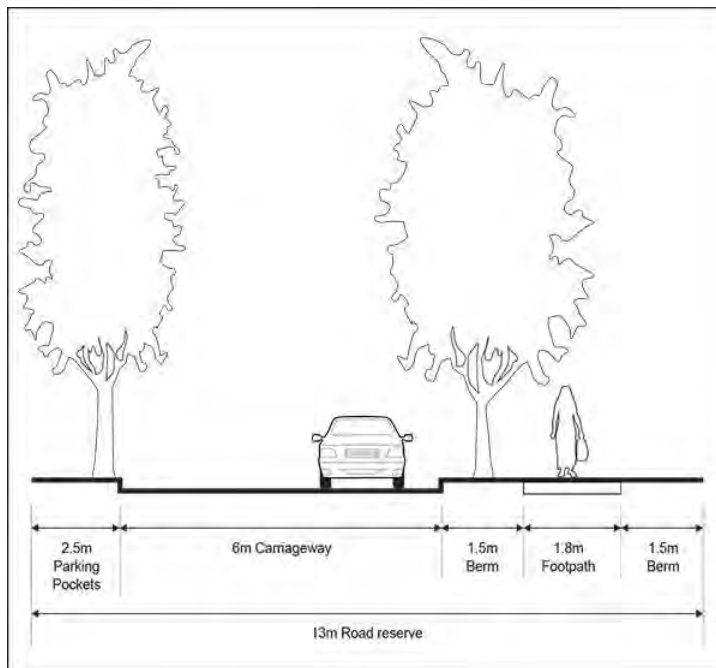
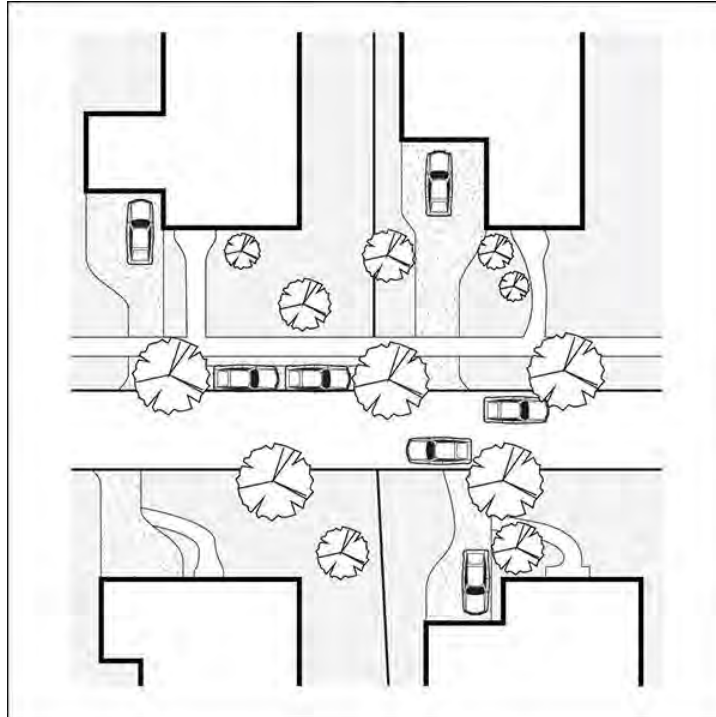


Figure 2: Major roads

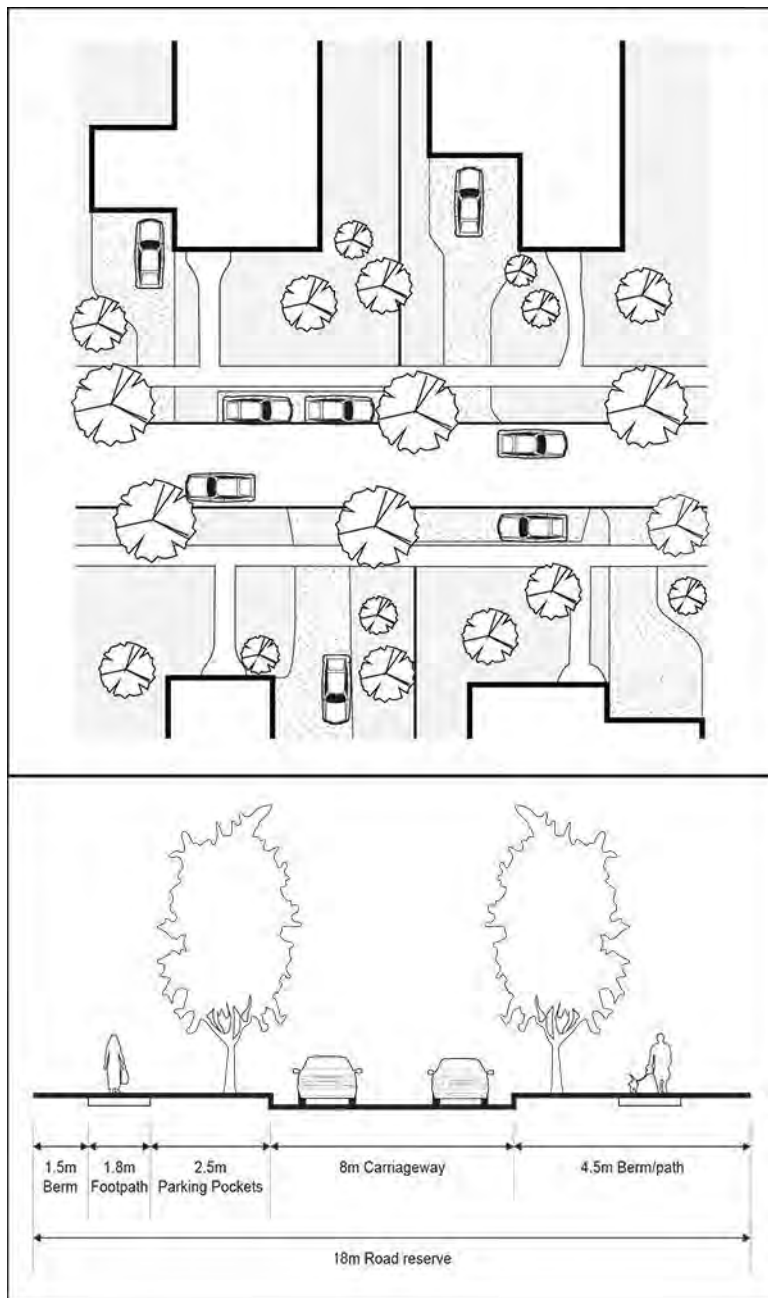


Figure 3: Kingseat Road

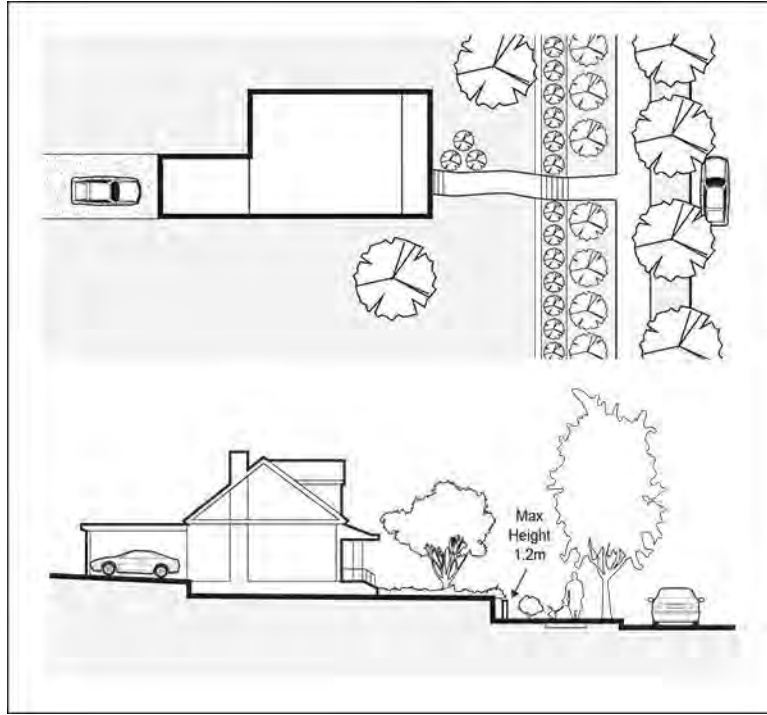


Figure 4: Retaining detail

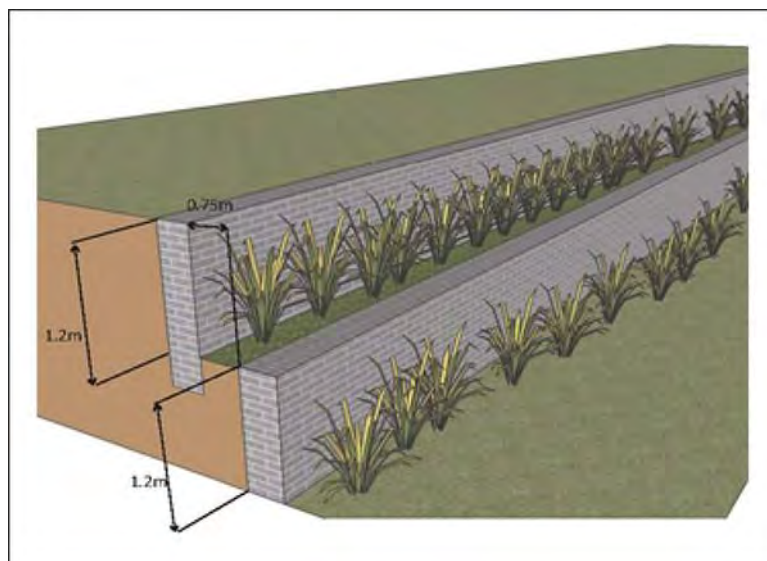


Figure 5: Roading Hierarchy – Sub-precinct E



Figure 6: Patumahoe Road – Cross Section

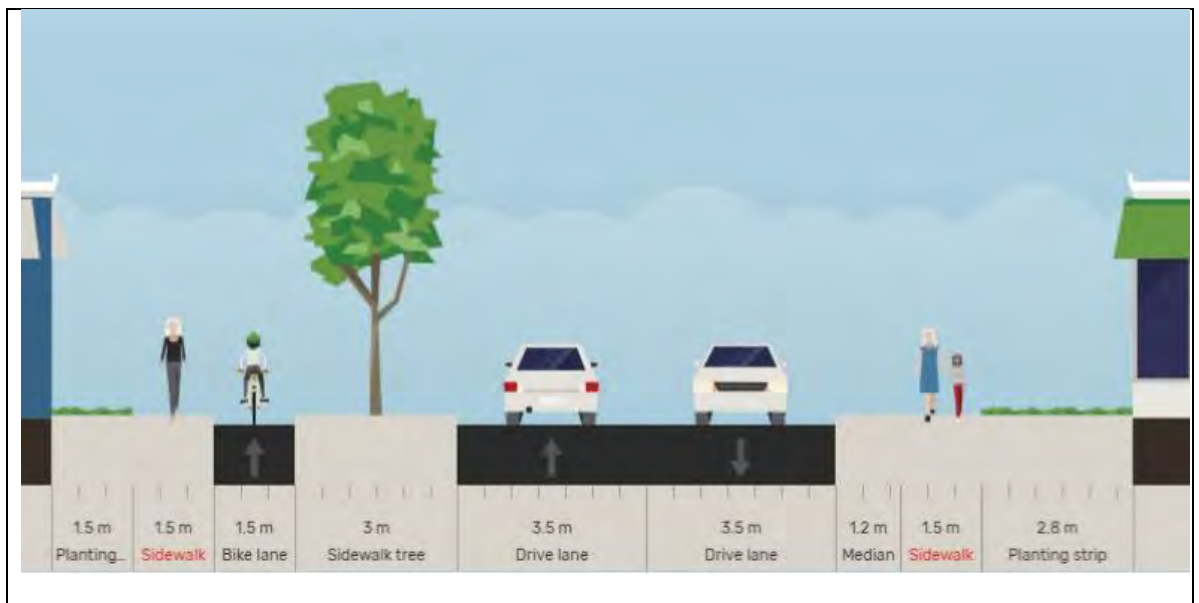


Figure 7: Greenway – Cross Section



Figure 8 – Minor Road Cross Section



Figure 9 – Local Road Cross Section



Figure 10 – Light Industrial Road Cross Section

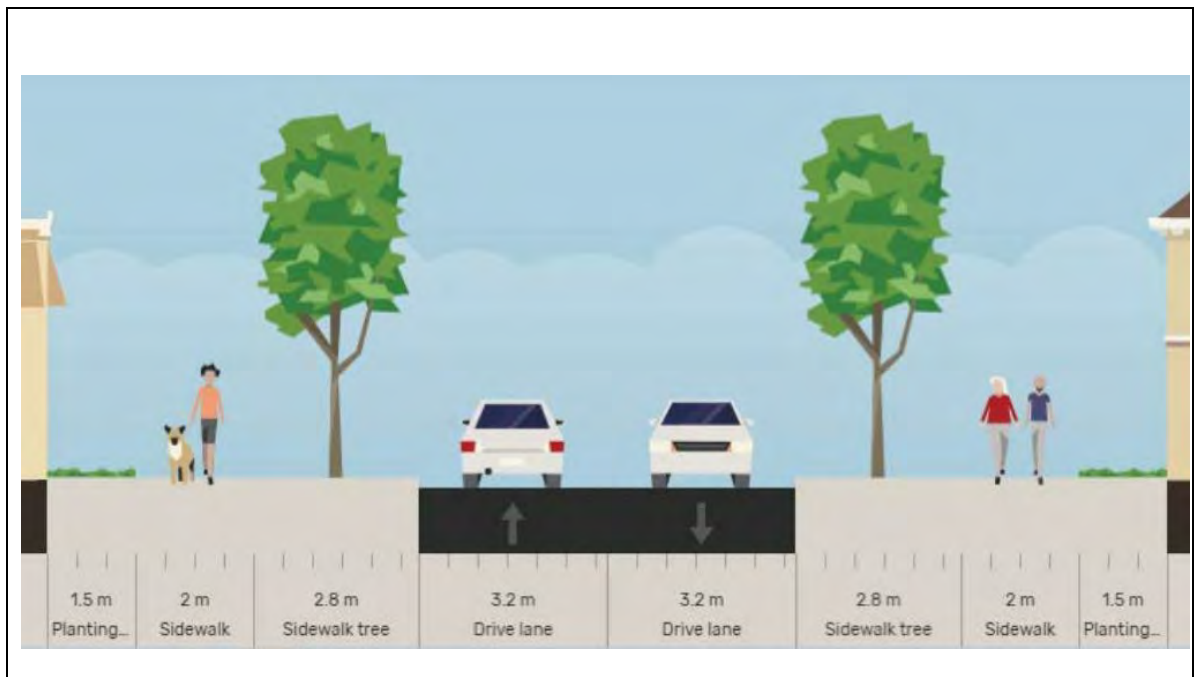
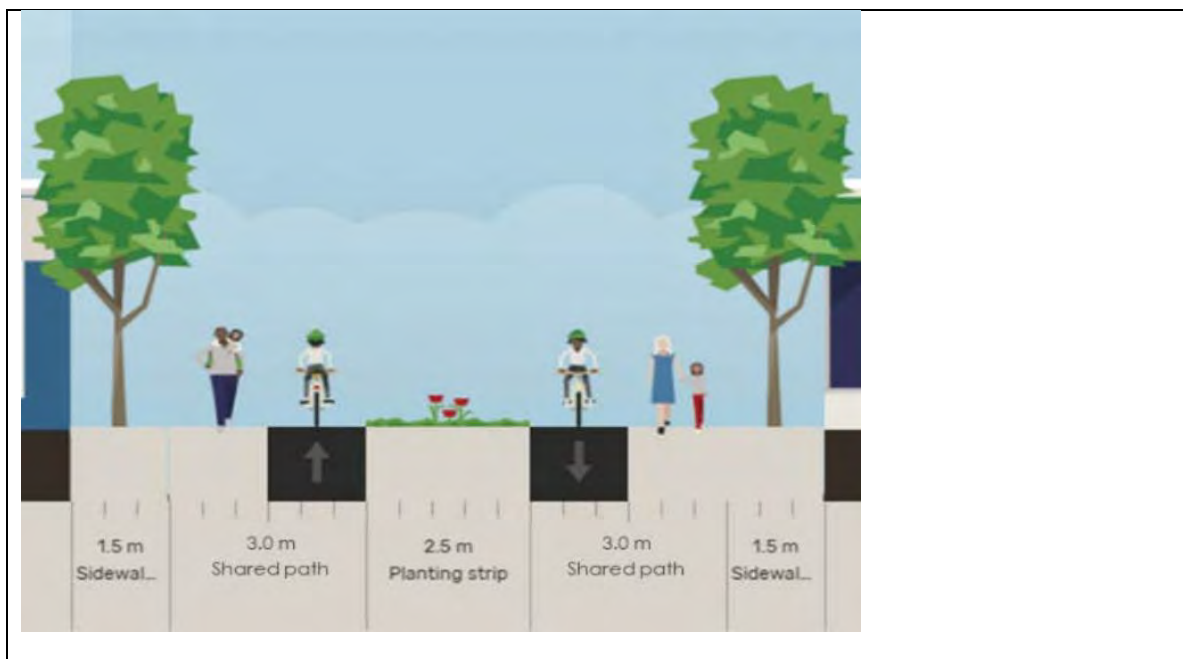


Figure 11 – Shared Path Cross Section



I430.8.1. Assessment criteria

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

- (1) Development and infringement of development standards.
 - (a) For sub-precincts A, B, C and D the extent to which an activity complies with the Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
 - (b) For sub-precinct E extent to which an activity complies with the Patumahoe: Precinct plan 3.
 - (c) For sub-precincts A, B, C, D and E whether the design of any roads, vehicle access ways or pedestrian walkways is consistent with the relevant precinct plan and relevant Figures 1- 4 or 5-9 above.
 - (d) The extent to which existing vegetation will be removed and what mitigation planting is proposed to increase the overall vegetated area.
 - (e) How the landscape character and amenity of the area will be enhanced.
 - (f) Where it can be demonstrated it is not possible or practicable to meet other assessment criteria with respect to vegetation, whether provision is made for replacement planting that will enhance the landscape character and amenity of the area.

- (g) The extent to which buildings and works are not visually prominent or do not create any scars on the landscape that would be visually prominent.
- (h) The extent to which the height and the scale, massing and form of the building is compatible with the low density and natural character of the landscape.
- (i) The extent to which development in sub-precincts B, C and D maintains the natural landform of the Patumahoe Hill.
- (j) Whether the presence and scale of retaining walls in sub-precincts B, C and D is minimised to avoid modification of the natural gradient of the Patumahoe Hill.

(2) Subdivision and infringement of subdivision standards

- (a) For sub-precincts A, B, C, D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant precinct plan and relevant Figures 1- 4 and 5-11 above.
- (b) Whether site sizes meet the minimum requirements in Standard I430.6.7 above.
- (c) The extent to which the subdivision is designed to protect existing indigenous vegetation and provide for the planting of new vegetation to mitigate the effects of removing any existing significant vegetation.
- (d) Whether the subdivision is in accordance with the Patumahoe Stormwater Network Discharge Consent.

(3) Additional assessment criteria for subdivision and infringement of subdivision standards in sub-precincts B, C and D

- (a) Stormwater
 - (i) Whether stormwater from sub-catchments “East” and “West 1” as identified in Patumahoe: Precinct plan 2 – Staging and stormwater sub catchment plan is directed to the Main Stormwater Treatment/Detention Pond in Sub-precinct A
 - (ii) Whether stormwater flows from the western sub-catchments “West 2” and “West 3” as identified in Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan are maintained at pre-development levels.
 - (iii) Whether a pond should be established on the northern corner of Sub-precinct D, primarily as a flood management system and landscape amenity feature but also as a stormwater quality improvement device if a pond in that location is required for the

- purpose of maintaining stormwater flows at a pre-development level.
- (iv) If a pond is established on Sub-precinct D, whether it is treated as an amenity feature and landscaped accordingly.
 - (v) Whether on-site stormwater detention is also required (such as soakage pits) except where it can be demonstrated that geotechnical conditions within sub-precincts B, C and D do not allow for on-site soakage.
 - (vi) Whether the development uses water sensitive design techniques, including swales, grey water rainwater harvesting for outdoor use, rain gardens, and/or permeable paving etc.
- (i) In the event development of the sub-precincts B, C and D is staged:
 - (i) Whether sub-catchments “East” and “West 1” comprising stage 1 should be developed first and drain to the main pond on Sub-precinct A.
 - (ii) Whether sub-catchments “West 2” and “West 3” comprising stage 2 should drain to the western pond in Sub-precinct A.
 - (ii) The extent to which the subdivision in sub-precincts B, C and D maintains the natural landform of the Patumahoe Hill by ensuring that the grading of individual lots does not occur as part of the subdivision engineering works; rather, the formation of building platforms occurs at the time individual sites are developed and the modification of the natural gradient of the Patumahoe Hill is thereby minimised.
 - (iii) The extent to which lighting design for streets recognises the visually prominent hillside location of sub-precincts B, C and D by minimising all light pollution.
 - (iv) Whether design of lighting standards includes bollard style standards for street lighting which can be mixed with pedestrian scaled light standards.
 - (v) The extent to which landscaping consists of ecologically sourced native plants (i.e. those that naturally occur in the Manukau Ecological District) which are appropriate to the site. (Examples of such species are set out in the typical plant palettes in Figures 512 and Tables 1–7 below).
 - (vi) Whether plantings and other landscape features will result in a maintenance free mature landscape, inasmuch as is practical.

Figure 12: Landscape concept plan and typical plant palettes sub-precincts B, C and D



(4) Additional assessment criteria for subdivision in sub-precinct E

(a) Stormwater

- (i) Whether stormwater is directed to the Main Stormwater Treatment/Detention Pond;
- (ii) Whether stormwater flows from the Main Stormwater Treatment/Detention Pond are maintained at pre-development levels.
- (iii) Whether on-site stormwater detention is also required (such as soakage pits) except where it can be demonstrated that geotechnical conditions within sub-precinct E do not allow for on-site soakage.
- (iv) Whether the development uses water sensitive design techniques, including swales, grey water rainwater harvesting for outdoor use, rain gardens, and/or permeable paving etc.

(b) Roading

- (i) Whether any works are required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and
- (ii) Whether safety improvements to the local road network are facilitated by subdivision in order to safely accommodate the additional activity associated with development in sub-precinct E.

- (iii) Whether any safety improvements are required to maintain the safe operation of the railway level crossing on Patumahoe Road, and
- (iv) Whether subdivision and development in sub-precinct E contributes proportionately to any required safety improvements to the level crossing.
- (c) In the event development of sub-precincts E is staged:
 - (i) Whether the establishment of roading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct plan 3, Auckland Council Codes of Practice and the Auckland Design Manual.
 - (ii) Whether public water supply and wastewater networks can be extended to each stage in sub-precinct E;
 - (iii) Whether each stage of development can drain to the main Stormwater Treatment/Detention pond within the Sub-precinct.
- (d) The extent to which landscaping consists of ecologically sourced native plants (i.e. those that naturally occur in the Manukau Ecological District) which are appropriate to the site. (Examples of such species are set out in the typical plant palettes in Tables 1–7 below).
- (e) Whether plantings and other landscape features will result in a maintenance free mature landscape, insomuch as is practical.
- (f) The extent to which subdivision design and associated provisions ensure that the specific Standards I430.8(1)(b-d) and I430.8(2)(b, c, f-l) applicable to Sub-precinct E achieve their respective purpose(s).

Table 1 Native Restoration Planting Schedule (all species to be ecosourced)

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING
Native Restoration: Nurse Species			
<i>Carex</i> sp	Native grasses	PB2	500mm
<i>Coprosma repens</i>	Taupata	PB2	1.0m
<i>Coprosma robusta</i>	Karamu	PB2	1.0m
<i>Cordyline australis</i>	Cabbage tree	PB2	1.0m

<i>Geniostoma rupestre</i>	Hangehange	PB2	1.0m
<i>Hebe stricta</i>	Koromiko	PB2	1.0m
<i>Kunzea ericoides</i>	Kanuka	PB2	1.0m
<i>Leptospermum scoparium</i>	Manuka	PB2	1.0m
<i>Libertia sp</i>	NZ Iris	PB2	0.5m
<i>Meliccytus ramiflorus</i>	Mahoe	PB2	1.0m
<i>Myrsine australis</i>	Mapou	PB2	1.0m
<i>Phormium sp (dwarf)</i>	Dwarf flax	PB2	0.5m
<i>Phormium tenax</i>	Flax	PB2	1.5m
Native Restoration Enrichment Species			
<i>Cordyline australis</i>	Cabbage tree	PB5	2.0m
<i>Cyathea medullaris</i>	Tree fern	PB5	4.0m
<i>Knightia excelsa</i>	Rewarewa	PB5	4.0m
<i>Meryta sinclairii</i>	Puka	PB5	4.0m
<i>Podocarpus totara</i>	Totara	PB5	5.0m
<i>Vitex lucens</i>	Puriri	PB5	5.0m

Table 2: Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING [approximate]
Large Scale Street Trees			
<i>Vitex lucens</i>	Puriri	P8150	20.0m
Residential Scale Street Trees			
<i>Alectryon excelsa</i>	Titoki	P8150	10.0m

Table 3: Native Garden Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Native Garden Specimen Trees			
<i>Alectryon excelsa</i>	Titoki	PB95	4.0m
<i>Cordyline australis</i>	Cabbage tree	PB95	2.0m
<i>Hoheria populnea</i>	Lacebark	PB95	3.0m

<i>Meryta sinclairii</i>	Puke	PB95	3.0m
<i>Plagianthus regius</i>	Ribbonwood	PB95	3.0m
<i>Sophora microphylla</i>	Kowhai	PB95	4.0m
<i>Vitex lucens</i>	Puriri	PB95	5.0m

Table 4: Garden Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Garden Specimen Trees			
<i>Alectryon excelsa</i>	Titoki	PB95	4.0m
<i>Cordyline australis</i>	Cabbage tree	PB95	2.0m
<i>Fraxinus sp</i>	Asc	PB95	4.0m
<i>Ginkgo sp</i>	Maidenhair	PB95	5.0m
<i>Liquidambar styracifluo</i>	America sweet gum	PB95	5.0m
<i>Liriodendron tulipifera</i>	Tulip tree	PB95	5.0m
<i>Magnolia sp</i>	Magnolia	PB95	6.0m
<i>Meryta sinclairii</i>	Puke	PB95	3.0m
<i>Quercus palustris</i>	Pin Oak	PB95	5.0m
<i>Vitex lucens</i>	Puriri	PB95	5.0m

Table 5 Gateway Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Gateway Specimen Trees			
<i>Cordyline australis</i>	Cabbage tree	PB150	2.0m
<i>Meryta sinclairii</i>	Puke	PB150	3.0m
<i>Vitex lucens</i>	Puriri	PB150	5.0m

Table 6: Evergreen Hedging Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
<i>Camellia sp</i>	Camellia	PB8	1.0m
<i>Griselinia sp</i>		PB8	1.0m
<i>Pittosporum sp</i>		PB8	1.0m

Table 7: Retaining Wall Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Shrubs and Hedging species			
<i>Camellia sp</i>	Camellia	PB5	1.0m
<i>Griselinia sp</i>		PB5	1.0m
<i>Phormium sp (dwarf)</i>	Dwarf flax	PB5	0.5m
<i>Pittosporum sp</i>		PBS	1.0m
Groundcovers			
<i>Dietes grandiflora</i>		PBS	0.5m
<i>Lomandra sp</i>		PB5	0.5m
Climbers			
<i>Ficus pumila</i>	Creeping fig	PB5	0.5m

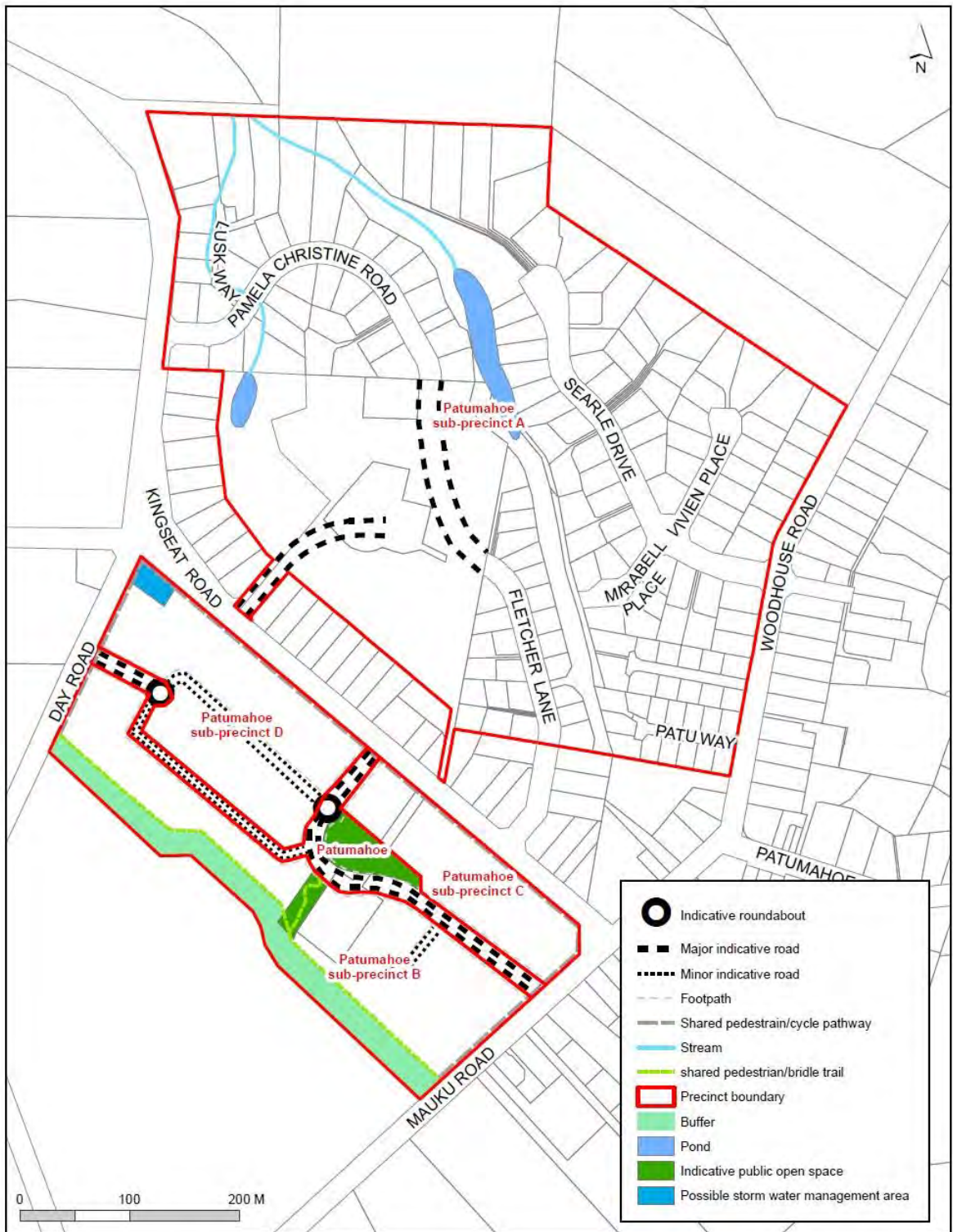
Table 8: Exotic Shelterbelt Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
<i>Alnus jorullensis</i>	Mexican alder	PB8	2.0m

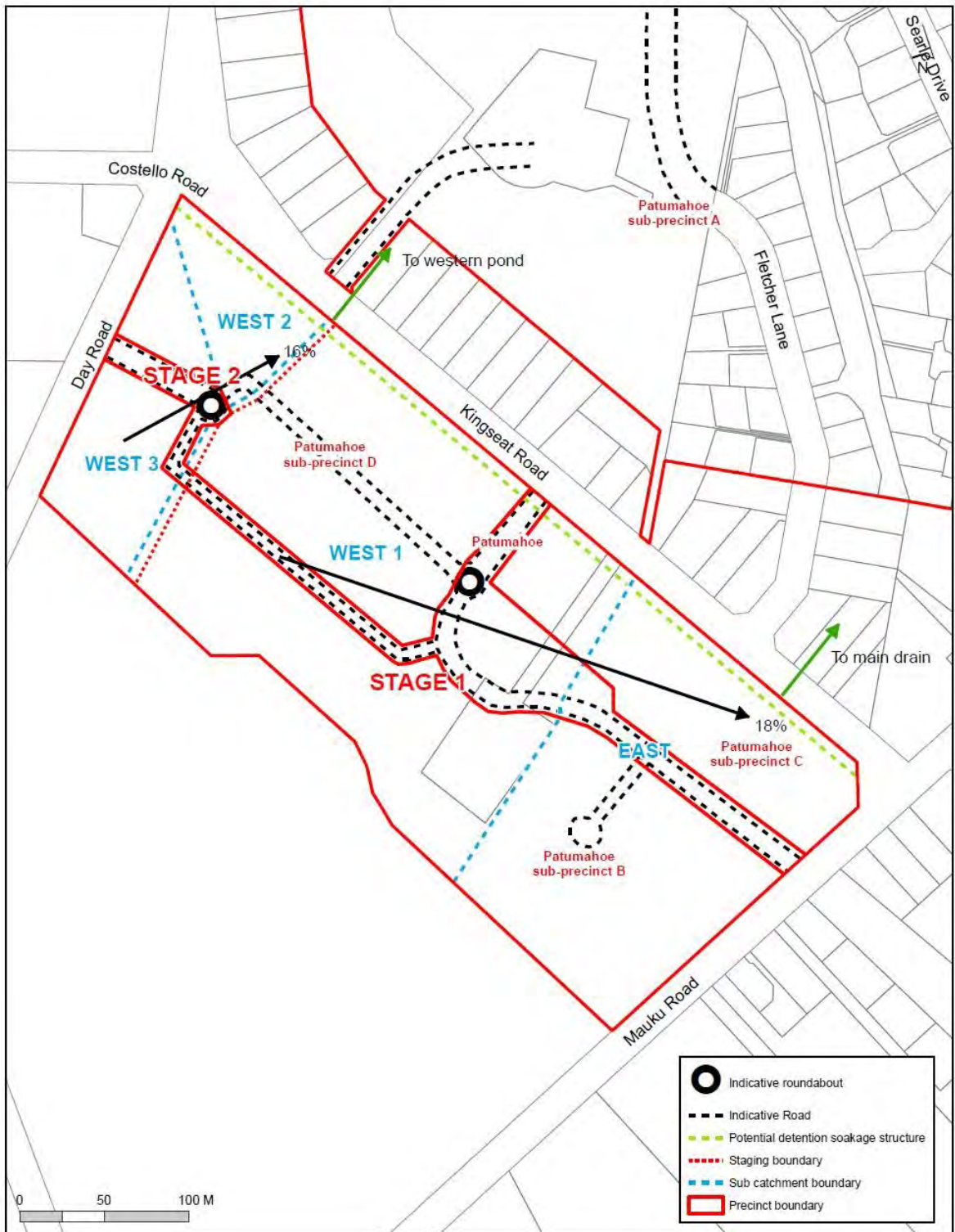
I430.9. Special information requirements

There are no special information requirements in this precinct.

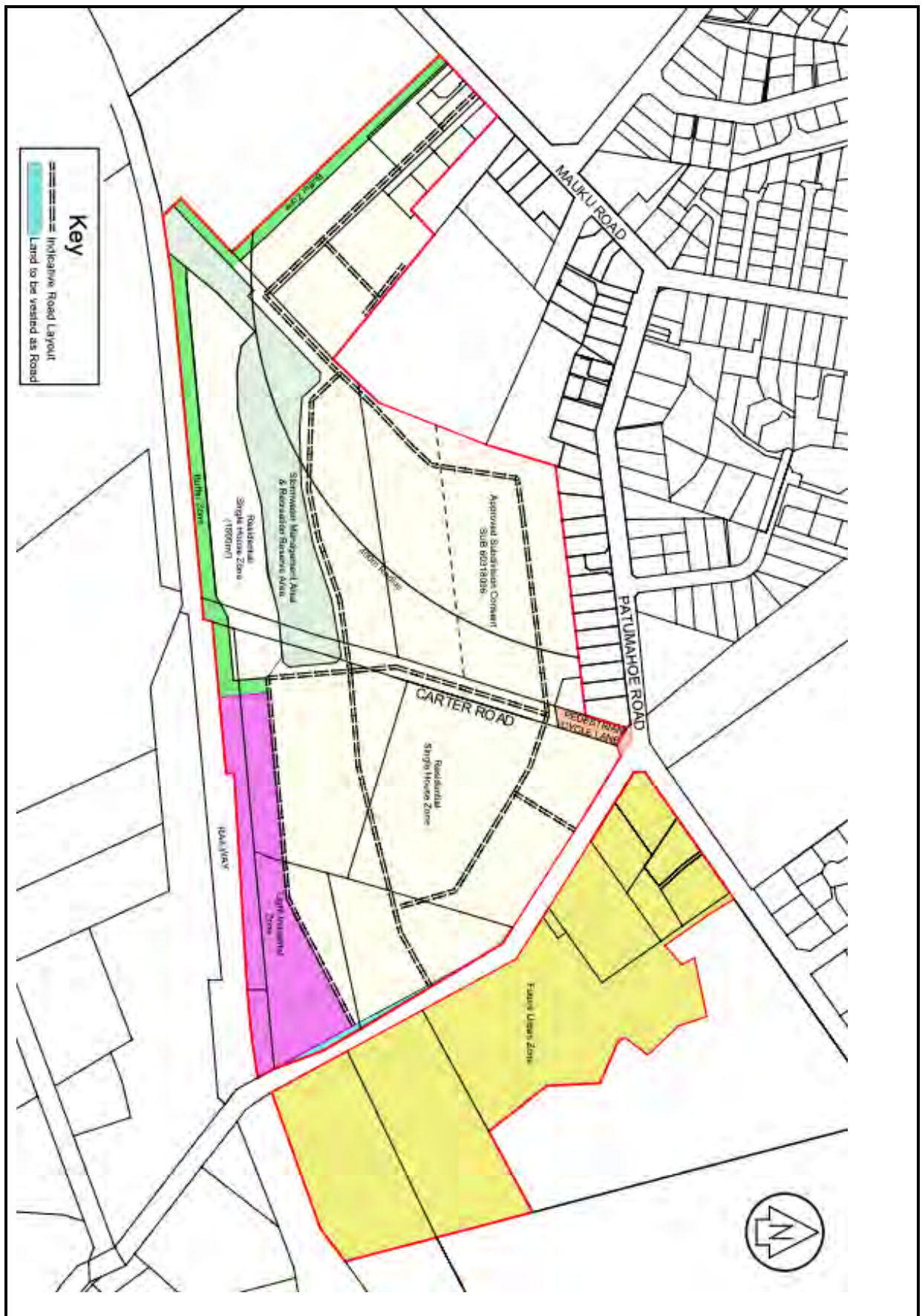
I430.10. Precinct plans I430.10.1 Patumahoe: Precinct plan 1



1430.10.2 Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan



1430.10.2 Patumahoe: Precinct plan 3 – Sub-precinct E



APPENDIX THREE

REQUESTS FOR FURTHER INFORMATION AND RESPONSES

19 November 2019

Ms Ann-Maree Gladding

Tripp-Andrews Surveyors Limited
PO Box 28750, Remuera
Auckland 1541
AUCKLAND

Issued via email: annmaree@trippandrews.co.nz

Dear Ann-Maree,

RE: Clause 23 RMA Further Information – Patumahoe South Private Plan Change Request

Further to your private plan change request under Clause 21 to Schedule 1 of the Resource Management Act 1991 in relation to Patumahoe South from Askew Consultants Limited, Council has now completed an assessment of the information supplied.

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

The table in Appendix 2 attached to this letter sets out the nature of the further information required and reasons for its request.

The table in Appendix 3 attached to this letter are advisory notes.

Should you wish to discuss this matter or seek a meeting to clarify points in this letter please do not hesitate to contact me.

Kind regards,



Sanjay Bangs
Planner
Plans & Places Department
021 619 327

Appendix 1

Basis for the Information Sought

First Schedule to the Resource Management Act 1991

Clause 23 Further information may be required

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

- (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or
- (b) the ways in which any adverse effects may be mitigated; or
- (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
- (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

(2) A local authority, within 15 working days of receiving any information under this clause, may require additional information relating to the request.

(3) A local authority may, within 20 working days of receiving a request under [clause 21](#), or, if further or additional information is sought under subclause (1) or subclause (2), within 15 working days of receiving that information, commission a report in relation to the request and shall notify the person who made the request that such a report has been commissioned.

(4) A local authority must specify in writing its reasons for requiring further or additional information or for commissioning a report under this clause.

(5) The person who made the request—

- (a) may decline, in writing, to provide the further or additional information or to agree to the commissioning of a report; and
- (b) may require the local authority to proceed with considering the request.

(6) To avoid doubt, if the person who made the request declines under subclause (5) to provide the further or additional information, the local authority may at any time reject the request or decide not to approve the plan change requested, if it considers that it has insufficient information to enable it to consider or approve the request.

Appendix 2:

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

Contents	
Planning, statutory and general matters – Sanjay Bangs, Plans & Places	2
Traffic matters – Wes Edwards, Arrive Ltd	8
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Water supply and wastewater matters – David Russell, Regulatory Engineering South	29
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Parks and Open Space – Roma Leota, Parks and Recreation Policy	30

#	Category of information	Specific Request	Reasons for request
Planning, statutory and general matters – Sanjay Bangs, Plans & Places			
P1	Infrastructure funding and delivery	<p>Please expand on the assessment of the PPC against the relevant sections of the following documents that relate to the funding, timing and delivery of the wider transport, and the integration/coordination between land use and infrastructure:</p> <ul style="list-style-type: none"> • AUP(OP) Regional Policy Statement (RPS) • AUP(OP) Appendix 1 Structure Planning Guidelines • Auckland Plan 2050 • Development Strategy • National Policy Statement on Urban Development Capacity (NPS:UDC) <p>This includes expanding on the following sections of the application:</p> <ul style="list-style-type: none"> • Section 8.0 Strategic Framework of the AEE 	<p>The relevant planning and policy documents signal a clear need to integrate and coordinate growth with the infrastructure necessary to service such growth. The Plan Change Request and Assessment of Environmental Effects (AEE) contains only limited assessment against the objectives and policies of the AUP(OP), Auckland Plan 2050 and NPS:UDC.</p> <p>Attachment 6 (p.12) to the private plan change (PPC) request addresses the coordination of the PPC with the Papakura to Pukekohe rail electrification project and the prospect of increased connector buses from Patumahoe. However, given that the majority of trips generated by the proposed residential zonings will be made by private car, the PPC needs to address the traffic impacts on the wider transport network, and particularly the strategic corridors of State Highway and State Highway 22.</p>

#	Category of information	Specific Request	Reasons for request
P2	Infrastructure funding and delivery	<ul style="list-style-type: none"> Attachment 6 - Appendix 1 AUP Assessment <p>Please provide a funding plan in accordance with Appendix 1.5.5(b) of the AUP(OP).</p>	<p>Appendix 1 requires specialists documents to support structure planning and plan change processes at a level appropriate to the scale of the area and the complexity of the issues identified by the process. Clause 1.5.5(b) references a funding plan as a relevant specialist document. Given the growth enabled by the plan change relies on the strategic and arterial transport networks in the southern area, a funding strategy is necessary to outline the programme for funding and delivery of this transport network.</p>
P3	Section 32 evaluation	<p>Please explain whether there are sufficient convenience retail, services, and community facilities within Patumahoe to meet the needs of residential growth enabled by this PPC request.</p>	<p>Refer also Item E2.</p> <p>It is unclear whether the existing Patumahoe town centre can adequately service the needs of the additional residential growth enabled by this PPC request, in terms of demand for retail, services and community facilities.</p> <p>The Patumahoe residential area has expanded significantly in the past 15 years as a result of structure planning undertaken by the former Franklin District Council. However, the growth of the town centre has been limited to taking up opportunities within the bounds of the commercial zoning. It is unclear whether the town centre has the retail and commercial services such as supermarkets of a suitable scale and commercial services, or the capacity to develop future commercial activities to meet the needs of the 200 new dwellings accommodated by this PPC request. It appears that residents will be required to travel to Pukekohe to have access to some daily convenience services.</p> <p>This is required to assist with understanding whether the PPC request is consistent with the relevant planning documents, which seek to achieve efficient and effective urban environments (NPS:UDC – OA1) and a quality compact urban form with convenient</p>

#	Category of information	Specific Request	Reasons for request
			access to services (Auckland Plan 2050 Development Strategy) and a diverse mix of choice and opportunity for people and communities (AUP(OP) RPS B2.3.1(1)(c)).
P4	Geospatial / mapping	Please provide geospatial shape files reflecting the extent of the PPC request area, and the extent and location of proposed zonings.	Shape files are required to depict the extent of the PPC request on the Auckland Unitary Plan Viewer when reporting to Planning Committee and when notified, should the request be accepted for notification.
P5	Geospatial / mapping	Please provide a high-quality map in PDF format showing the extent of the PPC request area, and the extent and locations of proposed zoning and extent of Patumahoe Precinct.	The PPC request relies on proposed Precinct Plan 3 to depict the proposed zonings. This is not sufficiently accurate, or of a high enough quality/resolution to depict the zonings for future reporting purposes (including a Clause 25 decision).
P6	Geospatial / mapping	Please provide a high-quality PDF copy of Precinct Plan 3	Also refer items LV3 and OS1 and Advisory Note 3.
P7	General	Please provide Certificates of Title for the properties that fall within the PPC area.	It is unclear whether there are any encumbrances on the titles of land that fall within the PPC area.
P8	Subdivision standards	In regard to the 600m ² minimum net site area within a 400m buffer from the corner of Patumahoe Road and Mauku Road, please explain whether a more nuanced 'boundary' to this control was explored to demarcate this standard.	The 400m radius proposed in Standard I430.6.7 to depict the area in which a 600m ² minimum net site area control applies appears to be broadly applied without consideration of the indicative roading pattern and expected form of subdivision that will arise. It will be useful to know whether a more detailed or nuanced boundary was considered, and whether applying a 400m radius will create issues where proposed lots cross this radius.

#	Category of information	Specific Request	Reasons for request
P9	Subdivision standard	Please provide justification for why a restricted discretionary rule for subdivision complying with the relevant standards (I430.4.2(A6)) has been proposed.	Sub-precincts B, C and D contain subdivision rules that rely on the underlying Auckland-wide provisions, which are generally a discretionary activity, whereas Sub-precinct E is proposed to treat subdivision (in accordance with the relevant standards) as a restricted discretionary activity. The preferred activity status is not justified within the AEE.
P10	Fencing strategy	Section 5.2 of the AEE references a fencing strategy. Please confirm whether bespoke fencing standards were intended to be proposed in the Patumahoe Precinct provisions, or if the underlying Single House zone provisions are being relied on.	It is unclear whether a bespoke fencing strategy has been proposed for the PPC area, or whether the plan change proposes to rely on the underlying fence standards within the Residential – Single House Zone.
P11	Indicative roads	The indicative roading layout shown on Precinct Plan 3 shows indicative roads partly adjoining the Patumahoe Domain. Please explain why these roads do fully or mostly adjoin the Patumahoe Domain.	The activation of the Patumahoe Domain is referenced in Section 5.2(5) of the AEE and the Urban Design Assessment as being a positive aspect of the PPC request. However, it appears that PPC request misses an opportunity to better open up the Domain through park edge roads, which in the PPC request only partially adjoins the Domain.
P12	Indicative roads	Please confirm how the detailed design of roads as described in Section 5.3 of the AEE will be delivered through the proposed provisions	Refer also Item T10 It is unclear whether bespoke provisions for the design of indicative roads are being proposed, or whether the detailed design will rely on ATCOP standards. Unlike for Sub-precincts B, C and D, no cross-sections of the road reserve have been proposed to inform future detailed design.
P13	Noise and vibration	Please explain how the noise and vibration standards recommended by Kiwirail for	Section 7.1 of the Plan Change Request AEE and S32 Request identifies noise and vibration standards as an outcome of consultation with Kiwirail. The report then notes

#	Category of information	Specific Request	Reasons for request
		residential and other sensitive activities proximate to the rail corridor will be secured through consent notice at the time of subdivision, given that the RD subdivision matters do not reflect these recommendations.	that these will be secured through a consent notice issued at the time of subdivision. However, the proposed subdivision rule for Sub-precinct E (I430.4.2(A6)) is restricted discretionary. Therefore, an assessment at resource consent will be limited to the matters contained in I430.8.1(2) and (3), which do not provide for a consideration of noise and vibration relative to the rail corridor. As a result, there is a significant risk that Council will not have the scope to enforce a consent notice at the subdivision stage.
P14	Landscape buffer areas	Please explain how the proposed landscaped buffer widths (proposed standards I430.6.9(2) – (4)) have been devised.	<p>The proposal involves extending the urban area of Patumahoe, thus enabling residential activities to locate closer to established rural production activities (and zoning that enables such activities).</p> <p>Although landscaped buffer areas have been proposed at the western edge of the PPC area, the interface between Single Housing and Light Industry zoned land and the boundary with the rail corridor, it is unclear how these buffer widths have been prepared.</p> <p>In respect of the buffer along the western boundaries of Sub-precinct E, it is unclear why a 10m buffer has been proposed given that the operative standard I430.6.9(1) requires a 20m wide buffer at the southwestern boundary of Sub-precinct B (Patumahoe Hill). (refer also Item LV2)</p>
P15	Reverse sensitivity	Please comment on how the 200m / 400m set back distances from the poultry sheds from 75 Patumahoe Road (Standard I430.6.15) have been developed.	Section 10.9(6) of the AEE identifies controls on sensitive residential activities within 400m of the poultry sheds at 75 Patumahoe Road as a means to address potential reverse sensitivity effects. Proposed rule I430.6.15 identifies buffer areas of 200m and 400m in which no-complaints covenants must be registered on titles in accordance with subdivision applications. However, it is unclear how these separation buffers have been

#	Category of information	Specific Request	Reasons for request
P16	Reverse sensitivity	Please clarify how the wording of Standard I430.6.15 has been developed, and how the standard is intended to function.	devised, and whether they reflect best practice for addressing air quality and reverse sensitivity effects for rural industries. Proposed Standard I430.6.15 requires enabling dwellings to be located within 200m / 400m of the poultry sheds located at 75 Patumahoe Road to adopt reverse sensitivity measures. It is unclear how this would be measured or applied at the subdivision stage – i.e. would the rule apply to any residential lot where all or part of the lot was within 200m / 400m of the poultry sheds? Would it also be clearer and more certain for subdivision applicants to require this setback from the cadastral boundary of 75 Patumahoe Road?
P17	Mana Whenua Consultation	Please outline whether consultation has been undertaken with iwi groups other than Ngāti Te Ata and Ngāti Tamaoho.	The Patumahoe area is subject to interests from mana whenua groups beyond those discussed in the summary of consultation contained in Section 7.3 of the AEE. The full list of mana whenua with an interest in the area are: <ul style="list-style-type: none"> • Te Ākitai Waiohū • Ngāti Tamaoho • Ngāi Tai ki Tāmaki • Te Ahiwaru – Waiohū • Ngāti Te Ata • Ngāti Maru • Waikato - Tainui

#	Category of information	Specific Request	Reasons for request
P18	Mana Whenua Consultation	Please explain what recommendations from mana whenua groups, if any, have informed or been incorporated into the proposed plan change provisions, and what will be addressed through resource consents or other processes.	Section 7.3 of the AEE and the CIA's contained in Appendix 1 and 1A outline a number of recommendations from Ngāti Te Ata and Ngāti Tamaoho. However, it is not clear whether the applicant has considered the extent to which these should be reflected in the proposed provisions within the Patumahoe Precinct, and what can be given effect to through other processes.
Traffic matters – Wes Edwards, Arrive Ltd			
T1	Wider network effects	Provide an assessment of transport impacts for the future environment.	<p>The ITA acknowledges that some other parts of Patumahoe are zoned for development, and has made some allowance for the development of those areas when considering intersection performance; however, it appears that no allowance has been made for growth from other sources. This could include, for example, growth in travel between Pukekohe and Glenbrook/ Waiuku as a result of other development in one or both areas.</p> <p>Without such an assessment the impact of the proposal on the future environment cannot be properly understood.</p> <p>Information should be provided on expected traffic growth in the area, preferably from regional/ district transport models, and assessment against that baseline provided for an appropriate future year (eg 2036). The growth information should reference information such as Council's Future Urban Land Supply Strategy (FULSS) and Council's Structure Plans for the Drury-Opāheke and Pukekohe-Paerata areas. The ITA prepared for the structure plan areas may also provide useful context.</p> <p>It is noted that Auckland Transport's comments recommend undertaking new traffic counts in the area. This recommendation is supported if assessments are based on existing volumes, or growth on existing volumes; however an approach based on</p>

#	Category of information	Specific Request	Reasons for request
T2	Wider network effects	Provide an assessment of effects of the Plan Change on the wider transport network	<p>projected future volumes from transport models is likely to provide a more robust assessment</p> <p>The ITA does not consider the impact of the Plan Change beyond the immediate area, although traffic generated by development of the land would pass through a number of other points on the road network, some of which currently have poor performance, where adverse effects might be generated.</p> <p>In addition, a number of changes to the transport network in the wider area are proposed, and the ITA needs to provide an assessment of the compatibility of the Plan Change with that network.</p> <p>Please provide an assessment of the likely (cumulative) impact on the wider transport network, and if development of the Plan Change area should be dependent on any infrastructure being in place.</p>
T3	Access	Provide justification for vehicular access points being confined to the four locations shown.	<p>The ITA shows four proposed road locations, but does not state if these are the only locations that would allow development of the land to be serviced safely and efficiently, and so should be the only locations permitted.</p> <p>It is noted that Standard I430.6.13 requires access to be from the indicative locations shown on Precinct Plan 3, with any other location being a Non-Complying Activity. No justification is provided to explain why access in any other location should be non-complying.</p> <p>See following request also.</p>

#	Category of information	Specific Request	Reasons for request
T4	Access	Identify locations for access intersections and pedestrian crossings that would be appropriate for a higher speed environment.	<p>As acknowledged in the ITA, the safety of the proposed access intersections and pedestrian crossings depend on the speed limit being lowered to 50km/h on each frontage road, which is outside the control of the applicant or Council.</p> <p>Auckland Transport has recently undertaken an extensive review of speed limits across the region, and has not reduced the speed limits on the frontage roads to 50km/h. It is therefore possible that Auckland Transport would not reduce the speed limit to 50km/h, particularly prior to development occurring.</p> <p>It is noted that comments provided by Auckland Transport suggest that forming the new intersections as urban roundabouts would assist in reducing the speed limit. In addition roundabouts would change the sight distance requirements and may make those requirements easier to provide in some locations; however, the ITA would need to demonstrate that appropriate roundabouts could be provided, detailing additional land that might be required (if any).</p> <p>The ITA should identify intersection and crossing locations that would be safe at the speeds coming into effect from 1 July 2020, and demonstrate that these would be both safe and efficient in order to show that appropriate transport infrastructure could be provided to support development of the land as proposed.</p>
T5	Access	Please address sight-distance issues for the proposed pedestrian crossing at the intersection of Patumahoe Road/ Clive Howe Road/ Carter Road.	<p>The ITA acknowledges that there are sight-distance issues at the intersection, but proposes a pedestrian crossing near this point, connecting a proposed pedestrian link within the Carter Road reserve to the school. The ITA recommends that assessment of this sight distance issue be deferred until resource consent stage.</p> <p>If the sight distance issues cannot be adequately resolved, this raises questions around the location and suitability of the proposed pedestrian link and the safety of pedestrians.</p>

#	Category of information	Specific Request	Reasons for request
			<p>It appears the sight distance constraints may be solved if some of the land within the Plan Change area was vested as road and some of the shelter belt trees were removed. Please provide an assessment of possible solutions to this issue to demonstrate that development as proposed can be serviced (with recently-approved speed limits).</p>
T6	Access	<p>Please provide a sound basis for the closure of Carter Road to vehicular traffic, other than the currently available sight distance.</p>	<p>It appears that the sight distance constraints at this intersection may be solved if some of the land within the Plan Change area was vested as road and some of the shelter belt trees were removed.</p> <p>The ITA provides no other reason for closure of this road to vehicular traffic. The ITA should provide an assessment of how this intersection might operate if the sight distance constraint was solved, and what the most appropriate form for this intersection would be.</p>
T7	Transport improvements	<p>Please demonstrate how the intersection of Patumahoe Road / Mauku Road / Woodhouse Road could operate satisfactorily in future.</p>	<p>The ITA acknowledges that the intersection of Patumahoe Road/ Mauku Road/ Woodhouse Road is likely to require some changes to address safety issues in the future as a result of development within the Plan Change area.</p> <p>It is also possible that future traffic growth from other sources could exacerbate that issue, potentially resulting in adverse effects when traffic from development of the PC land occurs.</p> <p>Some indicative designs should be provided that would address this issue to either demonstrate that appropriate solutions are able to be delivered, or alternatively identify any areas of third-party land that may be required to provide an appropriate solution. The ITA should identify the need (if any) for funding of this project (and/or any others) to be allowed for by AT or others.</p>

#	Category of information	Specific Request	Reasons for request
T8	Consistency	Please provide consistent information on the extent of the Plan Change and zoning, particularly near the Mauku Road frontage.	<p>The text of the ITA and AEE are inconsistent with each other, and with the provided drawings. Some show land fronting Mauku Road being rezoned, some show it outside the Plan Change area.</p> <p>It is unclear if the ITA assessment has allowed for traffic generated by residential zoning over the land fronting Mauku Road.</p>
T9	Consistency	Please provide consistent information on the widths and elements for the proposed road cross-sections.	<p>The text of the ITA is inconsistent with the provided road cross-section drawings.</p>
T10	Road design	Please provide confirmation that the Plan Change is seeking to include specific road cross-sections that would replace other standards, such as AT ATCOP or TDM.	<p>The ITA presents road widths and cross-sections as "proposed" but does not state if these would be, or should be, prescribed in the Plan Change, nor supplies sufficient evidence to demonstrate that the proposed cross-sections are superior to other standards in this context.</p> <p>It is noted that the Appendix 1 AUP Assessment states at Section 12, that "roading has been designed to meet with the technical standards of the Code of Practice"; however, the proposed road cross-sections are not consistent with ATCOP.</p> <p>If the road cross-sections and widths are intended to be prescriptive, or to be a base for assessment of a subdivision, the effect of these proposals, for example the provision of a footpath along one side of a road, need to be evaluated and compared against the effects of streets developed in accordance with other standards such as ATCOP/TDM</p>
T11	Access	Please confirm if development must commence with access from Patumahoe Road, and if so, provide justification.	<p>The proposed Plan Change standard I430.6.13 requires a new road access from Patumahoe Road (and closure of Carter Road) prior to any development.</p>

#	Category of information	Specific Request	Reasons for request
			<p>As proposed, this would result in development with access from Mauku Road occurring first being a Non-Complying activity.</p> <p>If developing the western portion of the area first would result in significant adverse effects this has not been stated, and no other justification for preventing access to Mauku Rd occurring first has been provided.</p>
T12	Access	Please provide concept drawings of new intersections	<p>The ITA contains a heading for “Appendix C Concept drawings of new intersections”, however no drawings are provided.</p> <p>In order to conclude that the proposed zoning can be serviced, and to understand the implications of doing so, it is important to understand if providing the new intersections (including right turn bays at all four intersections, footpaths, cycle paths etc) can be provided within the existing or proposed road reserves, or if additional land may be required.</p> <p>Indicative costs and funding responsibilities should also be provided so that infrastructure providers (Auckland Transport) can update planning documents if required.</p>
T13	Level crossing	Please provide a Level Crossing Safety Impact Assessment (LCSIA)	<p>The ITA states that a LCSIA will be undertaken. It is possible that the LCSIA may propose measures that require changes to the road network, or potentially have effects on others.</p> <p>In the event that a completed LCSIA cannot be provided in a timely manner, the ITA could indicate the sort of measures that are expected to be required.</p> <p>The ITA should provide confidence that the required measures can be provided so that the ability to service the zoning is assured.</p>

#	Category of information	Specific Request	Reasons for request
Additional traffic matters – David Russell, Regulatory Engineering South			
T14	Pedestrian linkage	Please provide an explanation to support the location of the pedestrian linkage proposed across Mauku Road (Page 17, Appendix 4A)	The pedestrian crossing across Mauku Rd proposed in this application is in a different location to the pedestrian linkage being constructed within Sub-precincts B and C on the north side of Mauku Rd. This has the potential effect of having two crossings within 100m. Further justification is required to support the pedestrian crossing proposed in this application.
T15	Walking and cycling	Please explain whether consideration has been given to providing a walking and cycling connection between the Sub-precincts B, C and D area to the proposed reserve within the PPC area.	There is a 3m walking cycling path on the 3 sides of Sub-precincts B, C and D (Day Road, Kingseat Road and Mauku Road). It would be helpful to know whether walking cycling path has been considered, either through the western section to the proposed reserve and domain, or a path from Johns Street through the domain onto the roads within the development.
T16	Level crossing	Please address the effects of the PPC on vehicle access from Carter Road to Lot 5 DP 109184 and Lot 1 DP 149371 south of the rail corridor.	Presently at least one landowner across the railway line is using Carter Rd to access the land from the end of Carter Rd. This does not appear to be reported in any of the documents. While the 2 land holdings do have legal access to Sedgebrook Road it does look like this crossing is the alternative access to both sites. This effect needs to be accessed.
T17	Carter Road intersection	Please update the Engineering Infrastructure Assessment to reflect the proposal to close Carter Road to cars and create a walking and cycling path.	The engineering report retains the Carter Rd / Patumahoe Rd intersection, whereas the proposal as expressed in the Plan Change Request, AEE and Section 32, and the ITA is to close this to vehicles and create a walking and cycling path.

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Economic matters – Susan Fairgray, Market Economics			
E1	Residential growth	Please provide an assessment of the efficiency of further residential growth occurring in Patumahoe within the wider Franklin area context.	<p>The PPC seeks to enable further expansion of the Patumahoe rural settlement beyond the degree specified in the Auckland Unitary Plan (AUP) (as established in the residential zoned area). The Franklin area strategic planning direction is for growth to predominantly occur within the larger urban centre of Pukekohe, while simultaneously allowing for some growth within the smaller rural settlements, including Patumahoe. This is established earlier in the Franklin District Growth Strategy 2050 which, albeit based on older data, indicates the preferred distribution of growth across the urban and rural centre structure in the district.</p> <p>The spatial distribution of growth has important economic effects on the economic efficiency of households, the efficiency of infrastructure provision and the efficiency of urban form. Within the PPC context, it is important to understand whether or not growth in this location is undermining the strategic spatial planning objectives to concentrate growth within the larger centre of Pukekohe.</p> <p>Useful information could include an assessment of how the scale of growth in the PPC compares to the level of growth occurring within Pukekohe. It is not clear from the applicants' economic assessment whether further growth adversely affects the overall pattern of growth across the urban/rural centres in the Franklin area, or whether it is consistent with the shares of growth anticipated within the planning strategic direction.</p> <p>If the share of residential growth likely to occur in Patumahoe due to the PPC is larger than anticipated in the strategic direction, then it is important to also understand the economic effects on households caused by locating within this area. Patumahoe is located significantly further from important aspects of amenity than Pukekohe (as</p>

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E2	Patumahoe Neighbourhood Centre	Please assess the adequacy of the existing commercial zoning of the Neighbourhood Centre zoned area in Patumahoe to meet additional demand from households in the PPC area.	<p>established in the strategic planning direction). This is likely to have effects on household efficiency through additional household travel.</p> <p>Additional residential growth in the PPC area will result in an expansion of the residential node at Patumahoe. This will generate additional demand for household sector commercial activity (i.e. retail, hospitality and household services). An important question is whether the level of zoned area is adequate to serve an expanded Patumahoe residential base.</p> <p>While the applicants' economic assessment report estimates the additional floorspace able to be sustained by the additional household demand from the PPC, it is not clear whether or not this can be accommodated by the existing commercial zoned area. The further assessment may also consider whether this additional demand could alternatively/partly be met through increasing the productivity of existing floorspace.</p>
E3	Household numbers	Please provide a further breakdown of the existing household number size of Patumahoe in relation to the number of households within the existing urban area (as established by the zoning) vs. the number of households in the surrounding rural area.	<p>It is important to understand the scale of the PPC relative to the existing size of the main urban area of Patumahoe. The report currently provides a household count for the Patumahoe census area unit (CAU) in total. However, the CAU also contains a large amount of rural land surrounding Patumahoe that is likely to contain a significant number of lifestyle properties, meaning that the CAU household count is unlikely to provide an informative estimation of the existing size of the Patumahoe rural settlement.</p> <p>This information is useful in understanding the likely effects of the PPC as the economic assessment makes reference to the percentage increase in the size of Patumahoe as a function of the PPC.</p>

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E4	Surrounding land uses	Please provide information on the agricultural land uses surrounding Patumahoe.	<p>The applicants' economic assessment displays the distribution and change in employment by industry sector that has occurred within Patumahoe and the surrounding area (Franklin and Pukekohe local board areas) through time. While this shows the change in employment numbers, it does not identify the quantity of land used for each type of activity or how this may have changed through time. Changes in employment may not necessarily reflect changes in agricultural land use due to such factors as changes in the registered base location of workers, changing technologies and the labour intensity of production, and the distribution of workers across multiple sites.</p> <p>It is important to understand the extent to which the surrounding land is being used for agricultural purposes. It provides context for the alternative potential agricultural land uses on the plan change site.</p>
E5	Agricultural potential	Please assess the effects of lost agricultural productive potential of the plan change site.	<p>While only a minor portion of the PPC site is currently used for productive agricultural purposes, there may be potential for future productive agricultural uses of the site. The applicants' soil assessment report shows that nearly all of the site (97%) is covered by prime soils, with prime soils still having high productive potential (notwithstanding the constraints stated by the applicant). In addition, the Auckland Council land use survey draft results have indicated that a significant portion of the site may instead be elite soils.</p> <p>The potential future productive uses of elite soils for local food production is important with the RPS objective to protect the land from urbanisation. It also recognises the scarcity of the elite soil resource within the Auckland region and New Zealand. Urbanisation of rural land typically removes any future productive potential for the land (e.g. removal of topsoil), eliminating the ability to subsequently convert the land back to agricultural uses.</p>

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			<p>It is therefore important to understand the economic costs of the loss of current and future productive capacity on the PPC site if the were to be urbanised. This assessment should be undertaken within a regional context as the economic effects, in relation to food supply, will not only be experienced locally. It would be useful to understand the share of regional elite/prime soils contained on the PPC site.</p>
Land productivity matters – Susan Fairgray, Market Economics			
LP1	Productivity	<p>Please demonstrate of the difference between the PPC site and other potential areas of residential expansion for Patumahoe in relation to potential horticultural productivity constraints.</p>	<p>The Land Productivity Assessment states there is concern about high quality soils being removed from production (p.2). However, the report indicates that the PPC is supported on the basis that if an area is needed for residential uses, then the PPC is the logical area for removal. This approach is outlined in the conclusions section where:</p> <p><i>“While there is concern about high quality soils being taken out of production to be zoned as residential, this land [the PPC site] seems a logical parcel of land to be zoned as such. ... It is logical, if any land is to be removed from rural production, it should be this piece of land (p2).”</i></p> <p>The productivity report has provided various assessments on a parcel level basis to demonstrate the suitability of each parcel for horticultural production. This assessment has only been conducted within the PPC area. However, I consider that to validate the logical rationale upon which the PPC support is reliant, then the assessment needs to demonstrate the PPC site’s suitability relative to other potential areas of residential expansion. Put simply, the rationale for support of the PPC can only hold true if the PPC area is demonstrated to be less suitable for agricultural production than other areas. Alternatively, the assessment must demonstrate that the same constraints are not/less present in other alternative locations for expansion for the conditional support to hold true. In my view, this is important because I observed productive horticultural uses</p>

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LP2	LUC Assessment	Please provide clarification on the reliance of the land use capability (LUC) Hanmore (2019) report in the assessment of soil constraints on the potential for agricultural/horticultural production.	<p>occurring in other locations immediately adjacent to Patumahoe's residential area during my site visits.</p> <p>Therefore, I consider it would be useful to understand the prevalence of potential constraints to horticultural production on other surrounding rural areas. It would be most useful to understand the presence of constraints related to land fragmentation and soil production capabilities as these factors form the predominant reasons for exclusion from productive uses within the report. These factors are considered further within the following sections.</p> <p>The Land Productivity Assessment assesses the suitability of each existing land parcel for rural productive uses. It initially identifies a large portion of the overall site (15.33ha) is potentially able to be used for rural production. It broadly identifies the area of the PPC site net of existing residential and commercial land uses or physical geographic constraints.</p> <p>In a subsequent assessment, the productivity report then goes on to further exclude nearly all of these potentially productive areas based on a combination of small site sizes and soil conditions. The final area that the report identifies as suitable for rural production amounts to 3.55ha.</p> <p>Firstly, it is not clear whether the report has reached this conclusion based on the Hanmore (2019) soils assessment or whether it has assessed the soils independently. Earlier in the report it is stated that the Hanmore (2019) report assessment has been taken into consideration within the assessment.</p> <p>Secondly, a number of observations on soil quality relate to the poor condition of the plants/vegetation with the report simultaneously stating that their condition may be attributable to agricultural production practices rather than/in addition to the soil.</p>

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			<p>Thirdly, the report states that ground conditions are poor in a number of lots due to poor drainage or irrigation. It states that the factors are uneconomic to mitigate due to the small lot sizes of the base parcels.</p> <p>However, it is not clear whether the constraints on these parcels would still apply (as a function only of the soil) if it became economic to mitigate these factors. The following section considers the potential lot size constraints, which appear to be a key driver of the economic viability of the mitigation.</p> <p>It would be useful to understand whether these constraints would still apply insofar as they relate specifically to the soil type (if it were assumed that it became economic based on lot sizes to invest further in the land). This is because I understand the Council soils assessment has produced differing results to the Hanmore (2019) report, with the PPC site potentially containing significant areas of LUC1 (elite) soils. It is therefore important to understand whether if the underlying soils reflected in those in the Auckland Council report, and if the constraint of small lot sizes were removed, whether the soil-related constraints in the productivity report would still apply.</p>
LP3	Land ownership	Please provide further assessment to test the effect of lot sizes on the viability of rural productive uses in the PPC area.	<p>As stated above, the productivity report initially identifies a 15.33ha area of land within the PPC site that is potentially suitable for rural production. In subsequent assessment, almost all of this land is excluded due to site constraints. Almost all lots are identified as having small lot sizes as an issue.</p> <p>When the spatial distribution of the original parcel areas identified as potential rural productive capacity are considered, they largely form a contiguous block of land. It is possible that these sites could be amalgamated (which would also equally need to occur under the PPC intended development) to form a larger block of land; or they could be amalgamated with adjacent sites.</p>

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			It would therefore be useful to understand whether the productivity report were to reach the same conclusion if these sites within the PPC were instead consider together as a larger lot size.
Land use capability – Fiona Curran-Cournane, RIMU			
LC1	Mapping	Please provide a map depicting the location of the LUC observations that were carried out by Mr Ian Hanore as part of his LUC and soil assessment of the subject area.	This information is required to validate the findings of the report.
LC2	Groundwater	<p>In relation to the Groundwater Management Zones discussed in Section 6.0 of the Land Capability Assessment, please:</p> <ul style="list-style-type: none"> • clarify the Auckland Council officer contacted; • provide any relevant correspondence and a link or specific reference to the Groundwater Management Zones 	In section 6.0 'Potential Productivity' of his report, Mr Ian Hanore reports that the availability of water is needed for the land to reach its full production potential and refers to the Groundwater Management Zones and an Auckland Council officer he was in contact with in relation to the two described aquifers. It would be helpful if he can identify the Auckland Council officer, their correspondence and a link or specific reference to the Groundwater Management Zones.
LC3	Reverse sensitivity	Please substantiate the observation on page 5 of the Land Productivity Assessment that a large proportion of the	In their report, Ms Sandy Scarrow and Mr Andrew Baker reported that a large proportion of the land in the subject area is already being impacted by reverse sensitivity issues of

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		land in the subject area is already being impacted by reverse sensitivity issues of neighbouring properties and that it is common for kiwifruit growers to either convert to organic production or cease growing as a result of on-going complaints.	neighbouring properties and that it is common for kiwifruit growers to either convert to organic production or cease growing as a result of on-going complaints.
LC4	References	Please provide a copy of the Scarrow and Underwood (2005) report entitled ' <i>Rural Subdivision in the Western Bay of Plenty District - 2005 Update</i> ', cited in the Land Productivity Assessment.	A copy of the report is necessary to substantiate the statements made on page 2 of the Land Productivity Assessment in relation to the impact of subdivision on rural productivity.
Urban design matters – Sarah Lindsay, ADO			
UD1	Concept master plan	Please clarify how the concept master plan contained as Attachment 6 (p.33) to the Urban Design Assessment will be implemented by the proposed provisions, and what roads or other elements from the concept master plan differ in the proposed precinct plan.	There are discrepancies between the concept master plan and proposed Precinct Plan 3, particularly in relation to the roading pattern. This appears to be largely related to the consented development on Lot 1 DP169130. However, confirmation is sought as to how this has changed.
UD2	Land ownership	It is envisaged that sites will be purchased at different times over a period of time. Please confirm whether this is the case	It is envisaged that sites will be purchased at different times over a period of time.

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UD3	Land ownership	Please explain how the Section 7 Assessment matters set out at pages 16-26 of the Urban Design Assessment (i.e. matters of good urban design) that require walkable block sizes, optimal road layout, regular site sizes, sites facing onto streets and the like, can be proposed/achieved unless all the sites are purchased concurrently.	
UD4	Land ownership	Please explain how (any) new roads will be planned for and built given the multiple site owners.	
UD5	Land ownership	Please clarify if any new roads in the PPC area will be public or private roads. If this above is not yet known, please explain how acceptable urban design outcomes (refer UD3 above) can be achieved if the roads are not public streets.	

Landscape and visual effects – Ainsley Verstraeten, ADO				
LV1	Buffer Areas	Please clarify the makeup of planting within the 3m buffer planting along the southern boundary.	The Landscape and Visual Assessment describes the buffer area as being a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs. However, the proposed AUP amendments outlined in Attachment 5 refers to this area as indigenous specimen trees and shrubs only (proposed rule I430.6.9(4)(a)).	
LV2	Buffer Areas	Please provide further information and analysis for how the buffer areas widths of 5m, 3m and 10m have been devised.	The buffer area within sub precinct B is 20m and as the edge of this precinct is aligned with this it would seem appropriate to match the 20m on the other side of the road.	
LV3	Buffer Areas	Please explain why typical plant palettes have not been included for proposed Sub-precinct E to the Patumahoe Precinct.	The operative Patumahoe Precinct includes typical plant palettes for Sub-precincts B, C and D, referenced in assessment criteria I430.8.1(3)(f) and Figure 5. It is unclear why these palettes have not been included in the proposed Sub-precinct E.	
LV4	Landscape Framework	Please confirm whether the landscape framework strategy referenced in the Landscape and Visual Assessment (para 2.7 and 3.7h) is being proposed as part of the plan change or something that is required through resource consent at the time of subdivision.	The Landscape and Visual Assessment refers to a landscape framework strategy which includes open space plantings, landscape buffer and streetscape plantings, yet this information is not included in the precinct. Sub-precincts B, C and D appear to have included this information, so it is unclear as to why this approach has not been taken for sub-precinct E.	
LV5	Future Urban	Please confirm how the location of the eastern boundary of the proposed Future Urban Zone has been arrived at.	The Landscape and Visual Assessment refers on numerous occasions to a defensible edge, yet the eastern boundary of the FUZ appears to be in line with the cadastral boundaries rather than the escarpment.	

LV6	Retaining wall standards	Please clarify the minimum separation distance and landscape strip required between retaining walls.	The Landscape and Visual Assessment refers to a minimum of 1.0m landscape strip between retaining wall heights (para 3.7(i)) yet standard I430.6.2(2) and Figure 4 within the Patumahoe Precinct refers to a 75mm width.
LV7	Precinct Plan 3	Please provide a clearer demarcation of the landscaped buffer show along the southern boundary of Sub-precinct E within Precinct Plan 3.	It is difficult to identify the landscaped buffer area adjoining the rail corridor as depicted on Precinct Plan 3.
Stormwater and flooding matters – Iresh Jayawardena, Healthy Waters			
SW1	Stormwater Planning	<p>The proposed plan change must address/discuss how the proposed plan change request fits within the current operative plan's approach to sustainable development and how it meets the objectives and policies of the plan. Please provide an assessment addressing the above, in particular in the context of:</p> <ul style="list-style-type: none"> National Policy Statement on Fresh Water Management (2014) Chapter E1 Water Quality and Integrated Management relevant E1.2 Objective(s) and E1.3 Policies of the Auckland Unitary Plan (Operative in Part) Chapter E3 Lakes, rivers, streams and wetlands relevant E3.2 Objectives and E3.3 Policies 	<p>Given the complexity of the site and the significant increase of the foreseeable impermeable area on the site (as compared to what is present on the site), the Assessment of Environmental Effects and Section 32 Evaluation does not provide a clear assessment on relevant national, regional and district plans and policies; in particular, taking into consideration the freshwater management; water quality and integrated management of the proposed plan change.</p>

SW2	Stormwater Management	<ul style="list-style-type: none"> AUP RPS B7.3 Objectives and policies for freshwater systems <p>Please clarify which technical guideline documents were used for the proposed plan change.</p>	<p>Section 5.2 Design standards and guidelines of the Stormwater Management Plan (Appendix 11) states that stormwater system and stream work for the project was designed using Stormwater Management Devices: Design Guidelines Manual, ARC Technical Publication No. 10 (ARC TP10), Second Edition, 2003.</p> <p>Stormwater management that includes water quality improvements and flood mitigation needs to be designed using Water Sensitive Design parameters as the requirements of GD01 (already referenced in SMP) and GD04 instead of TP10.</p> <p>Water Sensitive Design for Stormwater, known as GD04, provides guidance for the application of water sensitive design (WSD) to land use planning and land development, with a specific focus on stormwater and freshwater management.</p>
SW3	Stormwater Management	<p>Please provide a ground soakage investigation report in terms of percolation rates and feasibility of using ground soakage system for stormwater disposal as per Guideline Document 2019/007 Version 1 – Stormwater Soakage and Groundwater Recharge in the Auckland Region. If found feasible, please amend stormwater management measures by incorporating ground soakage systems for stormwater disposal.</p>	<p>The geological information provided in the application indicates that the site is underlain by volcanic basalts and Kaawa formation. Subsurface investigations at the site show that the site is underlain by the South Auckland Volcanic Fields. Given that a large portion of the plan change area (Catchments 1 and 2) is covered by the High-Use Stream Management Areas Overlay, the High Use Aquifer Management Overlay and the Quality-Sensitive Aquifer Management Overlay of AUP, we consider that adoption of ground soakage system will assist in maintaining the healthy base flow in Mauku Stream and replenish the water resources in the groundwater aquifer systems underlying the site.</p>
SW4	Stormwater Management	<p>Please provide a detailed assessment of effects on the proposed diversion of stormwater runoff from Catchment 2 (4.01 ha) from a tributary of Whangamaire</p>	<p>Stormwater diversion can have adverse effects on downstream properties and exacerbate existing flooding problems if not properly managed. This needs to be</p>

		Stream into a tributary of Mauku Stream, in terms requirements in AUP and NDC.	explicitly addressed in the proposed plan change, so that the affected parties can clearly understand the proposal.
SW5	Stormwater Management	Please provide a longitudinal water surface profile along the critical pipe reaches (as shown on Figure 1 (p.31)) proposed under the 10% AEP future climate plan change scenario to demonstrate the feasibility of the proposed pipe network.	The 10% AEP future climate flood level at the proposed detention pond may hinder the performance of the proposed pipe network, and we need to ensure that proposed detention pond/pipe network scheme will be feasible in achieving the expected performance standards.
SW6	Stormwater Management	Please clarify if the following information provided in the Stormwater Management Report is correct: <ul style="list-style-type: none"> • <u>Section 4.1: Catchment 3</u> peak discharge of 0.039 cubic metres / second; • <u>Section 4.3: Flood volumes</u> for all catchments. 	These numbers are considered low by a few orders of magnitudes.
SW7	Stormwater Management	Please provide the HEC model for the proposed detention pond so that the performance of the proposed pond can be ascertained.	The proposed detention pond is critical part of the stormwater management to minimise adverse effects on the downstream properties. We need to understand the hydraulic performance of the pond.
SW8	Flood Risk and Hazard	Please compare and report on the pre and post plan change discharge hydrographs and volumes for a range of storm events –	This information is necessary in order to understand the adverse effects on the downstream properties.

		50% AEP, 10% AEP and 1% AEP for future climate.	
SW9	Flood Risk and Hazard	Please assess and report on the post development flood risk within the plan change area in terms of AUP provisions, especially E36 Natural Hazards. A post development floodplain map showing flood depths, and peak velocities should be prepared and provided.	This information is necessary to understand post-development flood risk and hazards management
SW10	Flood Risk and Hazard	Please provide a detailed post development flood risk model and associated report as per AC SW Modelling Specification (Nov 2011) covering the proposed future terrain form, the proposed detention pond and dams, the main drainage network should be provided.	We are concerned that the proposed Earthworks Site Contours Plan (Drawing EW003, Appendix 6) indicates many sections and public roads are below the detention dam overflow weir level at RL 66.74m. This may indicate that these properties and public roads may be subject to considerable flood risk under the post development scenarios.
SW11	Flood Risk and Hazard	Please check and determine the feasibility of the proposed overland flow paths layout, particularly for areas A and B shown in Figure 2 below.	We are concerned with feasibility and performance of the proposed overland flow paths in some areas (refer Figure 2 (p.31)) where the finished ground levels are below the dam overflow weir level.
SW12	Regionwide Network Discharge Consent (NDC)	A Stormwater Management Plan (SMP) detailing the Integrated Stormwater Management Approach for the site design is required to be prepared as part of the plan change application and submitted to Healthy Waters for in-principle approval.	Noting that Auckland Council's Regionwide Stormwater Network Discharge Consent (NDC) is commenced, this will take immediate effect for plan change process and subsequent resource consents if the development seeks to utilise the NDC to authorise diversion and discharges into the public network. This is to ensure that the effects of urbanisation in these greenfield areas and its discharges into sensitive receiving environments were adequately considered.

		(see also Advisory Note 2 in Appendix 3 to this request)	Any SMP submitted to Healthy Waters or intended for adoption needs to be assessed against Schedule 4 of the NDC and the Stormwater Management Plan template. Please refer to http://www.aucklanddesignmanual.co.nz/regulations/technical-guidance/ndc#/regulations/technical-guidance/ndc . The Auckland Design Manual has this information in tabs 3 and 4.
Water supply and wastewater matters – David Russell, Regulatory Engineering South			
W1	Pump Stations	Please confirm whether the location of pump stations, proposed to be on the frontage of the pond / drainage reserve, have been discussed with Council's Parks team and Watercare Services Limited.	Drawing WW001 (p. 20) of the Engineering Infrastructure Report shows pump stations the frontage of the pond and drainage reserve. These locations are unlikely to be acceptable to Parks and Recreation, and may not work for Watercare Services Ltd considering the manoeuvring area they require to access and maintain the pump station. Further discussions are needed with Watercare and Parks to confirm land requirements and location. This will provide greater certainty that the required Watercare lot can be created at the time of subdivision.
Geotech matters – James Beaumont, Riley Consultants Limited			
G1	Zone 3	Please provide further information to support the suitability of the engineering measures required to make the Zone 3 suitable for development.	There are no investigation locations or other information on the depth of the observed instabilities that would enable a consideration of the viability of the shear key, buttress fill and palisade wall measures within Zone 3 as identified in the Geotechnical Assessment prepared by Lander Geotechnical. This is an important consideration as the suitability of these measures is significantly affected by the depth of instability. Counterfort drains may also be problematic as an engineering measure, as they will likely need to extend downslope beyond the zone boundary and into adjacent properties to suitably suppress the groundwater table. This leaves us with setback being the only other option. However, after applying a development setback, there might be no land within Zone 3 that can be developed.

Parks and Open Space – Roma Leota, Parks and Recreation Policy			
OS1	Proposed open space	Please provide additional information including a map or plan showing the location, configuration and sizes of new areas of open space and linkages refer to in section 3.3 page 9 of the Plan Change Request AEE report	Given the growth enabled by the proposed plan change, there is a need to review the provision of parks and open space to provide adequate informal recreation opportunities and experiences for the anticipated residents.
OS2	Proposed open space	Please provide a clear plan showing the integration of new open space and linkages to existing open spaces and the overall open space network.	

Figure 1: Critical Pipe Reaches for Verifications of Longitudinal Water Surfaces Profiles (Refer Item SW5)

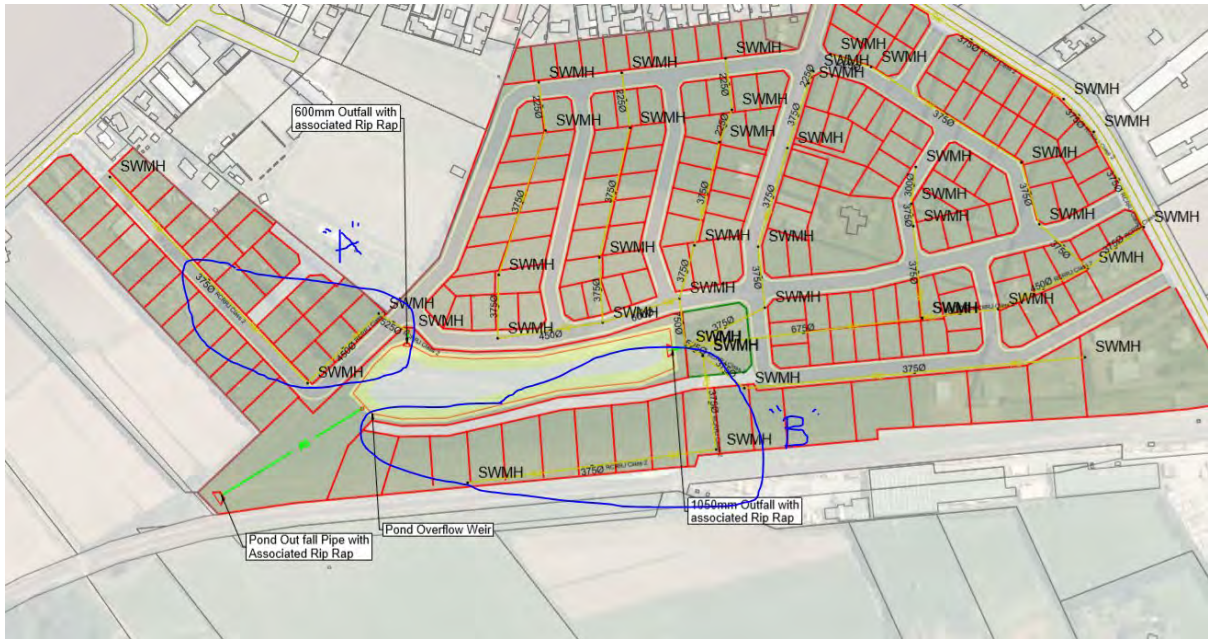
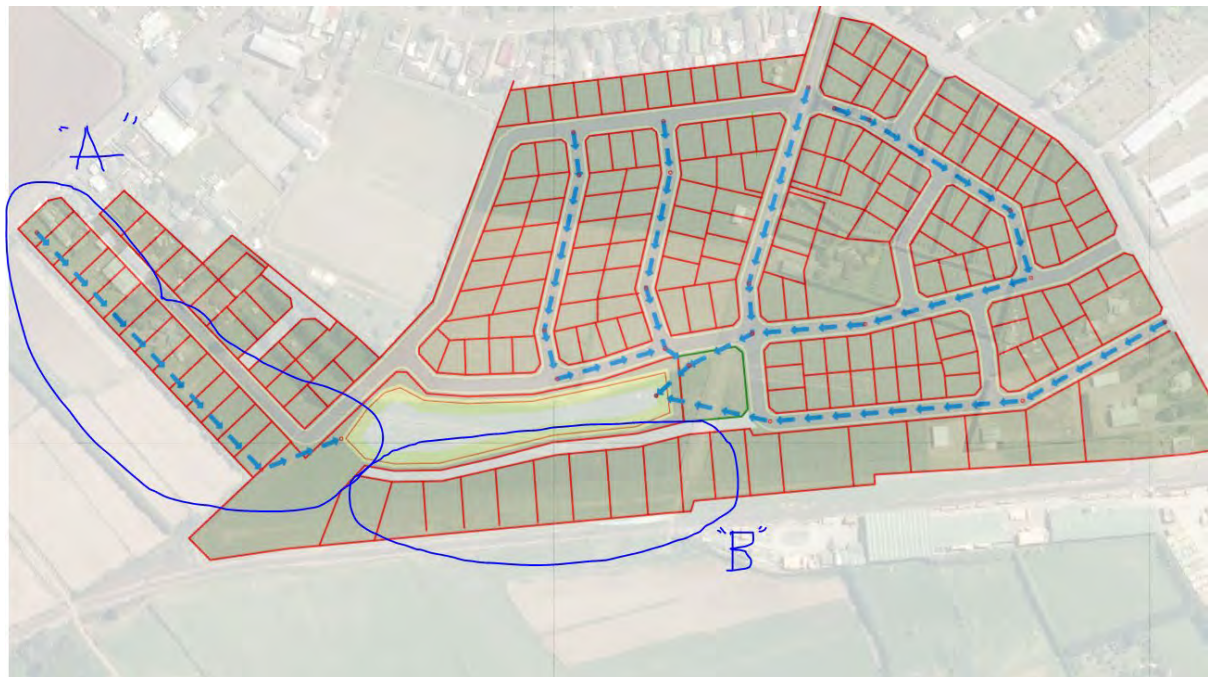


Figure 2 - Overland Flow Paths of Concerns (Refer Item SW11)



Appendix 3: Advisory notes

#	Category of information	Advice and reasons
1	Heritage – Accidental Discovery Protocols	<p>The plan change request refers to protocols on pages 17, 37 and 48, including to ‘accidental discovery protocols of the AUP’. Appendix 12 also refers to an accidental discovery protocol in the AUP.</p> <p>The accidental discovery provision in the AUP is a rule not a protocol. It appears in the land disturbance, infrastructure and coastal chapters of the plan and manages discoveries of sensitive materials including archaeological sites.</p> <p>Individual mana whenua engagement protocols cannot replace the requirement to comply with the ADR. Should applicants seek to adopt a supplementary protocol or protocols, the protocol/s must align with the plan rule and it must be made clear that they do not replace the rule.</p>
2	Stormwater Management – NDC	<p>Note: Refer to Item SW12 in Appendix 2</p> <ul style="list-style-type: none"> • Healthy Waters will formally adopt the SMP into the NDC after the plan change is made operative; • Assets are unlikely to be accepted by Council for vesting if NDC requirements are not met.
3	Precinct Plan 3	<p>The proposed precinct plan could be made clearer by:</p> <ul style="list-style-type: none"> • Removing zoning and zone annotations, as the proposed zoning can be depicted on a separate map (for the purposes of this PPC) and then within the AUP(OP) GIS viewer; • Clearly demarcating the location of a future neighbourhood park and stormwater device; • Consistent and clearer depiction of the subdivision standards – currently these are shown in a variety of ways (400m radius, annotation for large lots). For example, these could instead be shown as subdivision areas A, B and C and referenced in the precinct plan key and in Table I430.6.7.1; • Identifying the location of the poultry farm or cadastral boundaries of 75 Patumahoe Road.

#	Category of information	Advice and reasons
4	Land use capability	<p>There appears to be some difference of opinion between the LUC experts for Council and the applicant, in terms of the classification of Patumahoe clay loam on Class A slope. While the Ag First report identifies the Patumahoe clay loam found as being LUC 2, this could be considered as LUC 1 using findings derived from Hick and Vujcich (2017)¹ and supported by the AUP(OP) definition of 'Land containing elite soil'.</p> <p>It would be beneficial to resolve this disagreement as much as possible prior to notification of the plan change.</p>

¹ Hicks, D. L. and V. Vujcich (2017). "Farm-scale land use capability classification for Auckland. Auckland Council Technical Report TR2017/016."

Our Reference: 17158

16th April 2020

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Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your feedback provided on 19 November 2019 we make the following comments. These comments have been compiled from the relevant experts:

Planning, Statutory and general matters – Sanjay Bangs, Plans & Places

P1. Infrastructure funding & delivery

Please expand on the assessment of the PPC against the relevant sections of the following documents that relate to the funding, timing and delivery of the wider transport, and the integration/coordination between land use and infrastructure:

The relevant planning and policy documents signal a clear need to integrate and coordinate growth with the infrastructure necessary to service such growth. The Plan Change Request and Assessment of Environmental Effects (AEE) contains only limited assessment against the objectives and policies of the AUP(OP), Auckland Plan 2050 and NPS:UDC.

Attachment 6 (p.12) to the private plan change (PPC) request addresses the coordination of the PPC with the Papakura to Pukekohe rail electrification project and the prospect of increased connector buses from Patumahoe. However, given that the majority of trips generated by the proposed residential zonings will be made by private car, the PPC needs to address the traffic impacts on the wider transport network, and particularly the strategic corridors of State Highway and State Highway 22.

To the extent that specific issues for further assessment are raised, these are addressed below. Clarification is required if there are more general questions.

P2. Infrastructure funding and delivery

Please provide a funding plan in accordance with Appendix 1.5.5(b) of the AUP(OP).

Appendix 1 requires specialist documents to support structure planning and plan change processes at a level appropriate to the scale of the area and the complexity of the issues identified by the process. Clause 1.5.5(b) references a funding plan as a relevant specialist document. Given the growth enabled by the plan change relies on

the strategic and arterial transport networks in the southern area, a funding strategy is necessary to outline the programme for funding and delivery of this transport network.

For the reasons set out below, it is considered that the level of development provided by the Plan Change, when measured against expected growth and uptake is not such that undue pressure on infrastructure will be created. However, the applicant is willing to discuss an Infrastructure Funding agreement as the plan change progresses, and any infrastructure issues are highlighted.

P3. Section 32 Evaluation

Please explain whether there are sufficient convenience retail, services, and community facilities within Patumahoe to meet the needs of residential growth enabled by this PPC request.

It is unclear whether the existing Patumahoe town centre can adequately service the needs of the additional residential growth enabled by this PPC request, in terms of demand for retail, services and community facilities.

The PPC will result in the establishment of 200 additional household, approximately 500 additional residents over a 6-8 year timeframe at a rate of 20-30 households per year (i.e. 2022-2030). Development of the subject land is anticipated to follow completion of the two zoned residential are at Patumahoe, which have capacity for 101 new dwellings (approx. 4 years housing supply). The addition of new dwellings to Patumahoe will increase demand over time for retail, services and community facilities, potentially requiring an expansion of those facilities or new facilities. The current level of land utilisation in Patumahoe Township is considered to be moderate.

The Patumahoe residential area has expanded significantly in the past 15 years as a result of structure planning undertaken by the former Franklin District Council. However, the growth of the town centre has been limited to taking up opportunities within the bounds of the commercial zoning. It is unclear whether the town centre has the retail and commercial services such as supermarkets of a suitable scale and commercial services, or the capacity to develop future commercial activities to meet the needs of the 200 new dwellings accommodated by this PPC request. It appears that residents will be required to travel to Pukekohe to have access to some daily convenience services.

There are opportunities for an expansion of retail and commercial service activities in the Business: Neighbourhood Centre zone located centrally within the township to meet the needs of residents and to discourage the need for travel to Pukekohe (by existing and future residents). These include:

- extending trading hours and/or employing new staff
- expanding existing business premises
- use/conversion of existing vacant shops/buildings and sites within the existing zone for retail/commercial use
- additions to or redevelopment existing buildings i.e. construction of (or additions to create) 2-level buildings

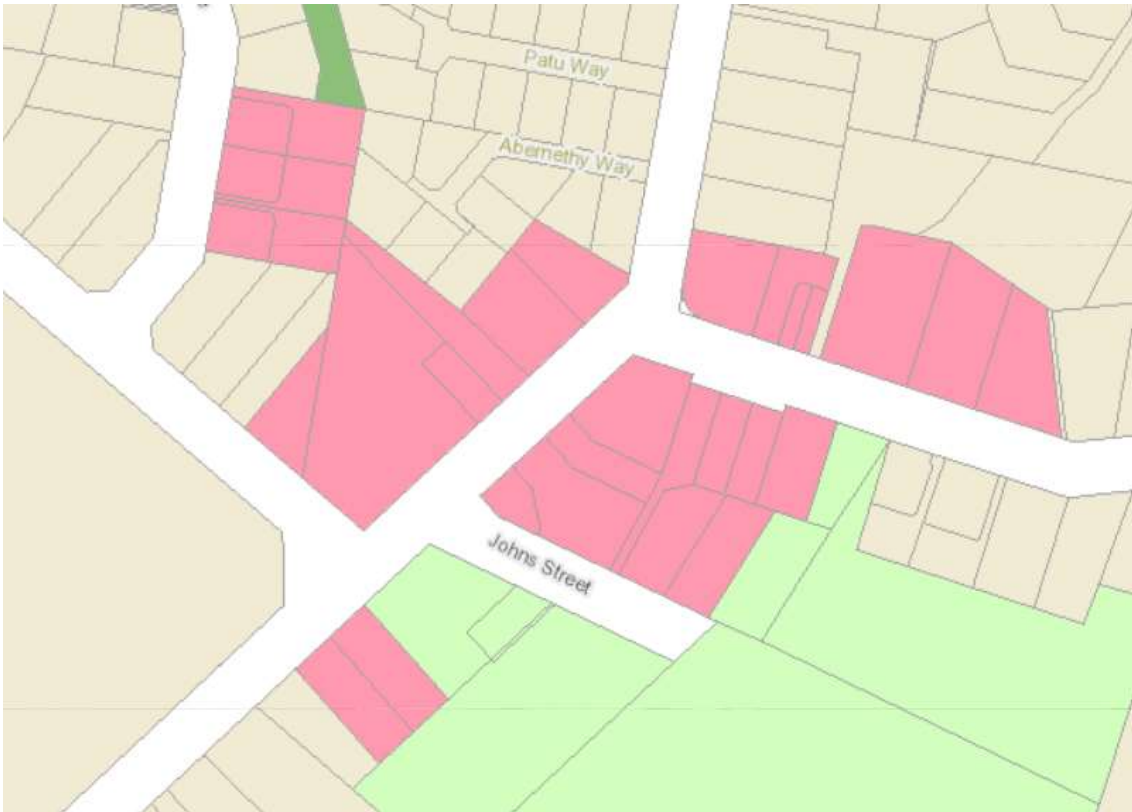
- conversion of the former post office building located at 17 Patumahoe Road (adjacent to the Foursquare Supermarket)
- relocation of the ITM timber yard located at 14 Patumahoe Road and redevelopment of that site for commercial activities
- relocation of the engineering workshop and redevelopment of the site at 4-6 Mauku Road
- removal/conversion of the dwelling at 3 Mauku Road to commercial/retail activities
- conversion of the workshop building at 1 Woodside Road to commercial/retail activities

This is required to assist with understanding whether the PPC request is consistent with the relevant planning documents, which seek to achieve efficient and effective urban environments (NPS:UDC – OA1) and a quality compact urban form with convenient access to services (Auckland Plan 2050 Development Strategy) and a diverse mix of choice and opportunity for people and communities (AUP(OP) RPS B2.3.1(1)(c)).

The Economic assessment by Property Economics (Appendix 10 of the AEE), concludes the 200 additional dwellings on the subject land would lead to the creation of 17 new jobs in the commercial, retail and food and beverage sectors. The upgrade, expansion or addition of new commercial and retail facilities (as outlined above) would occur over a 10-12 year period as the growth in household numbers progressively creates market conditions that stimulate business to respond in order to capture the additional household expenditure in those categories. The increased local demand for fresh food and groceries will encourage business operators to improve local retail services for those products. Improvements in local retail and commercial services will both accommodate the demand resulting from new housing and will also enhance services available to existing Patumahoe residents, thereby reducing their reliance on "out of town" retail and commercial services over time. The 10-12 year timeframe will ensure that the market has sufficient time to respond to ensure that the needs of local residents can be suitably met over that timeframe.

Community facilities in Patumahoe include Primary School (years 1-6), Playcentre, Children's Playground, Patumahoe Domain (Rugby/Cricket grounds), Sports Park with training lights (Clive Howe Rd), Indoor heated pool and Swimming school, Tennis Club, War Memorial Hall, Bowling Club, Rugby Club, Cricket Club, Fire Station (with two appliances). In comparison to more urban settlements the community facilities at Patumahoe are considered to be used to a moderate level with capacity for to accommodate more intensive use/potential increase in player numbers as the population progressively increases.

Finally, it is noted that the creation of local employment opportunities within the Light Industrial zone will further promote Patumahoe as a "efficient and effective" urban centre that provides for local employment at a substantially higher level than it does currently.



P4. Geospatial Mapping

Please provide geospatial shape files reflecting the extent of the PPC request area, and the extent and location of proposed zonings.

Shape files are required to depict the extent of the PPC request on the Auckland Unitary Plan Viewer when reporting to Planning Committee and when notified, should the request be accepted for notification.

Noted

P5. Geospatial Mapping

Please provide a high-quality map in PDF format showing the extent of the PPC request area, and the extent and locations of proposed zoning and extent of Patumahoe Precinct.

The PPC request relies on proposed Precinct Plan 3 to depict the proposed zonings. This is not sufficiently accurate, or of a high enough quality/resolution to depict the zonings for future reporting purposes (including a Clause 25 decision).

PPC plan is attached

P6. Geospatial Mapping

Please provide a high-quality PDF copy of Precinct Plan 3

Precinct Plan 3 attached

P7. General

Please provide Certificates of Title for the properties that fall within the PPC area.

Certificates of Titles have been added.

P8. Subdivision Standards

In regard to the 600m² minimum net site area within a 400m buffer from the corner of Patumahoe Road and Mauku Road, please explain whether a more nuanced 'boundary' to this control was explored to demarcate this standard.

The 400m radius proposed in Standard I430.6.7 to depict the area in which a 600m² minimum net site area control applies appears to be broadly applied without consideration of the indicative roading pattern and expected form of subdivision that will arise. It will be useful to know whether a more detailed or nuanced boundary was considered, and whether applying a 400m radius will create issues where proposed lots cross this radius.

Under further consideration at the time of writing.

P9. Subdivision Standards

Please provide justification for why a restricted discretionary rule for subdivision complying with the relevant standards (I430.4.2(A6)) has been proposed.

Sub-precincts B, C and D contain subdivision rules that rely on the underlying Auckland-wide provisions, which are generally a discretionary activity, whereas Sub-precinct E is proposed to treat subdivision (in accordance with the relevant standards) as a restricted discretionary activity. The preferred activity status is not justified within the AEE.

The reasons supporting application of RC or C activity status to a precinct relate to the high level of certainty of outcome from subdivision of land within a precinct that is subject to a precinct plan and a set of precinct specific standards. In comparison, for vacant site subdivision outside of a precinct there is no overall precinct plan that sets the spatial framework for subdivision and which is accompanied by a set of provisions intended to ensure high standards of subdivision layout and design, resulting in high levels of Residential Amenity.

Subdivision listed as a discretionary activity in Table E38.4.2 Subdivision in residential zones must comply with the applicable standards for the proposed subdivision listed in E38.6 General standards for subdivisions, E38.8.1 General standards in residential zones. Subdivision of a Parent Site of 1ha or greater complying with Subdivision Standard E38.8.3.1 (minimum net site areas) is listed as a Discretionary Activity Table E38.4.2 (in areas where no Precinct Plan applies). In the Patumahoe Precinct Table I430.4.1 rule (A2) does not specify any activities status but effectively adds additional subdivision standards for sub-precincts B, C and D.

It is understood that that the activity status remains as RD for sites <1ha and D for sites >1ha.

Options: a) Specify no activity status in table I430.4.2 - RD status would then apply to subdivision of lots <1ha in area and D status would apply to lots >1ha in area.

b) Include RD as an entry in Rule A6 of Activity Table I430.4.2, which would result in all subdivision in the precinct E that complies with the specified subdivision standards being classified as a Restricted Discretionary Activity (and assessed in accordance with the relevant matters specified in the Plan).

The RD application would continue to be subject to E38.6 General standards for subdivisions, including E38.8.1 General standards in residential zones as I430.6 Standards states "The overlay, zone and Auckland-wide standards apply in this precinct in addition to the following standards ...". For those reasons RD status is preferred.

RD Activity Status is consistent with other Precincts - e.g. I418 Kingseat Precinct where subdivision complying with the precinct standards is listed as a RD Activity Table I418.4.1 rule (A53), whereas at Karaka North subdivision complying with the precinct standards is a Controlled Activity (I417.4.1 (A10)).

P10. Fencing Strategy

Section 5.2 of the AEE references a fencing strategy. Please confirm whether bespoke fencing standards were intended to be proposed in the Patumahoe Precinct provisions, or if the underlying Single House zone provisions are being relied on.

It is unclear whether a bespoke fencing strategy has been proposed for the PPC area, or whether the plan change proposes to rely on the underlying fence standards within the Residential – Single House Zone.

A fencing strategy that encourages passive surveillance of public open spaces and an appropriate interface with Rural Production zoned land and the rail corridor adjacent the plan change area.

Proposed Fencing controls:

1. For residential allotments in the Single House zone the provisions of rule H3.6.12 would apply (unless modified) to front, side and rear yards. That rule specifies that fences within the front yard shall be up 1.8m in height if the fence is at least 50 per cent visually open.

Given the rural village nature of Patumahoe and noting the form and type of development on properties within the settlement, where either no front fences or low fences are common fences of that height would not be consistent with the rural village character, a new Standard is therefore proposed (as follows):

I430.6.16 Fences in Sub-precinct E

(1) Fences within the front yard must not exceed a height of 1.4m (measured from ground level at the boundary) and must be a minimum 50% visually open as viewed perpendicular to the front boundary.

For lots adjoining OS zoned land the normal standard in the Single House zone is 2m high (with no visual permeability requirement). However, to provide a higher level of passive surveillance of open space areas within sub-precinct E and in recognition of the rural village character of the settlement – the following is proposed:

(2) Side/Rear fences adjoining an Open Space zone must not exceed a height of 1.8m (measured from ground level at the boundary) and if more than 1.4m in height must be a minimum 50% visually open as viewed perpendicular to the boundary.

Clause 1430.8 includes a new matter for discretion (1430.8 (2)(k)) which provides discretion in relation to compliance with the fencing standards.

(A16)	Vacant sites subdivision involving parent sites of less than 1ha complying with Standard E38.8.2.3	RD
(A17)	Vacant sites subdivision involving parent sites of less than 1ha not complying with Standard E38.8.2.3.	D
(A18)	Vacant sites subdivision involving parent sites of 1ha or greater complying with Standard E38.8.3.1	D
(A19)	Vacant sites subdivision involving parent sites of 1ha or greater not complying with Standard E38.8.3.1	NC

P11. Indicative Roads

The indicative roading layout shown on Precinct Plan 3 shows indicative roads partly adjoining the Patumahoe Domain. Please explain why these roads do fully or mostly adjoin the Patumahoe Domain.

The activation of the Patumahoe Domain is referenced in Section 5.2(5) of the AEE and the Urban Design Assessment as being a positive aspect of the PPC request. However, it appears that PPC request misses an opportunity to better open up the Domain through park edge roads, which in the PPC request only partially adjoins the Domain.

The indicative roading layout shown on Precinct Plan 3 shows indicative roads adjoining the SW corner of the Patumahoe Domain. The existing consented subdivision SUB60318096 (12/12/18) has a road layout that does not adjoin the Patumahoe Domain and which when implemented would preclude an extension of roading along the eastern boundary of the Domain. Precinct Plan 3 recognises and respects the existing rights under this consent (as it is understood that the consent is likely to be implemented in the next 1-2 years).

P12. Indicative Roads

Please confirm how the detailed design of roads as described in Section 5.3 of the AEE will be delivered through the proposed provisions

Refer also Item T10

It is unclear whether bespoke provisions for the design of indicative roads are being proposed, or whether the detailed design will rely on ATCOP standards. Unlike for Sub-precincts B, C and D, no cross-sections of the road reserve have been proposed to inform future detailed design.

I430 Precinct Provisions - have been amended to include:

A new matter for discretion as Clause I430.8 (2)(k) which provides discretion in relation to compliance with the standard road cross sections (Figures 5-9).

Amendments to assessment criteria I430.8.1 (2), to include reference to Figures 5-9, as follows:

- (a) For sub-precincts A, B, C, D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant precinct plan and relevant Figures 1- 4 and 5-9 above.*

P13. Noise & Vibration

Please explain how the noise and vibration standards recommended by Kiwirail for residential and other sensitive activities proximate to the rail corridor will be secured through consent notice at the time of subdivision, given that the RD subdivision matters do not reflect these recommendations.

Section 7.1 of the Plan Change Request AEE and S32 Request identifies noise and vibration standards as an outcome of consultation with Kiwirail. The report then notes that these will be secured through a consent notice issued at the time of subdivision. However, the proposed subdivision rule for Sub-precinct E (I430.4.2(A6)) is restricted discretionary. Therefore, an assessment at resource consent will be limited to the matters contained in I430.8.1(2) and (3), which do not provide for a consideration of noise and vibration relative to the rail corridor. As a result, there is a significant risk that Council will not have the scope to enforce a consent notice at the subdivision stage.

A new Standard I430.6.17 - Protection from Railway Noise and Vibration in Sub-precinct E has been added to Attachment 5 - Proposed Amendments to AUP.

That standard applies internal noise standards for dwellings located within 100m of the Pukekohe-Glenbrook railway network, and a vibration standard within 60m of the railway network. Clause I430.8 includes a new matters for discretion (I430.8 (2)(k) and (2)(l)) which provide discretion in relation to compliance with the railway noise and vibration standards in sub-precinct E. Finally a new Assessment Criterion is proposed (e) which requires consideration as to how the subdivision design and associated provisions ensure that the Standards applicable to sub-precinct E are achieved.

P14. Landscape Buffer Areas

Please explain how the proposed landscaped buffer widths (proposed standards I430.6.9(2) – (4)) have been devised.

The proposal involves extending the urban area of Patumahoe, thus enabling residential activities to locate closer to established rural production activities (and zoning that enables such activities).

Although landscaped buffer areas have been proposed at the western edge of the PPC area, the interface between Single Housing and Light Industry zoned land and the boundary with the rail corridor, it is unclear how these buffer widths have been prepared.

In respect of the buffer along the western boundaries of Sub-precinct E, it is unclear why a 10m buffer has been proposed given that the operative standard I430.6.9(1) requires a 20m wide buffer at the southwestern boundary of Sub-precinct B (Patumahoe Hill). (refer also Item LV2)

Refer to LV2

P15. Reverse Sensitivity

Please comment on how the 200m / 400m set back distances from the poultry sheds from 75 Patumahoe Road (Standard I430.6.15) have been developed.

Section 10.9(6) of the AEE identifies controls on sensitive residential activities within 400m of the poultry sheds at 75 Patumahoe Road as a means to address potential reverse sensitivity effects. Proposed rule I430.6.15 identifies buffer areas of 200m and 400m in which no-complaints covenants must be registered on titles in accordance with subdivision applications. However, it is unclear how these separation buffers have been devised, and whether they reflect best practice for addressing air quality and reverse sensitivity effects for rural industries.

The Auckland Unitary Plan (operative in part) does not control the location of dwellings (in any zone) relative to an existing poultry farm; however, it does apply management standards to existing intensive farming activities (of more than 25 pig equivalents or more than 10,000 poultry) under Air Quality Standard E14.6.2.2, requiring the facility to operate in accordance with a Management Plan. The applicable standard for the location of intensive farming activities from 21 October 2001 housing between 10,000 to 180,000 chickens (Air Quality Standard E14.6.3.5) specifies that the "premises, measured from the exhaust vents closest to the neighbouring site, must be located a minimum of 400m from the property boundary or notional property boundary". Within that 400m distance a registered instrument is required to restrict the owners and occupiers of such land from complaining about any offensive and objectionable odours or dust within the buffer area generated by the chicken farm. In addition the intensive farming activity must operate in accordance with a Management Plan.

A more prescriptive approach is included in the Regional Air Quality Plan for Taranaki (a Region with a high number of Poultry farms), and has been developed with reference to

UK, NSW and Victorian codes of practice (refer to Note 1). Appendix V of the Plan specifies buffer distances between dwellings and poultry sheds, as follows:

Number of poultry	1. Distance to nearest off site dwellinghouse	2. Distance to nearest sensitive area (refer to Policy 2.3)	3. Distance to road	4. Distance to any boundary
	metres	metres	metres	metres
Fewer than 30,000	100	100	100	50
30,000 – 59,999	200	200	100	50
60,000 – 79,999	300	300	100	50
more than 80,000	400	400	100	50

The existing facility at 75 Patumahoe Road houses 30,000-60,000 poultry, for which the recommended buffer distances are 200m to the nearest dwellinghouse.

Note 1: ‘Code of Good Agricultural Practice for the Protection of Air’ (UK Ministry of Agriculture, Fisheries and Food 1998), ‘Odour Management at Intensive Livestock Installations’ (UK Environment Agency 2005, www.environmentagency.gov.uk/agriculture then select ‘pigs and poultry’), ‘Poultry Industry Agreed Standards and Codes of Practice’, October 1995, developed by the Poultry Industry Association of NZ (Inc), a draft code of practice prepared by Environmental Science and Research for Taranaki Regional Council, 1994, the ‘NSW Poultry Farming Guidelines (draft)’ October 1992, developed by NSW Agriculture and referenced by the Environment Protection Authority (NSW), and ‘Victoria Code for Broiler Farms 2001’ (Department of Primary Industries Victoria, www.dpi.vic.gov.au).

P16. Reverse Sensitivity

Please clarify how the wording of Standard I430.6.15 has been developed, and how the standard is intended to function.

Proposed Standard I430.6.15 requires enabling dwellings to be located within 200m / 400m of the poultry sheds located at 75 Patumahoe Road to adopt reverse sensitivity measures. It is unclear how this would be measured or applied at the subdivision stage – i.e. would the rule apply to any residential lot where all or part of the lot was within 200m / 400m of the poultry sheds? Would it also be clearer and more certain for subdivision applicants to require this setback from the cadastral boundary of 75 Patumahoe Road?

Proposed Standard I430.6.15 will apply to the subdivision of land within sub-precinct E, in particular to any proposed allotment with a building platform located within 400m of the poultry sheds at 75 Patumahoe Road (should the broiler sheds continue to be in operation at the time of subdivision).

For those allotments located between 200m and 400m from the poultry sheds a no-complaints covenant shall be registered on the title preventing complaints about any offensive and objectionable odours or dust within the buffer area generated by the poultry sheds. These allotments are further than 200m from the sheds and would therefore be subject to lower level effects from any offensive or objectionable odours that may result from a failure of on-site management processes at the poultry farm.

For allotments located either wholly or partially within 200m of the poultry sheds (if the activity continues) then additional reverse sensitivity measures may be required to "Council's satisfaction", that will likely include registration of a "no complaints covenant", combined with other measures that may be necessary to ensure a supply of fresh/deodorised air to residents living closer to the poultry sheds, such as an air supply ventilation system (with filtration) in accordance with the applicable Building Code standard (under Clause G4 - Ventilation) and the "Healthy Homes" standards introduced in February 2019. The onus will therefore be on the applicant at the time of subdivision to demonstrate to Council that appropriate noise quality can be maintained for residents of dwellings within 200m of the poultry sheds in order to secure consent.

In clause E14.6.3.5 the Auckland Unitary Plan adopts the "exhaust vents " of an intensive farm as the point of measurement of its set back distance for new intensive farming activities from a neighbouring site. As the location of exhaust vents may change over time, it is considered to be more appropriate to adopt the poultry shed as the reference point for measuring the 200m/400m buffer distances at the time of subdivision (which is more conservative than the AUP and consistent with the TRC-Regional Air Quality Plan.

P17. Mana Whenua Consultation

Please outline whether consultation has been undertaken with iwi groups other than Ngāti Te Ata and Ngāti Tamaoho.

The Patumahoe area is subject to interests from mana whenua groups beyond those discussed in the summary of consultation contained in Section 7.3 of the AEE. The full list of mana whenua with an interest in the area are:

- Te Ākitai Waiohū
- Ngāti Tamaoho
- Ngāi Tai ki Tāmaki
- Te Ahiwaru – Waiohū
- Ngāti Te Ata
- Ngāti Maru
- Waikato - Tainui

Both Ngati Tamaoho & Ngati Te Ata have prepared CIAs.

P17. Mana Whenua Consultation

Please explain what recommendations from mana whenua groups, if any, have informed or been incorporated into the proposed plan change provisions, and what will be addressed through resource consents or other processes.

Section 7.3 of the AEE and the CIA's contained in Appendix 1 and 1A outline a number of recommendations from Ngāti Te Ata and Ngāti Tamaoho. However, it is not clear whether the applicant has considered the extent to which these should be reflected in the proposed provisions within the Patumahoe Precinct, and what can be given effect to through other processes.

The recommendations from Ngati Te Ata and Ngati Tamaoho summarised in section 7.3 of the AEE in the two CIA's have informed the design response to the subject land in respect of a number of Te Aranga principles, including measures that will improve natural environments and environmental health.

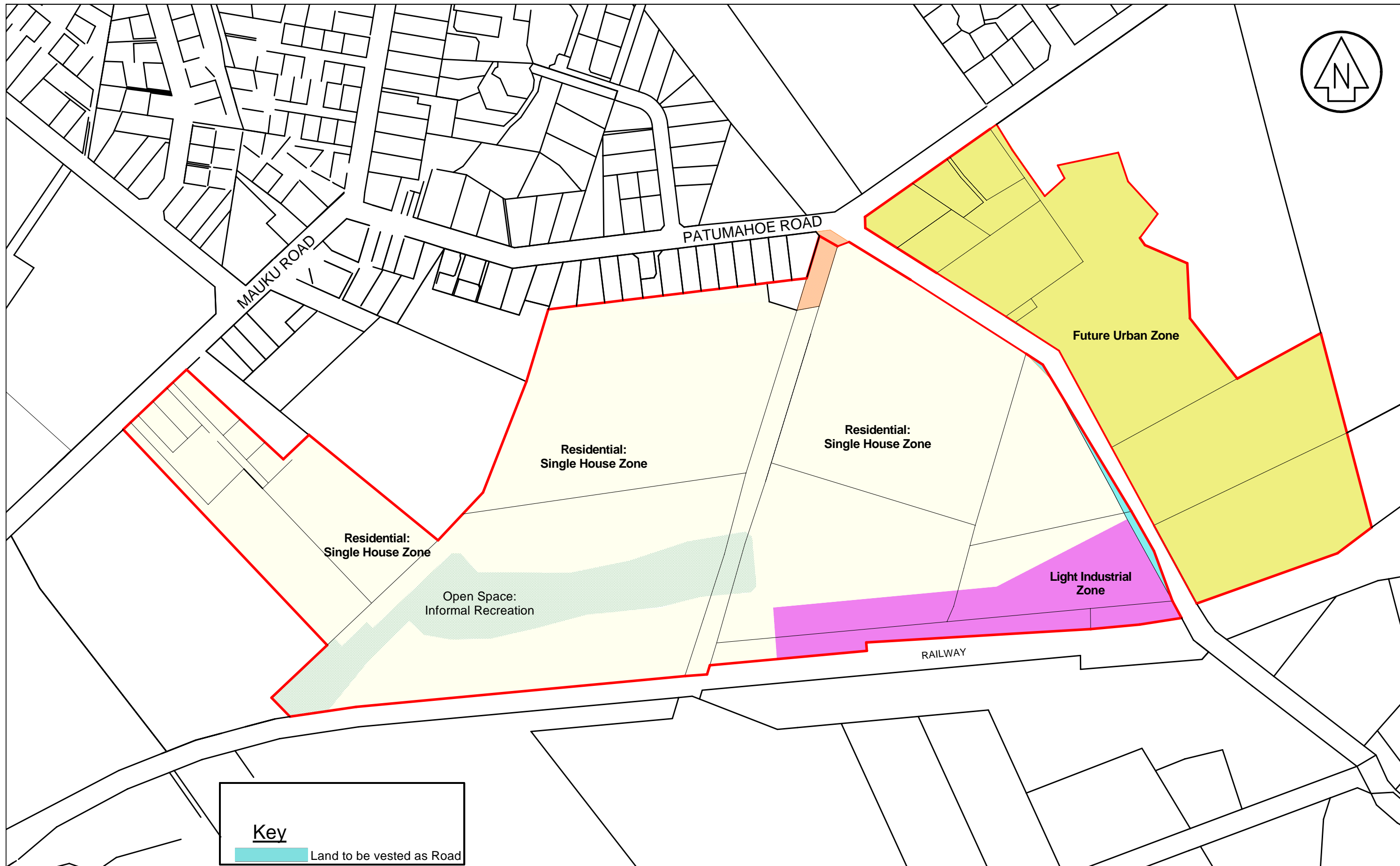
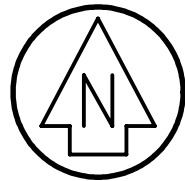
The effective management and treatment of stormwater to manage flows and to remove contaminants is a significant objective for both Iwi. The stormwater solution proposed for the site, will utilise a pond (or ponds) located in the natural low point of the sub-catchment that will provide water quality treatment and flow management. The use of groundwater recharge methods are also being considered. The pond(s) will discharge (at a rate no greater than pre-development levels) via an overland flowpath into the natural flowpath located to the SW of the subject land. As other services will be connected to reticulated networks they will not give rise to any adverse cultural effects on site.

The applicable planting schedules for the precinct (in particular Tables 1 -3 and 5) feature 100% native species (which are to be Eco sourced if possible).


At the time that application(s) for subdivision and associated earthworks and infrastructure are being prepared for the subject land further consultation will be undertaken with Iwi in relation to a cultural blessing of the site, monitoring of site works, the incorporation of Mahi toi, the detailed design of parks and open spaces and the incorporation of Maori names within the development.

An accidental discovery protocol will apply during the period of site works.

The potential incorporation of "sustainable design" features such as solar panels and green roofs will be determined at the time of subdivision and/or is at the discretion of future owners of Light Industrial and or Residential allotments within the subdivision.



Key

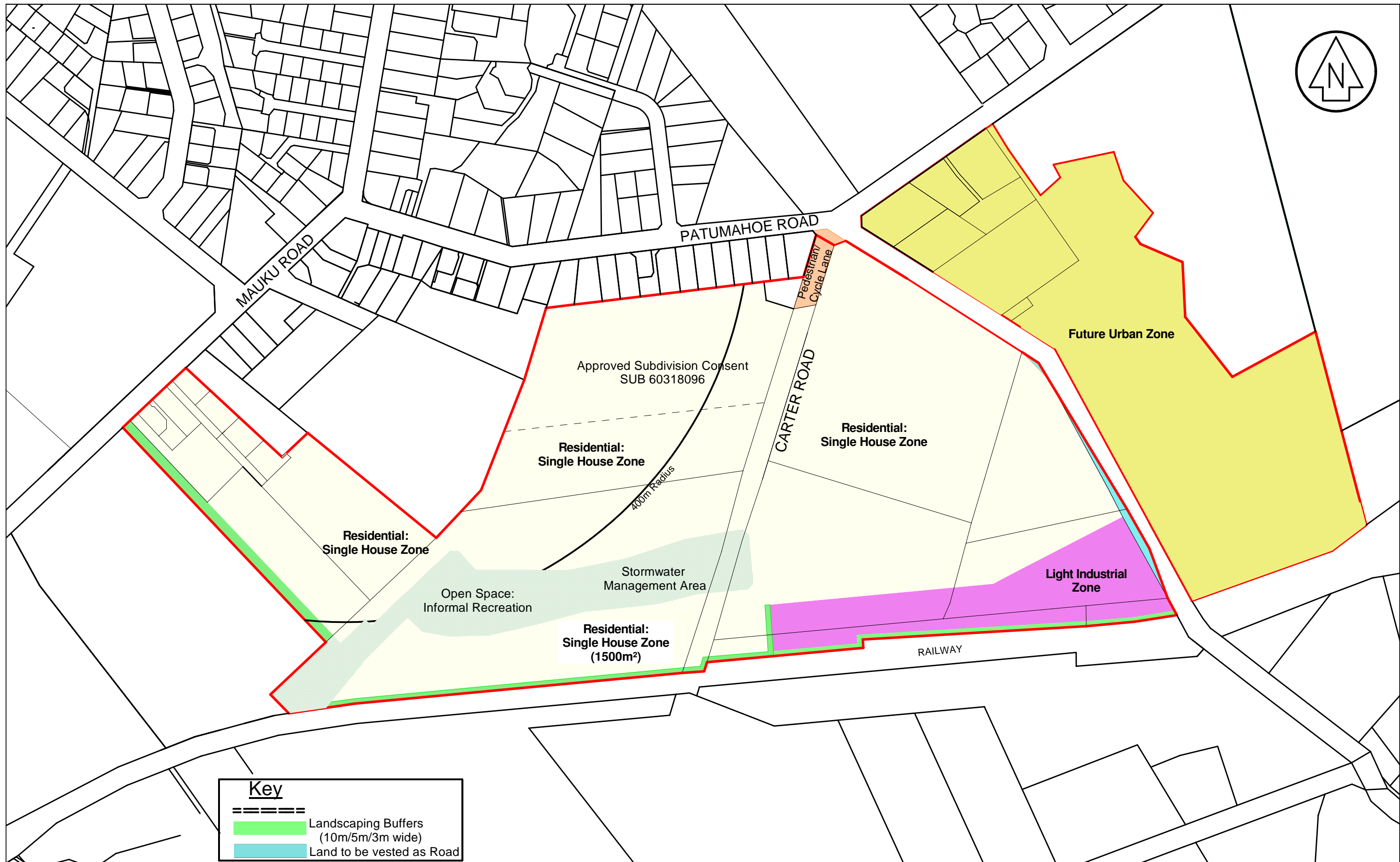
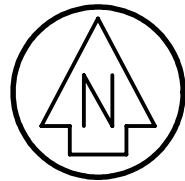
 Land to be vested as Road

TRIPP ANDREWS SURVEYORS LTD
 LICENSED CADASTRAL SURVEYORS & ENGINEERS
 PO BOX 28-750
 REMUERA
 AUCKLAND 1541
 Ph 09 589 1962
 info@TrippAndrews.co.nz

**PATUMAHOE PRECINCT PLAN 3
 PROPOSED ZONING
 CARTER ROAD, PATUMAHOE**

SCALE 1:3500 (A3)
SHEET 1 OF 1
DATE: 17/06/2020

CLIENT REF
17158



Key	
	Landscaping Buffers (10m/5m/3m wide)
	Land to be vested as Road

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**PATUMAHOE PRECINCT PLAN 3
 PROPOSED ZONING
 CARTER ROAD, PATUMAHOE**

SCALE 1:3500 (A3)

SHEET 1 OF 1

DATE: 27/04/2020

CLIENT REF

17158

Our Reference: 17158

16th April 2020

Auckland Council
Private Bag 92300
Auckland

195 Main Highway
Ellerslie

PO Box 28750
Remuera
Auckland 1541

Auckland 523-3382
Franklin (09) 235-9709
Fax 522-4246

info@trippandrews.co.nz

Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your questions of 19 November 2019, we make the following comments in reply. These comments have been compiled from the relevant experts:

Economic matters – Susan Fairgray, Market Economics

E1. Residential Growth

Please provide an assessment of the efficiency of further residential growth occurring in Patumahoe within the wider Franklin area context.

The PPC seeks to enable further expansion of the Patumahoe rural settlement beyond the degree specified in the Auckland Unitary Plan (AUP) (as established in the residential zoned area). The Franklin area strategic planning direction is for growth to predominantly occur within the larger urban centre of Pukekohe, while simultaneously allowing for some growth within the smaller rural settlements, including Patumahoe. This is established earlier in the Franklin District Growth Strategy 2050 which, albeit based on older data, indicates the preferred distribution of growth across the urban and rural centre structure in the district.

The PPC is consistent with the strategic growth distribution identified in the Franklin District Growth Strategy 2050 (published 2007), and with the Strategic Direction established by the Auckland Plan 2050, Auckland Unitary Plan and the Franklin Local Board Plan 2017 - in particular the strategy of "quality compact urban growth", which includes inter alia that "some growth is anticipated in the smaller towns and villages". The PPC seeks to provide for 200 additional dwellings at Patumahoe, which will make a small (but locally significant), contribution towards meeting Auckland 30 year target (to 2048) of 408,300 dwellings. The PPC represents 0.05% of the total growth anticipated within the Region over that 30 year period, and is anticipated to be delivered in years 6-12 of the 30-year timeframe (i.e. 2022-2028). (Refer to Attachment 6 - Appendix 1 AUP Assessment for further discussion).

The most recent data released by Auckland Council records that 14,032 new dwellings were consented in the year ended 30 June 2019, with a distribution of 83 per cent within existing urban areas; 10 per cent in future urban areas; and 7 per cent were in rural

zones. That data confirms that growth is focussed in urban areas, but is also occurring region wide.

The spatial distribution of growth has important economic effects on the economic efficiency of households, the efficiency of infrastructure provision and the efficiency of urban form. Within the PPC context, it is important to understand whether or not growth in this location is undermining the strategic spatial planning objectives to concentrate growth within the larger centre of Pukekohe.

Pukekohe is identified in The Auckland Plan 2050 (along with Warkworth) as one of two principal nodes for accommodating a large proportion of the growth within the Auckland Region, with a target of 7,920 new dwellings in Pukekohe (including Belmont) and a further 6,350 in Paerata (immediately north of Pukekohe) as recorded in Table 3 of the Future Urban Land Supply Strategy (July 2017). As summarised above - the development of concentrated housing around Pukekohe and Paerata is a central part of the multi-nodal growth strategy and represents by far the highest number of proposed allotments/dwellings that are to be provided in the southern part of the Region. However, each of the strategic planning documents provides explicit recognition that growth will also occur in smaller rural towns and settlements. The provision of subdivision opportunities in towns and settlements at a rate that meets the needs of the local communities can occur in a manner that complements, and does not undermine, development from occurring within the larger specified growth nodes of the Region.

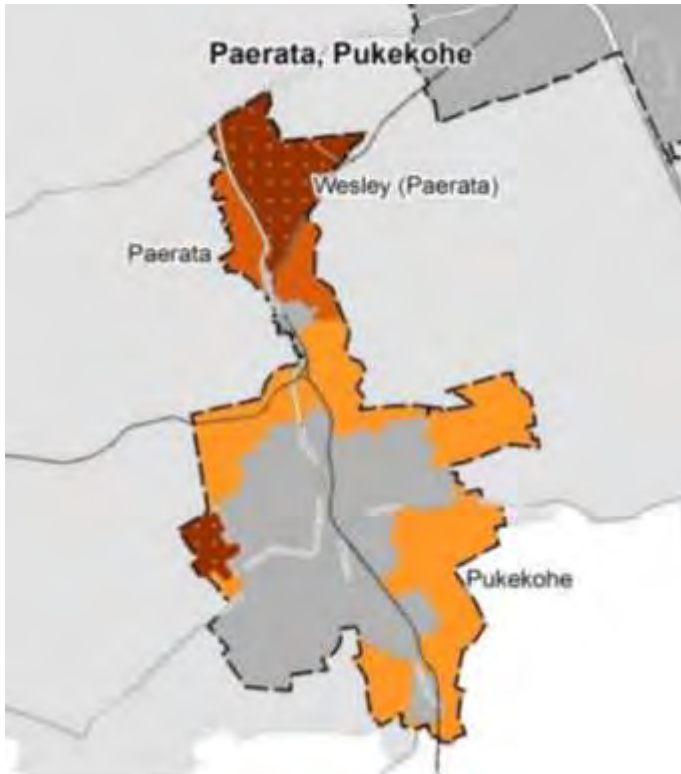
Useful information could include an assessment of how the scale of growth in the PPC compares to the level of growth occurring within Pukekohe. It is not clear from the applicants' economic assessment whether further growth adversely affects the overall pattern of growth across the urban/rural centres in the Franklin area, or whether it is consistent with the shares of growth anticipated within the planning strategic direction.

The total growth for Pukekohe-Paerata targeted in the FULSS is 14,270 dwellings. In comparison, the addition of 200 dwellings to Patumahoe via the PPC represents an addition of only 1.4% to the sub-regional growth centred around Pukekohe. The potential for the 1.4% of additional housing at Patumahoe to impact on the overall pattern of development within the urban/rural centres of the former Franklin district is negligible and could in no way undermine the strategic direction of the relevant planning documents.

If the share of residential growth likely to occur in Patumahoe due to the PPC is larger than anticipated in the strategic direction, then it is important to also understand the economic effects on households caused by locating within this area. Patumahoe is located significantly further from important aspects of amenity than Pukekohe (as established in the strategic planning direction). This is likely to have effects on household efficiency through additional household travel.

The PPC seeks to consolidate growth around the existing town centre of Patumahoe, creating walkable neighbourhoods and local employment opportunities within the proposed Light Industrial zone and within retail, food & beverage and commercial services sectors. As outlined in the answer to question P3, the addition of new dwellings to Patumahoe will increase demand over time for retail, services and community

facilities, potentially requiring an expansion of those facilities or new facilities. Therefore, new households within the PPC will benefit from the efficiencies gained from the design and layout of the subdivision in accordance with the Precinct Plan, will be able to utilise existing and expanded/enhanced retail, commercial and community services, and will be provided with opportunities for local employment (thus minimising travel outside of the settlement. Existing residents will also benefit from those expanded/enhanced retail, commercial and community services and the new opportunities for local employment (which are currently relatively limited, as there is no Business: Light Industry zone at Patumahoe.



E2. Patumahoe Neighbourhood Centre

Please assess the adequacy of the existing commercial zoning of the Neighbourhood Centre zoned area in Patumahoe to meet additional demand from households in the PPC area.

Additional residential growth in the PPC area will result in an expansion of the residential node at Patumahoe. This will generate additional demand for household sector commercial activity (i.e. retail, hospitality and household services). An important question is whether the level of zoned area is adequate to serve an expanded Patumahoe residential base.

Refer to P3

While the applicants' economic assessment report estimates the additional floorspace able to be sustained by the additional household demand from the PPC, it is not clear whether or not this can be accommodated by the existing commercial zoned area. The

further assessment may also consider whether this additional demand could alternatively/partly be met through increasing the productivity of existing floorspace.

Refer to P3

E3. Household Numbers

Please provide a further breakdown of the existing household number size of Patumahoe in relation to the number of households within the existing urban area (as established by the zoning) vs. the number of households in the surrounding rural area.

It is important to understand the scale of the PPC relative to the existing size of the main urban area of Patumahoe. The report currently provides a household count for the Patumahoe census area unit (CAU) in total. However, the CAU also contains a large amount of rural land surrounding Patumahoe that is likely to contain a significant number of lifestyle properties, meaning that the CAU household count is unlikely to provide an informative estimation of the existing size of the Patumahoe rural settlement.

This information is useful in understanding the likely effects of the PPC as the economic assessment makes reference to the percentage increase in the size of Patumahoe as a function of the PPC.

Utilising aerial photography for Patumahoe (ref) the existing settlement (located on land zoned Single House and Neighbourhood Centre) comprises 378 dwellings. The settlement therefore represents 54.5% of the CAU (378/693 dwellings).

Population increase in the settlement will occur in the period prior to the next Census (scheduled for March 2023) - as at the time the aerial photos were taken there were 42 vacant sites and two areas of land zoned for subdivision that will provide a total of 73 (71 new) allotments in Precincts B , C and D and the 30 allotments that have been consented on Carter Road.

The available supply of residential land for Patumahoe therefore comprises 143 additional allotments/dwelling, which would increase the total number of dwellings in the CAU by 20.6% to 836 over a 4-5 year period (2020-2025), resulting in the settlement comprising 62.3% of the CAU.

E4. Surrounding Land Uses

Please provide information on the agricultural land uses surrounding Patumahoe.

The applicants' economic assessment displays the distribution and change in employment by industry sector that has occurred within Patumahoe and the surrounding area (Franklin and Pukekohe local board areas) through time. While this shows the change in employment numbers, it does not identify the quantity of land used for each type of activity or how this may have changed through time. Changes in employment may not necessarily reflect changes in agricultural land use due to such

factors as changes in the registered base location of workers, changing technologies and the labour intensity of production, and the distribution of workers across multiple sites.

The information on changes in employment relating to surrounding land uses is included to provide context for the plan change and to assist in identifying the types of ancillary activities that could be established within the proposed Light Industrial zone to support surrounding rural industries and to provide local employment opportunities within the settlement. The information also assists in understanding the structural changes in employment by sector, including the overall reduction in employment associated with productive land uses i.e. as more machinery is utilised and the scale of commercial production increases - with associated productivity gains for the commercial growers. That information provides an economic context but has not been relied upon to determine the productive potential of the subject land under its current zoning.

It is important to understand the extent to which the surrounding land is being used for agricultural purposes. It provides context for the alternative potential agricultural land uses on the plan change site.

Consideration of surrounding land use is not considered to be directly applicable to the plan change. The assessment is focussed on the productive use and productive potential of the subject land, and what alternative use and zoning of that land may be the most appropriate to achieve the objectives of the plan change.

E5. Agricultural Potential

Please assess the effects of lost agricultural productive potential of the plan change site.

While only a minor portion of the PPC site is currently used for productive agricultural purposes, there may be potential for future productive agricultural uses of the site. The applicants' soil assessment report shows that nearly all of the site (97%) is covered by prime soils, with prime soils still having high productive potential (notwithstanding the constraints stated by the applicant). In addition, the Auckland Council land use survey draft results have indicated that a significant portion of the site may instead be elite soils.

The potential future productive uses of elite soils for local food production is important with the RPS objective to protect the land from urbanisation. It also recognises the scarcity of the elite soil resource within the Auckland region and New Zealand. Urbanisation of rural land typically removes any future productive potential for the land (e.g. removal of topsoil), eliminating the ability to subsequently convert the land back to agricultural uses.

The land use classifications of the subject land and its productive potential have been subject to detailed assessment by a Soil Scientist and Horticultural Consultant. Those assessments are summarised in the AEE and S.32 report and are appended to that report in full. The assessment concludes that due to fragmentation and constraints that the productive potential of the subject land is limited, and that only 9% of the subject land exhibits productivity that utilises and is reliant on existing soil characteristics.

In terms of the RPS objectives and policies relating to Soils (which seek to avoid elite soils and only those prime soils that are significant for their ability to sustain food production) the effects of the plan change rezoning the subject land to Single House, Light Industrial and Open Space zones are considered to be negligible as the plan change would not remove prime soils that are significant for their ability to sustain food production (with the exception of the 3ha of land utilised productively within the proposed Future Urban zone, which will be determined by a future structure planning exercise). Further comment is provided by the applicant's Barrister.

It is therefore important to understand the economic costs of the loss of current and future productive capacity on the PPC site if it were to be urbanised. This assessment should be undertaken within a regional context as the economic effects, in relation to food supply, will not only be experienced locally. It would be useful to understand the share of regional elite/prime soils contained on the PPC site.

The subject land contains no elite soils, and the identified area of prime soils is of low productive value currently and its future productive potential has also been assessed as low (due to constraints/soil type/ lack of irrigation)and reverse sensitivity (refer to Appendix 8 - Ag First report on soil capability and Appendix 9 - Fruition Report on productive potential.

Memorandum

To	Ann-Maree Gladding	From	Shane Lander
Email	annmaree@trippandrews.co.nz	Date	24 July 2020
Company	Tripp Andrews	Reference	J01073
cc		Pages	1 of 8
Subject	Council RFI – Plan Change - Carter Road Patumahoe South		

Further to our Preliminary Geotechnical Appraisal Report (Ref No J01073, dated 26 October 2018) we are in receipt of the following Council RFI:

We are in support of investigations being carried out to for future resource consent applications regarding the geotechnical solutions to address ground stability adjacent to and within Zone 3. However, in our view, the applicants geotechnical engineer still needs demonstrate that based on the current knowledge of the ground conditions, there are engineering measures available that would render the land suitable for future development. The current information leaves us with only the setback option as being viable and this would render a large part of zone 3 as still being subject to the hazard. Please provide further comment such that Council can be confident that the instability hazard can be mitigated such that the Zone 3 land would be suitable for future development.

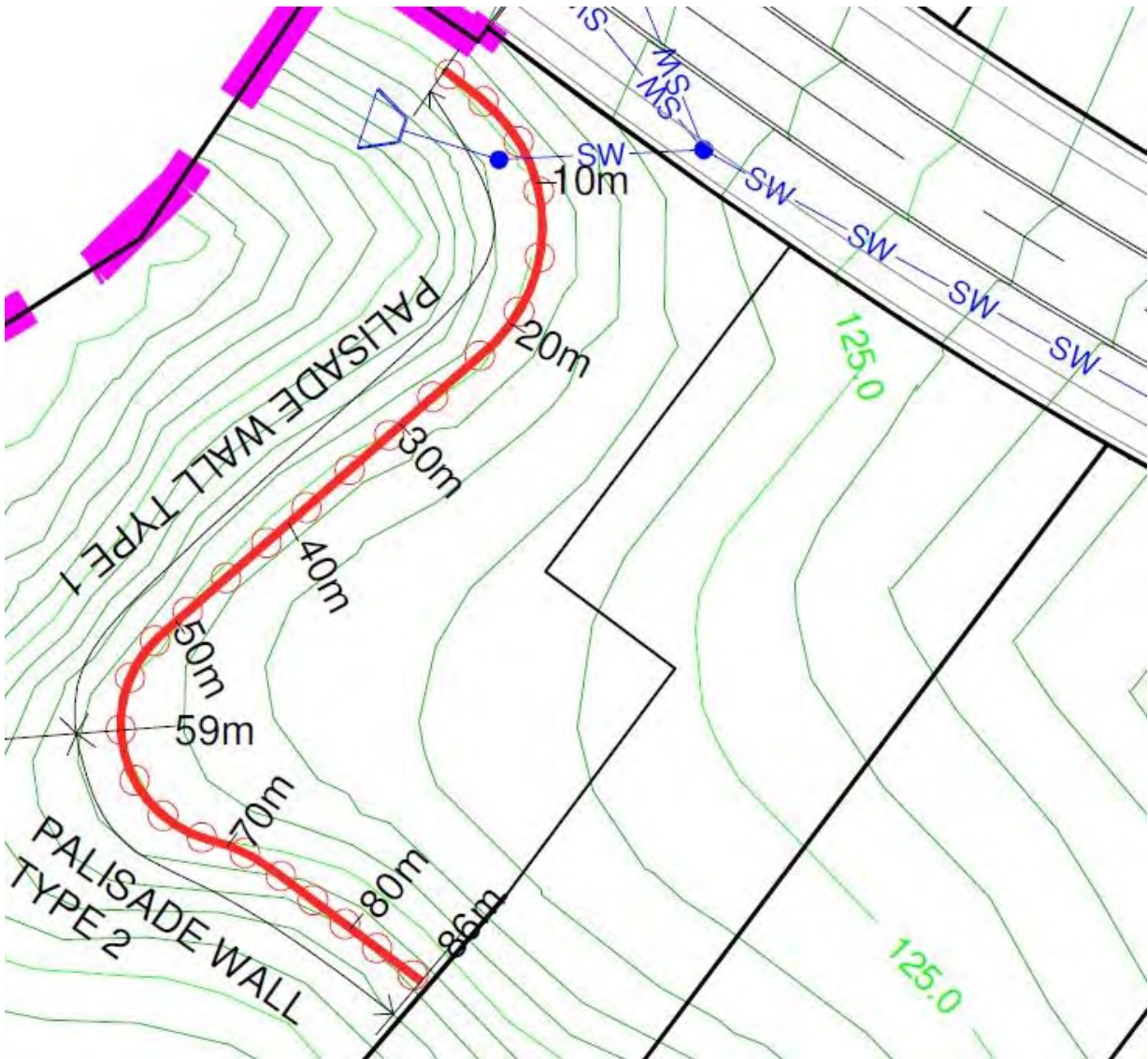
Prior to preparing our response we have spoken to James Beaumont of Riley Consultants, who is the geotechnical engineer acting for Council in terms of this RFI. He has clarified that Council require a degree of comfort that the engineering solutions provided in the PGAR (i.e. palisade piles, shear keys, drainage) have been used in similar situations elsewhere in Auckland geology to enable urbanisation over steep unstable ground, in other words, that there is precedence, and that the solutions can be accommodated wholly within site boundaries. We have set out some relevant case studies below.

1 CASE STUDY AT 315 FLAT BUSH SCHOOL ROAD

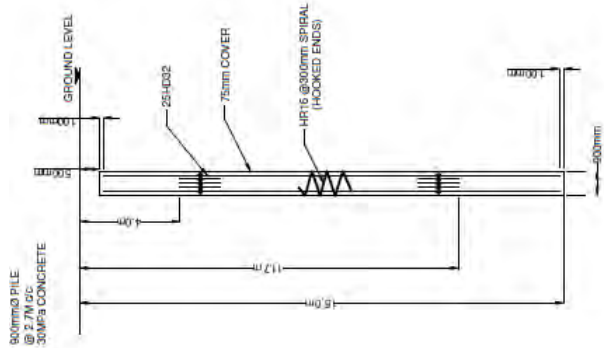
Geotechnical setting is a narrow but resilient ridge line flanked either side by steep and unstable ground also referred to as a “Zone 3” area. Urbanisation of this land involves the creation of in excess of 350 new residential lots, most of which are located over the unstable terrain. Geotechnical solutions have involved palisade piles, geotechnical drains and shear keys, which are currently under construction and contained within the confines of the development area (i.e. they do not enter into neighbouring land). The following sections demonstrate precedence in the design and construction of these solutions, and are applicable in principal to Carter Road as the same issues prevail here.

1.1 Palisade Piles

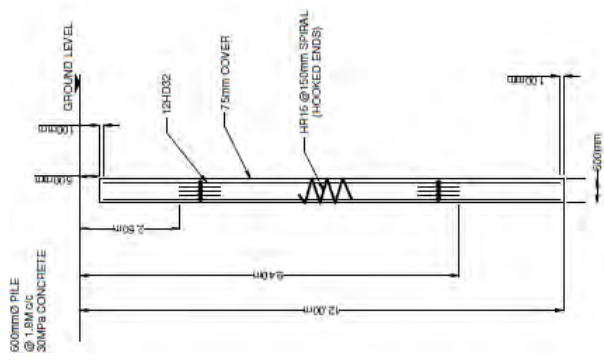
Typically used at the head of unstable slopes to prevent regression into the ridge lines, and thereby provide safe support to the edges of residential lots, and is applicable at Carter Road to enable setback lines to establish closer to the edge of the unstable slope, should the Zone 3 slope not be safely remediated via earthworks and drainage as part of any future urban development scheme.



Inset 1: Palisade Wall alignment – without the wall the lot and part of the road would not be viable



PALISADE WALL - TYPE 2 DETAIL
N.T.S



PALISADE WALL - TYPE 1 DETAIL
N.T.S

Pile Type	Dia	c/c	Vertical Rebar	Shear Rebar	Cover	Min L	Depth from GL to cut off	
							Boles	Type
1	600mm	3.8	12H132	HR16@150	75mm	12.0	6	2.5
2	600mm	2.7	25H132	HR16@300	75mm	15.0	12	4.0
								8.4
								11.7

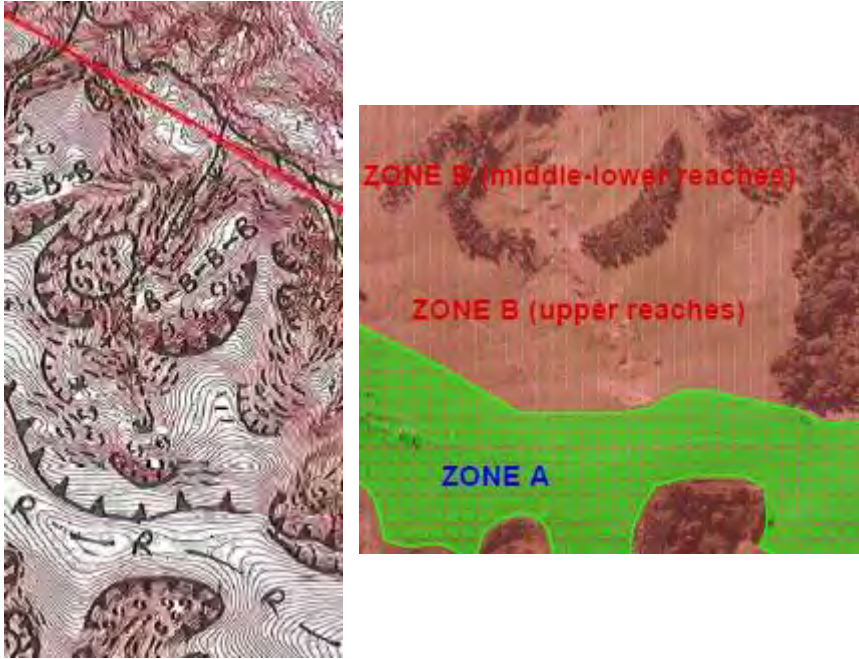
Inset 2: Actual Palisade Wall design details



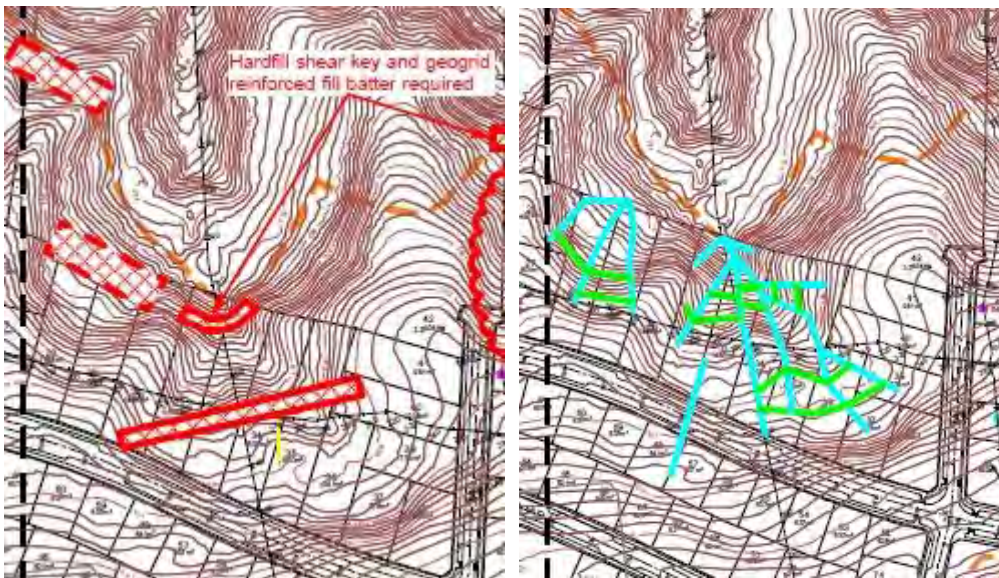
Inset 3: Construction Photos

1.2 Shear Keys and Drains

This provides solutions for slope remediation where infilling of the gullies downslope cannot occur (e.g. due to ecology, streams or because the gully is in a neighbouring property). Once the shear keys and drainage are built, buttress filling occurs, and the land is stabilised to enable safe urbanisation upon what was once a landslide.



Inset 4: Geomorphic Map / Zones— unstable area to be urbanised identified (Plan Change Stage)



Inset 5: Geotechnical Concept Design of unstable area from inset 4 – shear key and drain alignments (Resource Consent Stage)

Requirement	Location	Details
Shear Key (SK4)	A5: Ch 63m (centre) A3: Ch 114m (centre) A1: Ch 140m (centre) A2: Ch 47m (centre)	Geometry: (W) 6m; (L) 115m; (D) 8m Fill Type: Engineer Certified Clay Other details per Appendix 6.1 and 6.2 drawings
Mechanically Stabilise Earth (MSE) Fill	SK4: Bulk Fill	Geogrid Type: Tensar RE580* Layer Length: 13m (horizontally) Layer Spacing: 0.5m (vertically) No. Layers: 6 No. Total Area: 8,970m ² Other details per Appendix 6.1 and 6.2 drawings * geogrid final configuration subject to product selection and design check using proprietary software application (or similar)
Geotechnical Drains	Underfill	Collector Drain: 7 No.; (W) 1m; (D) 1m Total Lineal Length: 530m* Lateral Drain: 26 No.; (W) 0.6m; (D) 1m Total Lineal Length: 780m* Other details per Appendix 6.1 and 6.3 drawings * engineers estimator to double check

Inset 6: Geotechnical Detailed Design, note actual detailed design drawings are omitted from this RFI response due to file size (Engineering Approval Stage)



Inset 7: Construction Photos for Compliance stage (shear key, benching out, drainage). Butress filling will be placed upon the prepared ground and final design levels achieved to enable urbanisation.



Inset 8: Typical outcome of geotechnical land stabilisation works permitting safe urbanisation (Armstrong Farm Drive, built on a landslide 15 years ago involving shear keys and drainage, located near the case study area presented above) – extracted from Google Earth database looking north, with inset same site actual aerial photograph of large scale shear key and drainage during construction looking south

2 CLOSURE

In summary, there is clear precedence that with appropriate site investigations, engineering design and construction, urbanisation can occur upon large scale land instability features, such as have been identified in the Carter Road geotechnical report.

Please do not hesitate to contact the undersigned should any further information regarding safe urbanisation upon unstable slopes be required. After all, this is our core area of expertise and why we are in business.

For and on behalf of Lander Geotechnical Consultants Limited

S G Lander
Principal Geotechnical Engineer
CMEngNZ, CPEng

Jack MacDonald

From: Nimal Gamage <nimal.gamage@aucklandcouncil.govt.nz>
Sent: Wednesday, 10 July 2019 10:05 AM
To: Jack MacDonald
Subject: FW: Mauku Stream Information

Hello Jack

Sorry there is no CMP information available for the Makau stream other than what is in the Patumahoe CMP which you already have. General flooding and overland flow info can be accessed through Geomaps in the Council website as you are aware.

Regards
Nimal

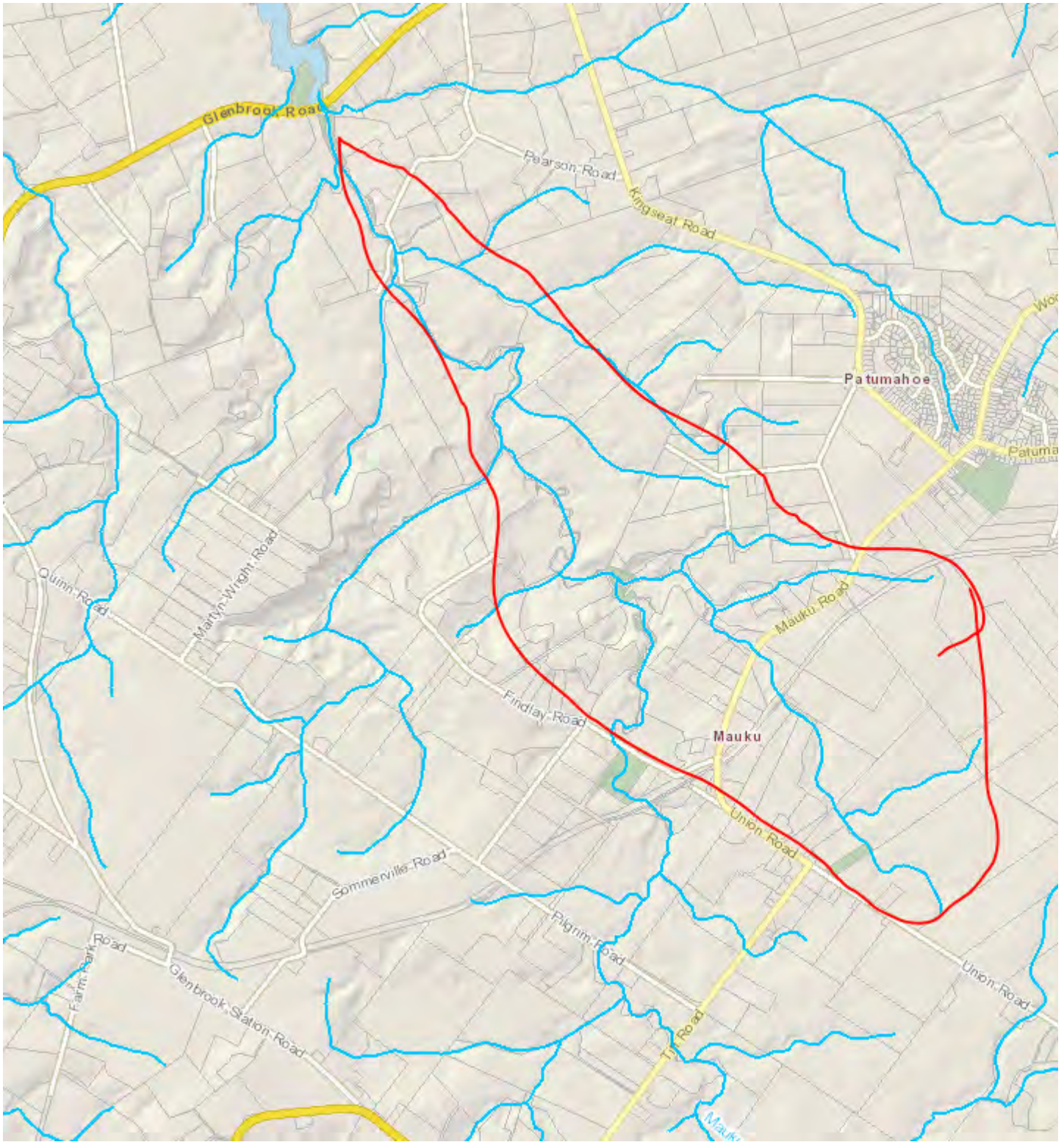
Nimal Gamage

Senior Engineer
Healthy Waters | Infrastructure & Environmental Services
Mobile +64 21 605987
Auckland Council, Bledisloe level 3 South, 24 Wellesley Street, Auckland Central

From: Jack MacDonald <jack@trippandrews.co.nz>
Sent: Thursday, 4 July 2019 8:59 AM
To: HWDevelopment <HWDevelopment@aucklandcouncil.govt.nz>
Subject: Mauku Stream Information

Morning Team,

I'm After any information available for the Mauku Stream and its catchment? Management plans, reports etc? I have the Patumahoe CMP but this predominantly talks about the Northern section of the Stream tributaries but more interested in the sections below? Any help will be much appreciated



Thanks.



Jack MacDonald
Civil Engineer

Jack@trippandrews.co.nz

021 0851 8679

09 589 1962 Auckland

09 235 9709 Franklin

Unit G, 195 Main Highway

Ellerslie, Auckland 1051

PO Box 28750, Remuera 1541

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Jack MacDonald

From: Nimal Gamage <nimal.gamage@aucklandcouncil.govt.nz>
Sent: Monday, 3 December 2018 11:59 AM
To: Jack MacDonald
Subject: RE: Updated Flood Modelling for Carter Road, Patumahoe

Hello Jack

There is no updated flood modelling info available for the area you mention below. You can access the available info(overland flow paths and floodplains etc.) through Geomaps in the Council website.

Regards
Nimal

Nimal Gamage | Senior Engineer
Healthy Waters | Infrastructure & Environmental Services
Mobile +64 21 605987
Auckland Council, Level 3 South, 24 Wellesley Street, Auckland Central
Visit our website: www.aucklandcouncil.govt.nz

From: William Southorn **On Behalf Of** HWDevelopment
Sent: Thursday, 22 November 2018 8:46 a.m.
To: Nimal Gamage
Subject: FW: Updated Flood Modelling for Carter Road, Patumahoe

Good morning Nimal

I have assigned this to you in SAP
Request Information: 8700887409, Updated Flood Modelling for Carter Road,

Can you please respond to the customer within 5 business days.

Thanks,
Will

From: Jack MacDonald <jack@trippandrews.co.nz>
Sent: Wednesday, 21 November 2018 5:02 PM
To: HWDevelopment <HWDevelopment@aucklandcouncil.govt.nz>
Subject: Updated Flood Modelling for Carter Road, Patumahoe

Hi,

I am after the most upto date flood model info for the below area including our clients property carter road Patumahoe.

Any help wil be much appreciated

Regards



Jack MacDonald
Civil Engineer

Jack@trippandrews.co.nz

021 0851 8879

09 589 1962 Auckland

09 235 9709 Franklin

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23 April 2020

Auckland Council

Attention: Sanjay Bangs

By Email Only: Sanjay.Bangs@aucklandcouncil.govt.nz

Cc: clients, Ann-Maree Gladding

Dear Sanjay,

Private Plan Change – Askew Consultants Limited, Patumahoe South

1. I refer to Council's Clause 23 request of 19 November 2019, and our subsequent meeting of 17 December 2019. A full response is presented in the attached material from Tripp Andrews.
2. There are, however, two aspects of the Council's queries to which I respond particularly; soils classification and productivity. These are found under the Land Productivity and Land Use Capability sections of the request, and were also canvassed in our meeting.
3. I address the key themes in each as follows.

Land Productivity

4. The following issues arise in the Land Productivity section:

Relativity

5. The Land Productivity section asks for an assessment of the productivity/constraints of the application area, as compared to other horticultural areas. It states:

Please demonstrate of the difference between the PPC site and other potential areas of residential expansion for Patumahoe in relation to potential horticultural productivity constraints.

6. And by way of explanation:

*The productivity report has provided various assessments on a parcel level basis to demonstrate the suitability of each parcel for horticultural production. This assessment has only been conducted within the PPC area. **However, I consider that to validate the logical rationale upon which the PPC support is reliant, then the assessment needs to demonstrate the PPC site's suitability relative to other potential areas of residential expansion.***

*Put simply, the rationale for support of the PPC can only hold true if **the PPC area is demonstrated to be less suitable for agricultural production than other areas**. Alternatively, the assessment must demonstrate that the same constraints are not/less present in other alternative locations for expansion for the conditional support to hold true. **In my view, this is important because I observed productive horticultural uses occurring in other locations immediately adjacent to Patumahoe’s residential area during my site visits.***

(my emphasis added)

7. In response; several difficulties arise with this approach, which in my view, is not properly justified.
8. First, the evaluation required under s32 Resource Management Act 1991 (“**the Act**”), does not require an assessment of this application site, in comparison to other locations. In other words, there is no requirement under the Act, to consider whether this site might be more or less suitable for residential expansion, than any other that may be conceived of.
9. Instead, what is required, in essence is an evaluation of whether *this* proposal is the most appropriate way to achieve the purpose of the Act¹. That is the starting point.
10. However, the objectives of the Unitary Plan are relevant in evaluating whether the Plan Change is the most appropriate way to achieve the purpose of the Act. In this context, and considering land productivity objective B2.6.1(b) is key. It says in relation to Coastal and Rural Villages that:

Growth and development of existing or new rural and coastal towns and villages is enabled in ways that: avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production.

11. This objective requires an evaluation of “significance” for food production (where prime soils are found). To that extent, it is accepted that the usefulness of any prime soils on the application site to generate food crops needs to be put into a context of Auckland’s overall demand. In other words, is any food crop generated from prime soils on the application site worthwhile. It is accepted, that this becomes a comparative assessment. That comparison though is as to the productivity of this site, in the context of an overall quantity of food production.
12. However, that does not require consideration of whether the application is less suitable for agricultural production than other area. Much less, does the question become whether the application site is suitability relative to other potential areas of residential expansion.
13. Second, even if a relative assessment were required (which it is not), the above request gives no geographical extent of what other sites should be evaluated. Is that to be in the immediate vicinity, the district or even the region? Such a comparative exercise becomes impossible.

¹ *Long Bay-Okura Great Park Soc Inc v North Shore CC EnvC A078/08* at paragraph 34

14. Finally, and with respect, Dr Fairgray's observation that she observed other productive horticultural uses immediately adjacent is meaningless. No detail or assessment of these is given, and at best, it is purely anecdotal.

Site Size Constraints

Please provide further assessment to test the effect of lot sizes on the viability of rural productive uses in the PPC area.

15. Dr Fairgray's comments offer the premise that the existing title structure should be ignored. It states:

*When the spatial distribution of the original parcel areas identified as potential rural productive capacity are considered, **they largely form a contiguous block of land. It is possible that these sites could be amalgamated (which would also equally need to occur under the PPC intended development) to form a larger block of land; or they could be amalgamated with adjacent sites.***

16. I have contemplated whether there is any legal basis that could compel the amalgamation of the titles that form the application site; or even of some of them. In so doing, I have considered whether there is any coercive power available to the Council to do so under any of its regulatory or development functions. There is not.
17. I cannot conceive of a scenario, by Public Work, enforcement, subdivision or any other means whereby Council (or for that matter Central Government) could compel the amalgamation of privately held, free-hold titles; nor that this possibility could arise.
18. Neither is there any suggestion, nor need, for the separate titles to be held together, or amalgamated to form the intended development. Whilst it is correct to observe that the proposed plan change would result in an integrated development, particularly because a Precinct Plan is proposed whereby key infrastructure such as roading is set out, it is not necessary, nor contemplated that amalgamation of titles will be necessary to achieve this.
19. Rather, individual landowners will need to co-operate to implement the intended development between them. In this instance, this is facilitated by a limited liability company and by including rules and provisions in the plan change request requiring roading layouts to be achieved.
20. I should emphasise further that although the bulk of land is held by various members of the Askew Family, there nevertheless separate, and distinct land ownerships, which must be respected.
21. In summary, the existing certificates of title need to be respected. Any suggestion that they may somehow be amalgamated, or that the productivity of the application site should be evaluated as one, is at best, a purely academic exercise.
22. No further response is justified, or necessary.

Soils Classification

Please provide clarification on the reliance of the land use capability (LUC) Hanmore (2019) report in the assessment of soil constraints on the potential for agricultural/horticultural production.

23. By way of explanation:

“Firstly, it is not clear whether the report has reached this conclusion based on the Hanmore (2019) soils assessment or whether it has assessed the soils independently. Earlier in the report it is stated that the Hanmore (2019) report assessment has been taken into consideration within the assessment.”

24. In response, I note that the horticultural productivity reports clearly states that:

In order to produce this report, a site visit was conducted in late August. The area was walked over and the various lots considered in terms of their current land use and the soil characteristics.

And further.....

We have also accessed resources on-line and in our respective offices including the relevant soil map. These references are noted within this report.

25. In response, the authors of the report were satisfied, themselves, that the Hanmore soils assessment, which incidentally reaches the same evaluation as that prepared by Max Adams, was realistic and correct, as well as from their own observations.
26. I must emphasise that, in preparing their report, Sandy Scarrow and Andrew Barber, were asked to consider the soil classifications, but also to contemplate broadly whether any crop might be more or less suited to the land as they found it. The horticultural assessment presented, was therefore, based on the broadest possible approach.

Land Use Capability

27. Our meeting of 17 December 2020 refers. I understood, Dr Fiona Curran-Cournane to have raised some questions with the methodology of Land Use Capability Assessment Report prepared by Ian Hanmore of AgFirst.
28. The question was asked as to why the Waikato Region: Extended Land Use Capability Legend had not been referred to. It has not been referenced, because it is considered out of date, by a considerable margin. I understand that document was published in the late 1960's at a scale of 1:63,000.
29. In response, the latest reference material is the 3rd Edition Land Use Capability Survey Handbook (2009). This specifically replaces, with an updated methodology, the two previous editions.

30. In light of Dr Curran-Cournane's comments, and subsequent material determining a Class I LUC classification over part of the application site, further comment was sought from Mr Bob Cathcart of AgFirst. In light of Dr Curran-Cournane's comments, and subsequent material determining a Class I LUC classification over part of the application site, further comment was sought from Mr Bob Cathcart of AgFirst. Mr Cathcart has 49 years' experience in land and resource water management, including extensive experience in land use capability methodology and classification. His curriculum vitae is attached.

31. Mr Cathcart has reviewed the assessment prepared by Mr Hanmore and confirmed its conclusions. He advises as follows:

“(a) The 3rd Edition Land Use Capability Survey Handbook (2009) is the “bible” for land use capability classification. Not only is the Extended Legend out of date, but it also employed methodologies and approaches to productivity consistent with technology and practice of the time (1960's/70's), that have since been superseded;

(b) Soil productivity has changed over time. Whilst it may have been that parts of Patumahoe were once considered highly productive year-round, and even Elite (referencing the Extended Legend), that productivity has now been lost or compromised, by practices over time;

(c) Determining whether the inherent Land Use Capability of the land can be realised requires not only consideration of the soil characteristics (applying the survey handbook), but also, an overall evaluation of the property concerned; local growing conditions, economics, constraints and practices.

I am comfortable with the conclusions reached by Mr Hanmore and previously Max Adams, that there are no Elite Soils on the application site, and that productivity of those defined as Prime Soils are severely limited by their high clay content which prevents year-round cropping. “

32. Overall, Dr Curran-Cournane's approach, and apparent reliance on outdated references are not accepted, as either appropriate or useful. The relevance of this has not been explained, but in any event, I would expect comments offered by an expert witness to be carefully scrutinised.

33. The applicants are therefore satisfied, that the methodology, and conclusions reached in the Land Use Capability Assessment Report to be both robust, and reliable. It is acknowledged also, that these findings have now been considered by three independent experts, who have all reached the same conclusion.

Mapping - Please provide a map depicting the location of the LUC observations that were carried out by Mr Ian Hanmore as part of his LUC and soil assessment of the subject area.

34. Please find attached Mr Handmore's map of site references.

Groundwater - In relation to the Groundwater Management Zones discussed in Section 6.0 of the Land Capability Assessment, please:

· clarify the Auckland Council officer contacted;

- ***provide any relevant correspondence and a link or specific reference to the Groundwater Management Zones***

35. Please find attached the map referenced by Mr Hanmore. He has advised that he does not have a record of the person he discussed this with.

Reverse Sensitivity - Please substantiate the observation on page 5 of the Land Productivity Assessment that a large proportion of the land in the subject area is already being impacted by reverse sensitivity issues of neighbouring properties and that it is common for kiwifruit growers to either convert to organic production or cease growing as a result of on-going complaints.

36. In response, these comments were made by two experts from their experience, and frankly, should be respected as such. There are particular examples, as one instance, in Hawkes Bay.

Please provide a copy of the Scarrow and Underwood (2005) report entitled 'Rural Subdivision in the Western Bay of Plenty District - 2005 Update', cited in the Land Productivity Assessment.

37. Please see attached.

Conclusion

38. I trust the above provides a helpful and satisfactory response to the above issues.

A handwritten signature in blue ink, appearing to read 'Julian Dawson'.

Julian Dawson - Barrister

Field Observation Sites For The LUC Assessment Of The Proposed Rezoning Area in Patumahoe



• Field Observation Site □ Proposed Future Residential Zoning □ Proposed Residential Zoning

Our Reference: 17158

16th April 2020

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Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your feedback provided on 19 November 2019 we make the following comments. These comments have been compiled from the relevant experts:

Landscape & Visual Effects – Ainsley Verstraeten, ADO

LV1 Buffer Areas

Please clarify the makeup of planting within the 3m buffer planting along the southern boundary.

The Landscape and Visual Assessment describes the buffer area as being a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs. However, the proposed AUP amendments outlined in Attachment 5 refers to this area as indigenous specimen trees and shrubs only (proposed rule I430.6.9(4)(a)).

Rule I430.6.9(4)(a) and Appendix 5 are consistent with each other - no action required.

LV2 Buffer Areas

Please provide further information and analysis for how the buffer areas widths of 5m, 3m and 10m have been devised.

The buffer area within sub precinct B is 20m and as the edge of this precinct is aligned with this it would seem appropriate to match the 20m on the other side of the road. (also covered by P14 below)

Refer to P14 (below)

LV3 Buffer Areas

Please explain why typical plant palettes have not been included for proposed Sub-precinct E to the Patumahoe Precinct.

The operative Patumahoe Precinct includes typical plant palettes for Sub-precincts B, C and D, referenced in assessment criteria I430.8.1(3)(f) and Figure 5. It is unclear why these palettes have not been included in the proposed Sub-precinct E.

I430.8.1 Assessment Criteria, Clause (4) provides Additional assessment criteria for subdivision and infringement of subdivision standards in sub-precinct E. Those criteria include consideration of whether landscaping is ecologically sourced and refers to Tables 1-7 as an example of suitable species.

LV4 Landscape Framework

Please confirm whether the landscape framework strategy referenced in the Landscape and Visual Assessment (para 2.7 and 3.7h) is being proposed as part of the plan change or something that is required through resource consent at the time of subdivision.

The Landscape and Visual Assessment refers to a landscape framework strategy which includes open space plantings, landscape buffer and streetscape plantings, yet this information is not included in the precinct. Sub-precincts B, C and D appear to have included this information, so it is unclear as to why this approach has not been taken for sub-precinct E.

The "landscape framework strategy" is included within the Precinct provisions for sub-precinct E via:

- Rule I430.4.2 (A6)
- Standards I430.6 (1-3, 9, 16)
- Matters for Discretion I430.8 (2) (f), (j)
- Assessment Criteria I430.8.1 (2)(c), (4)(b)(c)(d)

LV5 Future Urban

Please confirm how the location of the eastern boundary of the proposed Future Urban Zone has been arrived at.

The Landscape and Visual Assessment refers on numerous occasions to a defensible edge, yet the eastern boundary of the FUZ appears to be in line with the cadastral boundaries rather than the escarpment.

The escarpment is intended to be the limit of urban activity with dwellings and buildings set back sufficiently on geotechnically stable land. The location of an Urban zone boundary relative to escarpment is to be determined at time of future plan change for this land, at time of subdivision and at time of individual building consents.

LV6 Retaining Wall Standards

Please clarify the minimum separation distance and landscape strip required between retaining walls.

The Landscape and Visual Assessment refers on numerous occasions to a defensible edge, yet the eastern boundary of the FUZ appears to be in line with the cadastral boundaries rather than the escarpment.

The existing Standards I430.6.2 that applies to sub-precincts B, C and D is being extended to apply to sub-precinct E. There is no reason to adopt an alternative standard for sub-precinct E alone.

LV7 Precinct Plan 3

Please provide a clearer demarcation of the landscaped buffer show along the southern boundary of Sub-precinct E within Precinct Plan 3.

It is difficult to identify the landscaped buffer area adjoining the rail corridor as depicted on Precinct Plan 3.

The Precinct Plan has been updated(attached).

P14 Landscape Buffer Areas

Please explain how the proposed landscaped buffer widths (proposed standards I430.6.9(2) – (4)) have been devised.

The proposal involves extending the urban area of Patumahoe, thus enabling residential activities to locate closer to established rural production activities (and zoning that enables such activities).

Although landscaped buffer areas have been proposed at the western edge of the PPC area, the interface between Single Housing and Light Industry zoned land and the boundary with the rail corridor, it is unclear how these buffer widths have been prepared.

In respect of the buffer along the western boundaries of Sub-precinct E, it is unclear why a 10m buffer has been proposed given that the operative standard I430.6.9(1) requires a 20m wide buffer at the southwestern boundary of Sub-precinct B (Patumahoe Hill).

(refer also **Item LV2**)

Auckland Council have sought clarification as to how the landscape buffer areas of 3m, 5m and 10m have been devised. Council officers have also noted that the landscape buffer in Sub Precinct B is 20m wide and commented that it seems appropriate to ‘match’ that buffer width on the other side of Mauku Road.

The widths of the landscape buffers within the proposed plan change have been carefully considered to determine the appropriate landscape typology and width that is required to achieve a defensible edge to the proposed urban zoned land. This includes consideration of:

- *the site conditions (topography in particular);*

- the neighbouring landuses (including their sensitivity to change of the type anticipated by the plan change and their vulnerability to ‘development creep’); and
- the land use type within the plan change area.

3m width Landscape Buffer

A minimum 3m width Landscape Buffer comprising a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs is proposed along the south boundary of industrial lots located on the south boundary of the plan change area. This portion of the plan change area adjoins the rail corridor. The 3m wide buffers strip will enable exotic shelterbelt species and indigenous tree and shrub plantings to be established whilst enabling efficient landuse of the Industrial zoned lots. Planting of this scale and character, in combination with the neighbouring rail corridor will form a defensible edge and serve to filter and screen views of the industrial development from the Rural zoned land to the south.

5m width Landscape Buffer

A minimum 5m width Landscape Buffer comprising a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs is proposed: between Industrial zoned land and SHZ land; and, along the south boundary of residential lots located on the south boundary of the plan change area (adjoining the rail corridor).

The 5m width buffer is adequate to will accommodate exotic shelterbelt species and indigenous tree and shrub plantings whilst enabling efficient landuse of the SH zoned lots. The slightly larger dimension of this buffer in comparison to the ‘Industrial’ buffer described above is in response to the likely preference for a more organic planting style along residential lot boundaries, rather than a more simple ‘wall’ of planting which is adequate on industrial lots. Planting of this scale and character, in combination with the neighbouring rail corridor will form a defensible edge and serve to filter views of the urban residential development from the Rural zoned land to the south.

10m width landscape Buffer

A minimum 10m width Landscape Buffer comprising a mix of indigenous trees and shrubs is proposed along the western side of the proposed SHZ land abutting low lying and flat, Rural Production zoned land accessed from Mauku Road. A 10m width buffer in this location will allow an adequate depth of enable the establishment of indigenous planting to read as create a buffer between the urban residential land and the neighbouring rural zoned land.

The variance in the width of this buffer in comparison to the 20m width landscape buffer adjoining rural zoned land along the western edge of Sub precinct B (on the north side of Mauku Road) stems from the following factors:

- the quite different topography of the proposed plan change area which is low lying and flat, whilst the Sub precinct B area corresponds to Patumahoe Hill making it far more visible from the surrounding landscape. The nmore generous width of this buffer manes that a more varied planting character will be achievable which is considered appropriate given its visibility;
- the consequently greater vulnerability of the neighbouring rural zoned land to development creep as a consequence of the high amenity afforded from this elevated landform; and

- *perhaps most importantly, the originally intended role of the Sub precinct B landscape buffer to function as a defensible edge as well as an accessible open space. BGLA was involved in the Sub precinct B plan change. It was originally intended that a walkway/cycleway be integrated into the buffer with dedicated areas provided for picnicking and a viewing platform. Whilst these latter open space 'initiatives' were not integrated into the final plan change documentation approved by the Commissioners, the 20m width of the western edge landscape buffer was retained.*

Our Reference: 17158

16th April 2020

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Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your feedback provided on 19 November 2019 we make the following comments. These comments have been compiled from the relevant experts:

Parks & Open Space – Roma Leota, Parks & Recreation Policy

OS1 & OS2 Proposed Open Space

Please provide additional information including a map or plan showing the location, configuration and sizes of new areas of open space and linkages refer to in section 3.3 page 9 of the Plan Change Request AEE report

Please provide a clear plan showing the integration of new open space and linkages to existing open spaces and the overall open space network.

Given the growth enabled by the proposed plan change, there is a need to review the provision of parks and open space to provide adequate informal recreation opportunities and experiences for the anticipated residents.

The Precinct Plan for sub-precinct E shows the intention to create an integrated and connected network of public spaces, connecting the Patumahoe Domain via a roading network that integrates a pedestrian/cycle path with a new area of open space within the subject land. The new area of open space comprises a Neighbourhood Reserve and a Local Purpose Reserve (which will also contain a stormwater pond).

Precinct Plan 3 shows the overall spatial layout for the future subdivision and development of the subject land. The location of all roads, reserves and pedestrian/cycle linkages shown on the Precinct Plan are indicative i.e. they show the intended spatial layout for future subdivision of the land (but does not define the precise spatial location of those features).

Matters of detailed design, including the location, dimensions, levels and contour of the new open spaces and linkage will be determined at the time that subdivision consent is sought for the subject land.

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Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your questions of 19 November 2019, we make the following comments in reply. These comments have been compiled from the relevant experts:

Water Supply & Wastewater Matters- David Russell

W1. Pump Station

Please confirm whether the location of pump stations, proposed to be on the frontage of the pond / drainage reserve, have been discussed with Council’s Parks team and Watercare Services Limited.

Drawing WW001 (p. 20) of the Engineering Infrastructure Report shows pump stations the frontage of the pond and drainage reserve. These locations are unlikely to be acceptable to Parks and Recreation, and may not work for Watercare Services Ltd considering the manoeuvring area they require to access and maintain the pump station. Further discussions are needed with Watercare and Parks to confirm land requirements and location. This will provide greater certainty that the required Watercare lot can be created at the time of subdivision.

These are subject to change though out the Resource Consent process and any concern can easily be mitigated due to the greenfield nature of the site. this level of detail will be provided at the detailed design stage.

Stormwater & Flooding Matters – Iresh Jayawardena

SW1. Stormwater Planning

Given the complexity of the site and the significant increase of the foreseeable impermeable area on the site (as compared to what is present on the site), the Assessment of Environmental Effects and Section 32 Evaluation does not provide a clear assessment on relevant national, regional and district plans and policies; in particular, taking into consideration the freshwater management; water quality and integrated management of the proposed plan change.

This information is in the AEE.

SW2. Stormwater Management

Section 5.2 Design standards and guidelines of the Stormwater Management Plan (Appendix 11) states that stormwater system and stream work for the project was designed using Stormwater Management Devices: Design Guidelines Manual, ARC Technical Publication No. 10 (ARC TP10), Second Edition, 2003.

Section 5.2 Design standards and guidelines of the Stormwater Management Plan (Appendix 11) states that stormwater system and stream work for the project was designed using Stormwater Management Devices: Design Guidelines Manual, ARC Technical Publication No. 10 (ARC TP10), Second Edition, 2003.

Water Sensitive Design for Stormwater, known as GD04, provides guidance for the application of water sensitive design (**WSD**) to land use planning and land development, with a specific focus on stormwater and freshwater management.

Please see the updated Stormwater Management Plan

SW3. Stormwater Management

The geological information provided in the application indicates that the site is underlain by volcanic basalts and Kaawa formation. Subsurface investigations at the site show that the site is underlain by the South Auckland Volcanic Fields. Given that a large portion of the plan change area (Catchments 1 and 2) is covered by the High-Use Stream Management Areas Overlay, the High Use Aquifer Management Overlay and the Quality-Sensitive Aquifer Management Overlay of AUP, we consider that adoption of ground soakage system will assist in maintaining the healthy base flow in Mauku Stream and replenish the water resources in the groundwater aquifer systems underlying the site.

This can be assessed at the Resource Consent stage, it is noted that part of the site is underlain by basalt rock which increases the options for Soakage. The Geotechnical report calls for further investigations at the resource consent stage and this testing can occur at this stage.

SW4. Stormwater Management

Stormwater diversion can have adverse effects on downstream properties and exacerbate existing flooding problems if not properly managed. This needs to be explicitly addressed in the proposed plan change, so that the affected parties can clearly understand the proposal.

All flows will be managed prior to discharging at the outlet, this ensures management can be designed to manage the flow to the predevelopment level for the Mauku Catchment only. See updated comments in the SWMP.

SW5. Stormwater Management

The 10% AEP future climate flood level at the proposed detention pond may hinder the performance of the proposed pipe network, and we need to ensure that proposed detention pond/pipe network scheme will be feasible in achieving the expected performance standards.

These are subject to change though out the Resource Consent process and any concern can easily be mitigated due to the greenfield nature of the site. this level of detail will be provided at the detailed design stage.

SW6. Stormwater Management

Please clarify if the following information provided in the Stormwater Management Report is correct:

- [Section 4.1](#): Catchment 3 peak discharge of 0.039 cubic metres / second;
- [Section 4.3](#): Flood volumes for all catchments.

These numbers are considered low by a few orders of magnitudes.

Please see the updated Stormwater Management Plan.

SW7. Stormwater Management

The proposed detention pond is critical part of the stormwater management to minimise adverse effects on the downstream properties. We need to understand the hydraulic performance of the pond.

These are subject to change though out the Resource Consent process and any concern can easily be mitigated due to the greenfield nature of the site. this level of detail will be provided at the detailed design stage

SW8. Flood Risk & Hazard

Please compare and report on the pre and post plan change discharge hydrographs and volumes for a range of storm events – 50% AEP, 10% AEP and 1% AEP for future climate. This information is necessary in order to understand the adverse effects on the downstream properties.

These are subject to change though out the Resource Consent process and any concern can easily be mitigated due to the greenfield nature of the site.

SW9. Flood Risk & Hazard

Please assess and report on the post development flood risk within the plan change area in terms of AUP provisions, especially E36 Natural Hazards. A post development floodplain map showing flood depths, and peak velocities should be prepared and provided.

These are subject to change though out the RC process and an concern can easily be mitigated due to the greenfield nature of the site.

SW10. Flood Risk & Hazard

We are concerned that the proposed Earthworks Site Contours Plan (Drawing EW003, Appendix 6) indicates many sections and public roads are below the detention dam overflow weir level at RL 66.74m. This may indicate that these properties and public roads may be subject to considerable flood risk under the post development scenarios.

These are subject to change though out the Resource Consent process but the earthworks can be changed to ensure the flows work to hold the flood levels in the reserve.

SW11. Flood Risk & Hazard

Please check and determine the feasibility of the proposed overland flow paths layout, particularly for areas A and B shown in Figure 2 below.

We are concerned with feasibility and performance of the proposed overland flow paths in some areas (refer Figure 2 (p.31)) where the finished ground levels are below the dam overflow weir level.

These are subject to change though out the Resource Consent process but the earthworks can be changed to ensure the flows work to divert all flows to the reserve area.

SW12. Regional Network Discharge Consent (NDC)

A Stormwater Management Plan (SMP) detailing the Integrated Stormwater Management Approach for the site design is required to be prepared as part of the plan change application and submitted to Healthy Waters for in-principle approval.

See updated report aligned with the NDC guidelines

Our Reference: 17158

16th April 2020

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Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your questions of 19 November 2019, we make the following comments in reply. These comments have been compiled from the relevant experts:

Traffic – David Russell

T14. Pedestrian Linkage

Please provide an explanation to support the location of the pedestrian linkage proposed across Mauku Road (Page 17, Appendix 4A)

Location is indicative only

T15. Walking and Cycling

Please explain whether consideration has been given to providing a walking and cycling connection between the Sub-precincts B, C and D area to the proposed reserve within the PPC area.

The consented subdivision LUC60329723 and SUB60318096 located adjacent to the Domain proposed a 200m² are of land to vest at reserve in Auckland Council that will provide a direct connection into Patumahoe Domain from the subdivision of the zoned area of Single House zoned land located adjacent to Carter Road. That allotment (Lot 200) provides a pedestrian/cycle pathway connection route into the Domain that aligns with to the north of the playing fields that would provide a suitable alignment for a shared pedestrian/cycle connection through the Domain to the village centre. Design, funding and construction of that pathway is a matter for Auckland Council Parks to coordinate with the subdividing landowner. Similar potential opportunities exist to provide for the establishment of a pathway through either the central part fo the Domain or around the southern edge of the Domain, although both routes are constrained by the location of the playing fields (including the central cricked pitch) and the lights for evening training. Both alternatives will require further investigation at the time of subdivision.

T16. Level Crossing

Please address the effects of the PPC on vehicle access from Carter Road to Lot 5 DP 109184 and Lot 1 DP 149371 south of the rail corridor.

There is no legal right of access from Carter Road across the railway line to the property at the NW end of Sedgebrook Road (Lot 5 DP 109184). The realignment of Carter Road would result in the closure of this access, which is not subject to existing use rights. The owner has other existing legal access and would be marginally inconvenienced by the closure of that access (adding 90-120 seconds to the travel time to Patumahoe village,

T17. Carter Road Intersection

Please update the Engineering Infrastructure Assessment to reflect the proposal to close Carter Road to cars and create a walking and cycling path.

The infrastructure report does not address the assess points into the site.

Ref: 310204152

26 June 2020

Dear Ann-Maree,

Patumahoe South Private Plan Change – Clause 23 Request for Further Information

Stantec is pleased to provide the following response to the traffic comments received from Auckland Council, dated 10 June 2020.

Introduction

Following receipt of the Patumahoe South Private Plan Change (“the Plan Change”) application, Auckland Council has issued a request for further information under Clause 23(2) of the Resource Management Act 1991 (“the request”), dated 10 June 2020. The following response addresses the transport related matters raised within the request.

The queries from the request are cited below in italics for ease of reference, with the Stantec response follow.

This response builds on the Integrated Transportation Assessment (“ITA”) supporting the Plan Change prepared by Stantec and dated June 2019.

Responding to Request for Further Information

T1 & T2 – Future Transport Environment / Wider Transport Network

The response to T1 and T2 have been combined as both queries address similar issues.

Query from AC

T1. Provide an assessment of transport impacts for the future environment.

The ITA acknowledges that some other parts of Patumahoe are zoned for development, and has made some allowance for the development of those areas when considering intersection performance; however, it appears that no allowance has been made for growth from other sources. This could include, for example, growth in travel between Pukekohe and Glenbrook/ Waiuku as a result of other development in one or both areas. Without such an assessment the impact of the proposal on the future environment cannot be properly understood. Information should be provided on expected traffic growth in the area, preferably from regional/ district transport models, and assessment against that baseline provided for an appropriate future year (eg 2036). The growth information should reference information such as Council’s Future Urban Land Supply Strategy (FULSS) and Council’s Structure Plans for the Drury-Opāheke and Pukekohe-Paerata areas. The ITA prepared for the structure plan areas may also provide useful context. It is noted that Auckland Transport’s comments recommend undertaking new traffic counts in the area. This recommendation is supported if assessments are based on existing volumes, or growth on existing volumes; however an approach based on projected future volumes from transport models is likely to provide a more robust assessment

T2. Provide an assessment of effects of the Plan Change on the wider transport network

The ITA does not consider the impact of the Plan Change beyond the immediate area, although traffic generated by development of the land would pass through a number of other points on the road network, some of which currently have poor performance, where adverse effects might be generated. In addition, a number of changes to the transport network in the wider area are proposed, and the ITA needs to provide an assessment

of the compatibility of the Plan Change with that network. Please provide an assessment of the likely (cumulative) impact on the wider transport network, and if development of the Plan Change area should be dependent on any infrastructure being in place.

Response

The traffic generation associated with the Plan Change and its impact on the wider road infrastructure is very low compared to the impact of the developments that are planned in Pukekohe, Paerata or Drury. Infrastructure improvements are planned to enable these much larger developments in South Auckland and will address the minor contribution to traffic impact associated with the plan change area.

An assessment of the traffic effects on the wider transport network, taking into consideration future traffic growth in the wider South Auckland area has been included within the updated ITA (dated 26 June 2020) in section 5.2 and 5.3.2.

We acknowledge that future growth in the surrounding areas will result in traffic volume increase along key roads within Patumahoe, however, both Mauku Road and Patumahoe Road currently have excess capacity and are unlikely to reach traffic-carrying capacity limits, even with the addition of future traffic associated with the Plan Change.

The need for and assessment of safety improvements in the vicinity of the development, including lower speed limits, have been included within the Precinct Provisions and will be undertaken at the time of subdivision.

It is also noted that by providing residential and employment activity in close proximity to (and within) the Plan Change area as proposed, the traffic generation onto the wider external transport network will be further reduced.

In summary, the traffic impact of the Plan Change (as reported in the updated ITA) with respect to the wider network will be low in comparison to the existing and future traffic volumes on the surrounding roads and the expected growth within the South Auckland region, and other developments in the area rely on infrastructure much more than the proposed development within the Plan Change area.

T3 –Access

Query from AC

Provide justification for vehicular access points being confined to the four locations shown.

The ITA shows four proposed road locations, but does not state if these are the only locations that would allow development of the land to be serviced safely and efficiently, and so should be the only locations permitted. It is noted that Standard I430.6.13 requires access to be from the indicative locations shown on Precinct Plan 3, with any other location being a Non-Complying Activity. No justification is provided to explain why access in any other location should be non-complying. See following request also.

Response

Vehicular access for the Plan Change is provided by four access points, as shown in Figure 9 in the ITA. The number of vehicle access connections to the Plan Change area is considered entirely sufficient and appropriate to accommodate the expected trip generation of the site. The traffic distribution is detailed in the ITA report, Appendix B.

As mentioned in the precinct provisions, the vehicular accesses can be provided from Patumahoe Road or from Mauku Road into the precinct within 50m of the indicative locations shown in Figure 9 of the ITA.

The indicative location of the accesses shown in Figure 9 has been identified based on providing a safe separation distance from existing intersections and from the proposed intersections, and at locations where adequate sight distances can be achieved. It is noted that sight distances will be confirmed against the Austroads Guide during the subdivision stage when the detailed location and layout of the intersections is confirmed.

Vehicle access for properties with sole frontage to Patumahoe Road is permitted but is expected to be located at least 10m from any surrounding intersections. Where properties have frontage to two roads, it is expected that vehicle access would be from the road with the lower hierarchy classification.

T4 – Access

Query from AC

Identify locations for access intersections and pedestrian crossings that would be appropriate for a higher speed environment.

As acknowledged in the ITA, the safety of the proposed access intersections and pedestrian crossings depend on the speed limit being lowered to 50km/h on each frontage road, which is outside the control of the applicant or Council. Auckland Transport has recently undertaken an extensive review of speed limits across the region, and has not reduced the speed limits on the frontage roads to 50km/h. It is therefore possible that Auckland Transport would not reduce the speed limit to 50km/h, particularly prior to development occurring. It is noted that comments provided by Auckland Transport suggest that forming the new intersections as urban roundabouts would assist in reducing the speed limit. In addition roundabouts would change the sight distance requirements and may make those requirements easier to provide in some locations; however, the ITA would need to demonstrate that appropriate roundabouts could be provided, detailing additional land that might be required (if any). The ITA should identify intersection and crossing locations that would be safe at the speeds coming into effect from 1 July 2020, and demonstrate that these would be both safe and efficient in order to show that appropriate transport infrastructure could be provided to support development of the land as proposed.

Response

We consider that the current speed limit of 70km/h on the southern section of Patumahoe Road fronting the Plan Change Area is appropriate only for the existing rural environment. As the area gradually becomes urbanised, a reduction in the speed limit will be required to ensure safe vehicle access to adjacent properties and to provide a safe walking and cycling environment.

It is noted that a speed limit review on Mauku Road has extended the 50km/h section to 180m southwest of Kingseat Road as a result of the developments as part of Sub-precinct B and C currently being constructed. It is expected that a similar process would be undertaken at the time of subdivision within the proposed Plan Change area.

If the speed limit is not reduced to 50 km/h by the commencement of the development, access locations will be designed to comply with safe sight distance requirements at 70km/h. Additional safety considerations, such as

the implementation of a roundabout or additional land take from within the Plan Change Area, and assessment of these improvements is included in the precinct provisions (I430.8.1 (3)(b)) to meet the sight distance requirements at 70km/h.

T5 – Access

Query from AC

Please address sight-distance issues for the proposed pedestrian crossing at the intersection of Patumahoe Road/ Clive Howe Road/ Carter Road.

The ITA acknowledges that there are sight-distance issues at the intersection, but proposes a pedestrian crossing near this point, connecting a proposed pedestrian link within the Carter Road reserve to the school. The ITA recommends that assessment of this sight distance issue be deferred until resource consent stage. If the sight distance issues cannot be adequately resolved, this raises questions around the location and suitability of the proposed pedestrian link and the safety of pedestrians. It appears the sight distance constraints may be solved if some of the land within the Plan Change area was vested as road and some of the shelter belt trees were removed. Please provide an assessment of possible solutions to this issue to demonstrate that development as proposed can be serviced (with recently-approved speed limits).

Response

It is important to provide a pedestrian connection close to the proposed Carter Road shared path as the existing zebra crossing is located approximately 115m west of the proposed shared path. The location of the existing zebra crossing may discourage pedestrians / cyclists from the Carter Road shared path of using the zebra crossing, resulting in people crossing at an uncontrolled intersection.

The specific location of the proposed zebra crossing will be defined in the resource consent stage of the project and provision has been made within the Precinct Plan to ensure that sufficient sight distance is provided between pedestrians and vehicles in the form of a covenant restricting landscaping on the south-eastern property at the intersection.

During the site visit the potential raised zebra crossing location was identified west of current Carter Road location with 75-80m sight distance between approaching traffic and pedestrians at the crossing. Approach Sight Distance (ASD) for 60 m/h design speed at crossing location where pedestrians have priority is 72m.

Additional safety improvements, such as raising the whole intersection could be considered in the future through the requirements of the Precinct Provisions to be implemented (if required) at the time of subdivision, to further enhance safety and reduce speeds at the Patumahoe Road/Clive Howe Road intersection.

T6 - Access

Query from AC

Please provide a sound basis for the closure of Carter Road to vehicular traffic, other than the currently available sight distance.

It appears that the sight distance constraints at this intersection may be solved if some of the land within the Plan Change area was vested as road and some of the shelter belt trees were removed. The ITA provides no other reason for closure of this road to vehicular traffic. The ITA should provide an assessment of how this

intersection might operate if the sight distance constraint was solved, and what the most appropriate form for this intersection would be.

Response

The main reason behind the closure of Carter Road to vehicular traffic is to encourage walking and cycling for shorter-distance trips between the Plan Change area and the existing urban development areas of Patumahoe.

The Carter Road Shared Path will connect the Plan Change area to Patumahoe School, Clive Howe Reserve and the Patumahoe village centre. The provision of safe walking and cycling infrastructure, separated from vehicular traffic, will encourage a higher proportion of active trips to be generated, and thereby reduce the traffic effects arising from the Plan Change on the surrounding roads.

It is also noted that a tee-intersection will provide a safer operating environment for both vehicles and active modes compared to what would otherwise be four-arm intersection, particularly as Carter Road currently does not achieve adequate or appropriate intersection visibility. The proposed outcome promoted through the Plan Change therefore achieves both efficiency and safety benefits over the current arrangements.

T7 – Transport Improvements

Query from AC

Please demonstrate how the intersection of Patumahoe Road / Mauku Road / Woodhouse Road could operate satisfactorily in future.

The ITA acknowledges that the intersection of Patumahoe Road/ Mauku Road/ Woodhouse Road is likely to require some changes to address safety issues in the future as a result of development within the Plan Change area. It is also possible that future traffic growth from other sources could exacerbate that issue, potentially resulting in adverse effects when traffic from development of the PC land occurs. Some indicative designs should be provided that would address this issue to either demonstrate that appropriate solutions are able to be delivered, or alternatively identify any areas of third-party land that may be required to provide an appropriate solution. The ITA should identify the need (if any) for funding of this project (and/or any others) to be allowed for by AT or others.

Response

It is acknowledged that further road safety assessment of the Patumahoe Road / Mauku Road intersection will be required to support the future development that will be facilitated through the Plan Change (Precinct Provisions) and recognising the dynamic nature of other developments within the surrounding area as well as the future needs of the operation of the wider transport network . The existing layout (and existing road reserve width of around 20m) of this intersection has sufficient space to enable safety improvements and address any connectivity issues that would be identified at the time of subdivision. Possible future intersection improvements that may be considered at the time of subdivision to cater for future traffic conditions (and in response to future land-use development that is expected to emerge within Patumahoe between now and the time of subdivision) could include the following:

- Making the intersection more compact;
- Raising the intersection;
- Providing pedestrian facilities;
- Converting the intersection into a roundabout; or

- Converting the intersection into a signalised intersection.

All of the above are considered feasible within the existing available road reserve widths at the intersection. The preparation of indicative designs for this range of possible improvements at this stage without more detailed investigations and without co-ordination with Auckland Transport in terms of what further enhancement might be currently warranted by the existing intersection form, is considered unlikely to provide additional value at this time.

It is instead proposed to include a specific road safety assessment and intersection upgrade provision within the Precinct Provisions (1430.8) to address the transportation and road user issues at this intersection at the appropriate time in the future. An assessment will be required to be completed at the time of subdivision, and where a rational nexus exists, the subdividing landowner would be expected to contribute proportionately towards remedial works or improvements. Once those works are more clearly defined – they can then be captured within a Development Funding Agreement.

T8 - Consistency

Query from AC

Please provide consistent information on the extent of the Plan Change and zoning, particularly near the Mauku Road frontage.

The text of the ITA and AEE are inconsistent with each other, and with the provided drawings. Some show land fronting Mauku Road being rezoned, some show it outside the Plan Change area. It is unclear if the ITA assessment has allowed for traffic generated by residential zoning over the land fronting Mauku Road.

Response

We confirm that the land fronting Mauku Road will be rezoned as part of the Plan Change.

The residential development within Sub-Precincts B, C and D was taken into account and is considered to generate hourly trips in a range of 90-100 trips per peak hour (see Section 5.1 in the ITA). Such trip generation is considered to be low and will have minor impact on the network operation in the area.

T9 - Consistency

Query from AC

Please provide consistent information on the widths and elements for the proposed road cross-sections. The text of the ITA is inconsistent with the provided road cross-section drawings.

Response

The ITA has been updated to reflect the proposed road cross sections.

T10 - Road design

Query from AC

Please provide confirmation that the Plan Change is seeking to include specific road cross-sections that would replace other standards, such as AT ATCOP or TDM.

The ITA presents road widths and cross-sections as “proposed” but does not state if these would be, or should be, prescribed in the Plan Change, nor supplies sufficient evidence to demonstrate that the proposed cross-

sections are superior to other standards in this context. It is noted that the Appendix 1 AUP Assessment states at Section 12, that "roading has been designed to meet with the technical standards of the Code of Practice"; however, the proposed road cross-sections are not consistent with ATCOP. If the road cross-sections and widths are intended to be prescriptive, or to be a base for assessment of a subdivision, the effect of these proposals, for example the provision of a footpath along one side of a road, need to be evaluated and compared against the effects of streets developed in accordance with other standards such as ATCOP/TDM

Response

The proposed road cross sections have been updated to better align with Auckland Transport's Transport Design Manual ("TDM") and are attached in Appendix A of the updated ITA (June 2020). It is proposed to provide unique cross sections for the Plan Change instead of utilising the standardised cross sections shown in the existing Precinct Plan in order to provide a slow speed environment and to emphasize the residential village environment.

Furthermore, for a residential development such as proposed, it is desirable to provide footpaths on both sides of the road as opposed to on one side as shown within the Precinct Plan to ensure safe walking connections.

The proposed cross sections have been designed to align with the intentions of the TDM to achieve appropriate vehicle function whilst providing for safe walking and cycling transportation. The only deviation from the TDM is in regards to the shared path. Shared paths are not an approved type of walking and cycling infrastructure in the TDM and may only be used where cyclist and pedestrian volumes are low. As the development is located within a rural environment, it is considered that the pedestrian and cyclists conflict will be relatively rare, and thus the use of a shared path is considered appropriate.

Additional traffic calming measures will be implemented to achieve a 30km/h speed environment along local and minor roads. This is further discussed in section 3.2 of the updated ITA.

T11 - Access

Query from AC

Please confirm if development must commence with access from Patumahoe Road, and if so, provide justification.

The proposed Plan Change standard I430.6.13 requires a new road access from Patumahoe Road (and closure of Carter Road) prior to any development. As proposed, this would result in development with access from Mauku Road occurring first being a Non-Complying activity. If developing the western portion of the area first would result in significant adverse effects this has not been stated, and no other justification for preventing access to Mauku Rd occurring first has been provided.

Response

The development can be constructed from the western side of the Plan Change area and access can only be provided from Mauku Road without the closure of Carter Road or the provision of access to Patumahoe Road for the first 50 dwellings (approximate number of houses on the western side of the Plan Change area), as long as the access road does not link to Carter Road. Once the 50 dwellings threshold is exceeded, the conversion of Carter Road to the shared path and a dedicated pedestrian/cyclist access is required to be provided to support the safety of all users within the development.

T12 - Access

Query from AC

Please provide concept drawings of new intersections

The ITA contains a heading for “Appendix C Concept drawings of new intersections”, however no drawings are provided. In order to conclude that the proposed zoning can be serviced, and to understand the implications of doing so, it is important to understand if providing the new intersections (including right turn bays at all four intersections, footpaths, cycle paths etc) can be provided within the existing or proposed road reserves, or if additional land may be required. Indicative costs and funding responsibilities should also be provided so that infrastructure providers (Auckland Transport) can update planning documents if required.

Response

Concept sketches have been provided in Appendix C of the updated ITA (June 2020).

T13 – Level Crossing

Query from AC

Please provide a Level Crossing Safety Impact Assessment

The ITA states that a LCSIA will be undertaken. It is possible that the LCSIA may propose measures that require changes to the road network, or potentially have effects on others. In the event that a completed LCSIA cannot be provided in a timely manner, the ITA could indicate the sort of measures that are expected to be required. The ITA should provide confidence that the required measures can be provided so that the ability to service the zoning is assured.

Response

The current design and infrastructure of the Patumahoe Road level crossing was reviewed during a site visit on 24 June 2020. A high-level assessment of the possible safety improvement upgrades to the level crossing (such as may be recommended or required by a later LCSIA) has been undertaken and is included in the updated ITA report. The assessment confirms that the upgrade measures which might feasibly be required can be provided.

Furthermore, the need for and provision of safety improvements to the railway level crossing on Patumahoe Road and assessment criteria of these improvements has been included as a provision within the Patumahoe Precinct Plan (I430.8). The subdividing landowner would be expected to contribute towards any improvements or remedial works identified as being required at that time and co-ordinated with KiwiRail and Auckland Transport as appropriate. Once those works are more clearly defined – they can then be captured within the proposed Development Funding Agreement.

T14 – Pedestrian Linkage

Query from AC

Please provide an explanation to support the location of the pedestrian linkage proposed across Mauku Road (Page 17, Appendix 4A)

The pedestrian crossing across Mauku Rd proposed in this application is in a different location to the pedestrian linkage being constructed within Sub-precincts B and C on the north side of Mauku Rd. This has the potential effect of having two crossings within 100m. Further justification is required to support the pedestrian crossing proposed in this application.

Response

The pedestrian linkage that has been constructed as part of Sub-precincts B and C on the northern side of Mauku Road, is considered to be sufficient to provide safe crossing for pedestrians across Mauku Road. The second crossing discussed as part of the original ITA is therefore not required to be constructed as part of this Plan Change.

P12 - Indicative roads

Please confirm how the detailed design of roads as described in Section 5.3 of the AEE will be delivered through the proposed provisions.

It is unclear whether bespoke provisions for the design of indicative roads are being proposed, or whether the detailed design will rely on ATCOP standards. Unlike for Sub-precincts B, C and D, no cross-sections of the road reserve have been proposed to inform future detailed design.

Response

Refer to T10. The road cross sections within the Plan Change Area have been designed to largely align with the TDM.

Yours sincerely



Saulius Vingrys
Transport Planning Team Lead (Auckland)



Don McKenzie
Private Sector Leader (Auckland) - Transportation

Stantec New Zealand

Ref: 310204152

23 July 2020

Dear Ann-Maree,

Patumahoe South Private Plan Change – Clause 23 Request for Further Information

Stantec is pleased to provide the following further response to the traffic comments received from Auckland Council, dated 7 July 2020.

Introduction

Following receipt of the Patumahoe South Private Plan Change (“the Plan Change”) application, Auckland Council has issued a request for further information under Clause 23(2) of the Resource Management Act 1991 (“the request”), dated 10 June 2020. Stantec has provided the response on 26 June 2020 with the updated ITA report. A further request for information was received from the Council on 7 July 2020. The following response addresses the remaining transport-related matters raised within this new request.

The outstanding RFI queries are cited below in italics for ease of reference, with the Stantec response to follow.

This response builds on the Integrated Transportation Assessment (“ITA”) supporting the Plan Change by Stantec originally developed in June 2019 and updated in June 2020.

Responding to Request for Further Information

T1 – Future Transport Environment in Patumahoe area

Outstanding query from AC

The additional information provided does not respond to the request. No additional information is provided on the sources of growth used to derive the estimate of 20-35% provided in the ITA to allow an understanding of what growth has been allowed for. No new traffic counts have been provided, nor projected future volumes in Patumahoe area from transport models.

Recommendation: Provide future link flows from transport models T2.

Response

The modelled link flows of Patumahoe Road and Mauku Road in the Supporting Growth Alliance’s (“SGA”) SATURN model are lower than the existing surveyed traffic volumes; therefore these SATURN flows were not provided in the previous RFI response. Lower modelled traffic flows on these roads could be due to the Patumahoe area being at the edge of the SATURN model and therefore the calibration of these links may not be as accurate as the core model.

We therefore propose to adopt a first principles approach and estimate future traffic flows based on the available area growth information. The latest tube counts from June 2019 have been reviewed in the area and the count on Patumahoe Road near the Patumahoe Primary school showed the morning and afternoon peak hour volumes of 571 vph and 679 vph, respectively. In order to estimate future traffic increase on these links, a conservative 3% per annum background traffic growth rate was adopted, and the estimated traffic from development within Precincts B, C and D (90 vph) together with the Patumahoe South Plan Change future trips

(approximately 200 vph) were added to the existing traffic volumes to derive an estimate future year traffic volume for the Plan Change area.

As a result, the estimated 2028 traffic volumes with the fully constructed Patumahoe South Plan Change development are in the range of 900 to 1050 vph on Patumahoe Road. From the survey data it was also identified that the directional peak traffic is around 66% of the two-way traffic in the peak direction.

Therefore, the estimated future traffic per lane on Patumahoe Road is expected to be up to approximately 700 vph per direction.

Road links and proposed intersections operating with such peak hour traffic volumes are expected to operate within broadly acceptable capacity limits and generate no notable capacity issues.

T2 – Capacity and Safety of Wider Area key interactions

Outstanding query from AC

Additional information has been provided including projected 2028 traffic volumes on Karaka Road (SH22), Glenbrook Road and Waiuku Road. A list of anticipated infrastructure projects has also been provided.

An assessment of the capacity of road links has been provided, but no assessment has been provided of the safety or capacity of any intersections in the wider area, and the potential impact of the plan change on those locations.

Recommendation: Demonstrate ability of key intersections to accommodate future flows safely and efficiently.

Response

It is considered that the Glenbrook Road/SH 22 and Glenbrook Road/Ostrich Road intersections will be the key nodes/intersections where additional traffic from the Plan Change development would use to travel between Patumahoe and Auckland during the peak hours.

As identified in the ITA report, the additional flow from the development travelling to Auckland is not expected to exceed 80 vph during the morning peak hour, and return to Patumahoe during the afternoon peak hour. In order to reach Auckland from Patumahoe the most direct route is via the above-mentioned intersections, however, not all of the 80 trips are expected to travel through these intersections due to expected congestion in the future. Alternative routes shown below, are available and can offer similar journey times, especially once the volumes on Glenbrook Road increase.



Routes via Linwood Road and Pukekohe East Road are also available for trips from Patumahoe to Auckland to fully bypass SH 22.

Due to a number of alternative routes, the proportion that the development traffic will add to the existing (and future) volumes on each route is low and any issues that are identified are considered to be existing or relate to the more significant, larger planned developments in the area e.g. Paerata Rise development which includes 4500 new households and other mixed use developments.

Despite that, as requested, SGA SATURN models were reviewed and future traffic flows derived for the above-mentioned intersections to develop the 2028 reference case models (without Patumahoe South Plan Change development) and 2028 Scheme models (with Plan Change development).

The modelled results are shown below. The PM peak modelling results for both scenarios are similar therefore only the AM peak results are discussed.

Ostrich Road/Glenbrook Road Intersection

MOVEMENT SUMMARY

▽ Site: 101 [2028 Ref Case AM]

New Site
Site Category: (None)
Giveaway / Yield (Two-Way)

Movement Performance - Vehicles						
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service
South: Ostrich Road						
1	L2	7	10.0	0.006	8.3	LOS A
3	R2	276	10.0	0.774	27.0	LOS D
Approach		283	10.0	0.774	26.6	LOS D
East: Glenbrook Road						
4	L2	95	10.0	0.061	7.5	LOS A
5	T1	313	10.0	0.171	0.0	LOS A
Approach		408	10.0	0.171	1.8	LOS A
West: Glenbrook Road						
11	T1	642	10.0	0.358	0.0	LOS A
12	R2	9	10.0	0.358	9.0	LOS A
Approach		651	10.0	0.358	0.2	NA
All Vehicles		1342	10.0	0.774	6.2	NA

MOVEMENT SUMMARY

▽ Site: 101 [2028 Scheme AM]

New Site
Site Category: (None)
Giveaway / Yield (Two-Way)

Movement Performance - Vehicles						
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service
South: Ostrich Road						
1	L2	7	10.0	0.006	8.3	LOS A
3	R2	316	10.0	0.896	39.3	LOS E
Approach		323	10.0	0.896	38.6	LOS E
East: Glenbrook Road						
4	L2	113	10.0	0.073	7.5	LOS A
5	T1	313	10.0	0.171	3.2	LOS A
Approach		426	10.0	0.171	4.4	LOS A
West: Glenbrook Road						
11	T1	642	10.0	0.358	3.3	LOS A
12	R2	9	10.0	0.358	9.0	LOS A
Approach		651	10.0	0.358	3.3	NA
All Vehicles		1400	10.0	0.896	11.8	NA

The right turn from Ostrich Road is modelled to start reaching its capacity limit and average delays are expected to increase by around 10-20s as a result of the Plan Change development. Such operation is expected only during the peak hours and is considered acceptable.

Glenbrook/SH22

Two options of the Glenbrook Road/SH 22 intersection were modelled – the existing T-intersection and the proposed roundabout. The results are shown below.

The give-way T-intersection modelling results:

MOVEMENT SUMMARY

Site: 101 [2028 Ref Case AM Peak]

New Site
Site Category: (None)
Giveaway / Yield (Two-Way)

Movement Performance - Vehicles						
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service
South: SH 22 South						
1	L2	116	10.0	0.101	8.7	LOS A
3a	R1	751	10.0	0.602	9.8	LOS A
Approach		867	10.0	0.602	9.7	LOS A
NorthEast: SH 22 North						
24a	L1	561	10.0	0.314	6.5	LOS A
26a	R1	305	10.0	0.171	6.3	LOS A
Approach		866	10.0	0.314	6.4	NA
West: Glenbrook Rd						
10a	L1	663	10.0	1.105	219.7	LOS F
12	R2	223	10.0	3.764	5019.7	LOS F
Approach		886	10.0	3.764	1427.9	LOS F
All Vehicles		2619	10.0	3.764	488.4	NA

MOVEMENT SUMMARY

Site: 101 [2028 Scheme AM Peak]

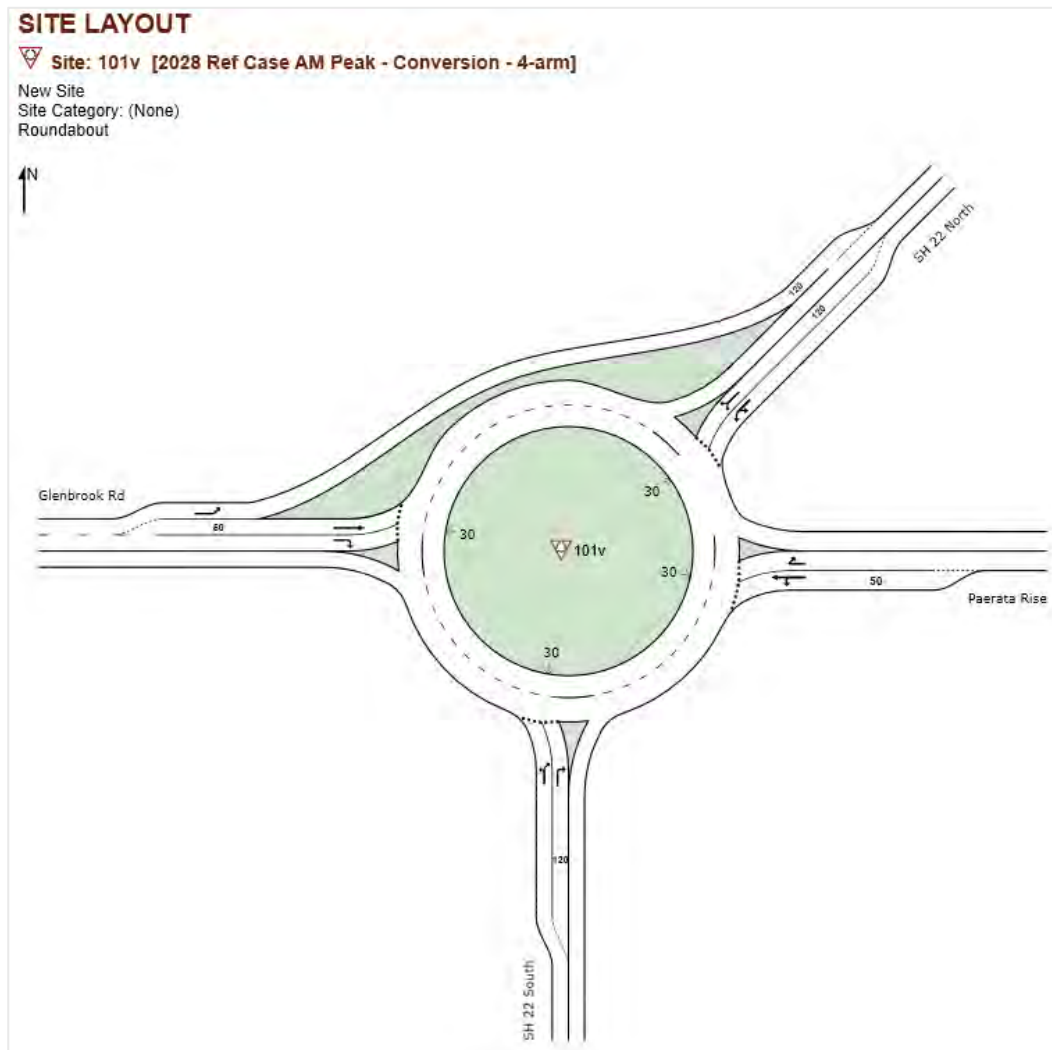
New Site
Site Category: (None)
Giveaway / Yield (Two-Way)

Movement Performance - Vehicles							
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service	95% Back Vehicles veh
South: SH 22 South							
1	L2	116	10.0	0.103	8.8	LOS A	0.4
3a	R1	791	10.0	0.648	10.5	LOS B	8.0
Approach		907	10.0	0.648	10.3	LOS B	8.0
NorthEast: SH 22 North							
24a	L1	561	10.0	0.314	6.5	LOS A	0.0
26a	R1	323	10.0	0.181	6.3	LOS A	0.0
Approach		884	10.0	0.314	6.4	NA	0.0
West: Glenbrook Rd							
10a	L1	703	10.0	1.264	495.9	LOS F	193.6
12	R2	223	10.0	4.422	6206.5	LOS F	227.5
Approach		926	10.0	4.422	1671.2	LOS F	227.5
All Vehicles		2717	10.0	4.422	643.3	NA	227.5

The results show that due to heavy traffic volumes on SH 22 in the future generated by the wider development activity expected within the Paerata/Pukekohe and surrounding areas, traffic from the minor Glenbrook Road approach will experience extensive delays (even without the Patumahoe South Plan Change proposed traffic). The development traffic will add only up to an extra 3% of total traffic travelling through the intersection and will mostly affect the left turn from the Glenbrook Road to SH 22 further increasing delays of this movement. The results show that changes will be required to efficiently accommodate the planned growth in Pukekohe and Paerata even without the Plan Change development at Patumahoe South. The requirement to upgrade the intersection is not driven by or a function of the Plan Change traffic – the effect of the additional 3% in traffic movements through the intersection represent the typical day to day variations that might be currently expected along the roads approaching this intersection.

The capacity of the intersection increases significantly with the planned roundabout conversion and connection of the Paerata Rise development access to the roundabout. An indicative roundabout layout (based on the SATURN model) and modelled results are shown below.

Based on publicly available information, it is understood that the planning of the roundabout has advanced and the surveys of the intersection are being carried out in the near future.



MOVEMENT SUMMARY

Site: 101v [2028 Ref Case AM Peak - Conversion - 4-arm]

New Site
Site Category: (None)
Roundabout

Movement Performance - Vehicles									
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service	95% Back of Queue Vehicles veh	Distance m	
South: SH 22 South									
1	L2	107	10.0	0.849	12.9	LOS B	13.7	103.8	
3a	R1	684	10.0	0.849	16.9	LOS B	13.7	103.8	
3	R2	6	0.0	0.011	10.9	LOS B	0.0	0.3	
Approach		777	9.9	0.849	16.3	LOS B	13.7	103.8	
East: Paerata Rise									
4	L2	20	0.0	0.079	7.1	LOS A	0.4	2.5	
5	T1	19	0.0	0.079	6.7	LOS A	0.4	2.5	
6b	R3	87	0.0	0.129	11.9	LOS B	0.6	4.5	
Approach		126	0.0	0.129	10.4	LOS B	0.6	4.5	
NorthEast: SH 22 North									
24b	L3	33	0.0	0.164	5.2	LOS A	0.7	7.9	
24a	L1	528	10.0	0.723	9.1	LOS A	8.7	63.3	
26a	R1	305	10.0	0.723	14.4	LOS B	8.7	63.3	
Approach		866	9.6	0.723	10.8	LOS B	8.7	63.3	
West: Glenbrook Rd									
10a	L1	663	10.0	0.371	5.5	LOS A	0.0	0.0	
11	T1	15	5.0	0.028	6.0	LOS A	0.2	1.1	
12	R2	223	10.0	0.278	15.0	LOS B	1.9	14.7	
Approach		901	9.9	0.371	7.9	LOS A	1.9	14.7	
All Vehicles		2670	9.4	0.849	11.4	LOS B	13.7	103.8	

MOVEMENT SUMMARY

Site: 101v [2028 Scheme AM Peak - Conversion - 4-arm]

New Site
Site Category: (None)
Roundabout

Movement Performance - Vehicles									
Mov ID	Turn	Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service	95% Back of Queue Vehicles veh	Distance m	
South: SH 22 South									
1	L2	107	10.0	0.892	16.1	LOS B	17.4	132.6	
3a	R1	704	10.0	0.892	20.1	LOS C	17.4	132.6	
3	R2	6	0.0	0.011	10.9	LOS B	0.0	0.3	
Approach		817	9.9	0.892	19.5	LOS B	17.4	132.6	
East: RoadName									
4	L2	20	0.0	0.079	7.1	LOS A	0.4	2.5	
5	T1	19	0.0	0.079	6.7	LOS A	0.4	2.5	
6b	R3	87	0.0	0.129	11.9	LOS B	0.6	4.5	
Approach		126	0.0	0.129	10.4	LOS B	0.6	4.5	
NorthEast: SH 22 North									
24b	L3	33	0.0	0.164	5.2	LOS A	0.7	8.0	
24a	L1	528	10.0	0.724	9.1	LOS A	8.8	63.8	
26a	R1	305	10.0	0.724	14.4	LOS B	8.8	63.8	
Approach		866	9.6	0.724	10.8	LOS B	8.8	63.8	
West: Glenbrook Rd									
10a	L1	703	10.0	0.393	5.5	LOS A	0.0	0.0	
11	T1	15	5.0	0.029	6.2	LOS A	0.2	1.2	
12	R2	223	10.0	0.293	15.3	LOS B	2.1	15.8	
Approach		941	9.9	0.393	7.9	LOS A	2.1	15.8	
All Vehicles		2750	9.4	0.892	12.4	LOS B	17.4	132.6	

As seen from the results, the impact of 3% the development traffic is negligible and intersection operates within acceptable capacity limits in both scenarios once the planned roundabout is in place.

Traffic Safety

The traffic safety record of the last 10 years was reviewed for the key intersections on Glenbrook Road. The Glenbrook Road/SH 22 intersection has been previously identified as operating with some safety risks as a result of the atypical intersection layout (hence part of the justification for the planned roundabout at this location).

The Glenbrook Road/Ostrich Road intersection had recorded eight crashes in ten years, out of which only two were injury crashes (one serious and one minor). The last crash was recorded in 2017. The intersection operation does not show significant safety concerns, however right turns from Ostrich Road onto Glenbrook Road may become a more complex manoeuvre with increasing traffic volumes in the future. It is recommended that the road safety performance of this intersection be included in the matters for assessment in subsequent resource applications arising from the Plan Change.

Other minor intersections with Glenbrook Road do not display any notable road safety concerns.

As the proposed Plan Change development will add proportionally small amount of traffic, it is considered that the perception of additional traffic and additional delays/queues will not be noticeable. .

T4 – Development access at the 70km/h environment

Outstanding query from AC

Response notes that measures such as installing roundabouts at intersections likely to be required for speed environments above 50km/h, and it is suggested that these matters can be deferred until the time of subdivision consent.

No information has been provided to demonstrate that an appropriate roundabout or other form of intersection could be achieved that would allow the proposed zoning to be realised with a higher speed limit, nor can the potential effects (such as access to other land, road safety, delay to through traffic) of developing the land be properly understood in the event a roundabout or other treatment is required.

If it is not possible to safely provide for development of the land unless the speed limit is reduced this needs to be acknowledged so it can be considered by the public and decision makers.

Response

Three connections to the development can be established without the speed limit change on Patumahoe Road to enable the Plan Change development and these three intersections are considered sufficient to enable the development to be established and fully operational.

As per the figure provided below, the Intersection “A” with Patumahoe Road and the Intersection “D” with Mauku Road are

- a) located within the 50km/h zone,
- b) have sufficient sight lines and
- c) can be safely established.

Intersection C on the Patumahoe Road frontage currently sits within the 70km/h speed limit zone, however, it has sufficient sight lines to allow its construction as a safe T-intersection access serving the future development within the Plan Change area.



The fourth intersection, Intersection “B”, however, is close to the horizontal curve that limits sight lines. Its ability to enable safe access to the development relies on the speed limit change from the current 70 km/h speed limit to the 50 km/h speed limit. Despite that, even without the speed limit change, three safe and effective development intersections are considered sufficient to provide efficient vehicular access and cater for the estimated traffic demand in a manner that will ensure safety for both road user movements generated by the Plan Change area as well as passing road users on the frontage roads.

In addition to the above, we support the proposal to decrease the speed limit to 50 km/h on Patumahoe Road as the area becomes more urbanised. The speed limit change request should be lodged as part of the RC stage. We also consider that the roundabout at the Intersection C can potentially be a better alternative to the proposed T-intersection. The roundabout can be established as there is sufficient land on the development side (western side) of Patumahoe Road. As per our discussions with Wes Edwards, we understand that to satisfy this additional information request you are seeking a minimum of one workable solution. This workable solution is the T-intersection and thus the implementation of the roundabout should be explored in the subsequent resource consent stage as it is an additional option.

T5 – Zebra crossing location

Outstanding query from AC

The location of the zebra crossing cannot reasonably be deferred until the resource consent stage as the location of the shared path would be fixed by the Precinct Plan, and it is important that the two facilities are in close proximity.

It is assumed that reference to provisions to ensure sufficient sight distances in the Precinct Plan, are intended to refer to the proposed Precinct Standards and other proposed changes to I430.

While proposed assessment criterion (4)(b)(i) refers to works required to ensure pedestrian safety, that does not ensure that the crossing can be located close to the Carter Road shared path, particularly as relocating the path would be a non-complying activity.

It is noted that some roads in the area are critical links for the rural economy and frequently accommodate large vehicles (including HPMV), and this may not be compatible with possible measures such as raised intersections.

Response

As agreed during our discussion with Wes Edwards, this matter has sufficient justification to have a workable solution and therefore it was agreed that it will be deferred to the RC stage.

T7 – The design of Patumahoe Road/Mauku Road intersection

Outstanding query from AC

The response aims to defer any assessment until the time of subdivision. While the selection of the most appropriate facility and detailed design of the intersection treatment should be deferred, a decision on the plan change needs to be informed by the ability of the road network to safely and efficiently accommodate development under the proposed zoning.

It is considered likely that most of the suggestions for possible improvements would be unsuitable for this intersection, particularly given its importance to the surrounding rural economy by accommodating large vehicles, potentially including large vehicles carrying livestock (HPMV). A roundabout would require additional third-party land.

More information needs to be provided to demonstrate that there is at least one practicable means of addressing this issue and mitigating the (cumulative) effects of the plan change.

Advice Note: Development Funding Agreements are a common way of addressing funding of works associated with a development project, particularly where one developer is responsible for the majority share of a project. If Auckland Transport is to contribute funding it needs to be able to plan and allocate funds in advance.

Response

A potential intersection design that can be accommodated within the existing road reserve is attached to this response. Implementation of the crossing facilities shown in that concept plan would result in a safer pedestrian and cycling environment, while accommodating the full range of traffic movements through the intersection.

T10 and T12 – Cross-section Design

Outstanding query from AC

Updated road cross-sections have been provided.

Queries arising from new information:

- 1. The proposed cross-section for Patumahoe Road shows a 1.5m footpath adjacent to a 1.5m northbound bike path on the western side of the road, and the ITA text refers to this as a shared path. Please confirm what facilities are to be provided for southbound cyclists.*
- 2. The proposed cross-section for Patumahoe Road is not symmetrical and would not allow a similar set of features (cycle path, trees, on-street parking) to be provided on the eastern side of the road in future. Please advise what consideration has been given to the ability for the cross-section to cater for future upgrades.*

3. *The proposed cross-section for a number of roads shows a 2.5m to 3.0m wide berm labelled "Sidewalk tree". Please advise if on-street parking and/ or other items are intended to be located in this space in addition to trees.*
4. *No hierarchy or cross-section is provided for the Mauku Road frontage. Please advise what is intended for this road.*

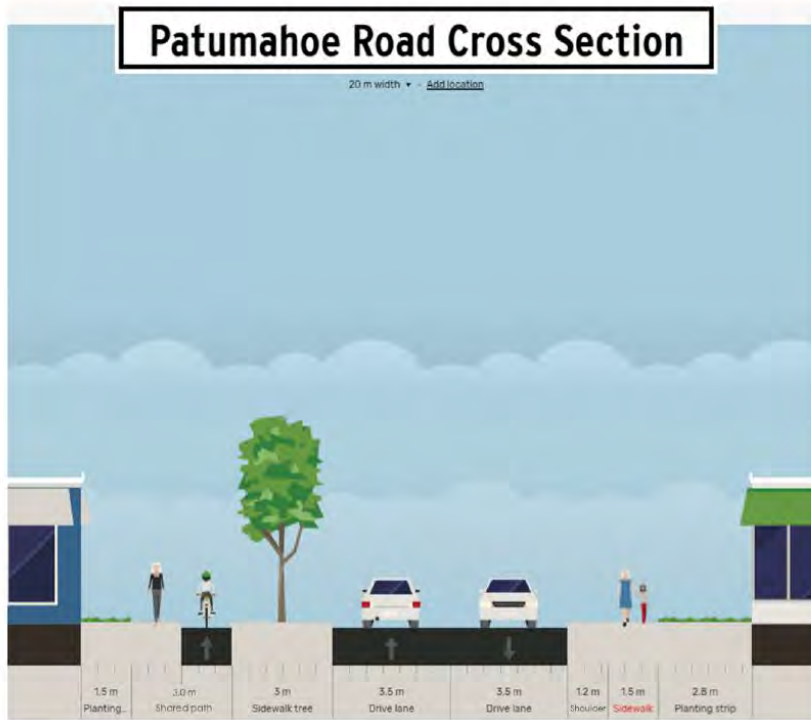
Response

The intersection concept designs, and cross sections have been updated and attached to this response. Further responses to the points above are:

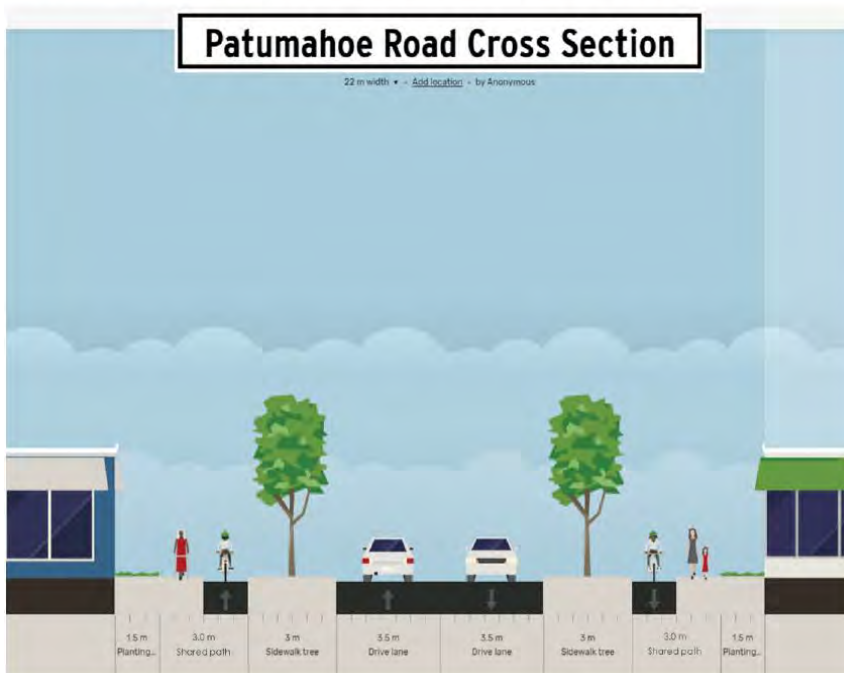
1. It is a bi-directional shared path of 3.0m. Please see the figure below the response. Southbound cyclists can share the path with northbound cyclists as the volumes of pedestrians and cyclists are expected to be low.
2. Two cross section options for Patumahoe Road are proposed in this response:
 - a. the interim cross section showing the developed western side of Patumahoe Road; and
 - b. the full Patumahoe Road cross section as part of the developed eastern side of Patumahoe Road.A plan showing the spatial impact of these cross sections is shown in the attached plan.
3. As discussed in the ITA there will be ample parking spaces within the private properties as these are large size lots. On-street parking can be provided on the local roads, but we do not propose such kerbside parking on either the Green Route or Patumahoe Road. We recommend that kerbside parking is carefully provided and that it not be overprovided.
4. The cross section provided of the Purple Route (cross section shown below) will connect to Mauku Road and will tie in with the existing traffic, walking and cycling infrastructure in that is currently in place or that is built as part of the sub-precinct B, C and D development.

Patumahoe Cross Section


a) Interim Cross Section



b) Final Cross Section



Purple Route Cross Section

Local Road Cross Section 



We trust the above readily satisfies the requirements and requests made in respect of the proposed Plan Change.

Yours sincerely



Saulius Vingrys
Transport Planning Team Lead (Auckland)

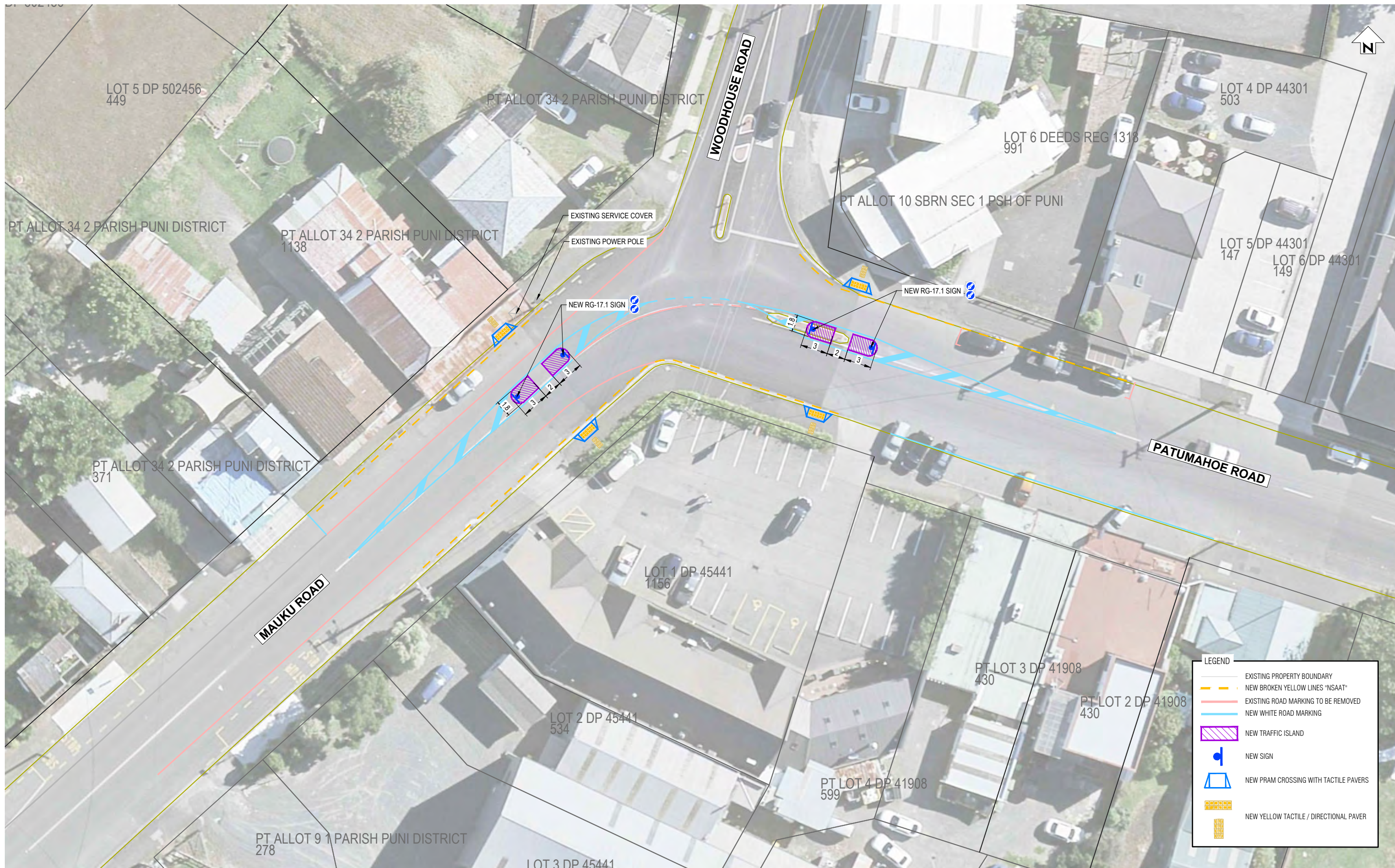


Don McKenzie
Private Sector Leader (Auckland) - Transportation

Stantec New Zealand

ORIGINAL SIZE A1

20/11/2018 4:43 p.m.



NOT FOR CONSTRUCTION

REV	DESCRIPTION	ML	SV	DATE
A	CONCEPT DESIGN			07/2020
	REVISIONS	DRN	CHK	APP

SURVEYED		
DESIGNED	Mark Luo	07/2020
DRAWN	Mark Luo	07/2020
CAD REVIEW		
APPROVED		
PROF REGISTRATION:		

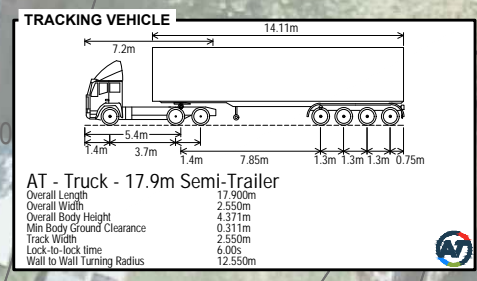
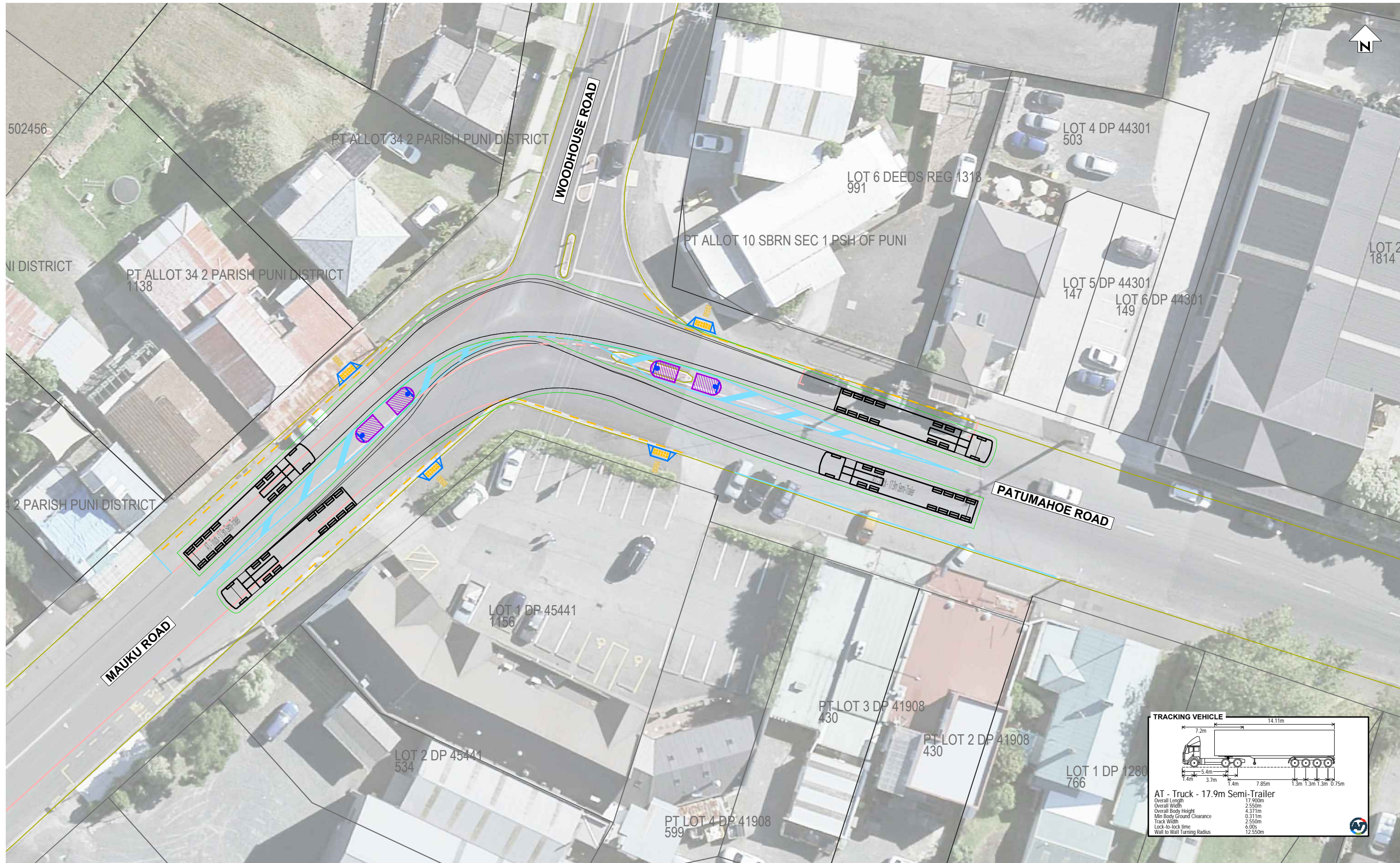


PATUMAHOE SOUTH PRIVATE PLAN CHANGE
 PATUMAHOE, AUCKLAND
 PATUMAHOE RD / MAUKU RD / WOODHOUSE RD INTERSECTION
 GENERAL LAYOUT (SHEET 1 OF 1)

Status Stamp	CONCEPT DESIGN
Date Stamp	21.07.2020
Scales	1:200@A1, 1:400@A3
Drawing No.	310204152-01-001-SK002
Rev.	A

ORIGINAL SIZE A1

20/11/2018 4:43 p.m.



NOT FOR CONSTRUCTION

REV	DESCRIPTION	ML	SV	07/2020	DATE
DRN	CHK	APP			
A	CONCEPT DESIGN				

SURVEYED		
DESIGNED	Mark Luo	07/2020
DRAWN	Mark Luo	07/2020
CAD REVIEW		
APPROVED		



Client

PATUMAHOE SOUTH PRIVATE PLAN CHANGE
PATUMAHOE, AUCKLAND

PATUMAHOE RD / MAUKU RD / WOODHOUSE RD INTERSECTION
VEHICLE TRACKING PLAN (SHEET 1 OF 3)

Status Stamp	CONCEPT DESIGN
Date Stamp	21.07.2020
Scales	1:200@A1, 1:400@A3
Drawing No.	310204152-01-001-SK002
Rev.	A

ORIGINAL SIZE A1

20/11/2018 4:43 p.m.



TRACKING VEHICLE

AT - Rubbish - 10.3m - Side load

Overall Length	10.300m
Overall Width	2.500m
Overall Body Height	4.163m
Min Body Ground Clearance	0.443m
Track Width	2.500m
Lock-to-lock time	6.00s
Max Steering Angle (Virtual)	47.00°

NOT FOR CONSTRUCTION

REV	DESCRIPTION	ML	SV	07/2020
REV	REVISIONS	DRN	CHK	APP
A	CONCEPT DESIGN			

SURVEYED		
DESIGNED	Mark Luo	07/2020
DRAWN	Mark Luo	07/2020
CAD REVIEW		
APPROVED		



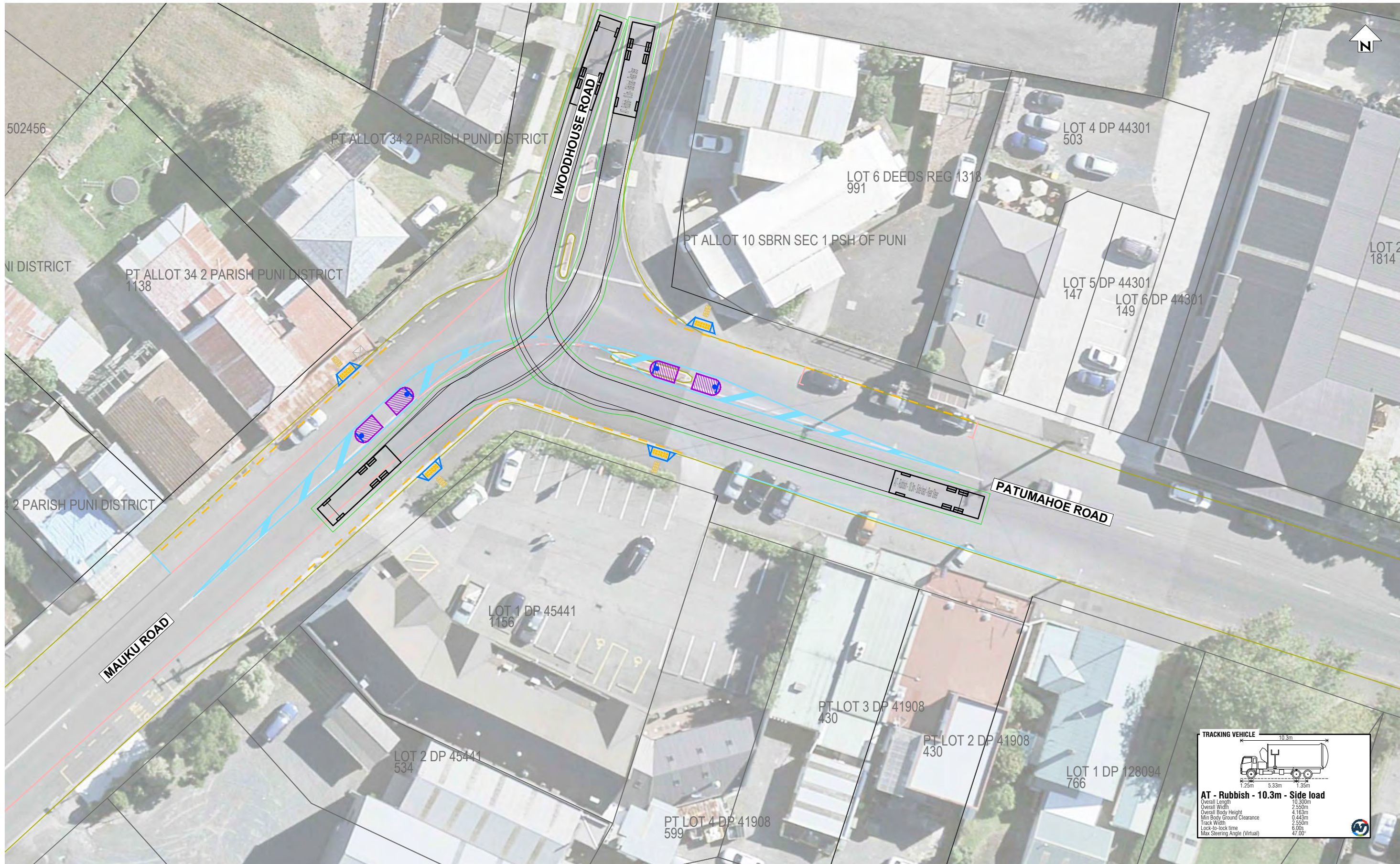
PATUMAHOE SOUTH PRIVATE PLAN CHANGE
 PATUMAHOE, AUCKLAND

PATUMAHOE RD / MAUKU RD / WOODHOUSE RD INTERSECTION
 VEHICLE TRACKING PLAN (SHEET 2 OF 3)

Status Stamp	CONCEPT DESIGN
Date Stamp	21.07.2020
Scales	1:200@A1, 1:400@A3
Drawing No.	310204152-01-001-SK002
Rev	A

ORIGINAL SIZE A1

20/11/2018 4:43 p.m.



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AT - Rubbish - 10.3m - Side load

- Overall Length: 10.300m
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- Lock-to-lock time: 6.00s
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NOT FOR CONSTRUCTION

SURVEYED		
DESIGNED	Mark Luo	07/2020
DRAWN	Mark Luo	07/2020
CAD REVIEW		
APPROVED		



PATUMAHOE SOUTH PRIVATE PLAN CHANGE
 PATUMAHOE, AUCKLAND

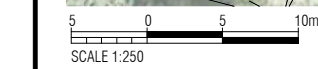
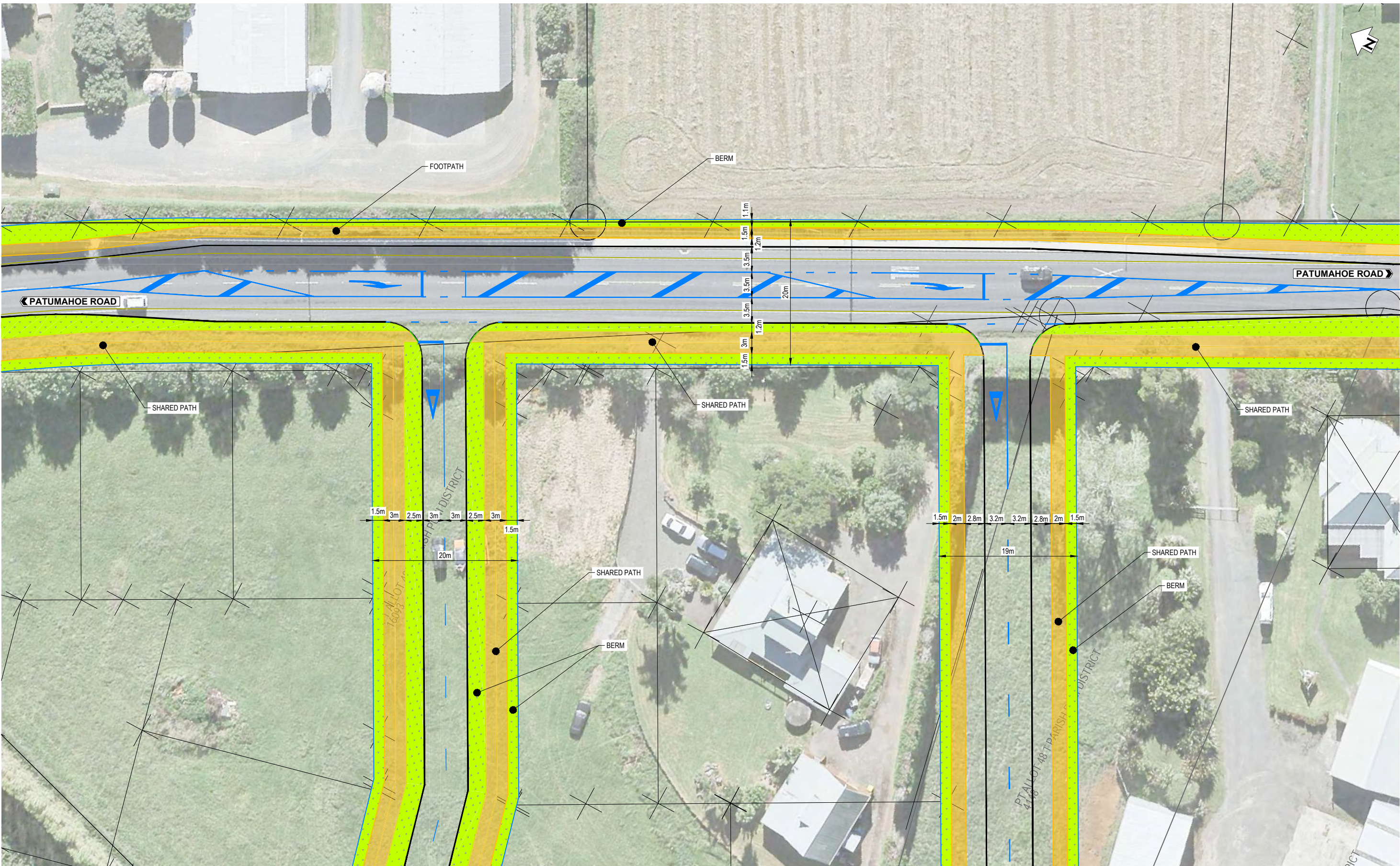
PATUMAHOE RD / MAUKU RD / WOODHOUSE RD INTERSECTION
 VEHICLE TRACKING PLAN (SHEET 3 OF 3)

Status Stamp	CONCEPT DESIGN
Date Stamp	21.07.2020
Scales	1:200@A1, 1:400@A3
Drawing No.	310204152-01-001-SK002
Rev	A

PROF REGISTRATION:

ORIGINAL SIZE A1

20/11/2018 4:43 p.m.



SCALE 1:250

NOT FOR CONSTRUCTION

REV	DESCRIPTION	DATE	BY	CHK	APP
A	FOR REVIEW	23.07.20	SP	SV	
	REVISIONS		DRN	CHK	APP

SURVEYED		
DESIGNED		
DRAWN	SIU PULETIUATO	23.07.20
CAD REVIEW		
APPROVED		
PROF REGISTRATION:		



PATUMAHOE
PLAN CHANGE

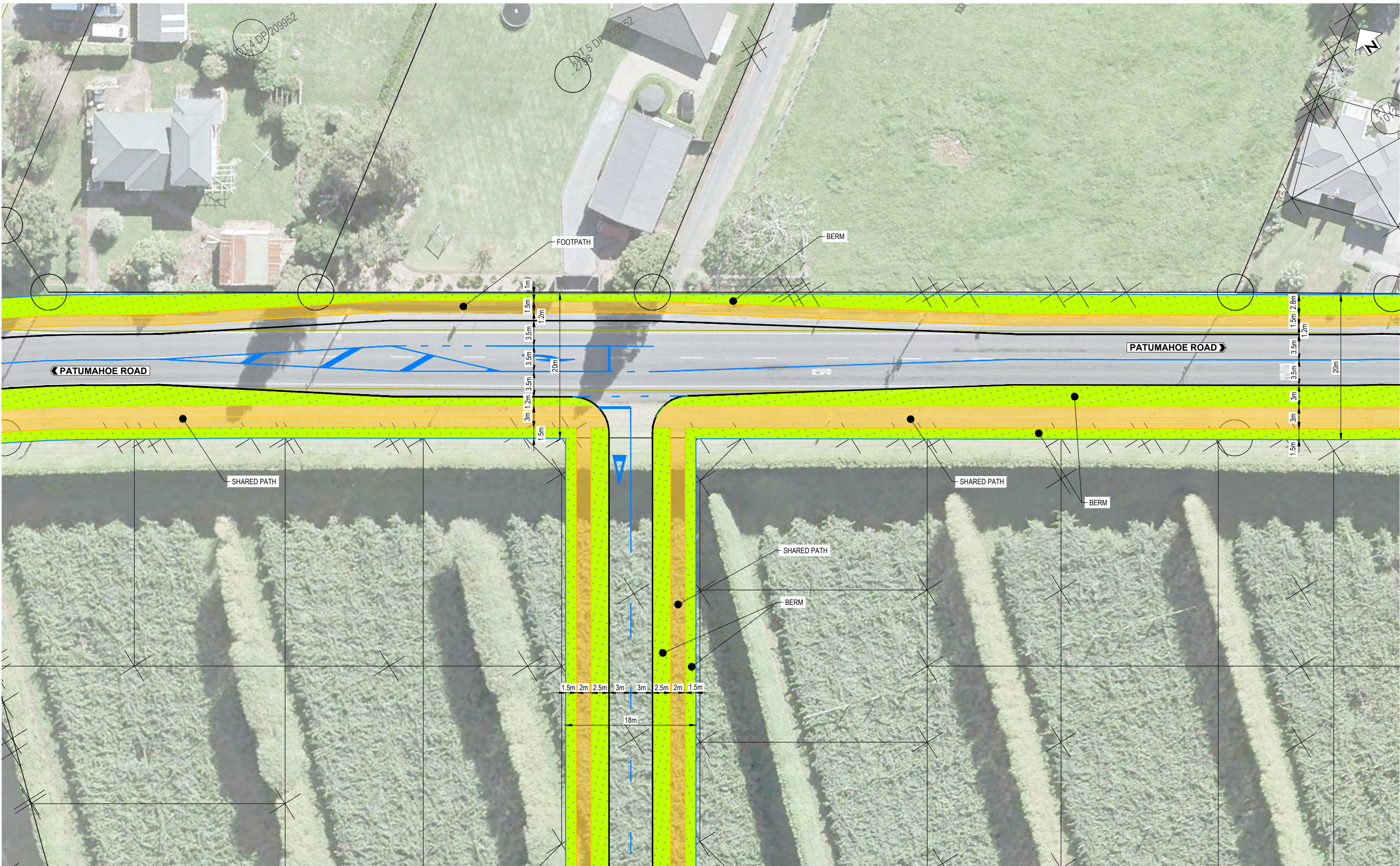
PATUMAHOE ROAD INTERSECTION
SHEET 2 OF 4

Status Stamp	FOR REVIEW
Date Stamp	23.07.2020
Scales	AS SHOWN
Drawing No.	310204152-01-001-SK001-2
Rev.	A

DO NOT SCALE - IF IN DOUBT, ASK

200 mm
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30
20
10
0

ORIGINAL SIZE A1



5 0 5 10m
SCALE 1:250

NOT FOR CONSTRUCTION

REV	DESCRIPTION	SP	SV	DATE
DRN	CHK	APP	DATE	
A	FOR REVIEW			23.07.20

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DESIGNED		
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CAD REVIEW		
APPROVED		
PROF REGISTRATION:		



Client

PATUMAHOE
PLAN CHANGE

PATUMAHOE ROAD INTERSECTION
SHEET 3 OF 4

Status Stamp	FOR REVIEW
Date Stamp	23.07.2020
Scales	AS SHOWN
Drawing No.	310204152-01-001-SK001-3
Rev.	A

20/11/2018 4:43 p.m.

Our Reference: 17158

16th April 2020

Auckland Council
Private Bag 92300
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195 Main Highway
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PO Box 28750
Remuera
Auckland 1541

Auckland 523-3382
Franklin (09) 235-9709
Fax 522-4246

info@trippandrews.co.nz

Dear Sanjay:

RE: Patumahoe – Comments to Council’s Feedback.

Further to your feedback provided in December 2019 we make the following comments: These comments have been compiled from the relevant experts:

Urban Design Matters – Sarah Lindsay, ADO

UD1 – Concept Master Plan

Please clarify how the concept master plan contained as Attachment 6 (p.33) to the Urban Design Assessment will be implemented by the proposed provisions, and what roads or other elements from the concept master plan differ in the proposed precinct plan.

There are discrepancies between the concept master plan and proposed Precinct Plan 3, particularly in relation to the roading pattern. This appears to be largely related to the consented development on Lot 1 DP169130. However, confirmation is sought as to how this has changed.

Changes have been made to reflect the approved subdivision consent on Lot 1 DP 169130

UD2 – UD 5 – Landownership

It is envisaged that sites will be purchased at different times over a period of time. Please confirm whether this is the case

Please explain how the Section 7 Assessment matters set out at pages 16-26 of the Urban Design Assessment (i.e. matters of good urban design) that require walkable block sizes, optimal road layout, regular site sizes, sites facing onto streets and the like, can be proposed/achieved unless all the sites are purchased concurrently.

Please explain how (any) new roads will be planned for and built given the multiple site owners.

Please clarify if any new roads in the PPC area will be public or private roads.

If this above is not yet known, please explain how acceptable urban design outcomes (refer UD3 above) can be achieved if the roads are not public streets.

It is envisaged that sites will be purchased at different times over a period of time.

The PPC seeks to facilitate the future subdivision and development of the subject land within the spatial framework established by Patumahoe Precinct Plan 3 and the associated precinct provisions. The application of an integrated planning process to the subject land has enabled that spatial and planning framework to be defined in a manner that will guide future subdivision to achieve a comprehensive and fully integrated development outcome for the subject land.

As is common in many "structure planned" areas where land ownership is fragmented, the precinct plan and precinct provisions are the primary method by which high quality urban design outcomes (for the land as a whole) are achieved.

The staged construction of roading is common in new development areas (as shown in the Aerial Photos below of Karaka Lakes (taken in 2012 and 2017). As each land parcel within the subdivision is developed roading (and associated services) are constructed to the boundary of that allotment allowing the future extension of those services across the subject land.

All proposed road are proposed to be Public Roads.

Karaka Lakes (2012 Aerial Photo - Auckland Council GIS)



Karaka Lakes (2017 Aerial Photo - Auckland Council GIS)





APPENDIX FOUR
SUBMISSIONS AND FURTHER SUBMISSIONS

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 55(Private): Patumahoe South

SUMMARY OF DECISIONS REQUESTED

Enclosed:

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

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 17 December 2020.
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 55 (Private) - Patumahoe South
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
1	1.1	Tania Shine	t4h5hine@gmail.com	Decline	Decline the plan change
2	2.1	Joanne Ineson	bagpipers@xtra.co.nz	Approve the plan change with the amendments I requested	Approve the plan change with the amendments I requested
2	2.2	Joanne Ineson	bagpipers@xtra.co.nz	Approve the plan change with the amendments I requested	Seeks a a new AT bus stop with a shelter on Patumahoe Road up by the school, and a shelter for the existing Mauku Road bus stop. Also seeks a better bus service for Patumahoe.
3	3.1	Karen Bright	brighty1973@icloud.com	Decline	Decline the plan change
4	4.1	Barry John Stephens	pattychicks@hotmail.com	Approve the plan change with the amendments I requested	Approve the plan change with the amendments I requested
4	4.2	Barry John Stephens	pattychicks@hotmail.com	Approve the plan change with the amendments I requested	Rezone 75 Patumahoe Road to a live submission [zoning] instead of future urban.
5	5.1	Deborah Tangney	dtangney@hotmail.com	Decline	Decline the plan change
6	6.1	David Murray McLean	raucousdave@gmail.com	Decline	Decline the plan change
7	7.1	David Hopkins	davidhopki@gmail.com	Decline	Decline the plan change
8	8.1	William Thomas Colgan	maryjane.harve@gmail.com	Approve the plan change with the amendments I requested	Approve the plan change with the amendments requested
8	8.2	William Thomas Colgan	maryjane.harve@gmail.com	Approve the plan change with the amendments I requested	Include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone
9	9.1	Doug Lloyd	doug.lloyd@xtra.co.nz	Decline	Decline the plan change
10	10.1	Michael Graeme Weck	mike@gjweck.co.nz	Approve the plan change without any amendments	Approve the plan change without any amendments.
11	11.1	Keven and Beverley Eastman	kelvenandbev@orcon.net.nz	Decline	Decline the plan change
12	12.1	Louise Brotherton	louiseb@farmside.co.nz	Decline	Decline the plan change
13	13.1	Te Akitai Waiohua Waka Taua Incorporated Attn: Nigel Denny	akitai.waka.taua@gmail.com	Decline	Decline the plan change
14	14.1	Brad Michie	bradleemichie0601@gmail.com	Decline	Decline the plan change
15	15.1	Philippa Williams	williamsppj@gmail.com	Decline	Decline the plan change, but if approved, make the amendments I requested
15	15.2	Philippa Williams	williamsppj@gmail.com	Decline	Amend the plan change so that the new road placement (Intersection D) is reconsidered.

Plan Change 55 (Private) - Patumahoe South
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
16	16.1	Karena Brady-Leathem	bradyleathems@slingshot.co.nz	Decline	Decline the plan change
17	17.1	Midnight Orchard Attn: Alison Askew	pwaskew@xtra.co.nz	Support	Supports the proposal
18	18.1	Yvonne Wagner	ywagner07@gmail.com	Decline	Decline the plan change
18	18.2	Yvonne Wagner	ywagner07@gmail.com	Decline	Use Lots 18 & 19 for community gardens and community vegetable allotments.
19	19.1	Nicola Ermens	nicolabellhouse@hotmail.com	Decline	Decline the plan change
20	20.1	Anthony Roy Bellhouse	tonybellhouse54@gmail.com	Decline	Decline the plan change
21	21.1	Lyn Bellhouse	tonylyn@xtra.co.nz	Decline	Decline the plan change
22	22.1	Wayne and Brenda Hussey	brayneandwenda@gmail.com	Decline	Decline the plan change
23	23.1	Lynette Frances Hickey	Lynette.dave@xtra.co.nz	Decline	Decline the plan change
24	24.1	Garry Neil McLean	jkat@xtra.co.nz	Decline	Decline the plan change
25	25.1	Brett Robert Hunter and Bronwyn Hunter	bronwyn.brett@xtra.co.nz	Decline	Decline the plan change
26	26.1	Peter Joseph Watt	pete.watt@indufor-ap.com	Decline	Decline the plan change
27	27.1	Tamsin Wilson	tamsin@secretgarden.co.nz	Decline	Decline the plan change
28	28.1	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change to avoid urbanisation on elite and prime soils.
28	28.2	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would protect and retain the high productive potential of the soil within the plan change boundary.
28	28.3	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change [in relation to a compact urban form]
28	28.4	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would align the plan change request with the Auckland Plan growth strategy and the FULSS.
28	28.5	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change [in relation to the National Policy Statement on Urban Development]
28	28.6	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would align the plan change request with the NPS-UD.

Plan Change 55 (Private) - Patumahoe South
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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
28	28.7	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change [in relation to reverse sensitivity]
28	28.8	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would remove potential for reverse sensitivity effects on established rural production activities.
28	28.9	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change [in relation to geotechnical issues]
28	28.10	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would avoid, mitigate, or remedy geotechnical hazards.
28	28.11	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	Decline the plan change [in relation to transport]
28	28.12	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	In the alternative, any other such relief that would mitigate effects on the wider transport network from the urbanisation proposed by plan change request.
28	28.13	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to those imposed in other areas around Patumahoe, with a greater use of native species.
28	28.14	Auckland Council Attn: Austin Fox	austin.fox@aucklandcouncil.govt.nz	Decline, but if approved, seeks amendment	If the proposed Plan Change is accepted, then PC55 be amended to align the amount and location of open space to be provided with Council's Open Space Provision Policy 2016.
29	29.1	Environmental Defence Society Incorporated Attn: Cordelia Woodhouse	cordelia@eds.org.nz	Decline	Decline the plan change
30	30.1	Kāinga Ora Attn: Brendon Liggett	developmentplanning@hnc.co.nz	Neutral	Remove Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E in its entirety from the precinct provisions
30	30.2	Kāinga Ora Attn: Brendon Liggett	developmentplanning@hnc.co.nz	Neutral	Seeks any consequential relief necessary to satisfy Kāinga Ora's concerns
31	31.1	Horticulture New Zealand Attn: Lucy Deverall	lucy.deverall@hortnz.com	Amend the plan change	Amend the proposed precinct provisions so that: - an additional 5m to afford further separation distance to better assist in avoiding reverse sensitivity issues - landscaping includes shelter belts to ensure avoidance of any risk of reverse sensitivity arising from sprays, noise and smell, and - public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity
32	32.1	David Walsh	drw@fastmail.com	Decline	Decline the plan change
33	33.1	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Decline the proposed rezoning of 9 hectare on the eastern side of Patumahoe Road from Rural Production to Future Urban zone

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.2	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Retain the proposed rezoning of 2.5 hectares at the southern end of the development from Rural Production and Strategic Transport Corridor to Light Industrial.
33	33.3	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Require more information about the impact of the development on the wider transport network, including if the infrastructure improvements identified as providing a contribution to the traffic impact associated with the Plan Change are not realised or not realised by the timeframes identified. If these infrastructure requirements are necessary to support the development to be enabled by this Plan Change in any way, then identify appropriate methods to address them, such as appropriate staging triggers.
33	33.4	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Require analysis with revised trip generation rates based on development level/quantum proposed and any additional mitigation required.
33	33.5	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Require wider network assessment of the effects of this development given that the strategic network assessment did not include the effects of this development and much of the strategic capacity is utilised by others.
33	33.6	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Objective 3(a) as follows: '(3) Development and/or subdivision within the precinct facilitates a transport network that: (a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network; '
33	33.7	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Objective 4 as follows: '(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses and the railway network.'
33	33.8	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Retain Policy 5.
33	33.9	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend I430.3 to add a policy that recognises the requirements to protect development in Sub-precinct E from railway noise and vibration.
33	33.10	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend the activity table I430.4.2(A5) to specifically identify the 'applicable building and development standards in I430.6'
33	33.11	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend the activity table I430.4.2(AT) as follows: (A7) 'Subdivision which does not comply with one or more of the subdivision standards listed in (A6) above'

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.12	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.3 to clarify the standard does not apply to roads to be vested in Auckland Council.
33	33.13	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.5(1) as follows: '(1) All stormwater from impervious areas on sites shall be mitigated to achieve flow attenuation, such that 5m ³ /100m ² of roof area and 3m ³ /100m ² of other impervious areas are attenuation by one (or a combination) of the following methods: ...'
33	33.14	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.13(1) as follows: '(1) Before any S224(c) certificates for subdivision or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130 in accordance with SUB60318096 and LUC60329723 (while those consents remain valid), the following works shall be constructed and completed to the Council's satisfaction:'
33	33.15	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.13(1)(a) as follows: '(a) A new road access either from Patumahoe Road or from Mauku Road into the precinct with a 60m of <u>from the</u> indicative locations shown on Patumahoe: Precinct Plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design); '
33	33.16	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword Standard I430.6.13(1)(b) as follows: ' (b) a footpath, appropriate kerb and channel, berm and street trees, and a services corridor along the road frontage(s) adjacent to the portion of land being developed; '(b) <u>the width of the road from the property boundary of the proposed site to the kerb on the opposite site of the road.</u> '
33	33.17	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword Standard I430.6.13(1)(c) as follows: '(c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road; '(c) <u>'subdivision creating sites with access from Carter Road'</u>
33	33.18	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword Standard I430.6.13(1)(i) to clarify what road needs to be formed.
33	33.19	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword Standard I430.6.13(1)(ii) as follows: '(ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and '(ii) <u>'the northern portion of Carter Road, which is identified as 'pedestrian / cycle lane' on Precinct Plan 3 is to be closed to vehicle traffic and formed with pedestrian access and separated cycle facilities'</u>
33	33.20	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword I430.6.13(1)(c)(iii) to clarify how vehicle access is to be provided to the Watercare facility at 6 Carter Road.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.21	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Request clarification on the loss of access for Lot 12 DP83912 and ongoing provision of such if required.
33	33.22	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant, to require the vesting of land as road adjacent to Patumahoe Road as identified on Precinct Plan 3.
33	33.23	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant including identification on Precinct Plan 3, to require the upgrade of Patumahoe Road frontage in conjunction with subdivision and development. This includes separated walking and cycling facilities to be provided along the western side of Patumahoe Road extending to Woodhouse Road and vesting of land to accommodate this infrastructure.
33	33.24	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Insert a new heading 'I430.8.1A Matters of discretion' and renumber consequently if required.
33	33.25	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Reword I430.8(2) as follows: '(2) Subdivision and infringement of subdivision standards other than those standards listed in (A2) and (A6)'.
33	33.26	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Delete the matter of discretion at I430.8(2)(c) as follows: '(c) Compliance with minimum site size requirements.'
33	33.27	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Remove the matter of discretion at I430.8(2)(f) as follows: '(f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (Roading Hierarchy) and Figures 6-11 (Cross-Sections) below.' Insert a new matter of discretion for I430.8(2) as follows: '(x) The adequacy of the transport infrastructure and services to provide for the subdivision'
33	33.28	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend the matter of discretion at I430.8(2)(h) as follows: '(h) establishment of suitable safe and efficient road access from Patumahoe Road to Sub-precinct E and the internal road network including footpaths and cycleways within the Sub-precinct.'
33	33.29	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend the matter of discretion at I430.8(2)(i) as follows: '(i) need for and provision of road safety improvements to those sections of Patumahoe and/or Mauku Roads, including at the intersection with Woodhouse Road, adjacent to mitigate the transport effects of development in Sub-precinct E.'
33	33.30	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Retain the matter of discretion at I430.8(2)(j)

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33	33.31	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Remove Figures 5 – 11 in the Precinct Plan, showing the roading hierarchy and cross sections of roads and a shared path. Replace the cross-sections with an approach that identifies the minimum road reserve widths, functional requirements, and particular components such as separated cycle facilities.
33	33.32	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend the Precinct Plan to clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council.
33	33.33	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(1)(b) as follows: (b) For Sub-precinct E, the extent to which an activity a development complies with the Patumahoe: Precinct Plan 3 and implements the identified transport infrastructure.
33	33.34	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(1)(c) as follows: (c) For Sub-precincts A, B, C, and D and E whether the design of any roads, vehicle access ways or pedestrian walkways is consistent with the relevant Precinct Plan and relevant Figures 1 - 4 at 5-9 above.
33	33.35	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criteria at 1430.8.1(2) as follows: (2) Subdivision and infringement of subdivision standards other than those standards listed in (A2) and (A6).
33	33.36	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(2)(a) as follows: (a) For Sub-precincts A, B, C, and D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant Precinct Plan and relevant Figures 1 - 4 and 5-11 above.
33	33.37	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Insert new assessment criterion for 1430.8.1(2) as follows: (x) For Sub-precinct E, the extent to which the subdivision implements the transport infrastructure identified on Precinct Plan 3.
33	33.38	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Delete assessment criterion 1430.8.1(2)(b) as follows: (b) Whether site sizes meet the minimum requirements in Standard 1430.6.7 above.
33	33.39	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(4)(b)(i) as follows: (i) Whether the subdivision will implement any works are required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.40	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(4)(b)(ii) as follows: '(ii) Whether the subdivision will implement any safety improvements required to the local road network are facilitated by subdivision in order to safely accommodate the additional activity address any transport effects associated with development in Sub-precinct E.'
33	33.41	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(4)(b)(iii) as follows: '(iii) Whether the subdivision provides for any safety improvements are required to maintain the safe operation of the railway level crossing on Patumahoe Road, and'
33	33.42	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Delete assessment criterion 1430.8.1(4)(b)(iv) as follows: '(iv) Whether subdivision and development in Sub-precinct E contributes proportionately to any required safety improvements to the level crossing. '
33	33.43	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(4)(c)(i) as follows: '(i) Whether the establishment of reading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct Plan 3, Auckland Council Codes of Practice and the Auckland Design Manual'
33	33.44	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Insert two new criteria for 1430.8.1(4)(c) as follows: '(x) Whether the <u>staging of development is aligned with the delivery of transport infrastructure needed to service the development</u> ' '(x) Whether the <u>establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure in existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.</u> '
33	33.45	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	Amend assessment criterion 1430.8.1(4)(f) as follows: '(f) The extent to which subdivision design and associated provisions address ensure that the specific Standards 1430.8(1)(b-d) and matters of discretion in 1430.8(2)(b, e, f-1) applicable to Sub-precinct E <u>achieve their respective purpose(s).</u> '

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.46	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	<p>Amend Precinct Plan 3 to delete the section of 'indicative road layout' located adjacent to the south-west boundary of the Patumahoe Recreation Reserve.</p> <p>Amend Precinct Plan 3 to include other transport works required to support the proposal including:</p> <ul style="list-style-type: none"> • Pedestrian crossings on Patumahoe Road • Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road • Pedestrian and potential cycling connection through Patumahoe Recreation Reserve • Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection • Additional bus stops on Patumahoe Road • Identification of roads for speed reduction measures. <p>Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.</p> <p>Amend Precinct Plan 3 to remove one of the proposed intersections onto Patumahoe Road but retain the intersection adjacent to the industrial zone.</p>
33	33.47	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	
33	33.48	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	<p>Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.</p>
33	33.49	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	<p>Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.</p>
33	33.50	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	<p>Amend the Precinct Plan to require two pairs of bus stops meeting Auckland Transport standards to be provided along Patumahoe Road in conjunction with subdivision and development of Sub-precinct E. The indicative location of the bus stops should be identified on Precinct Plan 3.</p>
33	33.51	Auckland Transport Attn: Sam McGough	sam.mcgough@at.govt.nz	Approve the plan change with the amendments I requested	<p>Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.</p>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
34	34.1	Alpito Hill Limited Attn: Peter Kraakman	petrus_kraakman@hotmail.com	Decline	Decline the plan change as it relates to the rezoning of 28 Mauku Road and surrounds to Single House Zone unless provisions are put in place to protect the site's land use activities from the effects of Single House development and use (ie reverse sensitivity).
34	34.2	Alpito Hill Limited Attn: Peter Kraakman	petrus_kraakman@hotmail.com	Decline	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.
35	35.1	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Decline the plan change, but if approved, make the amendments I requested
35	35.2	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that the private plan change is withdrawn and a replacement private plan change is prepared on the basis of a comprehensive structure planning process, including meaningful consultation with the Patumahoe community.
35	35.3	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that the subject site at 23 Clive Howe Road is included within the private plan change area and the Patumahoe Precinct;
35	35.4	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that the subject site at 23 Clive Howe Road and the adjoining site at 75 Patumahoe Road are rezoned Residential Large Lot and are subject to a subdivision standard which requires all new lots to have a minimum size of 2000m2 and an average size of 4000m2.
35	35.5	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks that the sites at 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road are rezoned to Residential Single House.
35	35.6	The Surveying Company Attn: Scott and Judith Gavin	leigh@subdivision.co.nz	Decline the plan change, but if approved, make the amendments I requested	Seeks any other alternative relief that will enable the subject site at 23 Clive Howe Road and adjoining/surrounding sites to be used for urban (residential) use.
36	36.1	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Support I1430.1 Precinct Description, with amendment to read: "...The Peeerata Waiuku Mission Bush Branch railway line forms the southern boundary of the precinct...."
36	36.2	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain I430.2. Objectives (1), (3) and (4) as notified
36	36.3	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain I430.10.2 Patumahoe: Precinct plan 3 - Sub-Precinct E, with amendment: Add a notation to Precinct plan 3 – Sub-Precinct E to show the location of the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E, adjoining the railway, referred to in I430.6.9 (4).
36	36.4	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain Table I430.4.2 Activity table, as notified
36	36.5	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain Standard I430.6.9. Landscape buffers in sub-precincts B, C, and D and E clauses (3) and (4) relating to sub Precinct E, as notified

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36	36.6	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain Standard I430.6.17, with amendment as follows: 1. Insert after the Table in (1): <u>or:</u> <u>is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u>
36	36.7	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Amend Standard I430.6.17 clause (b) as follows: (b) Compliance may be achieved by adopting the following construction schedule specified by <u>Kiwirail (refer to Schedule XX-Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions-October-2018.</u>
36	36.8	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a construction schedule for indoor noise [Refer to page 4 of submission for construction schedule].
36	36.9	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a new clause: (xx) Mechanical ventilation <u>If windows must be closed to achieve the design noise levels in clause 1., the building is designed, constructed and maintained with a mechanical ventilation system that:</u> <u>(a) For sleeping rooms, achieves the following requirements:</u> <u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u> <u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u> <u>iii. provides relief for equivalent volumes of spill air;</u> <u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u> <u>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u> <u>(b) For other habitable spaces, is as determined by a suitably qualified and experienced person.</u>
36	36.10	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert after proposed clause (2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95) or (b) is a single storey framed residential building with: i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and ii. vibration isolation separating the sides of the floor slab from the ground; and iii. no rigid connections between the building and the ground.

Plan Change 55 (Private) - Patumahoe South
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
36	36.11	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a new clause referring to all preceding clauses: (xxx) A report is submitted to the council demonstrating compliance with the clauses above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.
36	36.12	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain I430.8. Assessment – restricted discretionary activities (2) clause (j) as notified
36	36.13	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain I430.8. Assessment – restricted discretionary activities clause (2) (n) with amendment to clause (2) (n) to add sub criteria as follows: (n) Compliance with Railway Noise and Vibration Standards in Sub-precinct E including: (i) Whether the sensitive activity could be located further from the railway corridor; (ii) The extent to which the noise and vibration criteria are achieved and the effects of any noncompliance; (iii) Special topographical, building features or ground conditions which will mitigate vibration impacts
36	36.14	Kiwirail Holdings Limited Attn: Pam Butler	pam.butler@kiwirail.co.nz	Approve the plan change with the amendments I requested	Retain I430.8. 1(4)(b)(iii) and (iv) as notified
37	37.1	Watercare Services Limited Attn: Ilze Gotelli	ilze.gotelli@water.co.nz	Decline	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.
37	37.2	Watercare Services Limited Attn: Ilze Gotelli	ilze.gotelli@water.co.nz	Decline	Seeks that the following information be provided in order for it to adequately assess the effects of this Proposal: (a) How the additional water storage to service the Plan Change Area will be provided. (b) The availability of suitable land to accommodate the necessary upgrades to service the Plan Change Area, including identification of suitable land adjacent to the Patumahoe Reservoir to meet the appropriate hydraulic grade line to expand the existing asset in order to provide water supply to service the Plan Change Area. (c) An additional assessment of the full potential impacts of the rezoned land, including the proposed Sub-precinct E. (d) Any additional existing upgrades, and proposed wastewater infrastructure that will be required to accommodate additional flows. (e) Confirmation of how both the water and wastewater upgrades are intended to be funded. In the absence of the information set out above being provided by the Applicant to address the concerns set out in this submission, Watercare seeks that the Plan Change be declined.

Plan Change 55 (Private) - Patumahoe South
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
38	38.1	Counties Power Ltd Attn: Shravan Miryala	smiryala@align.net.nz	Approve the plan change with the amendments I requested	Accept the Plan Change
38	38.2	Counties Power Ltd Attn: Shravan Miryala	smiryala@align.net.nz	Approve the plan change with the amendments I requested	If the overhead lines are to remain, Counties Power Limited advises that clearance must be maintained between the overhead lines and any proposed street trees. These clearances are required under the Electricity (Hazards from Trees) Regulations 2003;
38	38.3	Counties Power Ltd Attn: Shravan Miryala	smiryala@align.net.nz	Approve the plan change with the amendments I requested	Seeks consultation regarding the species of trees/shrubs proposed by any Standard in the vicinity of overhead lines in all Sub-precincts (to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the species of the tree.
38	38.4	Counties Power Ltd Attn: Shravan Miryala	smiryala@align.net.nz	Approve the plan change with the amendments I requested	Retain provisions as notified/proposed, subject to submission points raised above: - 1430.6.13 (1)(b) - 1430.8 (2) - 1430.8.1(4)(e)
39	39.1	Federated Farmers of New Zealand Attn: Richard Gardner	rgardner@fedfarm.org.nz	Approve the plan change with the amendments I requested	Accept the Proposal as a whole, while taking proper account of reverse sensitivity matters.
40	40.1	David George Harper	davidgeorgeharper@windowslive.com	Decline	Decline the plan change
41	41.1	Ministry of Education Attn: Sian Stirling	sian.stirling@beca.com	Supports in part	Requests regular engagement with Auckland Council and the developer to understand the housing typologies being proposed, the staging and timing of the subsequent development. This will allow the Ministry to appropriately plan for the potential impact of the development on the school network including the investigation of the provision of new schools and planning for interim and significant upgrades to existing schools.
41	41.2	Ministry of Education Attn: Sian Stirling	sian.stirling@beca.com	Supports in part	No specific decision requested, but supports the proposed safety improvements to mitigate traffic effects on pedestrian safety.
41	41.3	Ministry of Education Attn: Sian Stirling	sian.stirling@beca.com	Supports in part	No specific decision requested, but supports the partial closure of Carter Road to be converted into a walking and cycling pathway
41	41.4	Ministry of Education Attn: Sian Stirling	sian.stirling@beca.com	Supports in part	No specific decision requested, but supports the proposed speed reduction to 30km/hr in the wider Proposed Plan Change area.
42	42.1	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner	nicole@planorama.co.nz	Approve the plan change with the amendments I requested	Approve PPC55 subject to - i. confirming the zoning of land abutting the rear boundary of the Submitter's site as Open Space zoned land; and ii. reviewing and, if necessary, refining the extent of the plan change area to ensure this best achieves sustainable growth and the efficient use of land and is the most appropriate method to achieve the purpose of the Resource Management Act 1991; and

Plan Change 55 (Private) - Patumahoe South
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
42	42.2	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner	nicole@planorama.co.nz	Approve the plan change with the amendments I requested	b. Approve PPC55 subject to amending the AUP-OP maps and text to - i. extend the plan change area to include the Submitter's site and to apply an appropriate zone to the land to enable settlement growth, for instance as Future Urban Zone and/or Residential -Single House zone and/or a Business-Light Industry zone; and ii. apply the proposed Patumahoe Sub-Precinct E to the Submitter's site. In the event that the PPC55 is approved without inclusion of the Submitter's site within the plan change area, require -- i. the imposition of a sufficiently wide, planted Landscape Buffer adjoining the entire boundary of the Submitter's site; and ii. the registration of a 'no complaints' covenant on those residential sites along the western boundaries of Sub-Precinct E adjoining the Submitter's site in respect of the effects of lawful activities undertaken on its land to create separation at the zone interface and ensure protection against reverse sensitivity effects.
42	42.3	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner	nicole@planorama.co.nz	Approve the plan change with the amendments I requested	
42	42.4	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner	nicole@planorama.co.nz	Approve the plan change with the amendments I requested	Seeks consequential amendments as necessary to achieve the relief sought above [Submission points 42.1, 42.2 and 42.3].
43	43.1	Douglas Rex Embling	dembling@xtra.co.nz	Decline	Decline the plan change
44	44.1	Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	sandrews@heritage.org.nz	Approve the plan change with the amendments I requested	Accept the proposed plan change with amendments to include appropriate provisions within the precinct plan to fully address Māori cultural heritage values identified and require the incorporation of Te Aranga principles into development through the resource consenting process.
45	45.1	Peter Hardy	hardy.p@xtra.co.nz	Not specified	Seeks that the proposal recognises the long term transport requirements of Patumahoe Village.

Submissions

Contact details

Full name of submitter: Tania Shine

Organisation name:

Agent's full name: Tania Shine

Email address: t4n5hine@gmail.com

Contact phone number:

Postal address:
16 Mauku Road
RD 4
Pukekohe
Pukekohe 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Rezone land within the central section as single house, light industrial and open space. Rezone the western section as single house zon. Apply a new sub-precinct, sub-precinct E within the Patumahoe Precinct (sl403 of the AUP) to all of the rezoned land containing a new Precinct Plan, activity rules, standards and assessment criteria. Rezone the 9ha eastern section as future urban

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I do not believe rezoning this land is in the best interests of the district or the future of food supply. This is fertile, productive horticultural land that will be bulldozed to make way for a housing development that will further reduce the "greenbelt" that exists between the more urban Pukekohe and the rural Patumahoe and the amount of land available for food production

1.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 23 October 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Joanne Ineson

Organisation name:

Agent's full name:

Email address: bagpipers@xtra.co.nz

Contact phone number:

Postal address:
43 Patumahoe Road
RD4
Pukekohe 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

New AT Bus stop on Patumahoe Road and a better service - not just off peak service

Property address: Patumahoe Road

Map or maps: Patumahoe Road

Other provisions:

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

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

The reason for my or our views are:

2.2

We need a new AT bus stop WITH A SHELTER on Patumahoe Road up by the school. We also need a Shelter for the existing Mauhu Road bus stop. I have contacted AT several times re this but have been fobbed off. With the bus stop on Patumahoe Road we need a better bus service - the off peak service is pretty hopeless and does not allow people to use the bus to get to work in Pukekohe (or travel by train to city) in the morning, nor does it allow people to use the bus on return trip.

2.1

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: New AT bus stop on Patumahoe Road by school

Submission date: 26 October 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Karen Bright

Organisation name:

Agent's full name:

Email address: brighty1973@icloud.com

Contact phone number:

Postal address:
2678

Pukekohe 2678

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

I believe the proposed changes will significantly change the nature of Patumahoe village to be detriment of the area. There has been significant growth and Patumahoe Road has already become extremely busy with the township becoming congested. The village is surrounded by prime growing land which adds to the character of the town. Further growth will result in us losing The village atmosphere.

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

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

The reason for my or our views are:
As outlined above.

3.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 1 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

Yes

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

Contact details

Full name of submitter: Barry John Stephens

Organisation name:

Agent's full name:

Email address: pattychicks@hotmail.com

Contact phone number:

Postal address:
75 Patumahoe Road Patumahoe
South Auckland
Auckland 2344

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

4.2

Rule or rules:
Zoning change to Lot 2DP 211908

Property address: 75 Patumahoe Road Patumahoe

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

AS our property is running a chicken farm, and the Tegel contract is due to expire in the near future, because of the age and conditions of the sheds.

We have tried growing avocados to no avail. Due to unsuitable soil. Also we are in very close proximity to the Patumahoe Primary school.

4.1

I or we seek the following decision by council: Approve the plan change with the amendments I requested

4.2

Details of amendments: We Would Like to make change to our property a live submission instead of future urban.

Submission date: 5 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Deborah Tangney

Organisation name:

Agent's full name:

Email address: dtangney@hotmail.com

Contact phone number:

Postal address:
78 John street ponsonby

Auckland 1011

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
All rules

Property address: Area

Map or maps:

Other provisions:

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Keep good land for growing food

5.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 10 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

Yes

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

Contact details

Full name of submitter: David Murray McLean

Organisation name:

Agent's full name:

Email address: raucousdave@gmail.com

Contact phone number:

Postal address:
158Capes Rd
RD4 Waiuku
Auckland 2684

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Rezoning of land from rural production to residential and business use

Property address:

Map or maps:

Other provisions:

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The elite soil land is too valuable for growing food for the rapidly expanding Auckland population. The claim of the creation of 100 local jobs is spurious at best; the more likely scenario is that a few building companies will win contracts and staff will come from all over the Auckland region to work in a short-term position, then move on to another development. There are simply not enough local unemployed builders for this plan to create any "local" employment, and if any new jobs are created they will be short term.

The plan offers benefit to the developer only and little or no good to the Patumahoe or Franklin community.

6.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 11 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: David Hopkins

Organisation name:

Agent's full name:

Email address: davidhopki@gmail.com

Contact phone number:

Postal address:

2103

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
land which can grow food

Property address:

Map or maps:

Other provisions:
I oppose any rezoning of land which can grow food in the Patumahoe area as proposed by these private plan changes.

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Council has a responsibility to uphold the results of the UNitary Plan consultations which resulted in at least some plan being reserved for food growing purposes. Since the UNitary Plan was completed, we have seen further evidence of climate change which reinforces the need for preserving quality agricultural land close to Auckland. With Covid 19 pandemic we have seen an example of massively disrupted food supply chain disruptions, again reinforcing the need to be able to grow food close to Auckland on a sustainable basis. We have also seen continued population growth requiring further food supply.
I support Council helping more housing be constructed, but not on food growing soils.

7.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 12 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

Yes

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

Contact details

Full name of submitter: William Thomas Colgan

Organisation name:

Agent's full name:

Email address: maryjane.harve@gmail.com

Contact phone number:

Postal address:
43 Settlement Road
Puni
Pukekohe 2678

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
Eastern Sector of proposed plan change to Future Urban zone

Property address: 95 Patumahoe Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I support the Proposed Plan Change which involves rezoning rural land to residential and industrial land uses and for the future urban zone area east of Patumahoe Road (which includes my property at 95 Patumahoe Road). However, as the detailed reports identify, and as I have previously raised in 2013 with the Unitary Plan Feedback Team and the Unitary Plan Independent Hearing Panel at that time, the use of sprays on this property and the smell and unacceptable farming methods in the form of chicken houses on the property adjoining mine, causes conflict with the school and established residential properties in this vicinity and this conflict will become a more significant and sensitivity issue if an urban development is opposite this land, and as such, this land been used for agriculture purposes does not have a plausible long term future. If the subject "eastern" area is only re-zoned to Future Urban these unacceptable farming practices will continue, in the foreseeable future, in an area predominantly housing.

The only way to negate the conflict and constraints that these agriculture practices will present in the future to Council, the proposed future urban dwellers and the land owners concerned (myself and

neighbour), is to re-zone all of the three sectors (western, central and eastern) to residential and industrial land use ("live" urban zones) with THIS Plan Change. This will have the effect of providing us, the effected land owners (myself and neighbour), with plausible alternative land use options to enable us to cease operation and which, in turn, enhances the many positive results this proposed Plan Change has for the Patumahoe community that have been detailed in the reports submitted

8.1 | I or we seek the following decision by council: Approve the plan change with the amendments I requested

8.2 | Details of amendments: To also include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone

Submission date: 15 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Doug Lloyd

Organisation name:

Agent's full name: Doug Lloyd

Email address: doug.lloyd@xtra.co.nz

Contact phone number: 021774374

Postal address:
26B Mauku Road Patumahoe
Pukekohe
Pukekohe 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
PC 55 (Private): Patumahoe South

Property address: 26B Mauku Road Patumahoe

Map or maps:

Other provisions:
Using 26B as a road to the proposed subdivision

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

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

The reason for my or our views are:
No consultation or negotiation what so ever, first notification was a council letter dated 22/10/2020

9.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 16 November 2020

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

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

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

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

No

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

Contact details

Full name of submitter: Michael Graeme Weck

Organisation name:

Agent's full name:

Email address: mike@gjweck.co.nz

Contact phone number:

Postal address:

P O Box 58

Patumahoe

2344

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Proposed Plan Change in relation to Patumahoe South.

Property address:

Map or maps:

Other provisions:

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I feel it makes sense to centralize the township around the local school, and shops.

Also with the new speed limit in this area makes it a lot safer for a sub division in this area.

Having an area for commercial buildings is a great idea, as the town is screaming out for it.

10.1 | I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 16 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Kelven and Beverley Eastman

Organisation name:

Agent's full name: jarrod G eastman

Email address: kelvenandbev@orcon.net.nz

Contact phone number: 0272078607 021821324

Postal address:

24A Mauku Road RD4 Pukekohe 2679

Patumahoe

Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

PC55 Appendix 4 Traffic impact assessment

the fourth intersection will be at

Mauku Rd the proposed location is 120m south of Kingseat road . Our property has been circled in red on the map we (K&B Eastman)have not nor have our neighbors inside the red zone been contacted. The above mentioned intersection will be a give way controlled T intersection with right turn bays from the main road.

.Kelven and Bev Eastman oppose this unitary plan - rezoning/redevelopment of Patumahoe from Askew Consultants ltd under schedule 1 to the resource management Act 1991.

Property address: 24A Mauku Road Patumahoe

Map or maps: 34.5 hectares of land in Patumahoe Zoned rural production-Askew consultants seeking to rezone residential, light industry future urban use

Other provisions:

The complete rezoning of this area and no notification or consultation by Any member of the Askew Consultants when our property is in the red zoned area.

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This personally affects our property and privacy we brought in Patumahoe Village .

Village meaning a small group of houses larger than a Hamlet but smaller than a town situated in a rural area.

by view of the plan the 4th exit appendix 4 potentially includes our drive way

11.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 16 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Louise Brotherton

Organisation name:

Agent's full name: Louise Brotherton

Email address: louiseb@farmside.co.nz

Contact phone number: 092363024

Postal address:
155 Cuff Rd,
Patumahoe
Auckland 0061 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

The entire proposed plan change 55 (private). To rezone land zoned Rural Production to Single House, Light Industrial and Future Urban.

Property address: 34.9853ha in 26 titles. 3.5602ha zoned single house and 31.4251ha zoned rural production.

Map or maps: Refer the proposal.

Other provisions:

The applicant seeks to rezone the land and develop for urban purposes.

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

- 1; The proposal is a total waste of valuable productive rural land which already is in very short supply.
- 2; The proposal is not in keeping with the ambiance and character of a rural village.
- 3; The proposal will severely impact on local rural enterprises.
- 4; The proposal will severely impact on traffic volumes on local roads.
- 5; It is not in keeping with the Unitary Plan.
- 6; Would be the cause of the loss of more rural production and land due to reverse sensitivity

complaints, pollution, noise and impede the large vehicle movements needed to service these enterprises.

7: Will severely impact on rural life styles due to increased noise, pollution, traffic volumes, light pollution, rubbish, fireworks and crime.

8; Will impact on amenity values as Patumahoe is highly valued due to its rural aspect and low volumes of people and traffic.

9; With all the many thousands of houses being built in Drury, Paerata and Pukekohe housing is not needed and there are already enough employment opportunities in the surrounding rural enterprises and Pukekohe.

10; The local roads are not built to cope with the extra volumes of traffic and there will be an increase in accidents resulting in property damage , injuries and callouts of police, ambulances and the fire service.

11; There would be a decrease in food production leading to cost increases , shortages and health problems.

12; Current shortages of Doctors, Nurses and other Health professionals already put peoples lives at risk without compounding the problem.

13; This proposal would have a human cost that is not taken into account. Myself and others have made long term and lifetime decisions to buy and live in Patumahoe based on the rural nature and zoneing . With the huge original Searle subdivision, the 76 more houses going up on Patumahoe Hill and another 30 consented houses in the Carters (now Searle) subdivision Patumahoe has more than enough development planned without any more .

14; The proposal is full of outdated information and inaccuracies. The reports have been creatively prepared for Askew,s with many many pages of repeated information largely based on speculation, estimates and opinions.

15; The Traffic Assessments are woeful. They also do not take into account the effects on all of Kingseat Rd, Woodhouse Rd, Cuff Rd, Ostrich Rd, Glenbrook Rd, Hunter Rd, Gun Club Rd, Mauku Rd, Patumahoe Rd, Day Rd, etc, etc. Being a rural area we also have lots of large, slower vehicles that serve the area that need to be considered. There will be long holdups and backlogs of traffic trying to get onto Glenbrook Rd and Kingseat Rd to access Papakura, Drury, Waiuku, Manukau and the motorway system.

16; To conclude: This proposal would only benefit the applicants and developers. It will be of detriment to the Village of Patumahoe, its residents, rural enterprise, local roads and infrastructure and the food production for New Zealanders.

12.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 17 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Nigel Denny

Organisation name: Te Akitai Waiohua Waka Taua Incorporated

Agent's full name:

Email address: akitai.waka.taua@gmail.com

Contact phone number: 021400921

Postal address:
PO Box 59185 Mangere Bridge Auckland 2151
Mangere Bridge
Auckland 2022

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
I430 Patumahoe precinct including proposed rezoning, precinct and sub-precinct provisions, standards, activities and assessment criteria

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

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

The reason for my or our views are:
- Insufficient consultation with Te Ākitai Waiohua, which has cultural interests in Patumahoe as a Mana Whenua iwi
- Lack of clarity on productive land and consideration of prime soils in the proposed plan change area

13.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 17 November 2020

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

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

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

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

No

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

Contact details

Full name of submitter: Brad Michie

Organisation name:

Agent's full name:

Email address: bradleemichie0601@gmail.com

Contact phone number: 0210677787

Postal address:

4 Searle Drive

Patumahoe

Franklin 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Unitary plan change

Property address: 26A Mauku Rd Patumahoe

Map or maps:

Other provisions:

New road through residential area (actual house)

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

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

The reason for my or our views are:

Major disruption to residential property

14.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 17 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Philippa Williams

Organisation name:

Agent's full name: Pip Williams

Email address: williamspipj@gmail.com

Contact phone number: 0211552103

Postal address:
24B Mauku Road
RD4
Patumahoe
Pukekohe
Pukekohe 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Site and Surrounding Area - Our property is included in this without our knowledge or consent. Please see Envivo's Attachment 1 - Subject Land Property Details.

Traffic Impact Assessment - Intersection D - Again our property is impacted by these plans without any communication with us. Please see the attachments for details of the planned area and the proposed intersection.

Property address: 24 B Mauku Road, Patumahoe

Map or maps: Any maps that are connected to Intersection D and maps that include our property as part of the application.

Other provisions:

Rezoning of land - There appears to be some discrepancy about the soil quality. The council have identified over half the land as being elite soil whereas the applicants say there is no elite soil.

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

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

The reason for my or our views are:

Our property is hugely affected by this proposed change. Of greatest concern to us is the planned Intersection D. We are unsure how this application can be accepted without consent of all the property owners within the proposed zone.

15.1 | I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

15.2 | Details of amendments: New road placement (Intersection D) needs to be reconsidered.

Submission date: 17 November 2020

Supporting documents

Proposed development site.pdf

Concept drawing of Intersection D.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

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

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

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

No

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

The proposed masterplan for the development is shown in Figure 8.



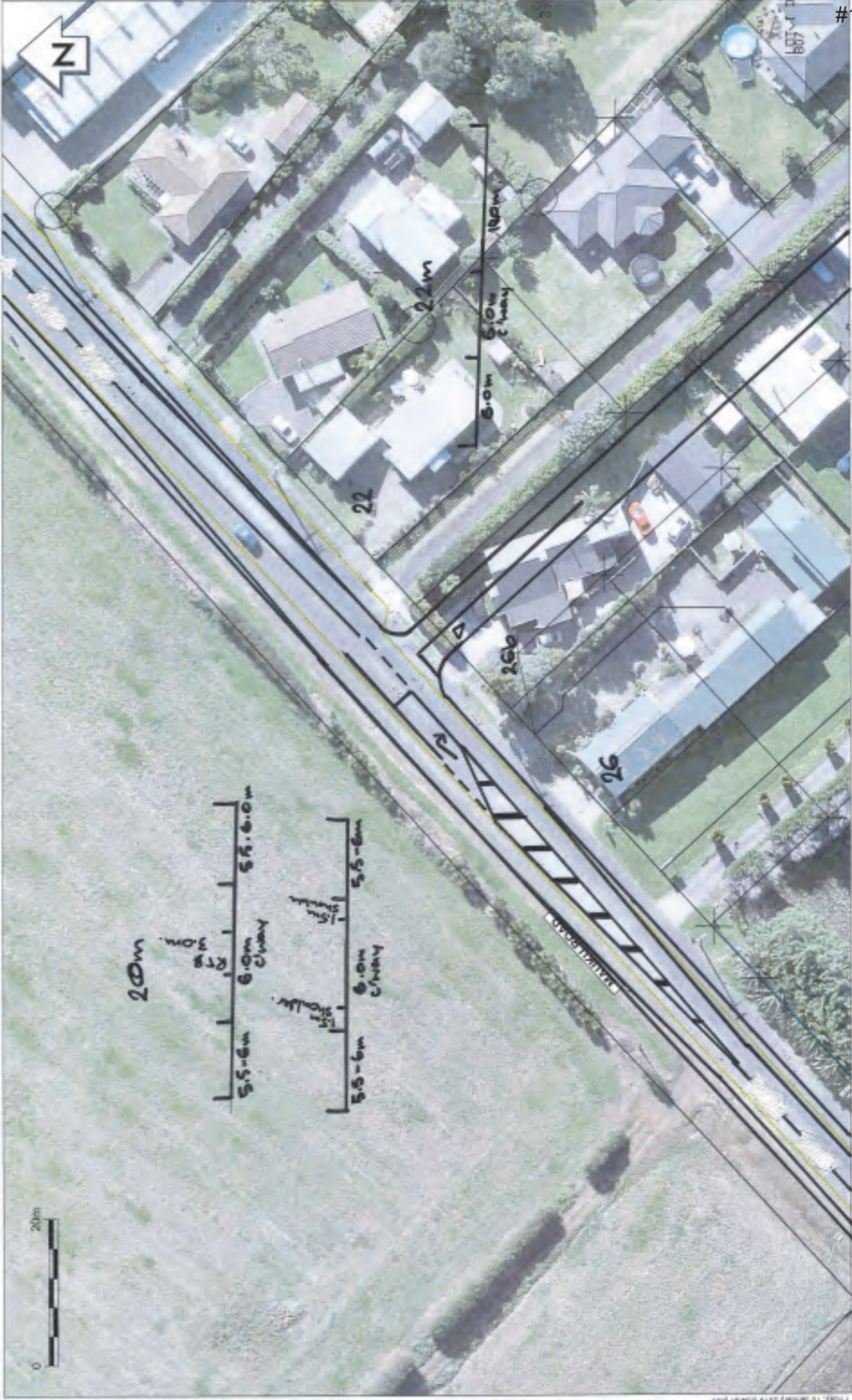
Figure 8: Patumahoe Plan Change Indicative Masterplan

DRAWN/CTM	---	STATUS	---
DATE	18.01.19	SCALE	1:500(8A3)
DWG NO:15728A2A			

PLAN CHANGE - PATUMAHOE --- Manku Road Intersection

REV	DATE	BY	CHK	DESCRIPTION
A				ISSUE FOR TENDER/ISSUE

X:\WORK\15728\15728A2A\DWG\15728A2A.dwg



Printed: 18 January 2019 10:48:57 AM

Contact details

Full name of submitter: Karena Brady-Leathem

Organisation name:

Agent's full name:

Email address: bradyleathems@slingshot.co.nz

Contact phone number:

Postal address:

Patumahoe2679
2679

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

The rezoning of rural to residential land in Patumahoe south.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Patumahoe village is not being looked after. People didn't move out here to live like the cramped towns we came from. We moved here to be in a country village. We do not need more houses. Already there have been traffic accidents outside the dairy and cafe due to the influx of cars. What once was a lovely rural school is not bursting at the seams. The rugby & cricket club need more fields and parking. There is now more crime. Our village is changing to much. We know we have to accept some growth and that is what we have done, but enough is enough.

16.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 17 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

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

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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)

Alison Maree Askew

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

Midnight Orchard

Address for service of Submitter

21 Carter Road, Patumahoe

Telephone:

021 2746934

Fax/Email:

pwaskew@xtra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 55

Plan Change/Variation Name

Patumahoe South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

21 Carter Road Patumahoe

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

17.1 |

To whom it may Concern,

I own the kiwifruit orchard on 21 Carter Road Patumahoe.

17.1 | I Support this proposal on these grounds.

1. The kiwifruit orchard 4.5 hectares of kiwifruit which barely makes a profit some years and losses other years.
2. The bottom third of the orchard floods regularly and I can spend a month pumping the water out to save the vines.



3. 30 percent of the vines are dying from wet feet and Phytophthora.
4. Spray application is very tricky with a school directly opposite. This requires after school hours applications.

Regards Alison Askew

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

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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)

Korone Wagner

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

Address for service of Submitter

PO Box 727, Pukekohe, 2340

Telephone:

027 292 1234

Fax/Email:

ywagner07@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 55

Plan Change/Variation Name

Patumahoe South

The specific provisions that my submission relates to are:

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

Plan provision(s)

change/variation to plan

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are: There are already 2 or 3 new developments in Patuonahae without sufficient road or school infrastructure
Jobs created will likely be temporary due to building & the number is too small to justify the number of houses proposed
Too much congestion (continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- 18.1 Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

18.2 Use lots 18 & 19 for community gardens & community vegetable allotments

- 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

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

17/11/20
Date

Notes to person making submission:

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

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

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

I could / could not gain an advantage in trade competition through this submission.
If you could gain an advantage in trade competition through this submission please complete the following:

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

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

Contact details

Full name of submitter: Nicola Ermens

Organisation name:

Agent's full name:

Email address: nicolabellhouse@hotmail.com

Contact phone number:

Postal address:
8 Tavarinya Way
RD4
Patumahoe
Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
The whole proposal

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

While I understand the need for houses and growth in our city, the village of Patumahoe is not the place for such a large development. There are not enough jobs in the area to sustain such growth, so many people living here already work in the city, commuting on our ever busy rural roads. Current developments much closer to the motorways and city for commuters that are massive - Paerata and Drury - are much more suited to this growth. I disagree that the soil is not prime, we can't afford to lose any more of our productive land for houses. People live in Patumahoe for the rural village and small school and community. We understand there is need for some growth but this scale is not acceptable when people spend their hard earned money for a lifestyle, to have it changed on a huge scale for someone to make alot of money. The school will no longer be a small rural school and will end up having to build classrooms on their fields to cope with the growth and I don't think that's fair. Thank you.

19.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Anthony Roy Bellhouse

Organisation name:

Agent's full name:

Email address: tonybellhouse54@gmail.com

Contact phone number:

Postal address:
47 Pamela Christine road
R D 4 Pukekohe
Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address: Patumahoe South

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
Big development as per the proposal is too much for the infrastructure around the village of Patumahoe.

20.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Lyn Bellhouse

Organisation name:

Agent's full name:

Email address: tonylyn@xtra.co.nz

Contact phone number:

Postal address:
47 Pamela Christine Rd
RD 4
Patumahoe 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address: PC55 Patumahoe South

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
Patumahoe does,not need any more subdivision, no local employment in the area, more sensible areas are Paerata, Drury nearer the motorways

21.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

Yes

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

Contact details

Full name of submitter: Wayne and Brenda Hussey

Organisation name:

Agent's full name:

Email address: brayneandwenda@gmail.com

Contact phone number: 02102840462

Postal address:
28 Sedgebrook Road
Patumahoe
Auckland 2678

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

The introduction of a light industrial area in the Patumahoe South proposal.

Property address:

Map or maps:

Other provisions:

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

1. In this proposal there appears to be no consultation with the local school regarding the future schooling needs of the proposed families, that would live in the 200-250 homes. Patumahoe School is already at capacity and this does not seem to be considered in this application.
2. The proposed light industrial area is a concern as this could cover a broad range of businesses. Some of these businesses that are under this category could operate 24/7 and cause significant noise and light pollution. There appears to be no consideration of the combined noise and impact of 8 large lots. This would have a significant impact on our property and our ability to enjoy peace and quiet. Not to mention the additional traffic that would be generated on these rural roads by those businesses and additional homes.
3. In the almost 30 years that we have lived at this property the majority of the local lands surrounding us is arable growing land. This land is a valuable part of producing food for the Auckland region.

22.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Lynette Frances Hickey

Organisation name: NA

Agent's full name: NA

Email address: Lynette.dave@xtra.co.nz

Contact phone number: 0274887923

Postal address:
PO BOx 219

Patumahoe 2344

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
Storm water Appendix 11

Property address: 219 Hunter Road Patumahoe

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Let me begin by saying that I am opposed to the entire plan change. As a resident of Patumahoe for almost 20 years I have seen many changes, not all of them bad, but not all of them good either. We have gone from a lovely, well resourced rural village of around 400 homes to something much larger with no additional infrastructure (transport, parking, medical facilities, schooling etc). However Patumahoe has adjusted and generally welcomed the new residents. This does not mean it can or should be asked to absorb an additional 250 homes on top of the 100 additional homes already in the pipe line. In fact it is my belief that it cannot and that the desire to further subdivide the land as proposed has financial motivations rather than any other stated purpose .

There is no need to make Patumahoe bigger. Subdivisions in Paerata and Drury more than accomodate future urban sprawl and are better connected to Auckland and better resourced to deal with Urban sprawl. The argument that the proposed land change does not affect elite or prime soils is short sighted. The Patumahoe clay loams are indeed elite and cover less than 1%, of New Zealand. It is claimed that this should be ignored due to the land in question being held in small parcels making it non productive. A property just opposite the proposed plan change area operates a thriving boutique

horticulture business. This business employs up to 10 people. The fact that the current owners of the land covered in the subdivision proposal claim it is not economically viable does not mean it will always be unviable however its productive ability will never be realised in the future if it has houses built on it. The other argument outlined to encourage you to believe it is not possible to produce off this land relates to reverse sensitivity. The land at both 95 and 75 Patumahoe road along with 61 Patumahoe have previously applied to council for a change from Rural production to residential zone. This application was denied by both the council and the environment court in 2016. This fact alone should give today's council pause for thought. Amongst other things their stated reasons for applying for the land use change included their belief that change was inevitable and that "the use of sprays on the property (95 Patumahoe Road) will no doubt in the not too distant future cause conflict with the school and established properties in its vicinity as the smell from the chickens housed in the adjacent property has done". They continue "the properties in subgroup Area 1 are not only not economically viable but also practicing unacceptable farming methods in the form of chicken houses which release offensive smells on a regular basis which causes conflict with neighbours and Patumahoe Primary School". The proposed subdivision has 'dealt' with this by allowing for a 400m buffer specifically around the chicken farm. Given that the existing village and school that was supposedly complaining about the odour is more than 400m away from the chicken farm I would have thought both the chicken farm and the onion growers should be objecting to the proposed housing across the road rather than being members of the group proposing the land change.

The suggestion that the sub division should proceed to provide a clearly defined Rural Urban Boundary is ridiculous. At what point does this argument stop. If this reasoning is supported then where does the Rural Urban Boundary finish on the other edges of our "small rural village". Currently there is a gradual introduction to the village when travelling from Pukekohe. This is subtle and more fitting of a rural village. The 'urban' area begins at Carter and Clive Howe roads and there is no need to change this. It is also alarming to see that the proposed plan does not include a planting or screening plan to soften the Patumahoe Road boundary of the proposed light industrial area should it go ahead. This would make a very unattractive entry into Patumahoe village.

Within the proposed plan change the land to the east of Patumahoe Road is to be changed from Rural Production to Future Urban. It is worth considering that at least 4 of these properties have been purchased in the last 5 years knowing that their land was zoned Rural Production and excluded from any planned Urban development.

As an owner of a property that borders the Future Urban zone I was surprised to see that within the proposal is stated that "a meeting for affected neighbours was held at the Patumahoe Rugby club in August 2018 and that all the neighbours either supported or were neutral regarding the plan change proposal". I was not told of the meeting or of the proposed plan change and would certainly not have supported it had I been in attendance. I know that I am not the only neighbour who did not get notification so their assertion that we were all informed is factually incorrect.

Within the proposed plan change there are 3 storm water catchments identified. Catchment 3 being "7.07Ha currently discharging to the Whangamaire stream via sheet run off or overland flow paths". As this area is proposed as Future Urban they have chosen not to deal with its stormwater limitations at all and say it will "not be analysed at this stage".

What they don't mention is that the segment of the Whangamaire stream the catchment discharges to is identified in the Unitary Plan as an area of "Significant Natural Heritage" and can be found on the Significant Ecological areas (terrestrial) overlay on the Unitary Plan. It is a 'Scheduled' natural feature and as such is entitled to a range of protections including "from suffering adverse effects from subdivision". By not dealing with the storm water from Catchment 3 in the proposed plan change they have managed to include in the proposed plan change that it is compliant in B2.6.1. page 24/25 "objection...growth and development of existing new rural town and village enable in ways that avoid natural and physical resources that have been scheduled in the unitary plan in relating to natural heritage, Mana Whenua and natural resource". Had they included a storm water plan for Catchment 3 this would not be true and is in fact misleading. There are less than 5% of wet land areas still in existence. This wetland is part of the Manukau lowlands and is unique in its own right but also exists as part of an ecological corridor for plants, birds and fish species. Within this wetland there are many species including Raupo beds, ancient Carex Secta, Kahikatea, Bitterns, Kingfishers, eels, crayfish, and other native fish species. Stock have been excluded from this wetland for over 15 years and much work and capital have gone into restoring it. The process of covenanting this 5Ha wetland is almost complete and can be seen as area x,y,z on DP 533541. The wetland runs from the base of Henry Reserve.

Our property also has another covenanted area, cov8953936.5, which did include a pond area surrounded by a wetland border and established Native plants. However, since the new housing has

gone in on Mahoe glade above the covenanted area the wetland species have died leaving just a toxic weed fill pond. I have discussed this with members of the Auckland Council and the general consensus is either the change in flow or the quality of the water run off caused by the new houses and roading has lead to this drastic deterioration of the wetland species. It would be a travesty if this were to occur in the larger wetland we have covnented. Especially in light of it being of sufficient quality to warrant being identified in the Unitary plan and in light of the recently introduced rules surrounding water quality as identified on the new National Policy Statement (2020) regarding fresh water.

Regardless of wether the proposed plan change is approved I believe that the area Proposed as Future Urban should be excluded from the plan change and remain a Rural production Zone to ensure this precious resource is protected.

Lynette Hickey

23.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Garry Neil McLean

Organisation name:

Agent's full name: Garry Neil McLean

Email address: jkat@xtra.co.nz

Contact phone number: 0211109628

Postal address:

22 mauku road RD4 Pukekohe 2679

Patumahoe

Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Site and surrounding area Our property is included in this without our consent or knowledge PC 55 Appendix 4 traffic impact assessment property address 22 Mauku road .

the fourth intersection will be at Mauku road the proposed location is 120m south of Kingseat road. This is in the zoning of my property.

The above mentioned 4th intersection will be a give way controlled intersection with right hand turning bay from the main road under 2.4 traffic volumes proposing high volumes of traffic

Property address: 22 mauku road Patumahoe

Map or maps: map and maps 2.1 site location and all other maps connected to intersection D and maps that include our property

Other provisions:

Rezoning of land There appears to be some discrepancy about soil quality. The council have identified over half of the land being elite soil where the applicants say there is no elite soil.

There was a meeting held in Patumahoe rugby club rooms stating in documents that all neighbours and property owners impacted were present . We new nothing of this nor did our neighbours

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Our property is impacted massively by this proposed change our greatest concern is the planned intersection D we are unsure how this application can be accepted without knowledge or consent of all property owners within the proposed zone.

24.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Brett Robert Hunter and Bronwyn Hunter

Organisation name:

Agent's full name:

Email address: bronwyn.brett@xtra.co.nz

Contact phone number: 0272483813

Postal address:
104 Patumahoe Road
Pukekohe
Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

The entire proposed Plan Change 55 (private). to rezone land zoned rural production to single house, light industrial and future urban.

Property address: 34.9853ha in 26 titles . 3.5602ha zoned single house and 31.4251ha zoned rural production.

Map or maps: refer to the proposal.

Other provisions:

the applicant seeks to rezone the land as above and develop for urban purposes.

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

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

- 1: The proposal is a total waste of valuable productive rural land which is in short supply.
- 2: It is not in keeping with the Unitary Plan.
- 3: This proposal will severely impact on the traffic volumes on local roads.
- 4: Will be the cause of the loss of more rural production and land due to reverse sensitivity complaints, noise, pollution and impede the large vehicle movements needed to service these enterprises.
- 5: will severely impact on rural life styles due to an increased traffic volumes, noise, pollution, rubbish.
- 6: This proposal is not in keeping with the character of a rural village.
- 7: the local roads are not built with the extra traffic volumes and there will be an increase of accidents resulting in property damage and or injuries, police, ambulance and fire service callouts.
- 8: the proposal is full of outdated information and inaccuracies. lots of speculation, estimates and

opinions to make this proposal look good.

9: with already two approved subdivisions, north Carter Road and corner Mauku Road and Kingseat Roads (over a hundred houses) we don't need any more.

10: We are the only Land owners that is in the proposed "light industrial" zone wanting to remain rural as it is why we bought this property for the lifestyle.

11: If the light industrial zone goes ahead we will be badly effected as we are on tank water and the air pollution during construction will effect our health.

12: Village amenities; no Medical facilities an the fire service is only voluntary.

13: with all the houses being built in Drury, Paerata and Pukekohe housing is not needed and there are employment opportunities in the surrounding rural areas.

14: this proposal will only benefit the applicants and developers. It will be detrimental to the village of Patumahoe , its residents , rural enterprises, local roads and infrastructure and food production for new Zealanders. Vegetables and Meat.

25.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Peter Joseph Watt

Organisation name:

Agent's full name: Pete Watt

Email address: pete.watt@indufor-ap.com

Contact phone number:

Postal address:
111 Patumahoe Road
RD 3
Auckland
Auckland 2678

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
Plan Change 55 (Private)

Property address: 111 Patumahoe Rd

Map or maps: all areas

Other provisions:

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

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

The reason for my or our views are:

The proposed plan contravenes the unitary plan released last year. That process identified the area in question as high producing agricultural land. The rationale put forward by the consultant who prepared the report gives scant attention to this fact that if managed, the land is very productive. Aerial images dating back to 1942 show the land and surrounds have been under active cultivation or pastoral management.

<http://retrolens.nz/map/#/1762202.846476081/5881725.24304984/1763658.7329990773/5882785.806817208/2193/12>

It is also noted that a previous application for change of use on Sedgebrook road was declined by the council on the basis that it was not appropriate given quality of the land. Patumahoe has grown with two substantial developments - this has lead to increased traffic flows and along with similar housing developments (Pukekohe, Drury and Paerata) placed pressure on already

inadequate infrastructure.

Notable is the congestion around Patumahoe centre, the school and also the addition of commuter traffic into Auckland. Future subdivision applications should be considering the combined impact rather than just the local impact.

In the time since the earlier developments, there has been no real appreciable change in the shops or amenities.

The benefit of 250 additional houses must be questioned in terms of what real tangible benefits will it bring to the community? Is there a need given other approved developments in the district?

26.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

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

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

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

No

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

Contact details

Full name of submitter: Tamsin Wilson

Organisation name:

Agent's full name: Tamsin D Wilson

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Contact phone number: 021 02728189

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111 Patumahoe road
RD3 Pukekohe
Auckland
Auckland 2678

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address: Land located on Southern side of Patumahoe township

Map or maps:

Other provisions:
Private Plan Change Request by Askew Consultants

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

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

The reason for my or our views are:

As a horticultural grower in Patumahoe with land directly adjacent to the subject land, I totally disagree with the suggestion that this land is not worth retaining for production. This is some of the best growing land in New Zealand (the best I have ever farmed on in my career) and once it is in housing, we'll never get it back. Its possible that some has been poorly taken care of, resulting in poor drainage, but the parent material is what matters - something that cant just be recreated elsewhere. The volcanic parent material in this area, with the help of soil microbes, produces highly productive soil. It may have been mistreated in previous years, but would require very little work to return it to a class 1 soil.

I farm just 0.2ha but our soil is so fertile, I have never needed to apply artificial fertiliser in the past 7 years. Soil tests show that our clay loam soil has organic matter of almost 10%. This is so rare in New Zealand. My business has consistently employed 10 local people - with a turnover to support them from just 0.2ha productive growing space. It is wrong to assume that parcels of land must be large to

be productive or commercial.

Further, I would suggest that in future, growing and housing will not conflict as growers transition to using fewer, if any chemicals.

Your role and your legacy as decision makers should be to save this highly valuable productive land for future generations. Please do not bury more of Patumahoe's precious soil under concrete and tarmac. We're going to need it for food production.

In addition to my concerns about the loss of this high potential soil, I am also extremely concerned about the effect of more houses squashed onto small sections in Patumahoe. This is not going to 'maintain and enhance the character of Patumahoe as a rural township' - it'll actually harm the village. We already have a couple of sub-divisions, with another Searle development happening soon. That's enough for one small village.

27.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 19 November 2020

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

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

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

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

Yes

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

**Submission on publicly notified private plan change request:
Plan Change 55 (Patumahoe South)**

Auckland Council
135 Albert Street
Private Bag 92300
Auckland 1142

Submitter:
Auckland Council

Scope of submission:

This is a submission on the whole of proposed private Plan Change 55 – ‘Patumahoe South’.

The specific provisions which this submission relates to are:

All provisions of proposed private Plan Change 55.

I seek the following decision:

- Proposed Plan Change 55 be declined.
- In the alternative, any such other relief which address the specific issues and concerns set out in the following sections.

Loss of elite and/or prime soils within the PPC area

The Council submission is that:

- The plan change land is identified within the New Zealand Land Resource Inventory (‘NZLRI’) and the council’s FARMLUC database as containing Land Use Capability (‘LUC’) Class 1 soils. LUC Class 1 land is “the most versatile multiple-use land with minimal physical limitations for arable use”. Class 1 soils fall within the definition of ‘elite soils’ in the AUP. The plan change request includes a more detailed assessment of the soils and it states that there is no elite soil within the plan change request, with the majority being prime soil (LUC 2 & 3). However, the capability of the land has been independently assessed on behalf of the Council and concludes that approximately 58% of the land is elite soil, and 40% prime.
- The Unitary Auckland Plan (AUP) states that Auckland, especially areas in Franklin, has land of high productive potential for farming classified as elite land and prime land. This land is mapped on the Land Use Capability maps. The priority in these areas is to maintain the potential for these high quality soils to be used for agricultural purposes, rather than activities that are not dependent on soil quality. In this context the Council considers that urbanisation is not an activity that depends on being located on high quality soil.
- The AUP RPS outlines at B9.1 specific issues for the rural environment in the Auckland region which includes protecting the finite resource of elite quality soils from urban expansion. The RPS includes objectives for rural activities that include:
 - o Objective B9.2.1(2) Areas of land containing elite soil are protected for the purpose of food supply from inappropriate subdivision, urban use and development.

- Objective B9.2.1(4) Auckland’s rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development.
- The RPS in relation to urban growth and form includes the following objective and policy:
 - Objective B2.6.1(1) Growth and development of existing or new rural and coastal towns and villages is enabled in ways that:
 - (b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production.
 - Policy 2.6.2(1) Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:
 - (d) avoids elite soils and avoids where practicable prime soils which are significant for their ability to sustain food production.
- Since the plan change does not avoid development on elite soils which are considered to be significant for their ability to sustain food production, the plan change does not accord with these objectives and policies in the RPS.
- The plan change request describes the land within the request as fragmented and therefore not suitable for rural production. However, there are a number of policies within the Unitary Plan that seek to encourage the amalgamation of rural sites, especially within areas such as this with highly productive soils, to increase the productive value of the land. These include Unitary Plan policy E39.3(3), the Transferable Rural Site Subdivision provisions at E39.6.4.7, and the identification of this plan change area within the ‘land amalgamation incentivised area’, in Appendix 14. Within this area, amalgamations are further encouraged through a bonus transferable title for each amalgamated site (a two for 1 deal).
- As a result of these policies it is considered unreasonable to conclude, as the plan change request does, that an existing level of land fragmentation is a sufficient reason to justify that the sites elite, or prime, soil is in a state that is incapable of being used for highly productive uses.
- The Franklin Local Board Plan (2017) is relevant to the consideration of this plan change:
 - The Franklin Local Board Plan is a strategic document reflecting community priorities and preferences. It guides the local board activity, funding and investment decisions and influences local board input into regional strategies and plans.
 - A common theme during feedback on the draft plan was support for the protection of productive soils. This is reflected in the final plan through ‘Outcome 4: Growth is dealt with effectively’. It states that “protecting our fertile soils used for local horticulture and agriculture is a key priority” and a key initiative in the plan is to “Plan for growth in the right places, centred on local and town centres, to protect productive soils used for local agriculture and horticulture.”
- There are also a number of proposed policies in the draft National Policy Statement on Highly Productive Soils (NPS-HPS) relevant to this plan change. The draft NPS-HPS has been consulted on and is awaiting final issue. The draft NPS-HPS include Proposed Policy 3:
 - Urban expansion must not be located on highly productive land unless:

- a. there is a shortage of development capacity to meet demand (in accordance with the NPS-UDC methodologies and definitions); and
- b. it is demonstrated that this is the most appropriate option based on a consideration of:
 - a cost-benefit analysis that explicitly considers the long-term costs associated with the irreversible loss of highly productive land for primary production;
 - whether the benefits (environmental, economic, social and cultural) from allowing urban expansion on highly productive land outweigh the benefits of the continued use of that land for primary production; and
 - the feasibility of alternative locations and options to provide for the required demand, including intensification of existing urban areas.

- Auckland Council lodged a submission generally supportive of the draft NPS-HPS, which sought that the proposed provisions relating to urbanisation on Highly Productive Land be strengthened.
-
- There is considered to be a lack of analysis covering the above elements of this proposed NPS-HPS policy in the plan change, including on the long term costs associated with the irreversible loss of the highly productive land for primary production, and the necessity for locating urban development on this land.

The Council seeks the following decision:

- 28.1 | - That the plan change be declined to avoid urbanisation on elite and prime soils.
- 28.2 | - In the alternative, any other such relief that would protect and retain the high productive potential of the soil within the plan change boundary.

Compact urban form

The Council submission is that:

- The Auckland Plan is the Spatial Plan for Auckland that is required under legislation [Local Government (Auckland Council) Act 2009]. Direction 1 of the Auckland Plan is to 'Develop a quality compact urban form to accommodate Auckland's growth'. A compact Auckland means future development will be focused in existing and new urban areas within Auckland's urban footprint.
- Around 62 per cent of development over the next 30 years is anticipated to be within the existing urban area. The remaining development is anticipated to occur largely within future urban areas (32 per cent) with a small amount allocated to rural areas – including towns and villages (6 per cent).
- One of the key benefits of the quality compact city approach is that it helps to maintain Auckland's rural productivity by limiting urban sprawl. Encouraging growth within urban areas helps to protect rural environments from urban encroachment and maintains the productive capability of the land and its rural character.

- The Auckland Plan’s approach to rural growth is to focus residential growth mainly in the towns which provide services for the wider rural area, particularly the rural nodes of Pukekohe and Warkworth. Less residential growth is anticipated in the smaller towns and villages. With the Auckland Plan identifying Pukekohe as a key development area, with significant growth anticipated over the next 30 years, approximately 1700 hectares of land for future urban development has been identified in the Auckland Unitary Plan around Pukekohe, including around 790 hectares in Paerata.
- The Future Urban Land Supply Strategy 2017 (‘FULSS’), sets out the sequencing of the land zoned Future Urban in the AUP. The FULSS identifies land to the west of the Patumahoe township known as Patumahoe Hill, zoned Single House in the AUP, as being development ready immediately. The land subject to the request is not identified within the FULSS for urban development at any time in the next 30 years.
- The AUP identifies greenfield areas in Drury-Opāheke and Pukekohe-Paerata for future urban growth. These areas are identified within the FULSS as being development ready at various stages between now and 2032, with the exact sequence of urbanisation depending on contextual considerations and constraints. These areas are subject to structure plans prepared by Council in 2019 to determine how future urban growth will be provided. In addition, Council has received private plan change requests to enable the development of landholdings within the Drury-Opāheke Structure Plan area. The land subject to this plan change request is not located within the Future Urban Zone, nor contemplated in the FULSS, and would represent growth additional to that anticipated in the Drury-Opāheke and Pukekohe-Paerata structure plan areas.
- The AUP RPS contains the following objectives and policies:
 - Objective B2.2.1(4): Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.
 - Policy B2.2.2(4): Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.
- The proposal to urbanise the land covered by the plan change would not support the objectives of creating a compact urban form, being located outside an existing rural village, and not within the Rural Urban Boundary. The extent of the Future Urban Zone in the AUP already provides for sufficient expansion of Auckland's urban areas, and represents a careful balancing of a wide variety of factors. This requested plan change deviates from and undermines the development strategy set out in the Auckland Plan 2050 and the AUP.

The Council seeks the following decision:

- 28.3 | - That the plan change be declined.
- 28.4 | - In the alternative, any other such relief that would align the plan change request with the Auckland Plan growth strategy and the FULSS.

National Policy Statement – Urban Development (NPS-UD)

The Council submission is that:

- The National Policy Statement on Urban Development 2020 came into effect on 20 August 2020. This submission contends that the area of land covered by PC55 is not intended to be predominantly urban in character and therefore not an urban environment for the purposes of the NPS-UD. The area of land covered by PC55 is zoned rural production in the AUP, and is not in in FULSS to be development ready for urbanisation over its planning horizon. As this land is not an urban environment the NPS-UD should not apply in this case.
- Notwithstanding the above, the NPS-UD, which replaced the National Policy Statement on Urban Development Capacity 2016, recognises the national significance of:
 - o having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
 - o providing sufficient development capacity to meet the different needs of people and communities.
- Section 3.8(2) of the NPS-UD addresses unanticipated or out-of-sequence developments, which is relevant to this plan change. This section directs local authorities to have particular regard to the development capacity provided by a plan change if that development capacity (a) would contribute to a well-functioning urban environment; and (b) is well-connected along transport corridors. Auckland Council has not yet set out criteria in the AUP for determining what constitutes significant capacity, so plan changes must be considered on a case-by-case basis to determine whether or not they reach this threshold of significance. As a result, in this case consideration was given to MfE guidance documentation. That documentation makes clear that it is developments that contribute significantly to development capacity that council should be “responsive” to, with respect to out of sequence or unanticipated developments. Council contends that that proposed in PC55 does not constitute significant development capacity.
- That guidance also notes that the NPS-UD does not override or replace the consideration of environmental effects occurring through the RMA Schedule 1 Plan Change process.
- This plan change would create a low-density development in a greenfield area outside a remote rural village that is not located on a frequent transport network. 200 to 250 dwellings in this location and configuration should not be considered significant in the regional context, and therefore the NPS-UD should not be used to justify this development outside the planned edges of the village and on elite and/or prime soils.

The Council seeks the following decision:

- 28.5 | - That the plan change be declined.
- 28.6 | - In the alternative, any other such relief that would align the plan change request with the NPS-UD.

Reverse Sensitivity

The Council submission is that:

- There is a significant potential for new reverse sensitivity effects on surrounding and adjacent highly productive rural land should the plan change be approved. The plan change would subject a new and wider extent of rural production land to issues of reverse sensitivity

from urban uses. The applicant has already highlighted existing reverse sensitivity concerns with the current urban rural interface, and expanding the urban area would only exacerbate this. These issues of potential reverse sensitivity could undermine the productive potential of the surrounding established rural production activities, which should be avoided.

-
- The draft NPS-HPS highlights reverse sensitivity as a major issue, and so council submits that weight be given to the plan changes potential effects in this regard.

The Council seeks the following decision:

- 28.7 | - That the plan change be declined.

- 28.8 | - In the alternative, any other such relief that would remove potential for reverse sensitivity effects on established rural production activities.

Geotechnical issues

The Council submission is that:

- The plan change request states there are two primary geotechnical constraints within the subject land. Those being slope stability along an escarpment in the eastern part of the plan change area, and compressible organic and/or cohesive soils through the middle of the plan change area.
- The analysis provided in the specialist Geotechnical report relies heavily on engineering solutions to overcome geotechnical risks, whereas these risks should be viewed as an indication that development is not appropriate in this location.

The Council seeks the following decision:

- 28.9 | - That the plan change be declined.

- 28.10 | - In the alternative, any other such relief that would avoid, mitigate, or remedy geotechnical hazards.

Transport

The Council submission is that:

- The information contained in the plan change's Integrated Transport Assessment outlines a series of infrastructure and safety upgrades in the vicinity of the site deemed to be necessary to enable the proposed urbanisation. However, it is considered that the main transport effects arising from the urbanisation proposed will be cumulative effects on the wider strategic transport network, including SH1 and SH22, which the proposed Plan Change does not address.
- There are few transport or employment options in this locality, and therefore the vast majority of traffic movements generated by the proposed development would be non-local private motor vehicle movements. Assumptions made in the planning of the wider strategic transport network to provide for planned future growth in the south will not have considered the growth proposed by this plan change. Therefore there is no certainty that the effects of the plan change on the wider strategic transport network are able to be adequately addressed.

- 28.11 | The Council seeks the following decision:
- That the plan change be declined.
- 28.12 |
- In the alternative, any other such relief that would mitigate effects on the wider transport network from the urbanisation proposed by plan change request.

Landscape Buffers

The Council submission is that:

- The plan change proposes a variety of landscape buffer widths, with differing vegetation species, for different parts of the site. The justifications for thinner landscape buffers of 3m, 5m, and 10m, compared to the 20m landscape buffers for other urban areas within the Patumahoe precinct are not considered to be strong. It is considered appropriate to require increased widths of the proposed landscape buffers to mitigate adverse effects to the same extent as that required for the other parts of the rural settlement. With increased landscape buffer widths there would also be a greater ability to use solely native species for the landscape buffers, which would be supported.

- 28.13 | The Council seeks the following decision:
- If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to these imposed in other areas around Patumahoe, with a greater use of native species.

Open Space

The Council submission is that:

- The plan change proposes an Open Space – Informal Recreation zoning over part of the plan change land, which also includes a stormwater pond. The management of the council's open space network and the acquisition of new open space are guided by Council's Open Space Provision Policy 2016. Through this policy the council has set open space provision targets to guide the amount, type, and distribution of open space expected in new greenfield development areas. Accordingly, the council would seek one 3000m² neighbourhood park to support the land in the Residential - Single House Zone, but would not want to acquire the amount of land shown on I430.10.2 Patumahoe: Precinct plan 3 – Sub-precinct E. This is because an oversupply of new park land puts pressure on the council's limited resources for ongoing maintenance, and because the land offered in the plan change contains a permanent stream and flood plain which is an additional and unwanted complication for use and management.

- 28.14 | The Council seeks the following decision:
- If the proposed Plan Change is accepted, then PC55 be amended to align the amount and location of open space to be provided with Council's Open Space Provision Policy 2016.

I wish to be heard in support of this submission.

On behalf of Auckland Council:



Councillor Chris Darby, Chairperson of the Planning Committee



Councillor Josephine Bartley, Deputy Chairperson of the Planning Committee



Tau Henare, Independent Māori Statutory Board member

Signatures of persons authorised to sign on behalf of submitter

Dated: 16 November 2020

Address for service:

Austin Fox

Senior Policy Planner – Regional, North, West, and Islands Planning

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Auckland Council

135 Albert Street

Private Bag 92300

Auckland 1142

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 55 (PATUMAHOE SOUTH) TO THE AUCKLAND UNITARY PLAN

TO: Auckland Council

FROM: Environmental Defence Society Incorporated
PO Box 91736, Victoria Street West, Auckland 1142
09 302 2972
cordelia@eds.org.nz

NAME OF SUBMITTER: Environmental Defence Society Incorporated (EDS)

29.1

- 1 This is a submission on the Proposed Private Plan Change 55 (**PC55**) to the Auckland Unitary Plan Operative in Part (**Unitary Plan**) to rezone 34.98 ha of land at Patumahoe.
- 2 EDS could not gain an advantage in trade competition through this submission.
- 3 This submission relates to the entirety of PC55.
- 4 EDS opposes PC55 and seeks that Auckland Council decline the plan change. The reasons for this are set out in Appendix 1.
- 5 EDS wishes to be heard in support of its submission.
- 6 If others make a similar submission, EDS will consider presenting a joint case with them at hearing.

DATED 20 November 2020



Cordelia Woodhouse
Solicitor
Environmental Defence Society Inc

APPENDIX 1: EDS SUBMISSION

INTRODUCTION

1. EDS is a not-for-profit national environmental organisation. It was established in 1971 with the objective of bringing together the disciplines of law, science and planning to promote better environmental outcomes in resource management matters. Since that time EDS has actively participated in public interest litigation and has been active in assessing the effectiveness of the Resource Management Act 1991 (**RMA**) and statutory planning documents in addressing key environmental issues.
2. This submission is made on PC55 which proposes to rezone 34.98 ha of land zoned predominately Rural Production (**the Site**) to Single House Zone, Light Industrial, Open Space and Future Open to enable the development of approximately 200 – 250 dwellings.
3. The Site is outside the Rural Urban Boundary (**RUB**) and as such the provisions in Section B9 (Rural Environment) of the Unitary Plan apply. These provisions were not addressed in PC55.
4. Section B9 contains provisions that seek to protect Auckland's rural areas outside the RUB from inappropriate subdivision, urban use and development.ⁱ In particular, rural subdivision should avoid areas that would undermine the integrity of the RUB. The significant development proposed as a result of PC55 would significantly change and urbanise the character of Patumahoe.
5. The Rural Production zoning over the Site also reflects its highly productive soils.ⁱⁱ 97% of the Site is covered in prime soils, defined in the Unitary Plan as including Class 2 and 3 Soils. Prime and elite (Class 1) soils are important for primary production, for both current and future generations.
6. Section B9 specifically addresses the issue of protecting Auckland's productive soils and includes a number of objectives and policies that seek to promote the productivity of rural land, including providing for rural subdivision at locations and densities that avoid where practicable land containing prime soils.ⁱⁱⁱ The priority for these areas is to maintain the high-quality soil for agricultural purposes, rather than activities that are not dependent on soil quality.^{iv}
7. PC55 ignores these provisions, and instead over-emphasises the provisions of Section B2 of the Unitary Plan which relate to urban growth and form. The policies in B2 introduce the requirement of avoiding where practicable prime soils only where they are significant for their ability to sustain food production. This introduces an additional consideration if the soils are to be protected: that the land must be significant for food production. EDS considers that the failure to take into account the policies of Section B9 resulted in errors in the planning assessment.

8. There is a need to protect New Zealand's productive soils from urban expansion similar to that proposed in PC55. Productive soils provide significant economic and employment benefits to the communities that surround them. They underpin New Zealand's position as a major exporter of primary-based production. Productive soils in the vicinity of New Zealand's largest conurbation will be under significant pressure from urban development and will need decisive decision-making to protect them.
9. The proposed degradation to New Zealand's productive soils will not give effect to the sustainable management purpose in the RMA, including the need to sustain natural and physical resources for current and future generations, and the need to safeguard the life supporting capacity of air, water, soil and ecosystems. Soils are a finite resource and once they are lost to urban development, they are lost forever.
10. In light of the above, EDS considers that PC55 is contrary to:
 - a. The sustainable management purpose in section 5(2) RMA;
 - b. Sections 7(b) and 7(g) of the RMA, which refer to the efficient use and development of, as well as the finite characteristics of, "natural and physical resources";
 - c. The provisions in the Unitary Plan (including but not limited to the provisions addressed above).
11. Although not yet a statutory document, and as such of limited weight, EDS also considers that PC55 is also contrary to the proposed National Policy Statement on Highly Productive Soils which is proposed specifically to protect Aotearoa's productive soils from further loss.

ⁱ Auckland Unitary Plan, Objective B9.2.1(4)

ⁱⁱ Auckland Unitary Plan, H19.3.1 – Zone Description.

ⁱⁱⁱ Auckland Unitary Plan, Policy B9.4.2(4)(d)

^{iv} Auckland Unitary Plan, B9.5 – Principal reasons for adoption



20 November 2020

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

Submission sent via email: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PROPOSED PLAN CHANGE 55 (PRIVATE): PATUMAHOE SOUTH IN THE AUCKLAND UNITARY PLAN OPERATIVE IN PART

Introduction

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service set out below provides the following feedback on the Proposed Plan Change 55 (Private) Patumahoe South (“**the proposed plan change**”) to rezone approximately 34.5ha of rural productive land to Residential – Single House, Business – Light Industry, Open Space – Informal Recreation and Future Urban Zones and apply I403 Patumahoe Precinct (with amendment to the precinct provisions) to the land in the Auckland Unitary Plan Operative in Part (“**AUP:OP**”)

Background

1. Kāinga Ora was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation (“**Housing NZ**”), HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown agent and is required to give effects to Government policies. and is the Government’s delivery agency for housing and urban development.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
 - a) Being a world class public housing landlord; and

- b) Leading and co-ordinating urban development projects.
3. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) support good access to jobs, amenities and services; and
 - c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
 4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
 5. In the Auckland region, the public housing portfolio managed by Kāinga Ora comprises approximately 30,100 dwellings. Auckland is a continued priority to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
 6. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora's interests lie in the provision of public housing to persons who are unable to sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
 7. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, rate payer and developer of residential housing in urban development more generally. Strong relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.
 8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing requires close collaboration between central and local government to address planning and

governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as improved urban environment.

9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing. These include the provision of services and infrastructure and how this may impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“CGH”) providers.
10. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora illustrate this broadened mandate and outlines two key roles of Kāinga Ora in that regard:
 - a) Initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) Providing a leadership or coordination role more generally.

Scope of Submission

11. The submission relates to Plan Change 55 as a whole.

The submission is:

12. Kāinga Ora is neutral to the proposed rezoning sought in proposed Plan Change 55
13. Kāinga Ora has particular interests regarding proposed Precinct Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E. This standard requires:
 - a) any new residential building and alteration located within 100m of the railway network to be subject to maximum noise level pertaining to railway noise of 35dB for sleeping spaces and 40dB for all other habitable rooms.
 - b) any new building and alteration located within 60m of the railway network to achieve rail vibration levels not exceeding 0.3mm/s.
14. Kāinga Ora **does not support** the proposed Precinct Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E due to the following planning concerns:

- a) The blanket 100m corridor being applied to all residential buildings within this corridor to comply with additional noise and vibration standards as the proposed standard is unnecessary and is overly onerous.
 - b) The cost and benefits arising from the proposed standard have not been assessed according to section 32 of the Resource Management Act 1991. The benefits achieved and the costs added to land owners have not been quantified.
15. Given Kāinga Ora's concerns above it is requested that the proposed precinct standard is to be **removed in its entirety**.

Relief Sought

16. Kāinga Ora seeks the following decision from Auckland Council on proposed Plan Change 55, as set out below:
- 30.1 | a) Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E **be removed** from the precinct provisions in its entirety;
 - 30.2 | b) Any consequential relief necessary to satisfy Kāinga Ora's concerns
17. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
18. Kāinga Ora wish to be heard in support of this submission.

Dated this 20th day of November 2020



Brendon Liggett
Development Planning Manager
Urban Development – Delivery

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598, Greenlane, Auckland

Email: developmentplanning@kaingaora.govt.nz

SUBMISSION ON Private Plan Change 55: Patumahoe South

20 November 2020

TO: Auckland Council

NAME OF SUBMITTER: Horticulture New Zealand



CONTACT FOR SERVICE:

Lucy Deverall
Environmental Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 021 581 6655
Email: lucy.deverall@hortnz.com

Horticulture New Zealand (HortNZ) thanks Auckland Council for the opportunity to submit on the proposal and welcomes any opportunity to work with Council and to discuss our submission.

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

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ’s submission and decisions we are seeking from Council are set out below.

Background to HortNZ

HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers’ and New Zealand Fruitgrowers’ and New Zealand Berryfruit Growers Federations.

HortNZ advocates for and represents the interests of 5000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 120,000 hectares.

The horticulture industry value is \$6.39 billion and is broken down as follows:

Industry value	\$6.39bn
Fruit exports	\$3.5bn
Vegetable exports	\$0.7bn
Total exports	\$4.2bn
Fruit domestic	\$0.88bn
Vegetable domestic	\$1.28bn
Total domestic	\$2.19bn

It should also be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food

production values provide a platform for long term sustainability of communities, through the provision of food security. The essential service that horticulture provides has been further highlighted through the Covid-19 response.

HortNZ’s purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting and advocating for growers in New Zealand.

HortNZ’s Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers’ awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

The principles that HortNZ considers in assessing the implementation of the RMA include:

- The effects based purpose of the RMA;
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers interests both in an environmental and sustainable economic production sense.

Executive Summary

Generally, HortNZ does not oppose the proposed rezoning of the land at Patumahoe South for the following reasons:

- The application has provided an analysis of productive capability of the land, including whether investment would resolve constraints. The analysis finds that productivity is low, soil quality is mixed but generally poor and investment in irrigation is unlikely due to small lot sizes. We have not sought peer review.
- Reverse sensitivity is proposed to be managed with a buffer strip within the proposed new urban area. We seek that this buffer strip be extended to 15m and that landscaping be sufficient to avoid reverse sensitivity effects from spray, noise and odour. We also seek that public access be excluded from the buffer strip. Public access would hinder the ability of the buffer strip to adequately manage reverse sensitivity effects.

There are some matters which have been excluded from the analysis of alternative uses of highly productive land. This includes whether amalgamation of lots could resolve productivity constraints and whether the land is suitable for activities that support primary production, such as packhouses or other rural industry. HortNZ believes these should form part of such an assessment on highly productive land. However, it is acknowledged that without the National Policy Statement on Highly Productive Land (NPS-HPL), there is no incentive or requirement for either council or the applicant to take those factors into account.

HortNZ has reservations on whether the current Unitary Plan framework is sufficient enough to avoid future urban creep once the character of an area containing highly productive land (such as Patumahoe) begins to change. Again, we anticipate more direction from the NPS-HPL which may provide more guidance for council's in balance rural and urban development.

We have used this submission as an opportunity to continue to advocate:

- the key principles and criteria we believe are central to assessing the use of highly productive land,
- the need for adequate consideration of the value of food production and the social, cultural, environmental and economic values associated with highly productive land, when assessing the need for urban development, and
- the need for a robust planning framework for managing reverse sensitivity within the wider Unitary Plan.

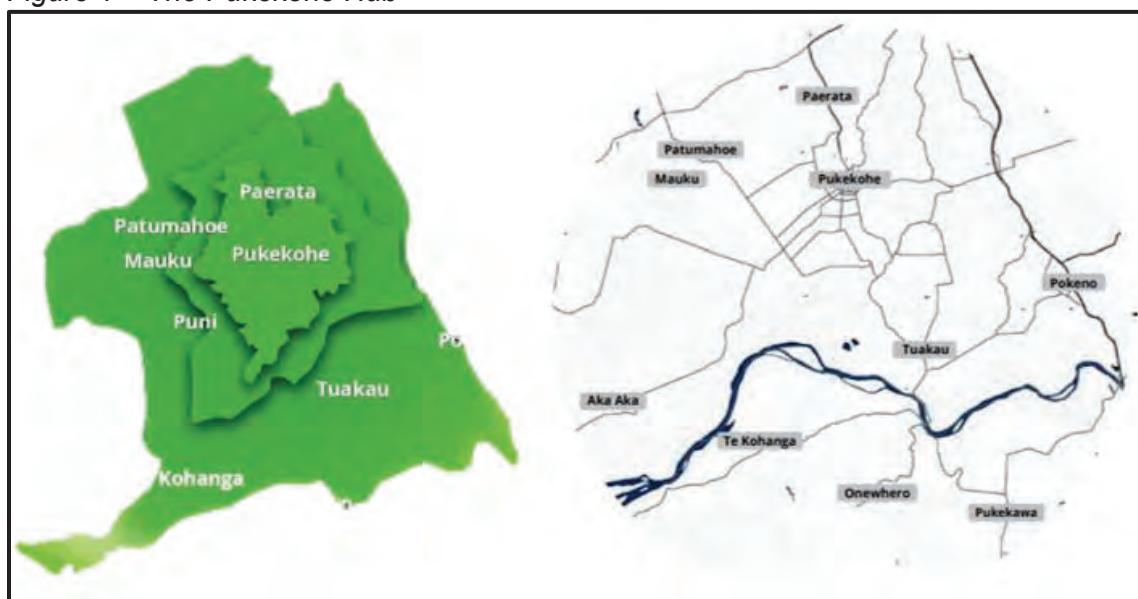
Introduction

Horticulture in the Auckland Region – The Pukekohe Hub

A 2018 Deloitte report provides an analysis of the horticultural sector in one of New Zealand's most prominent growing areas. The purpose of the analysis was to understand the social, environmental and economic values, and constraints, provided and faced by, the local industry.

The case study area was the 'Pukekohe hub', which includes the Patumahoe area.

Figure 1 – The Pukekohe Hub¹



Findings of the report show that:

- With an area of 4,359ha, the hub is only 3.8% of New Zealand's total fruit and vegetable growing area. But contributes to 26% of the value earned from national production of vegetables and some fruit.
- 90% of the produce grown in the hub is for the domestic market.
- The hub contributes significant to the vitality of local communities through social contributions to community groups and cultural diversity
- The hub contributes \$261million to GDP and employs 3,090 full time equivalents.
- Between 2002 – 2016 there has been a 30% reduction in vegetable cropping land across New Zealand.

Failure to adequately provide for continued operation and on-going development of horticulture, will impact the ability to meet future demand for fresh fruit and vegetables. In the next 25 years, the analysis predicted:

- a reduction in production of fruit and vegetables of between 46% - 55% and
- price increases between 43% - 58%

¹ *New Zealand's Food Story. The Pukekohe Hub.* Deloitte. 2018. <http://www.hortnz.co.nz/assets/Deloitte/New-Zealands-food-story-The-Pukekohe-hub.pdf>

- Up to 4,500 job losses
- An economic loss between \$850 million and \$1.1 billion.

Highly Productive Land

It is the view of HortNZ, that highly productive land is a finite natural resource that needs to be managed to meet the needs of people now, and those of future generations. In our view, sustainable food production is the primary value associated with this resource. Land identified as highly productive be protected for the use by primary production industries in contributing to sustainable food production.

Horticulture in particular is limited in where it may locate due to a reliance on a number of factors, including:

- soil quality
- supply of land
- access to quality water
- the right climate – temperature, sunshine hours, rainfall, wind
- proximity to reliable transport routes, markets and labour
- access to supporting infrastructure and services
- a supporting regulatory framework.

Typically, horticulture is best suited to land classified LUC 1-4, with commercial vegetable production being best suited to LUC 1-2. This type of land is in short supply, with LUC 1 – 2 representing only 5% of New Zealand’s landmass and LUC 1 – 3 representing 14%².

The Proposed NPSHPL identifies LUC 1 – 3 as a starting point for councils to identify highly productive land. HortNZ’s submission to the NPSHPL supported this approach. While not relevant to this particular application, HortNZ has concerns relating to Auckland Council’s hierarchy of Elite and Prime land which identifies all Prime land as being of lesser value. This approach has enabled a significant amount of development of LUC 2 and 3 land around Pukekohe Hill. This has had a significant and adverse impact on one of New Zealand’s largest horticulture hubs.

The NPSHPL recognises that the productive capacity or versatility of land may become compromised and that it may no longer be suitable for use by primary production activities. HortNZ’s submission to the NPSHPL recommended a range of factors that should be considered when assessing the productive capacity of land. Matters to consider include:

a) physical and legal constraints and enhancements for the productive capacity of land. The assessment must include all relevant factors, including the following factors, and may include others:

- Water allocation limits and allocation policy;
- Water quality limits and allocation policy;
- Lot size;

² Fiona Curran-Cournane, Melaine Vaughan, Ali Memon, Craig Fredrickson ‘Trade-offs between high class land and development:Recent and future pressures on Auckland’s valuable soil resources’ 2014 https://ac.els-cdn.com/S0264837714000489/1-s2.0-S0264837714000489-main.pdf?_tid=5b7e5b49-7e73-495c-8ec3-369768f8c264&acdnat=1549862995_9760292b4378403cd35bfc49fb0434c3

- Presence of structures and buildings;
- Access to transport routes;
- Access to appropriate labour markets;
- Supporting rural processing facilities and infrastructure;
- The current land cover and use and the environmental, economic, social, and cultural benefits it provides;
- Availability of suitable land for crop rotation;
- Lack of reverse sensitivity constraints;
- Access to energy for greenhouses;
- Access to transport routes;
- Worker accommodation; and
- Other constraints that may limit the use of land for primary production.

b) whether investment could feasibly resolve any of the physical and legal constraints above or identified as relevant to that property.

With regards to lot sizes, our submission to the Proposed NPS-HPL highlights that where land is fragmented or urbanised it is seldom returned to productive uses. However, where there are opportunities to aggregate parcels and reverse fragmentation, these should be incentivised. We acknowledge that currently there is no ability for Councils to require applicants to consider this matter, and HortNZ will continue to advocate for this to be a consideration in the NPS-HPL.

Submission

HortNZ acknowledges that the application contains an analysis of a number of factors including the productive capacity and capability of the land and whether investment in irrigation would feasibly improve constraints.

It is noted that investment in irrigation is deemed unfeasible due to lot size, and that there is no incentive to consider whether amalgamation would address this issue. It is noted that there is no analysis of whether the land might be suitable for activities that might support primary production, such as pack houses. Again, without national direction, there is no incentive for council or the applicant to take this into account.

The proposal includes a 10m wide buffer strip where proposed urban development adjoins remaining rural production land. The proposed buffer strip is located within the proposed development site. HortNZ supports this approach but seeks:

- 31.1
- an additional 5m to afford further separation distance to better assist in avoiding reverse sensitivity issues
 - that landscaping includes shelter belts to ensure avoidance of any risk of reverse sensitivity arising from sprays, noise and smell, and

- 31.1
- that public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity.

HortNZ has continually advocated to Auckland Council that urban zones should also contain controls to manage reverse sensitivity where land adjoins rural production. We would like to see this approach taken up throughout the wider Unitary Plan, and in particular in the anticipated plan changes to implement the Pukekohe-Paerata Structure Plans.

The matter of urban creep and the changing character of the surrounding rural area is one of significance. HortNZ notes that there is an existing structure plan area to the north-west of the town centre. The proposed development will substantially expand urban development into the rural production areas and will change the character and nature of the wider Patumahoe area.

This poses a significant risk to the wider rural production area. The presence of existing development and existing reverse sensitivity effects is commonly touted as a reason to support rezoning of rural land. This is exactly part of the reasoning given in the subject application. HortNZ questions whether the current planning framework will adequately protect the remaining, extensively cropped land to the south and west from further fragmentation or urbanisation in the future, justified by the assumption that the character of the area has changed and therefore rural production is no longer feasible.

HortNZ does not believe the different approaches towards Elite and Prime land within the Unitary Plan appropriately recognise the true value of highly productive land. This then impacts the decision-making process when balancing the values of urban and rural development.

Until the NPS-HPL is finalised, the decision on this current application will be significant in setting direction for future development of highly productive land in the Auckland Region.

Contact details

Full name of submitter: David Walsh

Organisation name:

Agent's full name:

Email address: drw@fastmail.com

Contact phone number: 0210439277

Postal address:
16 Searle Drive
Patumahoe
Auckland 2679

Submission details**This is a submission to:**

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:
All of PC55

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

In the first instance, the consultation process has failed to notify members of the community that will be effected by the rule change.

2018 Statistics New Zealand data for the Patumahoe Statistics area (34.38 sq km), which includes the Patumahoe village and all of its approach roads, indicates a dwelling count of 771. I would estimate that there are approximately 450 of those dwellings within the bounds of the Patumahoe village.

The proposed plan to add a 200-250 new dwellings to the village area constitutes an increase of approximately 44%-55% of the existing number of dwellings and an increase of 26% - 32% of the number of existing dwellings within the Patumahoe statistics area.

It is my opinion that, if you are intending to increase the population of an area by approximately 50%, that all members of the community should be notified of this plan. It is clear that this has not

happened. I live of Searle Drive and was not formally notified however people on Woodhouse Road were. This is not acceptable. I decline the plan change on this basis.

32.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 20 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: David Walsh

Organisation name:

Agent's full name:

Email address: drw@fastmail.com

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Other provisions:

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

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

The reason for my or our views are:

The requester fails to address or reduce any and all additional carbon emissions that will be created by the removal of quality topsoil and replacing it with residential housing and light industry. This is counter to the Auckland Councils own climate change mitigation strategies.

According to a paper published by Chandrakumar et al (2020) (<https://www.sciencedirect.com/science/article/abs/pii/S0360132319307723?via%3Dihub>) the Lifetime Carbon footprint of a new New Zealand house build is 280,000 kg-CO2 eqv. However, the target required to meet our climate change responsibilities (Paris accord) is below 60,000kg. The requester has not made provisions to combat the difference in these levels.

Additionally, the additional 200-250 dwellings proposed will likely see an increase an additional 306-383 cars introduced into the area (Stats NZ, 2018, average number of cars per household). On average, each household (Stats NZ, 2017), burns over 8,500 kg CO2-eqv per year. Stats NZ census data (2018) for the Patumahoe area shows approximately 80% of residents travel to work by car (either private or company) and this is 8.7% higher than the Auckland regional average, which is not surprising given the location of the village. However, it is likely to indicate that residents of Patumahoe will burn more carbon in transport than the average household.

Stats NZ (2018) data also shows that only 4.7% of Patumahoe residents take a train, bus, ferry or walk, cycle to work, verses 16% for Auckland region. Again, given the location of the village and lack of viable public transport options, this is not surprising. Again, both the requester and the council have provided no plan to increase transport options and thus reduce carbon emissions.

As far as I am aware, there is no plan to reduce emissions from the current subdivision that is being built on Kingseat Road, between Day Road and Mauku Road. Maybe we should be using this proposed area to plant trees instead?

This plan change is counter to Auckland Councils own carbon change mitigation policies and should not go ahead.

32.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 20 November 2020

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

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My submission relates to

Rule or rules:
All of PC55

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Once a parcel of land has been removed or destroyed, it would take 1000's of years to regenerate. It is extremely important that we don't destroy soil that can be used to grow things, either agriculture or forestry. Once it is gone, we can't ever get it back. It is extremely short sighted to think that just because the lots described above are not being used at this point in time, that they won't be used or useful in the future. As human overdevelop the landscape, the more import the soil is that is left.

Currently, 73% of the land in question is Class2. Appendix 8 states that:

"Class 2: Very good land with slight physical limitations to arable use, readily controlled by management and soil conservation practices. The land is suitable for many cultivated crops, vineyards and berry fields, pasture, tree crops or production forestry."

This in itself should be enough to decline the plan change.

Appendix 8 also states:

"When added up the total area of land with Ph soil available for primary production within the rezoning area totals 11.17ha and is classified as LUC class 2s. For this land to reach its full production potential water would need to be available for irrigation. Currently the Auckland Council has Groundwater Management Areas which have identified vulnerable and high use aquifers. The Patumahoe area falls within one of the high use aquifer areas. An Auckland council officer indicates there are two aquifers in the area, one at approximately 120m deep and one at approximately 50m deep. The deeper aquifer is likely fully allocated while there is still possible potential for consent to be granted to take water from the shallower aquifer -depending on the quantities required. As such it is likely there is potential to develop land in this area for various horticultural uses."

The soil can be used for horticultural practices and it is a "very good land". It should not be acceptable in the current climate situation the planet finds itself, such land be allowed to be developed into housing.

This plan change needs to be declined.

32.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 20 November 2020

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

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

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

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

Yes

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

20 November 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Attn: Sanjay Bangs

Email: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 55: PATUMAHOE SOUTH

Please find attached Auckland Transport's submission on Proposed Private Plan Change 55 Patumahoe South to the Auckland Unitary Plan (Operative in Part).

Should you have any queries in relation to this submission, please contact me on +64 944 74225 or at sam.mcgough@at.govt.nz.

Yours sincerely



Sam McGough
Assistant Planner, Land Use Policy and Planning North / West

cc:
Askew Consultants Limited
C/- Tripp Andrews
Via email: annmaree@trippandrews.co.nz

SUBMISSION BY AUCKLAND TRANSPORT ON PROPOSED PRIVATE PLAN CHANGE 55 – PATUMAHOE SOUTH

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 55 from Askew Consultants Limited to rezone land for urban purposes and introduce a new sub-precinct, Sub-precinct E, within the existing Patumahoe Precinct.

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 Askew Consultants Limited ('the applicant') has lodged a Private Plan Change ('PPC 55' or 'the Plan Change') to the Auckland Unitary Plan: Operative in Part ('AUP(OP)'). The Plan Change seeks to rezone 35 hectares of land in Patumahoe from Rural - Rural Production and Strategic Transport Corridor zones to Residential - Single House, Business - Light Industrial, Open Space and Future Urban Zones. PPC 55 also seeks to introduce a new sub-precinct, Sub-precinct E, within the existing Patumahoe Precinct.
- 1.2 According to the documents provided with the Plan Change application, the rezoning is expected to enable the development of 200-250 dwellings and 2.5 hectares of industrial land.
- 1.3 Auckland Transport is a Council-Controlled Organisation of Auckland Council ('the Council') and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.¹ Auckland Transport is responsible for the planning and funding of most public transport; promoting alternative modes of transport (i.e. alternatives to the private motor vehicle); operating the local roading network; and developing and enhancing the local road, public transport, walking and cycling network for the Auckland region.
- 1.4 Auckland Transport is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

2. Strategic context

- 2.1 The key overarching considerations and concerns for Auckland Transport for this Plan Change are described below.

¹ Local Government (Auckland Council) Act 2009, section 39.

Auckland Plan 2050

- 2.2 The Auckland Plan 2050 ('Auckland Plan') is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The Auckland Plan provides for between 60 and 70 per cent of total new dwellings to be built within the existing urban footprint. Consequently, between 30 and 40 per cent of new dwellings will be in new greenfield developments, satellite towns, and rural and coastal towns.
- 2.3 In identifying the approach to rural growth, the Auckland Plan states:
- Residential growth will be focussed in the two rural nodes of Pukekohe and Warkworth with less growth anticipated in smaller towns and villages
 - Residential development in rural zones will be limited with provision for residential growth being focussed in the existing countryside living zone.²
- 2.4 The Auckland Plan also recognises that the demand for business land and floorspace is an important consideration in planning for growth.
- 2.5 The transport outcomes identified in the Auckland Plan to enable growth include providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include: targeting new transport investment to the most significant challenges; making walking, cycling and public transport preferred choices for many more Aucklanders; and better integrating land use and transport. The high-level direction contained in the Auckland Plan helps to inform the transport priorities to support growth and management of effects associated with Plan Change proposals.

Managing Auckland-wide growth and rezoning

- 2.6 The high-level spatial pattern of future regional development is represented in the Auckland Plan and by the Future Urban zone in the AUP(OP). The Auckland Plan and the AUP(OP) identify Patumahoe as a rural settlement surrounded by rural production land. The AUP(OP) does not identify any land zoned Future Urban at Patumahoe.
- 2.7 Wide scale growth across the region places greater pressure on the available and limited transport resources that are required to support the movement of additional people, goods and services. The alignment of the AUP(OP) enabled growth and Plan Changes with the provision of transport infrastructure and services depends on having a high level of certainty about the funding and delivery of the required infrastructure and services. Without this certainty, there will continue to be a significant deficiency in the transport network due to the challenges of providing and co-ordinating transport responses to the dispersed growth enabled across the region.

Sequencing growth and aligning with the provision of transport infrastructure and services

- 2.8 The Future Urban Land Supply Strategy 2017 ('FULSS') provides guidance on the sequencing and timing of future urban land identified in the Auckland Plan. This guidance was incorporated into the updated Auckland Plan in 2018. The FULSS sets out the anticipated timeframes for 'development ready' areas over a 30-year period.

² p208, Auckland Plan 2050

The FULSS helps to inform infrastructure asset planning and funding priorities, to support development capacity to ideally be provided in a coordinated and cost-efficient way via the release of 'development ready' land.

- 2.9 The FULSS primarily addresses the sequencing and timing of large future development areas. In the south, these future development areas include Opaheke-Drury, Drury West and Pukekohe-Paerata. The existing live zoned land at Patumahoe is included in the FULSS but no other additional expansion is identified for this rural settlement. The FULSS notes that the amount of land identified in the AUP(OP) for future urbanisation in the rural settlements³ significantly contributes to the overall supply of land in the south. These areas total 1.046 ha and will contribute approximately 7,550 dwellings.
- 2.10 Plan Changes which propose to allow urban development before the wider staging and delivery of planned transport infrastructure services has occurred need to be carefully considered. In this case, the proposed urban development is not identified in the FULSS so will not have been considered in wider infrastructure planning. Auckland Transport needs to assess whether the Plan Change includes provisions to require applicants to mitigate the transport effects associated with the development and to provide the transport infrastructure needed to service the development. There is also a need to consider whether the development has any implications for the timing of the strategic transport infrastructure required in the future to service the southern growth areas identified in the FULSS, including that shown in the Drury-Opaheke and Pukekohe-Paerata structure plans.
- 2.11 Adverse effects which arise when development occurs before required transport infrastructure and services are provided cannot be addressed without funding to support the planning, design, consenting and construction of the transport infrastructure and services. There is a need to assess and clearly define the responsibilities relating to the required infrastructure and the potential range of funding and delivery mechanisms. This includes considering including the role of applicants/developers and taking into account the financially constrained environment that the Council and Auckland Transport are operating within.
- 2.12 The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 which are quoted below (with emphasis in bold):

'Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) **the area is well-serviced by existing or planned public transport**
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.'

'Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) **integrated with infrastructure planning and funding decisions;** and
- (b) strategic over the medium term and long term; and

³ The rural settlements for the south which are included in the FULSS are Maraetai, Oruarangi, Karaka North, Kingseat, Glenbrook Beach, Patumahoe, Clarks Beach, Clevedon, and Clevedon Waterways.

(c) responsive, particularly in relation to proposals that would supply significant development capacity.'

- 2.13 The Regional Policy Statement ('RPS') objectives and policies in the AUP(OP) place similar emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B3.3.2(5)(a) (e.g. Policy B3.3.2(5)(a) is to: *'Improve the integration of land use and transport by... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth'*).
- 2.14 The RPS contains objectives and policies relating to rural and coastal towns and villages. Objective B2.6.1(2) seeks that there is adequate infrastructure. Policy B2.6.2(1)(b) and (g) requires expansion of existing rural and coastal towns and villages to be undertaken in a manner that incorporates adequate provision for infrastructure and provides access to the town or village through a range of transport options including walking and cycling. Policy B2.6.2(3) enables significant expansions of existing rural and coastal towns and villages through the structure planning and Plan Change processes. There has not been any structure planning undertaken by the Council for Patumahoe and, as noted above, there is no additional expansion identified in the Auckland Plan Development Strategy for Patumahoe.

Cumulative effects

- 2.15 Cumulative adverse effects on the transport network can result from multiple developments that may individually have minor effects but which in combination can result in significant effects. This is a matter that must also be considered.

3. Specific parts of the Plan Change that this submission relates to:

- 3.1 The specific parts of the Plan Change that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport, and include ensuring there is adequate provision of transport infrastructure to support the development proposed through this Plan Change and deficiencies in the Precinct Plan provisions relating to transport matters.
- 3.2 Auckland Transport generally supports PPC 55 subject to:
- The resolution of Auckland Transport's concerns as outlined in this submission, including in **Attachment 1**.
- 3.3 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

4. The decisions sought by Auckland Transport are:

- 4.1 The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**.
- 4.2 In all cases where amendments to the Plan Change are proposed, Auckland Transport would consider alternative wording or amendments which address the reason for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the decisions requested.

5. Appearance at the hearing:

- 5.1 Auckland Transport wishes to be heard in support of this submission at a hearing.
- 5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:



Christina Robertson
Group Manager, Strategic Land Use and Spatial Management

Date: 20 November 2020

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Attachment 1

Topic	Support / Oppose	Reason for submission	Decision requested
Future Urban Zone	Oppose	<p>The applicant has not established sound resource management reasons for applying a Future Urban zone to land on the eastern side of Patumahoe Road. Such proposed urban development is not identified in Auckland Plan's 30-year Development Strategy nor the FULSS so will not have been considered in any wider infrastructure planning. The applicant has not appropriately assessed the transport effects associated with subsequent development of the Future Urban Zone. There is no consideration in the Integrated Transport Assessment (ITA) provided as part of the private Plan Change documentation or the Precinct Plan of how the Future Urban Zone will connect to the proposed development or the wider transport network.</p>	<p>Decline the proposed rezoning of 9 hectare on the eastern side of Patumahoe Road from Rural Production to Future Urban zone</p>
Light Industrial Zone	Support	<p>Auckland Transport supports the rezoning providing industrial land as part of the proposal, as this provides an option for local employment and reduces the need for travel.</p>	<p>Retain the proposed rezoning of 2.5 hectares at the southern end of the development from Rural Production and Strategic Transport Corridor to Light Industrial.</p>
Wider transport network and cumulative effect	Oppose	<p>The ITA identifies four key origin/destination areas including north towards Auckland City, north towards Kingseat, west towards Glenbrook and Waiuku, and east towards Pukekohe (with south towards Tuakau combined with the eastbound trips to Pukekohe). Page 25 of the ITA also identifies infrastructure improvements expected to occur within the vicinity of the Plan Change area over the coming five-year period, with commentary that these improvements will provide enhanced transport mode choice, travel route capacity, and an overall safer road network for existing and future trips.</p> <p>One of the Clause 23 responses identifies that "infrastructure improvements are planned to enable these much larger developments in South Auckland and will address the minor contribution to traffic impact associated with the Plan Change area."</p> <p>The ITA and Clause 23 response do not provide sufficient analysis of the cumulative transport effects generated by the proposal, on the wider transport network in combination with</p>	<p>Require more information about the impact of the development on the wider transport network, including if the infrastructure improvements identified as providing a contribution to the traffic impact associated with the Plan Change are not realised or not realised by the timeframes identified.</p> <p>If these infrastructure requirements are necessary to support the development to be enabled by this Plan Change in any way, then identify appropriate methods to address them, such as appropriate staging triggers.</p> <p>Require analysis with revised trip generation rates based on development level/quantum proposed and any additional mitigation required.</p> <p>Require wider network assessment of the effects of this development given that the strategic network assessment did not include the effects of this development and much of the strategic capacity is utilised by others.</p>

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Topic	Support / Oppose	Reason for submission	Decision requested
1430.2 Objective 3	Oppose in part	<p>other planned developments, if the infrastructure improvements listed in the ITA are not realised or not realised by the timeframes identified.</p> <p>Due to current rural zoning, the transport modelling from the Auckland Forecasting Centre expects a lower quantum of houses occupying the site. Current modelling including the site area reflects lower trip generation rates and does not anticipate the level of development now proposed. This lower rate has informed the strategic network to be developed over the next 30 years, and this development and its impacts were not included in that assessment.</p> <p>Auckland Transport is not satisfied the trip generation rates identified in section 5.1 of the ITA are suitable for a rural environment. The rates assume a level of mode choice that will not be possible in this location – so the effects would be larger than assumed in the ITA.</p> <p>The underlined section of objective 3(a) is confusing as it is not clear how it fits in with the rest of the objective.</p> <p>'(3) Development and/or subdivision within the precinct facilitates a transport network that:</p> <p>(a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, <u>including any upgrades to the surrounding network.</u>'</p> <p>It is not clear whether the upgrades referred to are upgrades that might be proposed by an applicant, or upgrades that have been planned and funded by others. To avoid confusion the reference to upgrades should be deleted as it is sufficient to refer to the transport network of the surrounding area.</p>	<p>Amend Objective 3(a) as follows.</p> <p>'(3) Development and/or subdivision within the precinct facilitates a transport network that:</p> <p>(a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network.'</p>
1430.2 Objective 4	Support in part	<p>Objective 4 should be amended to include reference to the railway network. Auckland Transport requests an amendment which supports the provisions proposed in 1430.6.17 to</p>	<p>Amend Objective 4 as follows:</p> <p>'(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses and <u>the railway network.</u>'</p>

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Topic	Support / Oppose	Reason for submission	Decision requested
		protect development in Sub-precinct E from railway noise and vibration.	
1430.3 Policy 5	Support	Auckland Transport supports Policy 5 as it will promote good transport outcomes for subdivision and development. It requires the provision of transport network elements identified on Precinct Plans, supports safe and sufficient movements for all transport modes, and references the requirements of Auckland Transport relating to design and construction.	Retain Policy 5. 33.8
1430.3 Missing Policy	Oppose in part	Standard I430.6.17 addresses the protection from railway noise and vibration in Sub-precinct E. The Precinct Plan should include a policy which recognises the requirements specified in I430.6.17.	Amend I430.3 to add a policy that recognises the requirements to protect development in Sub-precinct E from railway noise and vibration. 33.9
1430.4.2 Activity Table (A5)	Oppose in Part	It is not clear what standards are being referred to in I430.4.2(A5), particularly given the use of the term 'subdivision standards' in (A7). Standards identified in I430.6 do not separately identify building and development standards from subdivision standards.	Amend the activity table I430.4.2(A5) to specifically identify the 'applicable building and development standards in I430.6' 33.10
1430.4.2 Activity Table (A7)	Support in part	Support non-complying status for subdivision that does not comply with I430.6.7 Minimum net site area, and I430.6.13. Staging in Sub-precinct E. I430.4.2(A7) should be amended so that it is clear that if any of the subdivision standards listed in I430.4.2(A6) are not met, then the subdivision is a non-complying activity.	Amend the activity table I430.4.2(A7) as follows: (A7) 'Subdivision which does not comply with <u>one or more</u> of the subdivision standards listed in (A6) above' 33.11
1430.6.3 Paving materials in Sub-precincts B, C, D and E	Oppose in part	Standard I430.6.3 identifies paving materials to be used. While this may be relevant for individual sites it needs to be clear that this does not apply to materials used in the public road or any roads to be vested. Materials for public roads are specified in the relevant Auckland Transport code of practice/design standards.	Amend Standard I430.6.3 to clarify the standard does not apply to roads to be vested in Auckland Council. 33.12
1430.6.5 On-site stormwater mitigation in Sub-	Support in part	It is clear from the title that Standard I430.6.5 addresses on-site stormwater mitigation and does not apply to public roads.	Amend Standard I430.6.5(1) as follows: '(1) All stormwater from impervious areas <u>on sites</u> shall be mitigated to achieve flow attenuation, such that 5m ³ /100m ² of roof 33.13

Topic	Support / Oppose	Reason for submission	Decision requested
precincts B, C, D and E		However, this could be made clearer by an amendment to the text of the standard.	area and 3m ³ /100m ² of other impervious areas are attenuation by one (or a combination) of the following methods: ...
1430.6.13(1) Staging in Sub-precinct E	Support in part	Auckland Transport does not oppose the acknowledgement of the existing consents but the exclusion of Lot 1 DP169130 from this rule should only apply while the consent remains valid. It should also only apply to proposals that comply with that consent. Standard 1430.6.13(1) should be amended to reference subdivision consents, as well as building consents. The standard should also reference the specific consents granted (SUB60318096 and LUC60329723). If these consents are not given effect to, any later proposal for the same land should be assessed anew.	Amend Standard 1430.6.13(1) as follows: '(1) Before any S224(c) certificates for subdivision or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130 in accordance with SUB60318096 and LUC60329723 (while those consents remain valid), the following works shall be constructed and completed to the Council's satisfaction.'
1430.6.13(1)(a) Staging in Sub-precinct E	Oppose in part	The word 'access' is redundant as a new road would inevitably provide access to the development. The location of the new road from Patumahoe Road or Mauku Road into the precinct is indicative. Therefore, it is not necessary to specify that the road must be within 50 metres of the indicative location. Compliance with relevant sight distance will be required by Auckland Transport standards.	Amend Standard 1430.6.13(1)(a) as follows: '(a) A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of the indicative locations shown on Patumahoe Precinct Plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design)'
1430.6.13(1)(b) Staging in Sub-precinct E	Oppose in part	Standard 1430.6.13(1)(b) is unnecessarily detailed and confusing as it seeks to include various road components. Auckland Transport suggests rewording of the standard to include the entire width of the road.	Reword Standard 1430.6.13(1)(b) as follows: '(b) a footpath, appropriate kerb and channel, berm and street trees, and a services corridor along the road frontage(s) adjacent to the portion of land being developed.' '(b) the width of the road from the property boundary of the proposed site to the kerb on the opposite site of the road'.
1430.6.13(1)(c) Staging in Sub-precinct E	Oppose in part	There are a number of concerns with Standard 1430.6.13(1)(c). Clause (1)(c) addresses matters related to the access at the northern end of Carter Road where is it proposed to remove vehicle access and provide for pedestrians and cyclists only.	Reword Standard 1430.6.13(1)(c) as follows: '(c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road.'

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Topic	Support / Oppose	Reason for submission	Decision requested
		<p>It is not clear what is meant by Standard I430.6.13(1)(c) and it should be reworded for clarity.</p> <p>It is unclear what road clause (1)(c)(i) is referencing. The standard should be reworded to clarify which new road needs to be formed.</p> <p>In general, Auckland Transport no longer accepts shared paths as a form of walking and cycling infrastructure. Clause (1)(c)(ii) should be amended to include provision for a separated walking and cycling connection at the northern section of Carter Road.</p> <p>Clause (1)(c)(iii) does not specify how Lot 13 DP83912 containing the Watercare facility will be accessed as result of the proposed road changes. The standard should be reworded to specify how the site will be accessible. It is also not clear whether the applicant has addressed this matter with Watercare.</p> <p>There is a site on the corner of Carter Road and Patumahoe Road (Lot 12 DP83912) which will lose access to one of its vehicle entrances. It is not clear whether this has been addressed with the landowner.</p>	<p><u>'(c) subdivision creating sites with access from Carter Road'</u></p> <p>Reword Standard I430.6.13(1)(c)(i) to clarify what road needs to be formed.</p> <p>Reword Standard I430.6.13(1)(c)(ii) as follows:</p> <p>'(ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and'</p> <p>'(ii) 'the northern portion of Carter Road, which is identified as 'pedestrian / cycle lane' on Precinct Plan 3 is to be closed to vehicle traffic and formed with pedestrian access and separated cycle facilities'</p> <p>Reword I430.6.13(1)(c)(iii) to clarify how vehicle access is to be provided to the Watercare facility at 6 Carter Road.</p> <p>Request clarification on the loss of access for Lot 12 DP83912 and ongoing provision of such if required.</p>
I430.6.13 Staging in Sub-precinct E Missing Provisions	Support in part	Precinct Plan 3 indicates a section of land adjacent to Patumahoe Road is to be vested as road at a point where the legal road width narrows. This matter is not addressed elsewhere in the precinct provisions or the ITA. The precinct provisions need to be clear about the extent of land to be vested and when this required.	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant, to require the vesting of land as road adjacent to Patumahoe Road as identified on Precinct Plan 3.
I430.6.13 Staging in Sub-precinct E Missing Provisions	Oppose in part	The Precinct provisions need to clearly identify what works are required for the upgrade of Patumahoe Road frontage to provide a walking and cycling connection from the development into Patumahoe centre. This should be included in the staging provisions for Sub-precinct E.	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant including identification on Precinct Plan 3, to require the upgrade of Patumahoe Road frontage in conjunction with subdivision and development. This includes separated walking and cycling facilities to be provided along the western side of Patumahoe Road extending to Woodhouse Road and vesting of land to accommodate this infrastructure.

Topic	Support / Oppose	Reason for submission	Decision requested
I430.8 Assessment - restricted discretionary activities	Oppose in part	Section I430.8 should include a separate heading identifying 'Matters of discretion' to assist clarity and consistency. This is consistent with the identification of 'matters of control' in I430.7.1.	Insert a new heading 'I430.8.1A Matters of discretion' and renumber consequently if required.
I430.8(2) Assessment – restricted discretionary activities Subdivision and infringements of subdivision standards	Oppose	Clarification is needed to make clear that the matters of discretion listed in I430.8(2) do not apply to infringements of subdivision standards listed in the activity table I430.4.2(A6). Infringements of standards listed in I430.4.2(A6) is a non-complying activity. Reference to (A2) should also be added for completeness, though this does not relate to Sub-precinct E.	Reword I430.8(2) as follows: '(2) Subdivision and infringement of subdivision standards other than those standards listed in (A2) and (A6)'.
I430.8(2)(c) Assessment – restricted discretionary activities Subdivision and infringements of subdivision standards	Oppose	Subdivision that does not comply with Standard I430.8(2)(c) is non-complying in all precincts. Therefore, a matter of discretion for a restricted discretionary activity is not required.	Delete the matter of discretion at I430.8(2)(c) as follows: '(c) Compliance with minimum site size requirements'.
I430.8(2)(f) Assessment - restricted discretionary activities Subdivision and infringements of	Oppose	The matter of discretion at I430.8(2)(f) is not required as I430.8(2)(b) refers to subdivision in Sub-precinct E being consistent with Precinct Plan 3. As addressed elsewhere in this submission, the inclusion of Figures 5-9 is not supported so they should not be referenced in this matter of discretion.	Remove the matter of discretion at I430.8(2)(f) as follows: '(f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (reading Hierarchy) and Figures 6-11 (Cross Sections) below.' Insert a new matter of discretion for I430.8(2) as follows:

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Topic	Support / Oppose	Reason for submission	Decision requested
subdivision standards		Auckland Transport suggests a new matter of discretion related to the adequacy of transport infrastructure providing for the subdivision.	'(x) The adequacy of the transport infrastructure and services to provide for the subdivision'
1430.8(2)(h) Assessment - restricted discretionary activities Subdivision and infringements of subdivision standards	Support in part	In the matter of discretion at 1430.8(2)(h) it is not clear what is meant by 'suitable' road access. The wording should be amended to specify safe and efficient road access as this gives a clearer direction. The matter should also be amended to reflect the entire road network as this includes footpaths and cycleways.	Amend the matter of discretion at 1430.8(2)(h) as follows: '(h) establishment of <u>suitable</u> safe and efficient road access from Patumahoe Road to Sub-precinct E and the internal road network including, footpaths and cycleways within the Sub-precinct.'
1430.8(2)(i) Assessment - restricted discretionary activities Subdivision and infringements of subdivision standards	Support in part	The applicant's transport consultant has acknowledged that there may be improvements required at the Patumahoe / Mauku / Woodhouse intersection as a result of the development. The matter of discretion at 1430.8(2)(i) should be amended to include the Woodhouse Road intersection and acknowledge that safety improvements are required to mitigate transport effects of the development.	Amend the matter of discretion at 1430.8(2)(i) as follows: '(i) need for and provision of road safety improvements to these sections of Patumahoe and/or Mauku Roads, including at the intersection with Woodhouse Road, adjacent to to mitigate the transport effects of development in Sub-precinct E.'
1430.8(2)(j) Assessment - restricted discretionary activities Subdivision and infringements of subdivision standards	Support	Auckland Transport supports the matter of discretion at 1430.8(2)(j) which addresses the potential need for safety improvements at the railway level crossing.	Retain the matter of discretion at 1430.8(2)(j)

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Topic	Support / Oppose	Reason for submission	Decision requested
Figures 5 – 9 Precinct Plan	Oppose	As noted earlier in this submission, Auckland Transport does not support the inclusion of Figures 5 – 9 in the Precinct Plan. This level of detail should be left to subdivision and resource consent stage. In addition, the cross-sections do not comply with the Auckland Transport's code of practice/design standards in some respects and would require a departure from standards.	Remove Figures 5 – 11 in the Precinct Plan, showing the roading hierarchy and cross sections of roads and a shared path. Replace the cross-sections with an approach that identifies the minimum road reserve widths, functional requirements, and particular components such as separated cycle facilities.
Precinct Plan General	Oppose in part	The Precinct Plan does not clearly identify which roads are to be public and vested to Auckland Council. This is relevant as roads to be vested to Auckland Council need to comply with the Auckland Transport's code of practice/design standards.	Amend the Precinct Plan to clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council.
1430.8.1(1)(b) Assessment criteria Development and infringement of development standards	Support in part	Assessment criterion 1430.8.1(1)(b) should be amended for clarity and, to reference the transport infrastructure. In particular the criterion should be strengthened by making it clearer that compliance with Precinct Plan 3 requires implementation of identified transport infrastructure.	Amend assessment criterion 1430.8.1(1)(b) as follows: '(b) For Sub-precinct E, the extent to which an activity a development complies with the Patumahoe Precinct Plan 3 and implements the identified transport infrastructure.'
1430.8.1(1)(c) Assessment criteria Development and infringement of development standards	Oppose	As outlined elsewhere in this submission, Auckland Transport does not support the level of detail provided in Figures 5-9 and seeks the deletion of these figures. Therefore, consequential amendments are sought to delete references to these figures.	Amend assessment criterion 1430.8.1(1)(c) as follows: '(c) For Sub-precincts A, B, C, and D and E whether the design of any roads, vehicle access ways or pedestrian walkways is consistent with the relevant Precinct Plan and relevant Figures 1-4 or 5-9 above'.
1430.8.1(2) Assessment criteria Subdivision and infringement of	Oppose in part	Clarification is needed to make clear that the assessment criteria listed in 1430.8.1 do not apply to infringements of subdivision standards listed in the activity table 1430.4.2(A6). Infringements of standards listed in 1430.4.2(A6) is a non-complying activity.	Amend assessment criteria at 1430.8.1(2) as follows: '(2) Subdivision and infringement of subdivision standards other than those standards listed in (A2) and (A6).'

Topic	Support / Oppose	Reason for submission	Decision requested
subdivision standards			
1430.8.1(2)(a) Assessment criteria Subdivision and infringement of subdivision standards	Oppose in part	<p>As outlined elsewhere in this submission, Auckland Transport does not support the level of detail provided in Figures 5-9 and seeks the deletion of these figures. Therefore, consequential amendments are sought to delete reference to these figures.</p> <p>Subdivision in Sub-precinct E should however be consistent with the transport infrastructure identified on Precinct Plan 3 and this should be addressed by an assessment criterion.</p>	<p>Amend assessment criterion 1430.8.1(2)(a) as follows:</p> <p>'(a) For Sub-precincts A, B, C, and D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant Precinct Plan and relevant Figures 1- 4 and 5-11 above.'</p> <p>Insert new assessment criterion for 1430.8.1(2) as follows:</p> <p>'(x) For Sub-precinct E, the extent to which the subdivision implements the transport infrastructure identified on Precinct Plan 3'</p>
1430.8.1(2)(b) Assessment criteria Subdivision and infringement of subdivision standards	Oppose	Subdivision that does not comply with standard 1430.6.7 is non-complying in all precincts. Therefore, an assessment criterion for a restricted discretionary activity is not required.	<p>Delete assessment criterion 1430.8.1(2)(b) as follows:</p> <p>'(b) Whether site sizes meet the minimum requirements in Standard 1430.6.7 above.'</p>
1430.8.1(4)(b)(i) and 1430.8.1(4)(b)(ii) Assessment criteria Additional assessment criteria for subdivision in Sub-precinct E	Support in part	The assessment criteria at 1430.8.1(4)(b)(i) and (ii) should be amended to clearly identify that there are transport effects that need to be addressed and mitigations that may need to be provided in conjunction with subdivision proposals.	<p>Amend assessment criterion 1430.8.1(4)(b)(i) as follows:</p> <p>'(i) Whether the subdivision will implement any works are required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and'</p> <p>Amend assessment criterion 1430.8.1(4)(b)(ii) as follows:</p> <p>'(ii) Whether the subdivision will implement any safety improvements <u>required</u> to the local road network are facilitated by subdivision in order to safely accommodate the additional activity</p>

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Topic	Support / Oppose	Reason for submission	Decision requested
			address <u>any transport effects</u> associated with development in Sub-precinct E.'
1430.8.1(4)(b)(iii) and 1430.8.1(4)(b)(iv) Assessment criteria Additional assessment criteria for subdivision in Sub-precinct E	Oppose in part	Amend assessment criterion 1430.8.1(4)(b)(iii) to clearly identify that safety improvements may need to be provided in conjunction with subdivision proposals. The current wording of assessment criterion 1430.8.1(4)(b)(iv) is not clear. There is no certainty around how subdivision and development contributing to the need for safety improvements to the level crossing, would be assessed by the Council. It is also not clear how this criterion would assist the Council in ensuring that safety improvements are provided if warranted.	Amend assessment criterion 1430.8.1(4)(b)(iii) as follows: '(iii) Whether the subdivision provides for any safety improvements are required to maintain the safe operation of the railway level crossing on Patumahoe Road, and' Delete assessment criterion 1430.8.1(4)(b)(iv) as follows: '(iv) Whether subdivision and development in Sub-precinct E contributes proportionately to any required safety improvements to the level-crossing.'
1430.8.1(4)(c)(i) Assessment criteria Additional assessment criteria for subdivision in Sub-precinct E	Oppose	Auckland Transport's code of practice/design standards is the relevant document to refer to regarding transport infrastructure which is to be vested, not Auckland Council Codes of Practice or the Auckland Design Manual. Assessment criterion 1430.8.1(4)(c) does not address the need for any staging to ensure that the delivery of infrastructure is aligned appropriately. These concerns should be addressed by amending the existing criterion and adding two new criteria, regarding the staging of transport infrastructure, and the establishment of transport infrastructure being consistent with Precinct Plan 3 and Auckland Transport's code of practice/design standards.	Amend assessment criterion 1430.8.1(4)(c)(i) as follows: '(i) Whether the establishment of reading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct Plan 3, Auckland Council Codes of Practice and the Auckland Design Manual' Insert two new criteria for 1430.8.1(4)(c) as follows: '(x) Whether the <u>staging of development is aligned with the delivery of transport infrastructure needed to service the development'</u> '(x) Whether the establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure in existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.'
1430.8.1(4)(f) Assessment criteria	Oppose in part	Assessment criterion 1430.8.1(4)(f) is not clear. The criterion cross-references specific matters of discretion, some of which are covered by other assessment criteria, and some of which do not apply to subdivision (i.e. 1430.8(1)(b-d)). It is also not	Amend assessment criterion 1430.8.1(4)(f) as follows: '(f) The extent to which subdivision design and associated provisions <u>address ensure</u> that the specific Standards-1430.8(1)(b-

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Topic	Support / Oppose	Reason for submission	Decision requested
Additional assessment criteria for subdivision in Sub-precinct E		clear what the reference to 'achieve their respective purposes' is intended to mean since matters of discretion do not always have clearly identified purposes. Auckland Transport seeks rewording of the criterion.	e) and matters of discretion in 1430.8(2)(b, e, f-1) applicable to Sub-precinct E achieve their respective purpose(s).
1430.10.2 Patumahoe: Precinct Plan 3 - Sub-precinct E	Support in Part	<p>The Precinct Plan should be updated to identify all of the key transport infrastructure required to support subdivision and development within Sub-precinct E.</p> <p>As noted in a previous submission point, the reference to the 'Land to be vested as road' on Patumahoe Road as identified on Precinct Plan 3 is unclear. The key should identify this section of land as required to be vested for widening of Patumahoe Road.</p> <p>The indicative road layout identifies a connection adjacent to the south-western boundary of Patumahoe Recreation Reserve. Servicing of these lots may be better achieved by a jointly owned access lot rather than a public road.</p>	<p>Amend Precinct Plan 3 to delete the section of 'indicative road layout' located adjacent to the south-west boundary of the Patumahoe Recreation Reserve.</p> <p>Amend Precinct Plan 3 to include other transport works required to support the proposal including:</p> <ul style="list-style-type: none"> • Pedestrian crossings on Patumahoe Road • Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road • Pedestrian and potential cycling connection through Patumahoe Recreation Reserve • Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection • Additional bus stops on Patumahoe Road • Identification of roads for speed reduction measures. <p>Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.</p>
Precinct Plan 3	Oppose	<p>Precinct Plan 3 identifies three new intersections on Patumahoe Road. This is also shown on Figure 5 which is opposed in its entirety by Auckland Transport in other submission points.</p> <p>Auckland Transport does not support three new intersections due to safety concerns particularly with proposed cycle facilities along Patumahoe Road. Auckland Transport also considers that the subdivision and development can be adequately served with one less intersection.</p>	<p>Amend Precinct Plan 3 to remove one of the proposed intersections onto Patumahoe Road but retain the intersection adjacent to the industrial zone.</p>

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Topic	Support / Oppose	Reason for submission	Decision requested
Road Stopping at Carter Road		Auckland Transport supports maintaining the intersection adjacent to the industrial zone to deter heavy vehicle traffic travelling through the residential development.	
Road Stopping at Carter Road	Support in part	The proposal includes realignment of the southern portion of Carter Road. This will require a separate road stopping process with Auckland Transport and no application has been received. In addition, Auckland Transport sees value in maintaining the road connection to the rail line as future proofing for future rail/transport requirements.	Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.
Patumahoe Road speed limit	Oppose in part	Auckland Transport supports the proposal to reduce the speed limit on Patumahoe Road from 70km/h to 50km/h and extend the existing 50km/h speed limit along sections of Patumahoe Road, as identified in the ITA. There is a cost in changing in speed limits due to a required consultation process and supporting signage and road calming measures. Where speed reduction forms part of the mitigation mechanisms for a development those costs are to be borne by the developer.	Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.
Bus network / public transport provision	Oppose in part	Objective 3(b) and Policy 5(b) require subdivision and development in the Patumahoe Precinct to facilitate and provide for public transport as part of the transport network. The Patumahoe area is currently serviced by the #396 bus service, with two existing bus stops on Mauku Road. With the further urbanisation/development of Patumahoe provided for in the Plan Change more bus stops should be constructed to service the development. As part of the development, two pairs of bus stops should be provided on Patumahoe Road - one pair located near the Clive Howe Road / Carter Road intersection, and the second pair located between proposed new intersections B and C as identified in the ITA. The bus stops do not require shelters but should be designed to enable a shelter in the future.	Amend the Precinct Plan to require two pairs of bus stops meeting Auckland Transport standards to be provided along Patumahoe Road in conjunction with subdivision and development of Sub-precinct E. The indicative location of the bus stops should be identified on Precinct Plan 3.
Patumahoe Recreation	Oppose in part	Section 3.3 of the ITA refers to a pedestrian connection through the Patumahoe Recreation Reserve to connect John	Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling

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Topic	Support / Oppose	Reason for submission	Decision requested
Reserve Pedestrian connection		<p>Street and Patumahoe Road. This would provide a good connection for residents of the proposed development. However, the ITA does not specify who is responsible for funding this infrastructure and how it is linked to the development (i.e. through triggers). It is not clear whether the Auckland Council's Parks Department would support this pedestrian link.</p> <p>The pedestrian connection is also not identified or addressed in the Precinct Plan.</p> <p>If a separated walking and cycling connection along the western side of Patumahoe extending to Woodhouse Road cannot be realised, a cycling connection through the Patumahoe Recreation Reserve should be provided.</p>	<p>connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.</p>

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

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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)

Mr Peter Kraakman

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

Alpito Hill Limited

Address for service of Submitter

187 Titi Rd, Mauku RD3, Pukekohe, 2678

Telephone:

021 756 147

Fax/Email:

petrus_kraakman@hotmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 55

Plan Change/Variation Name

Putamahoe South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

28 Mauku Road

Or

Map

Or

Other (specify) I430.10.2 Patumahoe: Precinct Plan 3 - Sub-precinct E and Rezoning

Indicative Road through and proposed Single House Zone of 28 Mauku Rd

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

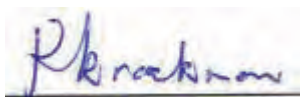
The reasons for my views are: Refer attached.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- 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)

17 November 2020
Date

Notes to person making submission:

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

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

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

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

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

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

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

SUBMISSION ON PROPOSED PLAN CHANGE 55 (PRIVATE): PATUMAHOE SOUTH

Submitter: Alpito Hill Limited

The submitter is the owner of 28 Mauku Road in Patumahoe.

Subject Property and Surrounding Environment

The site, 28 Mauku Road (Lot 1 DP 136094 CT NA80A/996) is a 3512m² pan handled shaped site located on the southern side of Mauku Road. The site has a 10m frontage to Mauku Road.

28 Mauku Road (Lot 1 DP 136094 CT NA80A/996) is a 3512m² site with direct frontage to Mauku Road of approximately 10m and an additional 10m of shared right of way access that provides an access leg serving 28 and 28B Mauku Road.

28 Mauku Road is zoned Rural – Rural Production under the Auckland Unitary Plan.

For over thirty years commercial activities have operated from the site in addition to residential use.

A factory was first established on the site around 1974 and was utilised to dehydrate vegetables. Then in the 1980s it was utilised by a different company to prepare, blanch, cool and blast freeze fruit and vegetables. Storage and warehousing activities were granted on the site in 1987.

The site is occupied by an 870m² commercial building. The building is constructed of concrete blocks and features two gables. A lean-to addition is provided at the rear and is utilised for a tradesperson storage.

The building is located 1.7m from the eastern boundary, 8.2m from the southern boundary, 17.1m from the western boundary and 24m from the northern boundary. The building is located approximately 75m from Mauku Road.

Over time the storage facility has been refurbished. “Country Storage” now accommodates approximately forty individual units of various sizes. The units are primarily utilised for long term storage. The occupier of one of the onsite dwellings assists with the management of the storage units.

The rear part of the building, 30m², is utilised as a storage area in association with the submitters building business. Located within the western part of the main building is a dwelling with a fence outdoor area to the west.

A single storey timber dwelling with steep roof is located in front of the commercial building. This dwelling is located 3m from the northern boundary.

The site is located on the edge of Patumahoe village. Three properties north- west of the subject site are zoned Residential – Single House Zone (numbers 26, 26A and 26B Mauku Road). All other adjoining properties are zoned Rural – Rural Production Zone (numbers 24, 28B, and 30 Mauku Road). These 3 adjoining sites ranging from 1.2 hectares to 2.4 hectares are developed with a dwelling on each.

Numbers 24 and 28B Mauku Road are presently utilised as lifestyle blocks for grazing of stock. 30 Mauku Road is currently used as a market garden and is screened from the site by an established hedge.

On the same side of Mauku Road the Business - Local Centre Zone is located within 75m, and the Open Space – Community Zone (Patumahoe Domain) is within 60m.

The property across the road is presently being utilised as Market Gardens, but is zoned Residential – Single House Zone. Residential development of this site, enabled by private plan change 27 to the Franklin District Plan has begun.



Figure 1: Auckland Council GIS Aerial

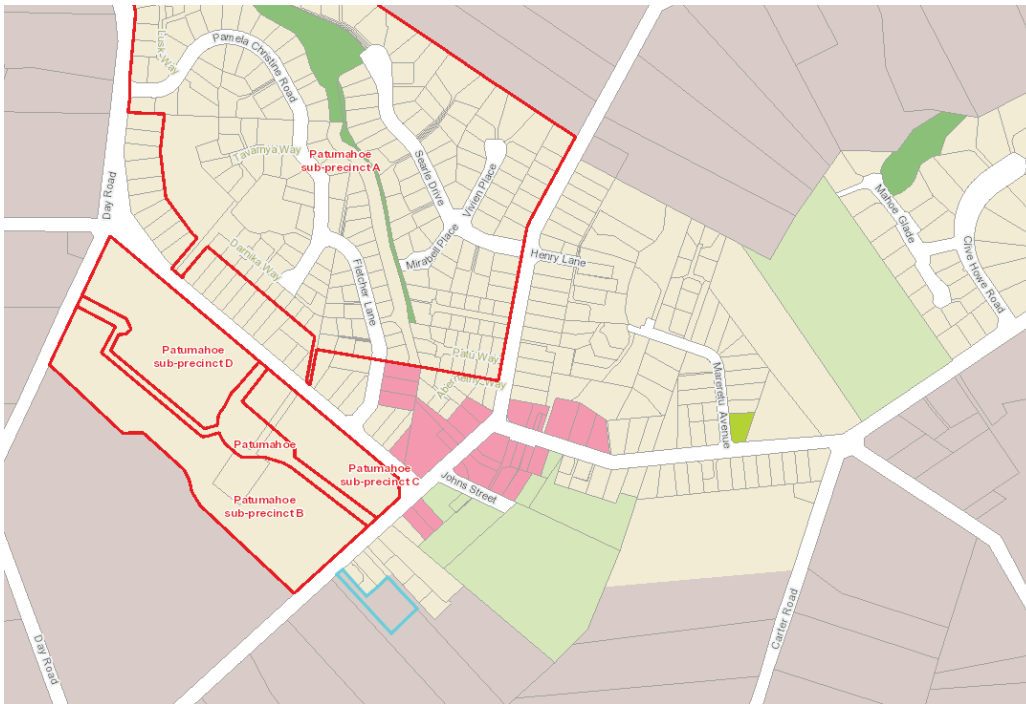


Figure 2: Unitary Plan Zoning

Resource consent (LUC60319893)

On 20/08/2018 land use resource consent (LUC60319893) was approved by Auckland Council to extend the existing building to provide four small additional units. The consent approved additions and alterations to the existing warehouse totalling 268m² to be split into four 59m² units that will be utilised as either an extension of the existing warehouse and storage facility; as well as associated earthworks, landscaping and signage. Copy provided in **Attachment 1**.

The submitter has given effect to the consent and is working through building consent requirements through the additions and alterations.

The existing infrastructure and investment in the property is significant.

Proposed Plan Change 55 (Private) Patumahoe South

Consultation

The submitter has been aware of the development and progression of the private plan change request.

The submitter expressed to the proponents of the private plan change a request that 28 Mauku road not be adversely affected by the proposal.

These views have not been expressed in the plan change application documents or in the planning response proposed by the applicants. Notably the consultation section of the *Plan Change Request Assessment of Effects and Section 32 Assessment*¹ states as follows:

7.2 Landowners within Plan Change Area

In the preparation of this plan change members of the applicant group have made contact a number of times with all relevant neighbouring landowners. A meeting was held in Patumahoe with all neighbours at the Patumahoe Rugby Club in August 2018 to establish neighbourhood support for the plan change. Each neighbour was either in support of the application or neutral to the application proceeding. In September 2019 members of the applicant group have contacted each neighbour to update them on progress of the application. The only neighbours that they have not been able to contact are the owners of the property at 104 Patumahoe Road

This should have been a flag for Council to consider whether sufficient information had been provided with the application or whether further information was required pursuant to Schedule 1, Clause 23 of the Resource Management Act 1991 to undertake a merits assessment pursuant to Clause 25:

Cl.23:

Where a local authority receives a request from any person under clause 21, it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

- a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of Schedule 4; or*
- b) the ways in which any adverse effects may be mitigated; or*
- c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or*
- d) **the nature of any consultation undertaken or required to be undertaken—***

The *Traffic Impact Assessment*² states as follows:

3.1 Proposed Connections to the Existing Road Network

Intersection D - It is proposed to provide a road into the site from 26B Mauku Road, approximately 120m south of Kingseat Road, which would provide a western link for the development, relieving the traffic volume from the development via Patumahoe Road. It is understood that there is currently a consented development (sub-precincts B, C, and D) to the west of this proposed intersection, and that this development is proposing to install a new intersection near this location. That intersection would be approximately 45m north of the location of intersection D. It is considered that such separation between these intersections is sufficient to design safely operating staggered T-intersections. It is understood that the development can be built in two stages due to

¹ Private Plan Change Request to The Auckland Unitary Plan: Operative In Part Patumahoe South, Plan Change Request Assessment of Effects and Section 32 Assessment, 26 June 2020. Envivo.

² Integrated Transportation Assessment Patumahoe Plan Change. Prepared for Askew Partnership June 2020. Stantec

the ongoing negotiations with the existing residents regarding road access at Intersection D off Mauku Road. In that case, the development would initially be progressed with road links to Patumahoe Road only at Intersections A, B and C.

Again, this would appear to raise significant uncertainty on the adequacy of the assessment, effects on other landowners, and likelihood of the outcomes sought by the plan change or required in terms of a viable traffic response being achieved.

The further information request on urban design issues³ provides the following:

UD2 – UD 5 – Landownership

It is envisaged that sites will be purchased at different times over a period of time. Please confirm whether this is the case Please explain how the Section 7 Assessment matters set out at pages 16-26 of the Urban Design Assessment (i.e. matters of good urban design) that require walkable block sizes, optimal road layout, regular site sizes, sites facing onto streets and the like, can be proposed/achieved unless all the sites are purchased concurrently. Please explain how (any) new roads will be planned for and built given the multiple site owners. Please clarify if any new roads in the PPC area will be public or private roads. If this above is not yet known, please explain how acceptable urban design outcomes (refer UD3 above) can be achieved if the roads are not public streets. It is envisaged that sites will be purchased at different times over a period of time.

Response:

The PPC seeks to facilitate the future subdivision and development of the subject land within the spatial framework established by Patumahoe Precinct Plan 3 and the associated precinct provisions. The application of an integrated planning process to the subject land has enabled that spatial and planning framework to be defined in a manner that will guide future subdivision to achieve a comprehensive and fully integrated development outcome for the subject land. As is common in many "structure planned" areas where land ownership is fragmented, the precinct plan and precinct provisions are the primary method by which high quality urban design outcomes (for the land as a whole) are achieved. The staged construction of roading is common in new development areas (as shown in the Aerial Photos below of Karaka Lakes (taken in 2012 and 2017). As each land parcel within the subdivision is developed roading (and associated services) are constructed to the boundary of that allotment allowing the future extension of those services across the subject land. All proposed road are proposed to be Public Roads.

The strategy employed is to rezone land not owned by the applicants and buy it later to achieve the plans outcomes. This is unfair and uncertain for other landowners and adversely effects there current and future land use. The outcome may be that some elements of the plan change are unachievable i.e. the Mauku Road linkage, noting that the proposed plan includes a **Non-Complying Activity** status for subdivision that precedes a new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of the indicative locations shown on Patumahoe: Precinct plan 3.

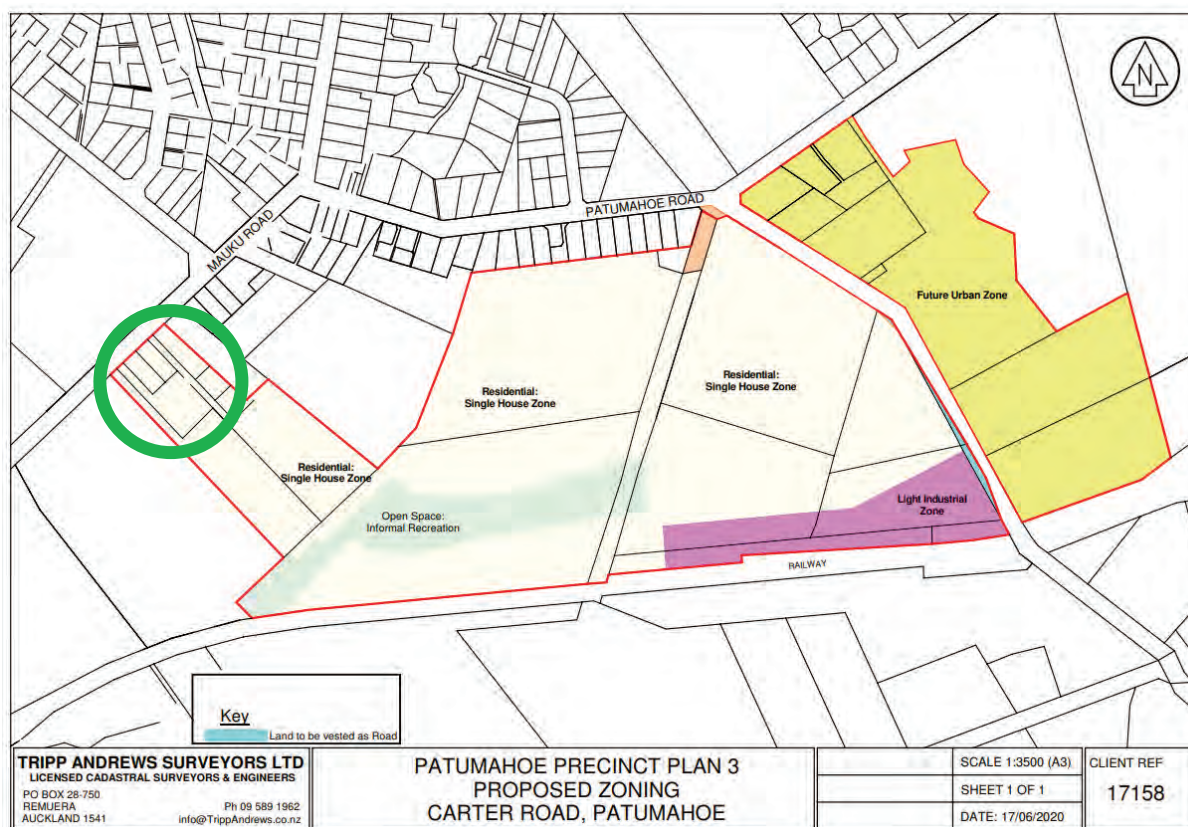
³ Tripp Andrews. 16 April 2020

This significant issue does not appear to have been addressed in Councils merits assessment pursuant to Schedule 1, Clause 25 of the Resource Management Act 1991 and in particular whether Council considered rejecting the plan change relative to CI25(4)(c):

CI25(4):
 (c) the request or part of the request is not in accordance with sound resource management practice;

Proposed Single House Zone

As notified PC55 proposes that 28 Mauku Road is zoned from Rural Production to Single House Zone.



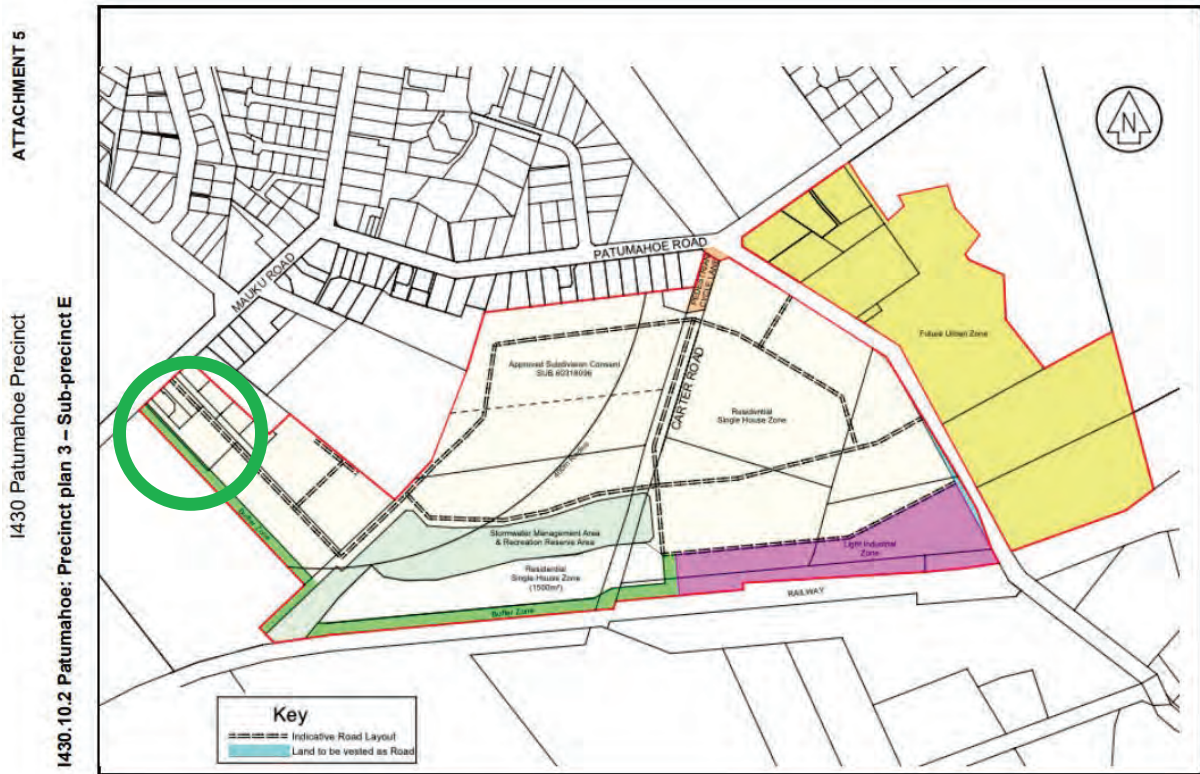
The rezoning does not recognise the historical, current and future land use of the property.

A Single House zoning of the site and surrounds is likely to create operational constraints for the site.

The plan change assessment (Section 32) fails to assess this matter and the plan change is therefore deficient.

1430.10.2 Patumahoe: Precinct plan 3 – Sub-precinct E

Precinct Plan 3 proposes an *Indicative Road* through 28 Mauku Road – effectively through the buildings.



This is a significant effect on the submitter.

The submitter has no intention to sell the property or remove the buildings and infrastructure that support the sites consented land use.

The plan change assessment (Section 32) fails to assess this matter and the plan change is therefore deficient.

The plan change assessment (Section 32) fails to assess alternatives should this linkage not be achievable.

I seek the following decision by Council

- 34.1 | The submitter seeks that the plan change be declined as it relates to the rezoning of 28 Mauku Road and surrounds to Single House Zone unless provisions are put in place to protect the site's land use activities from the effects of Single House development and use (ie reverse sensitivity).
- 34.2 | The submitter seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.

Decision on an application for resource consent under the Resource Management Act 1991



Discretionary activity

Application number:	LUC60319893
Applicant:	Alpito Hills Limited
Site address:	28 Mauku Road, Patumahoe
Legal description:	Lot 1 DP 136094
Proposal:	

To construct additions and alterations to the existing warehouse totalling 268m² which will be split into four 59m² units that will be utilised as either an extension of the existing warehouse and storage facility; as well as associated earthworks, landscaping and signage.

The resource consents required are:

Land use consents (s9) – LUC60319893

Auckland Unitary Plan (Operative in part)

District land use

H19 Rural Zones

- The proposal involves additions and alterations to an existing building that fails to meet the following standard and is a Restricted Discretionary Activity under C1.9(2):
 - The side yard setbacks are infringed along the western site boundary as the proposed commercial units are set back 6.8m from the site boundary, infringing the 12m side yard setback by 5.2m (H19.10.3).
- The use of the building addition for storage and lock up facilities requires consent as a Discretionary Activity (H19.8.1(A40)).

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

- The proposal involves a change of use which requires consent as a Controlled Activity under Regulation 9 of the NES: CS.

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 s104(1)(a) and (ab) of the RMA the actual and potential effects from the proposal will be acceptable, subject to the conditions of this consent, as:
 - a. The proposed addition will complement the existing building and will not be readily visible beyond the existing development on 26 Mauku Road. The limited height, being less than 5m, will be submissive to the existing warehouse and will not dominate the site.
 - b. The addition is designed to align with the existing warehouse and is in keeping with the surrounding environment in terms of the rural zoning and smaller scale urban development.
 - c. The additional storage units will be of an appropriate scale and use, when considering the growth of the Patumahoe area, especially as the area is subject to future growth enabled under the Auckland Unitary Plan.
 - d. The sign adjacent to the road reserve is of a limited bulk and height and is existing. This is an appropriate site identifier and the proposed signage on the individual commercial unit signage will not be visible from the street. The level of signage proposed is acceptable for the site and will not result in any dominance effects, provided that the condition of this consent is complied with.
 - e. The parking and accessway is suitable and appropriate manoeuvring capacity is achieved. It is expected that this will result in a reduction in traffic utilising the existing right of way.
 - f. The limited size and scale of the addition will not generate traffic that will adversely affect the surrounding transport network. It is estimated that the proposal will generate roughly 50 vehicle trips per day, with a peak of approximately 6 vehicles per hour. As a majority of this traffic will utilise the new vehicle accessway, it is not expected that this will adversely affect the existing right of way, as this will be primarily used by the owner to access their storage area at the rear of the existing building.
 - g. There are existing service connections on the site and an additional soakpit is proposed to mitigate and manage the additional impervious areas proposed. This is suitable and acceptable for the site.
 - h. Noise effects are anticipated to be limited as the anticipated uses are not expected to include those that would emit noise beyond the site boundaries. When considered against the receiving environment and permitted baseline in terms of permitted activities within the rural production zone, it is expected that any noise generated from the site

will be less than that of some permitted activities, such as rural airstrips, intensive farming, compliant quarries etc.

- i. The proposed lighting will not have any adverse effects on the wider environment due to the setback from the road and the proposed lighting being a sensor light in line with a residential standard of lighting.
- j. A Detailed Site Investigation (DSI) was provided and has been reviewed by Council specialist Claire Lacina. Ms Lacina's review agrees within the DSI provided, which states that low level contamination in the soil on site can be mitigated to minimise the risks to human health, provided that the Site Management Plan (SMP) is implemented. Compliance with the SMP is required as a condition of this consent as recommended by Ms Lacina, and will ensure that the effects will be acceptable.
- k. The application has been reviewed by Council Engineer Varusha Pandian who has not raised any concerns with the proposal and has confirmed that the servicing and earthworks are acceptable, subject to compliance with the conditions proposed under this consent. In addition, the signage proposed has been reviewed by Council traffic engineer Devan Thambiah, who has provided a condition requiring alteration to the existing sign adjacent to the road reserve.
- l. Regarding 26A Kingseat Road, the proposal will not adversely affect this site or its occupants, as the land is to be developed as part of Patumahoe Sub-Precinct B. In addition, the existing dwelling on this land is over 140m from Mauku Road, making any adverse traffic, noise or visual effects barely noticeable.
- m. Regarding 28B Mauku Road, the proposed addition is setback from the shared southern boundary further than the existing warehouse and the infringement is towards the right of way rather than the area where the dwelling is located. The proposed units will face towards the right of way on 28B Mauku Road and will be separated by a 1m high fence which will have 5 parallel parking spaces running alongside it. In addition, the area between the new driveway and the existing right of way will have a landscaped strip. This will provide visual separation between the sites, whilst maintaining the rural character in terms of visual openness.
- n. The proposed new sensor light will face towards the existing right of way and there is the potential for some light spillage. However, as the light will be a sensor light of a residential nature, it is expected that the light will create adverse effects that are less than minor. In addition, there is existing vegetation along the property boundary between 28 and 28B Mauku Road, which will further screen the lighting produced from the sensor lights.
- o. With regard to the traffic effects, it is expected that there will be positive effects for the property at 28 Mauku Road as there will be less traffic utilising the shared existing right of way. There is still a need to retain the right of way in order for the storage area to the rear of the warehouse to be accessed.
- p. 30 Mauku Road and its occupants and users will not be affected by the proposal due to the existing shelterbelt between the right of way on 28B Mauku Road and the location of the dwelling on the 30 Mauku Road site. It is not expected that any noise, traffic or amenity effects will not be noticeable to this site and its users.

- q. In terms of positive effects, the proposal will provide for commercial activities that will support planned urban development within the surrounding Patumahoe area and is a good use of the site which is already utilised for warehousing and storage.
- r. 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:

a) Auckland Unitary Plan (Operative in Part)

i. H19 Rural Zones:

- Objectives and Policies: H19.2.1, H19.2.2(5)(a)&(c), H19.2.3(1), H19.2.4(1), H19.2.5(1)-(4), H19.2.6(1)&(2), H19.3.2 and H19.3.3(1)
- Assessment Criteria: H19.12.2(1) (It is noted that although these criteria apply to restricted discretionary activities, the assessment matters provide guidance for the relevant matters to be considered and expected levels of effects.

The addition to the existing building will not result in noticeable bulk effects nor will the materials result in any adverse glare or reflectivity effects, as the building is in keeping with the form of the existing warehouse, which is in line with a building form that could be found within rural areas.

Limited earthworks are required to establish the addition as the site is already level and the building will not result in adverse amenity effects to adjacent sites as the addition will overlook a right of way and existing screen hedging.

The visibility of the addition from the road will be limited as the majority of the building will be located behind the site fronting the street. The proposed signage for the individual units is of an appropriate scale and will not create adverse effects towards adjacent sites or the wider environment. The existing sign located adjacent to the road reserve is also of an appropriate scale and does not detract from the surrounding character due to its limited bulk.

Noise and lighting emitted from the site will be acceptable as the proposed hours of operation and likely activities on site will not result in noise or lighting effects that will adversely affect adjacent sites. Noise from the activities is expected to be within the permitted limits and the lighting proposed will also comply with the standards. The AEE provided as part of the application and referenced in Condition 1, ensure compliance with these standards.

A new 1m fence and landscaped strip will delineate the entrance accessway and provide improved visual amenity.

The new accessway to service the site is appropriate and will reduce the traffic movements utilising the existing right of way. Appropriate parking is also provided to ensure there is no spill over on to the street.

Stormwater mitigation by way of soakage pit is proposed to mitigate the additional impervious areas and stormwater runoff generated by the building.

The proposed commercial activity will support the surrounding area as it develops and will provide services to support the surrounding residential and rural community. As the site is already utilised for warehousing and storage, the proposal does not result in any fragmentation of rural land. The site has been utilised for warehousing and storage for at least 20 years and therefore the proposal does not adversely affect the potential of rural production activities and is an appropriate site for such development being on the edge of the Patumahoe village. In addition, the site's location adjacent to residentially zoned land and the Patumahoe centre, makes this a good location for the proposed commercial use.

The character and amenity of the area is maintained as the addition is in keeping with the existing warehouse, whilst also being reflective of a more urban land use, which is acceptable given its location adjacent to residential and business land uses. Further, the addition is of an intensity and scale suitable to the small Patumahoe centre and will enable people and the community to provide for commercial needs within the surrounding rural setting. The proposal is consistent with the policies under H19.2.6 as it provides commercial services in line with the character of the area and will not result in any reverse sensitivity effects given the residential uses of the surrounding sites. It is expected that at least some of the units proposed will be utilised by businesses focused towards rural services, given the location within a rural township.

ii. E27 Transport:

- Objectives and Policies: E27.2 and E27.3(1)&(3)

The proposed vehicle crossing, accessway and parking will be appropriate to support the addition whilst minimising adverse effects on adjacent properties and road users. The location of the parking area set back from the road frontage will minimise adverse visual effects, as a majority of the parking spaces will not be visible from the street. In addition, the proposal will remove a majority of traffic utilising the existing right of way.

Sufficient separation is provided between adjacent vehicle crossings.

The expected trip generation is acceptable given the expected growth in the Patumahoe area and is not expected to result in noticeable adverse effects with regard to the operation of the surrounding transport network. The ability for reverse manoeuvring on site also ensures safe movements entering and exiting the site.

Appropriate loading space is provided for on site and will not be readily visible to adjacent sites or the wider environment. There is already an existing loading space on the site, which will not change.

Landscaping along the proposed accessway will also mitigate the visual effects of the new crossing and provide sufficient delineation between adjacent sites.

iii. E23 Signs:

- Objectives and Policies: E23.2 and E23.3
- Assessment Criteria: E23.8.2

The existing sign adjacent to the road reserve is of a scale which does not adversely affect the character and amenity of the area as it has a wooden frame, is not

illuminated and is under 2m in height. As the area develops over time, this may begin to look out of character, however currently, it is in keeping with the low-key character of the area. It is considered that this existing sign is visually recessive due to the materials, colour scheme and size and does not detract from the streetscape nor will it distract motorists.

Provided that the related condition is complied with, the sign will not produce adverse effects beyond a less than minor degree.

b) National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The DSI provided has been reviewed by Council specialist Ms Lacina, who has provided the following assessment:

“The proposed 140m³ volume of soil disturbance meets the Permitted Activity criteria under Regulation 8(3) of the NES:CS. The DSI has indicated the proposed development will not result in a change of use. However, given the area of development is currently vacant, unsealed land, and there is a residential dwelling on site, the proposed works are also assessed as a change of use under the NES:CS.

A DSI for the proposed application has been prepared, and shows the contaminants of concern are below SCSs (health) criteria – Commercial/industrial outdoor worker (unpaved), and the AUP(OP) E.30.6.1.4.1 Permitted activity soil acceptance criteria, but exceed regional background concentrations.

Therefore, the application is assessed as a Controlled Activity under Regulation 9 of the NES:CS Regulation (MfE, 2011).

I agree with the conclusions of the DSI that the low level contamination in the soil on site can be mitigated to minimise the risks to human health from the proposed commercial storage extension. The SMP (GSL, 2018) is considered sufficient to control the proposed development within soils exhibiting low level contamination, and implement procedures for future removal of the existing septic tank.”

Compliance with the Site Management Plan is required as a condition of this consent to ensure that the soil contamination is appropriately managed.

3. In accordance with an assessment under s104(1)(c) of the RMA the following other matters are considered appropriate:

a) Auckland Council Signage Bylaw 2015

The proposal includes the provision of signs on each of the units for identification purposes. The signs will only be visible from within the site and the adjacent right of way and will not be visually dominant in any way. These signs will be of a compliant size and location on the building and are therefore acceptable.

4. This proposal achieves the sustainable management purpose of the RMA under Part 2 because it will provide for the social and economic wellbeing of both the site owner as well

as future occupants. In addition, it is an appropriate use of land that has already been developed for commercial purposes and is in close proximity to an urban centre.

5. Overall the proposal is acceptable and will result in less than minor effects on the environment, provided that the conditions imposed are met.

Conditions

Under section 108 of the RMA, this consent is subject to the following conditions:

1. The addition of the four 59m² storage units, associated access, earthworks, landscaping and signage activity, 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 LUC60319893.
 - Application Form, Assessment of Environmental Effects and Unitary Plan Assessment prepared by Hodgson Planning Consultants Limited, dated 17 August 2018

Report title and reference	Author	Rev	Dated
Geotechnical Assessment and Stormwater Management Report (ref. RD4096/2)	Tisley Engineering Limited		17 April 2017
Detailed Site Investigation (DSI, 28 Mauku Road, Patumahoe, Auckland)	Geosciences Limited	1	24 July 2018

Drawing title and reference	Author	Rev	Dated
Kraakman #2121 Site Development Plan, 28A Mauku Road, Patumahoe	Doug Mills		28 June 2018
Kraakman #2121 Landscaping Plan, 28A Mauku Road, Patumahoe	Doug Mills		28 June 2018
Kraakamn, #2121, 28A Mauku Road, Patumahoe North West and South West Elevations	Doug Mills		June 2018
Kraakamn, #2121, 28A Mauku Road, Patumahoe South East Elevation	Doug Mills		October 2017
Proposed Additions at 28A Mauku Road, Patumahoe for P and N Kraakman – Floor Plan, RC1, #2121	Doug Mills		October 2017
Proposed Additions at 28A Mauku Road, Patumahoe for P and N Kraakman – Part Long Section, RC2, #2121	Doug Mills		October 2017
Proposed Additions at 28A Mauku Road, Patumahoe for P and N Kraakman – Foundation Plan, RC3, #2121	Doug Mills		August 2017
Proposed Additions at 28A Mauku Road, Patumahoe for P and N Kraakman – Roof Framing Plan, RC4, #2121	Doug Mills		August 2017

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 \$320 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/s.

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. 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 have been met, will the council issue a letter confirming compliance on request of the consent holder.

Vehicle crossing

4. The new vehicle crossing shall be designed and formed in accordance with Auckland Transport Code of Practice Standards (GD020B-1B). The new crossing shall maintain an at-grade (level) pedestrian footpath across the length of the crossing, using the same materials, kerbing, pavings, patterns and finish as the footpath on each side of the crossing. The berm shall be re-instated to Council's "Code of Practice for Working in the Road." (<https://at.govt.nz/about-us/working-on-the-road/>).

Advice note:

Works within the road reserve require prior approval from Auckland Transport. The consent holder should contact Auckland Transport as soon as possible to ensure any required approvals are issued prior to construction.

5. The driveways and manoeuvring areas shall be constructed, with stormwater control, in compliance with Council's current Auckland Council Engineering Standards, prior to the occupation of the commercial units, and to the satisfaction of the Council (Team Leader Compliance Monitoring South).
6. The driveway is to be sealed for the first 5metres from the road into the site.

Soakage Trench

7. The stormwater (soakage trench) system is part of the private drainage system of the lot. The owner(s) and all future owners of the lot are responsible for the maintenance of the soakage/recharge pit system at all times, to the satisfaction of the Council (Team Leader – Resource Compliance) at the consent holder's expense.

Signage

8. The existing sign adjacent to the road reserve shall be amended or replaced, and only one phone number shall be displayed on the free standing identification sign. The sign must retain the 1.2m height and 1.8m width of the existing sign. The lettering size of message that does not comply with Traffic Control Devices Manual 2011 (TCDM) of New Zealand Transport Agency shall be replaced with specified size of letterings.

Noise

9. Noise from the activity shall not exceed the following limits when measured at or on the boundary of the subject site:
 - 50dB L_{Aeq} between 7am and 10pm Monday to Friday inclusive;
 - 50dB L_{Aeq} between 9am and 6pm Sunday; and
 - 40dB L_{Aeq} 75dB L_{AFmax} at all other times.

Advice Note:

The consent holder is reminded of their general obligation under section 16 of the Resource Management Act 1991 to adopt the best practicable option to ensure that the emission of noise does not exceed a reasonable level.

Hours of operation

10. The storage and lock up activity shall be restricted to between the hours of 7:30am to 7:00pm.

Lighting

11. The new sensor light to be located on the verandah of Unit D as shown on the South-West elevation plan, dated June 2018, shall face downwards and away from the adjacent right of way to ensure no light spill occurs on the neighbouring property.

Contamination

12. Earthworks shall be undertaken in accordance with the Site Management Plan, dated 19 July 2018, submitted as part of the Detailed Site Investigation dated 24 July 2018. Any variation to this Site Management Plan shall be submitted to the Team Leader Compliance Monitoring Southern, Licensing & Regulatory Compliance, Auckland Council for certification.
13. If evidence of unexpected contamination (e.g. refuse/asbestos, discoloured, stained or odorous soil or groundwater) is discovered during any earthworks, the consent holder shall immediately cease the works in this vicinity and notify the Team Leader Compliance Monitoring Southern, Licensing & Regulatory Compliance, Auckland Council, and provide a contamination report to the satisfaction of the Team Leader Compliance Monitoring Southern, Licensing & Regulatory Compliance, Auckland Council.
14. Excess soil or waste materials removed from the subject site shall be deposited at a disposal site that holds a consent to accept the relevant level of contamination. Where it

can be demonstrated that the soil or waste materials have been fully characterised in accordance with the cleanfill criteria as outlined in the Auckland Unitary Plan (Operative in Part) (AUP(OP)) and meets the definition of 'cleanfill', the removal to a consented disposal site is not required. Copies of the disposal dockets for the material removed from the site shall be retained and provided to Auckland Council upon request.

15. The consent holder shall ensure that the contamination level of any imported soil complies with the cleanfill criteria as outlined in the Auckland Unitary Plan (Operative in Part) (AUP(OP)), and evidence thereof provided to the Team Leader Compliance Monitoring Southern, Licensing & Regulatory Compliance, Auckland Council.
16. The consent holder shall at all times control any dust from the site in accordance with the Good Practice Guide for Assessing and Managing the Environmental Effects of Dust Emissions, Ministry for the Environment (2016).
17. If required, stockpiles shall be placed within the excavation foot print and fully covered with polythene or equivalent impermeable material and anchored at the edges. Stockpiles shall be placed on impermeable surfaces and retained within the area of sediment controls. Stockpiles shall be completely covered with polythene or equivalent impermeable material.
18. Following completion of earth works, the consent holder shall provide to the satisfaction of the Team Leader Compliance Monitoring Southern, Licensing & Regulatory Compliance, Auckland Council, a works completion report, which shall include but not limited to the following:
 - Soil test results for any imported soils
 - Total Volume of excavated soil disposed off-site
 - Waste transfer notes of soils disposed to a licensed facility/landfill.
19. In the event the proposed earthworks are carried out in the location of the septic tank, the applicant's attention is drawn to the below conditions to assess if a health risk may be present:
 - a description of the treatment system (e.g. type, age, use, maintenance)
 - a map identifying the location of the system
 - intended future use of the wastewater disposal field
 - any soil disturbance/volume in the affected area(s)
 - any system failures or complaints in the past
 - evidence of testing results of discharge water quality to the soakage field, if available any LIM tags advising methamphetamine production in the property.
 - validation soil sampling from the tank pit and associated areas of overflow and/or disposal.

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 inspector unless otherwise specified. Please contact Auckland Council (Southern) on (09) 301 0101 or 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 as the applicant disagree with any of the above conditions, or disagree with the additional charges relating to the processing of the application, you have a right of objection pursuant to sections 357A 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.

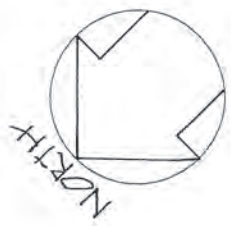
Delegated decision maker:

Name: Jane Masters
 Title: Team Leader, Resource Consents
 Signed:



Date: 20/8/2018

KRAAKMAN #2121
 Landscaping Plan
 23A Mauku Road,
 Patumahoe
 1:200 28 June 2018



BOTANICAL NAME	COMMON NAME	GRADE	MATURE HxW	SPACING	NUMBER
Pseudopanax	Cyril Watson	PB 3	2.0x2.0	6m	8
Corokia Cotoneaster	Korokio	PB 3	2.0x1.5	6m	8
Acacia Purpurea	Bidibidi	PB 2	0.1x1.0	random	15
Festuca Coxii	Blue grass	PB 2	0.3x0.3	random	30
Carex Comans	Carex grass	PB 2	0.3x0.3	random	30

LANDSCAPING NOTES

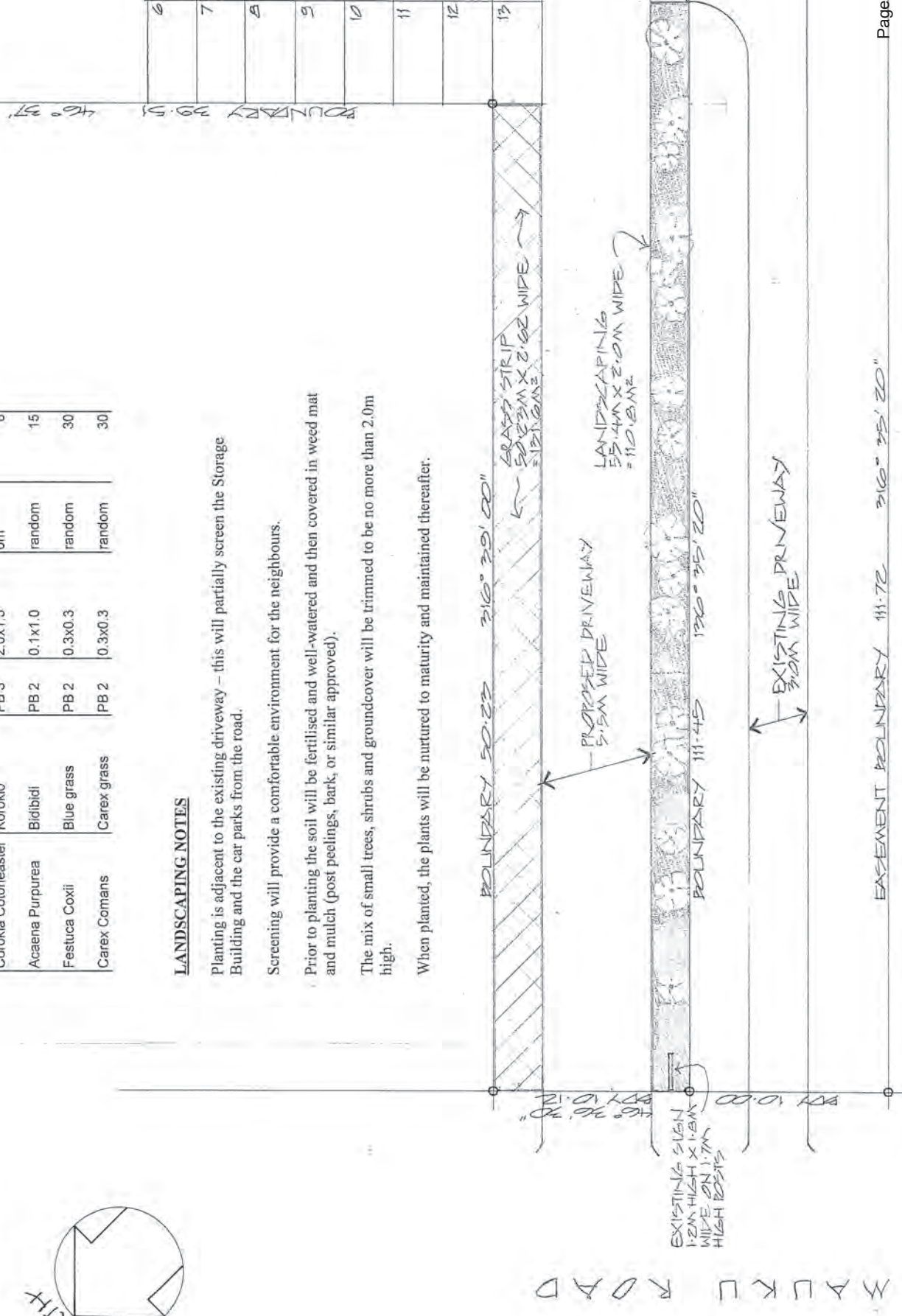
Planting is adjacent to the existing driveway – this will partially screen the Storage Building and the car parks from the road.

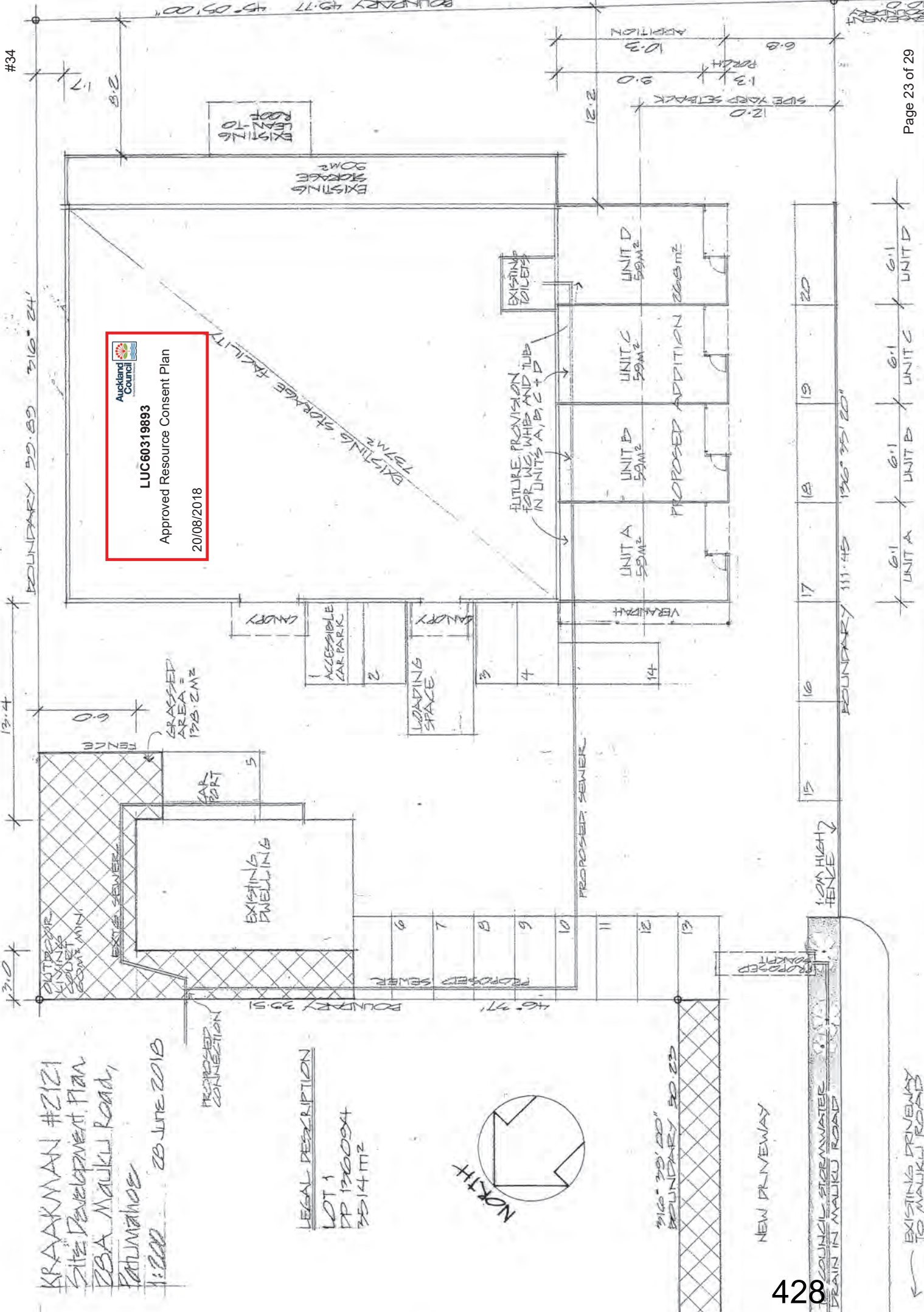
Screening will provide a comfortable environment for the neighbours.

Prior to planting the soil will be fertilised and well-watered and then covered in weed mat and mulch (post peelings, bark, or similar approved).

The mix of small trees, shrubs and groundcover will be trimmed to be no more than 2.0m high.

When planted, the plants will be nurtured to maturity and maintained thereafter.






LUC60319893
 Approved Resource Consent Plan
 20/08/2018

KRAAKMAN #Z121
 SITE DEVELOPMENT PLAN
 23A MAUKU ROAD,
 PŌHUNGAHŌE
 1:200 20 JUNE 2018

LEGAL DESCRIPTION
 LOT 1
 DP 136094
 3514 M²



316° 35' 00"
 BOUNDARY 50.23

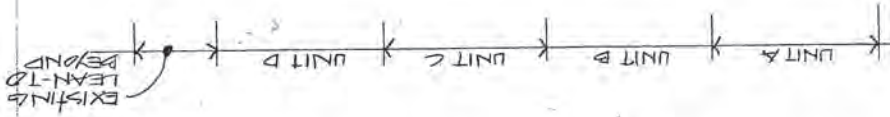
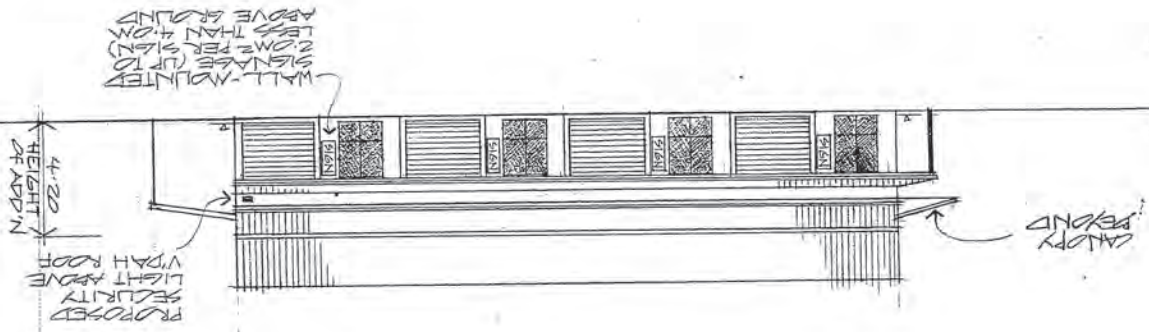
NEW DRIVEWAY

COUNCIL STORMWATER
 DRAIN IN MAUKU ROAD

← EXISTING DRIVEWAY
 TO MAUKU ROAD

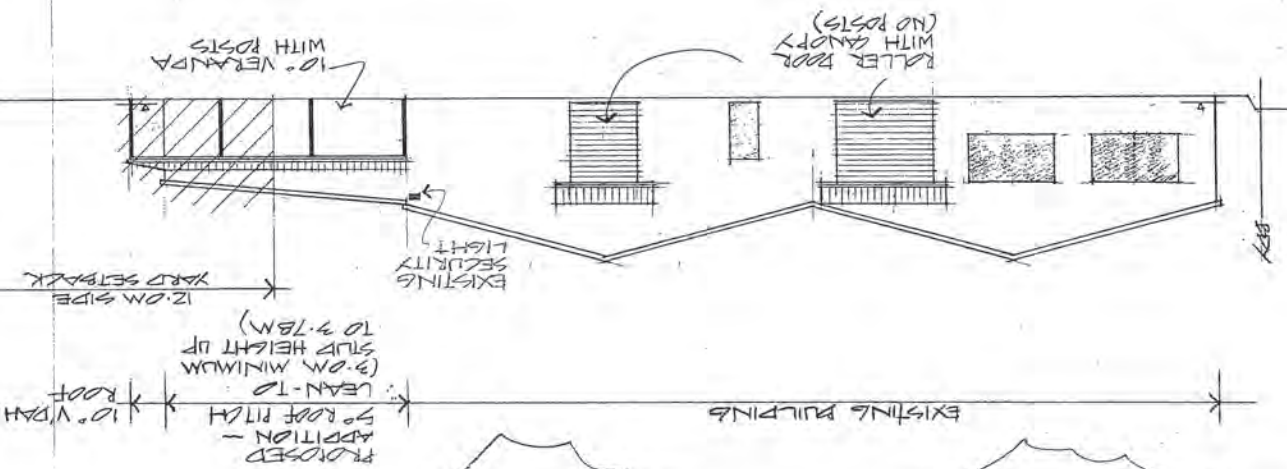
428

KRAAKMAN #2121 ZBA WALKU ROAD, BATHURST
SOUTH-WEST 1:200 JUNE 2018



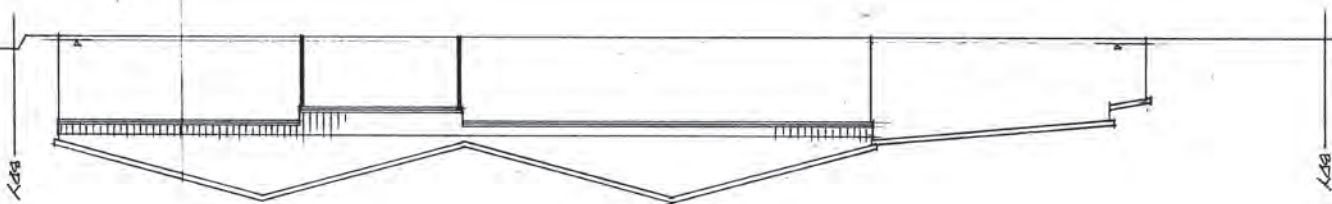
Auckland Council
 LUC60319893
 Approved Resource Consent Plan
 20/08/2018

KRAAKMAN #2121 ZBA WALKU ROAD, BATHURST
NORTH-WEST 1:200 JUNE 2018



SOUTH-EAST 1:200
October 2017

KRAAKMAN #2121
28A MAUKU ROAD, PŌHĀMŌE



EXISTING BUILDING

PROPOSED
LEAN-TO
ADDITION



LUC60319893

Approved Resource Consent Plan

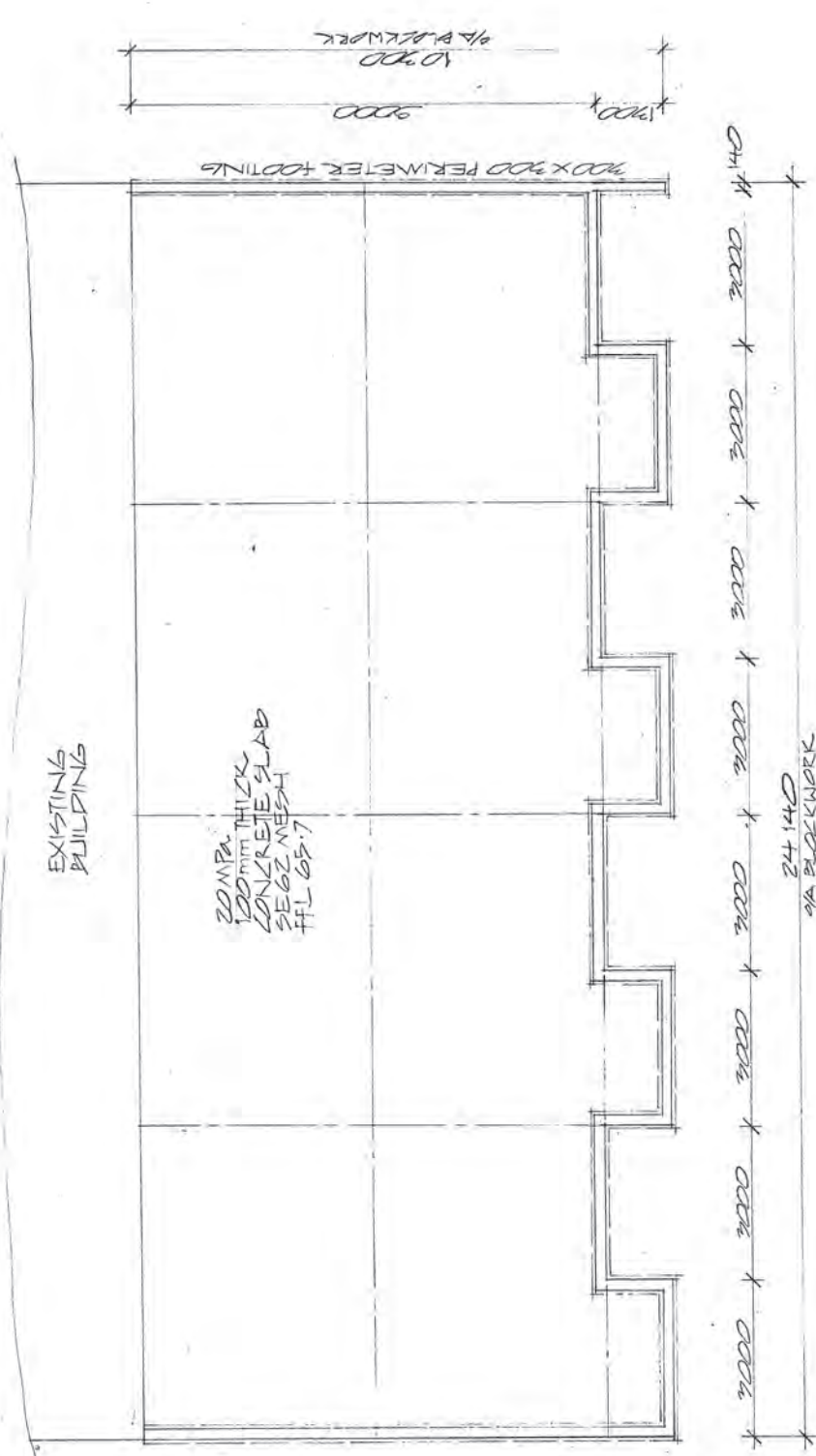
20/08/2018

VERIFY ALL DIMENSIONS BEFORE CONSTRUCTION

R63 #2121

DOUG MILLS
doug@trtdesign.co.nz 09 2355714
BOX 918
RIKELAHE
09 2355714

ALSO 2017
LPPK14



FOUNDATION PLAN | 1:100

450 x 450 x 500
PEEP (0.1m)
ISOLATED POST
FOOTINGS

PROPOSED ADDITIONS at
28A MAUKU ROAD, PATUMAHOE, for
P and N KRAAKMAN



LUC60319893

Approved Resource Consent Plan

20/08/2018

VERIFY ALL DIMENSIONS BEFORE CONSTRUCTION

RC4

2121

DOUG MILLS
BOX 918
PUEKOHU
doug@dttdesign.co.nz 09 255 5714

APR 2017
LPP/RIGHT

LEAN-TO AND VERANDA
RAFTERS - 30X45 S65
H1.2 THROUGHOUT

240X45 HYSPAN RAFTERS
AT 900 CRS - TYPICAL FOR
ALL 4 BAYS

30X45

ROOF FRAMING PLAN 1:100

PROPOSED ADDITIONS at
28A MAUKU ROAD, PATUMAHOE, for
P and N KRAAKMAN

Contact details

Full name of submitter: Scott and Judith Gavin

Organisation name:

Agent's full name: The Surveying Company

Email address: leigh@subdivision.co.nz

Contact phone number: 092389991

Postal address:

PO Box 466

Pukekohe

Auckland 2340

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address: 23 Clive Howe Road and surrounding sites

Map or maps: Include 23 Clive Howe Road in plan change area and enable Large Lot Residential development to a minimum of 1:2000 with an average of 1:4000. Rezone surrounding sites which are currently proposed to be Future Urban zone

Other provisions:

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

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

The reason for my or our views are:
set out in the attached document

35.1 | I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: set out in attached document

Submission date: 20 November 2020

Supporting documents

TSC Submission Plan Change 55 Patumahoe South.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

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

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

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

Yes

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

19th November 2020



Auckland Council
Private Bag 92300
AUCKLAND 1142

The Surveying Company LTD
17 Hall Street
PO Box 466 Pukekohe 2340
Phone 09 238 9991
Fax 09 238 9307
email: info@subdivision.co.nz
web: www.subdivision.co.nz

**SUBMISSION ON PROPOSED PLAN CHANGE 55: PATUMAHOE SOUTH –
TO THE AUCKLAND UNITARY PLAN**

To: Auckland Council

Submitter Name: Judith and Scott Gavin

Address: 23 Clive Howe Road, Patumahoe

Introduction:

This submission is made on behalf of Judith and Scott Gavin who own the 5.6ha site at 23 Clive Howe Road, Patumahoe (**'subject site'**). The subject site directly adjoins land included within plan change 55: Patumahoe South to the Auckland Unitary Plan.

This submission opposes the proposed private plan change as:

- It does not recognise that the Rural Production zone applied to the subject site and adjoining sites is outdated, inappropriate and unreasonable given that Clive Howe Road is a suburban street and the vast majority of these sites are not used for a productive purpose. Furthermore, perpetuating productive activities on these sites will result in reverse sensitivity issues;
- The subject site should be included within the plan change area as the site is a natural edge to the Patumahoe settlement and plays an important recreational role in the community;
- The Section 32 analysis undertaken is not comprehensive and robust as it does not consider the inclusion of the subject site in the plan change area and as it does not identify the inappropriateness of applying the Future Urban zone to sites which are already 'urban';

- The proposed private plan change does meet the statutory tests for a plan change as the proposal is not in accordance with the requirement in the Regional Policy Statement for the rezoning of land to be undertaken in a manner consistent with the Structure Plan process (as set out in Appendix 1 to the Unitary Plan).

This submission seeks that the private plan change is withdrawn and a replacement private plan change is prepared on the basis of a comprehensive structure planning process, including meaningful consultation with the Patumahoe community. Alternatively, this submission seeks that the subject site is included within the plan change area/Patumahoe Precinct and that the site and the adjoining site are live zoned Residential Large Lot with a subdivision standard that requires all new lots to have a minimum size of 2000m² and an average of 4000m². It is also sought to rezone the residential and lifestyle lots located on Clive Howe Road and Patumahoe Road Single House zone (800m²) (as opposed to Future Urban as promoted by the private plan change).

The alternate relief proposed will represent a balanced and integrated approach to the development of the subject site and Patumahoe in general. In particular, it will apply a zoning which will enable reasonable use of the subject site whilst also recognising its role at the edge of the Patumahoe settlement and the unique landscape, recreation and topographical features.

The reasons for our view are summarised below:

- (a) The existing Rural Production zone applied to the subject site and the adjoining sites is outdated and inappropriate.

The subject site and the adjoining sites are currently zoned Rural Production as shown in the plan below:

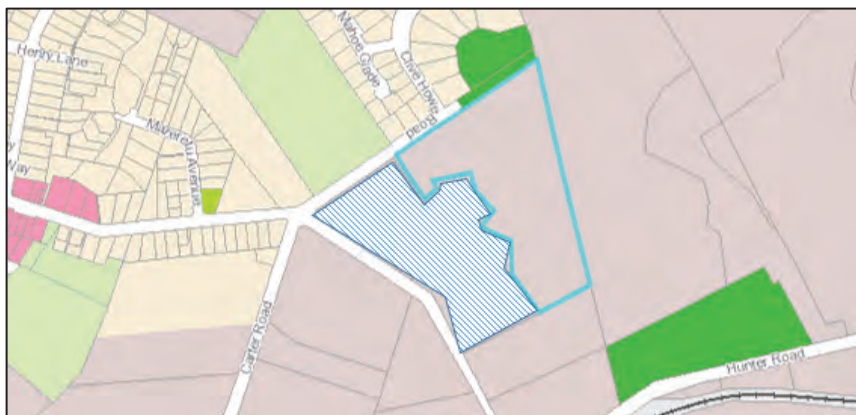


Figure 1 Subject Site - existing Rural Production Zone applied to the subject site (blue highlight) and adjoining sites (stripe)

At first glance, the Rural Production zone seems to be generally appropriate for the subject site and surrounding sites, particularly as it is consistent with zoning applied to the south and east. However, when a site visit to Clive Howe Road was undertaken, it became clear that the Rural Production zone currently applied to the subject site and adjoining sites is not appropriate or reasonable for the following reasons:

- Clive Howe Road is best described as a suburban street. Development adjoining this street includes Patumahoe School, Church, Clive Howe Sports grounds and 26 residential sites ranging in size from 770m² to 4800m². Sites of this size and development of this nature are not characteristic of the Rural Production zone. Photos of Clive Howe Road are shown below;



Figure 2 Photo of Clive Howe Road outside the entrance to the subject site



Figure 3 Photo of Clive Howe Road outside subject site but further to north

- Neither the subject site nor the majority of adjoining sites are used for a productive purpose. This is because the sites are either too small or the land is not suitable (e.g. the topography of the subject site does not enable productive activities). This is confirmed by the Land Use Capability report submitted by the applicant which shows that all of the adjoining sites are either residential or lifestyle properties. It is not reasonable to maintain a zone on a site(s) which cannot functionally be given effect to and does not represent the activities which are occurring;
- The only adjoining site which is used for a productive purpose is the site at 75 Patumahoe Road which contains a chicken farm. Our understanding is that sheds and technology used

in the farm is at the end of its useful life and therefore this productive use may not continue in the long term. Therefore, it is not necessary or appropriate to maintain the Rural Production zone on the basis of this site/activity;

- Whilst the subject site is not used for a productive purpose at the current time, if the Rural Production zone is maintained on these sites the current landowners or a future landowner may have no choice but to utilise the site for a Rural Production activity – given it cannot be used for any other purpose. Rural Production activities include intensive farming, animal breeding and boarding, quarrying and mineral prospecting and exploration. Enabling such activities in this suburban street has the very real potential for generating complaints and reverse sensitivity effects given the proximity of the subject site to residential dwellings. The potential for reverse sensitivity effects will be even more enhanced if the proposed private plan change is approved as there will be an increased supply of residential use in close proximity (approx. 150m) to the subject site.

Overall, it is considered that the existing Rural Production zone applied to the subject site and the adjoining sites is an outdated, inappropriate and unreasonable zone to apply.

(b) The subject site should be included within the boundary of the plan change

The subject site is 5.6ha in size and is located at the eastern end of the Patumahoe settlement. Whilst there are relatively flat areas on the site, there is a large escarpment which results in a significant change in grade between the western and eastern boundaries of the site. There is also two wetland areas and small pockets of indigenous vegetation. These features give the site a strong landscape value which is recognised in both the Landscape Assessment and Urban Design reports submitted by the applicant. These reports identify the steep escarpment as being a ‘robust feature’ that help to define the eastern edge of the settlement.

Whilst the subject site is on the fringe of the settlement, it nonetheless plays an important role in the functioning of the community. In particular, the site is used by Patumahoe School for the cross country, the rugby club uses the steep slopes for training and the general public use the site as informal parkland and a through route between the vested public parks as shown below:

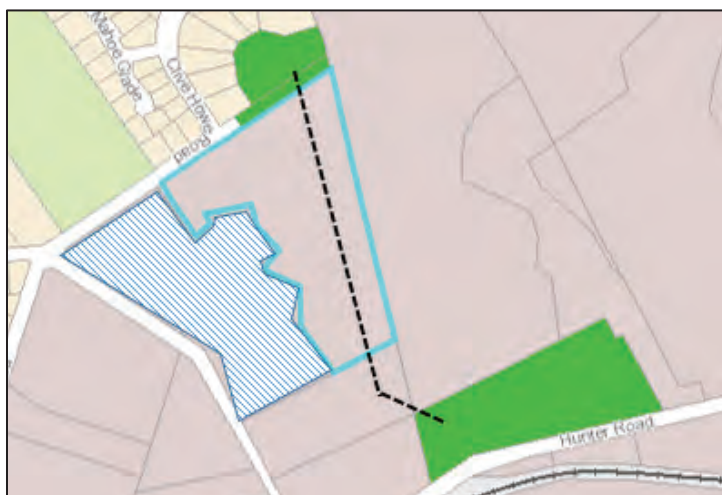


Figure 4 Informal walking track over the subject site

The recreational uses outlined above are currently at the benevolence and discretion of the landowners. If redevelopment of the subject site was enabled, this would provide an opportunity for the land which is used for recreation to be formally vested in the Council. This would secure and protect this land for recreation use in perpetuity.

Given that the subject site plays an important recreational role in the community and as it provides a robust edge to the settlement it should be included in any plan change relating to the future development of Patumahoe. In fact, the applicant's urban design report seems to have been prepared on the basis that this site is already included in the plan change and is proposed to be zoned Future Urban:

"The constraints of the eastern sector presented by the escarpment sensitivity and the existing chicken farming operation justify the use of a Future Urban zone to allow those matters to be resolved while still signalling the desirability of urban (residential) use of the land in the foreseeable future".

(c) Section 32 Analysis

The Section 32 analysis submitted with this proposal does not take full account of the benefits, costs and risks of new policies and rules on the community and environment as it does not give any consideration to including the subject site within the plan change area. This lack of consideration

means that the plan change does not achieve its stated aim of ensuring “integrated planning of land use, infrastructure and development (at a local level)”.

The Section 32 analysis also does not provide a comprehensive analysis in relation to the land proposed to be zoned Future Urban. In particular, the assessment ignores the fact that a number of these sites are already ‘urban’ given their small size and the fact that they are serviced with infrastructure and have kerb and channel. It is nonsensical to zone sites which are already urban ‘Future Urban’. It is backwards planning.

The Section 32 assessment also concludes that this land should be Future Urban because of the need for ‘bespoke design solutions’ and the existence of the chicken farm. A more comprehensive and complete s32 assessment and plan change process would not have simply ‘pushed these issues down the road’, rather it would have resolved them through undertaking the required consultation and assessment. It is also noted that this plan change and the Patumahoe Precinct are ‘bespoke’ provisions and therefore it is entirely possible and appropriate to address the eastern edge of the settlement in this plan change.

(d) Plan Change tests

In considering any private plan change the Council must consider the relevant statutory tests for plan changes summarised by the Environment Court in *Long Bay-Okura Great Park Society Inc & Ors v North Shore City Council*. Under these tests, a private plan change must “not be inconsistent with” the Regional Policy Statement within the Unitary Plan. In turn, the Regional Policy Statement requires that the rezoning of land follows the Structure Plan guidelines set out in Appendix 1 to the Unitary Plan.

This proposal is not consistent with the Structure Plan guidelines in Appendix 1 as the proposed plan change does not:

- appropriately address the urban edge of the plan change area as it does not include the subject site which has been identified as a ‘robust feature’ which defines the edge of the Patumahoe settlement;
- adequately provide for the important green linkage through the subject site between the two vested Council reserves;
- adequately address the opportunity to improve access through the subject site by providing for integrated development of the subject site and the adjoining site;

- adequately protect the important natural features on the subject site including the wetland, bush and escarpment;
- consider the contribution that the subject site could make to a compact urban form or the efficient use of land within the Patumahoe settlement;
- adequately provide for a range of densities to support housing choice;
- take account of the reverse sensitivity issues that will result from maintaining the existing Rural Production zone on the subject site;
- create an adequate transition at the edge of the Patumahoe settlement;
- take full account of feedback from landowners gained through consultation as no consultation has been undertaken with the owners of the subject site. Furthermore, the plan change documentation shows that no meaningful consultation has been undertaken with the Patumahoe community. The applicant has confirmed that no contact with adjoining property owners or the wider community has been made.

The above factors clearly demonstrates that a full and through planning process has not been undertaken prior to the notification of this plan change.

(e) Proposed Amendments to the plan change

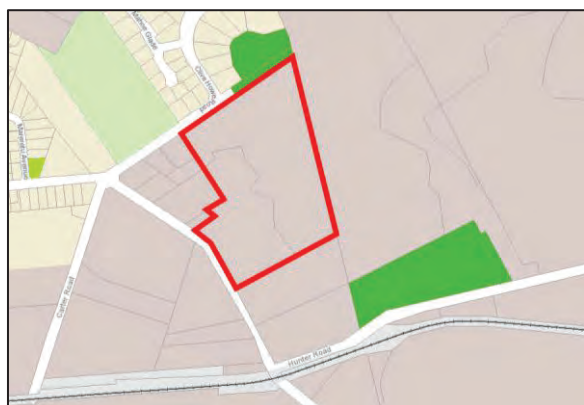
The first amendment sought by this plan change is that the sites fronting Clive Howe Road and Patumahoe Road should be 'live' zoned Single House. The Future Urban zone proposed in the plan change is demonstrably inappropriate as it precludes urban use of these already urban sites.

The second amendment sought by this plan change relates to the subject site and the adjoining site at 75 Patumahoe Road. It is proposed that these sites should be zoned Residential Large Lot as such zoning would recognise the landscape value of the escarpment, the fact that the land may be difficult to service and that there are topographical constraints.

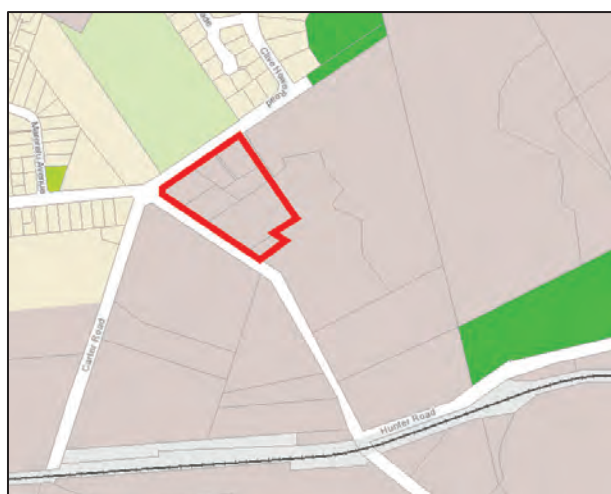
It is also proposed that the specific subdivision standard be included for these sites to enable the minimum lot size to be reduced to 2000m² provided that the average size is 4000m². Such an approach will achieve the intent of the Large Lot zone but will better enable small lots on the flat land and larger lots on the steeper slopes.

Relief Sought:

- 35.2 | 1. That the private plan change is withdrawn and a replacement private plan change is prepared on the basis of a comprehensive structure planning process, including meaningful consultation with the Patumahoe community;
- 35.3 | 2. That the subject site at 23 Clive Howe Road is included within the private plan change area and the Patumahoe Precinct;
- 35.4 | 3. That the subject site at 23 Clive Howe Road and the adjoining site at 75 Patumahoe Road are rezoned Residential Large Lot and are subject to a subdivision standard which requires all new lots to have a minimum size of 2000m² and an average size of 4000m².



- 35.5 | 4. That the sites shown below are zoned Residential Single House;



- 35.6 | 5. Any other alternative relief that will enable the subject site and adjoining/surrounding sites to be used for urban (residential) use.

Yours faithfully

THE SURVEYING COMPANY LIMITED

Prepared by:



SARAH NAIRN

Resource Management Planner

Authorised by:



LEIGH SHAW

Planning Manager

20 November 2020

Auckland Council
Unitary Plan
Private Bag 92300
Auckland 1142
Attn: Planning Technician

By email to: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR VARIATION (FORM 5)

Plan Change 55 Patumahoe South

NAME OF SUBMITTER:

KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE:

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WELLINGTON 6140
Attention: Pam Butler

Ph: 0275 708571

Email: Pam.Butler@kiwirail.co.nz

Submission on Auckland Unitary Plan - Proposed Plan Change 55 (Private): Patumahoe South

KiwiRail is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the requiring authority for land designated "Railway Purposes" (or similar) in district plans throughout New Zealand.

KiwiRail has an interest in protecting its ability to continue to operate, maintain and enhance the rail network, as well as seeking to ensure the safety and amenity of those parties occupying land adjacent to the rail corridor. The Plan Change area lies adjacent to the Mission Bush Branch Line. This line is currently largely used by freight traffic. KiwiRail seeks to protect the existing railway corridor to enable its ongoing use for operational purposes and to ensure the safety, health and amenity of nearby activities.

KiwiRail's specific submissions on the Plan Changes are set out in the following submission sheet. KiwiRail's proposed changes are **bold** and underlined. Proposed Plan Change text is italicised, and deletions are struck through.



KiwiRail supports the Plan Change, subject to the matters raised in this submission being appropriately addressed to ensure that any adverse effects of the proposal can be adequately avoided or mitigated.

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

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission.

If you have any queries, please don't hesitate to contact me.

Yours faithfully,



Pam Butler

Senior RMA Advisor

KiwiRail Holdings Limited





Sub #	Provision number	Support/Oppose/Seek Amendment	Submission/Comments/Reasons Plan Change 55 Patumahoe South	Relief Sought (as stated or similar to achieve the requested relief)
Plan Change 55 Patumahoe South				
1	1430.1. Precinct Description	Support, with amendment	Kiwirail supports the proposed change to the precinct description, as this acknowledges the location of the adjacent railway corridor and reflects the need to manage precinct development accordingly. This line is more accurately described as the Mission Bush Branch Line and a change is sought to correct this. There are consequential changes throughout the PC text which should be updated with the correct line description.	36.1 Support, with amendment to read; 1430.1. Precinct Description “... The Branch Line forms the southern boundary of the precinct...”
2	1430.2. Objectives (1), (3) and (4)	Support	Kiwirail supports the recognition of the need to address reverse sensitivity effects and to protect the health and amenity of lineside residents and road users. Adverse noise effects on people can be avoided by requiring new buildings for noise sensitive activities near railways to be appropriately located and designed. It is widely accepted nationally and internationally that sound and vibration from road and rail networks has the potential to cause adverse health and amenity effects on people living nearby. Incoming residents do not appreciate the actual effects of living with rail sound and vibration when they choose to live near existing railways. Railway operations occur 24/7 and include maintenance activities. Further, the objective seeks to ensure that the surrounding transport network operates safely and efficiently (including at level crossings). The proposed Precinct Objectives are supported by AUP OP objectives and policies seeking to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy.	36.2 Retain 1430.2. Objectives (1), (3) and (4) as notified
3	1430.10.2 Patumahoe: Precinct plan 3 – Sub-Precinct E	Support with amendment	The content of Precinct Plan 3 for sub precinct E is supported as it describes how mitigation for and from existing legally established infrastructure and activities will be managed. However, the Plan omits to include the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E adjoining the railway referred to in 1430.6.9. (4) and should be amended to include this.	36.3 Retain, with amendment Add a notation to Precinct plan 3 – Sub-Precinct E to show the location of the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E, adjoining the railway, referred to in 1430.6.9 (4).
4	Table 1430.4.2 Activity table	Support	Kiwirail supports the activities status as set out in the Table which provides for subdivision which observes the proposed standards in Precinct E as an RD and where not, as a NC activity. The provision provides an appropriate level of assessment for complying subdivision inclusive of the design mitigation required.	36.4 Retain as notified
5	1430.6.9. Landscape buffers in sub-precincts B, C, and D and E clauses (3) and (4) relating to sub Precinct E	Support	A key concern for Kiwirail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a planted setback for activities adjoining the railway corridor boundary through the landscape buffer control manages the interface between operations within the railway corridor and	36.5 Retain as notified



line side development i.e. reducing the risk of the public coming into contact with the operational railway.

1430.6.17. Protection from Railway Noise and Vibration in Sub-precinct E

Support, with amendment

Kiwirail supports the Plan Change noise and vibration standards as they largely reflect Kiwirails noise and vibration standard for development adjacent to the railway corridor. The controls are necessary to achieve sustainable development as they recognise the physical attributes and constraints applying to development in Precinct E. The controls reflect an integrated approach to planning that seeks to allow development to occur near the railway corridor, but in a way that appropriately manages the effects of, and effects on, the ongoing use and operation of the corridor and residential amenity and health.

The MBL currently mainly serves the Glenbrook Steel Mill and typically carries 8-10 freight trains per day. For new buildings constructed near the railway it is relatively straight-forward to control internal sound and vibration through the building location, design and provision of adequate ventilation systems. With careful design, future occupants can be protected from the most significant adverse effects associated with railway noise.

This submission seeks additional provisions which provide for alternate pathways to achieving compliance with the Kiwirail standard and to ensure that adequate ventilation is provided to manage noise when windows are shut. A further change is sought to ensure that compliance is adequately demonstrated.

Relief Sought (as stated or similar to achieve the requested relief)

Retain, with amendment as follows:

1. INSERT after the Table in (1);

or;

is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks

AND;

2. AMEND clause (b) as follows;

(b) Compliance may be achieved by adopting the following construction schedule specified by Kiwirail refer to Schedule XX Construction schedule for indoor noise control, page 5, Kiwirail Plan Provisions-October 2018.

AND;

3. INSERT Construction schedule for indoor noise control

<u>Elements</u>	Minimum construction for noise control in addition to the requirements of the New Zealand Building Code
<u>External walls</u>	<p>Wall cavity infill of fibrous insulation, batts or similar (minimum density of 9 kg/m3)</p> <p>Cladding and internal wall lining complying with either Options A, B or C below:</p> <p>Option A - Light cladding: timber weatherboard or sheet materials with surface mass between 8 kg/m2 and 30 kg/m2 of wall cladding</p> <p>Option B - Medium cladding: surface mass between 30 kg/m2 and 80 kg/m2 of wall cladding</p> <p>Option C - Heavy cladding: surface mass between 80 kg/m2 and 220 kg/m2 of wall cladding</p> <p>Ceiling cavity infill of fibrous insulation, batts or similar (minimum density of 7 kg/m3)</p> <p>Ceiling penetrations, such as for recessed lighting or ventilation, shall not allow additional noise break-in</p> <p>Roof type and internal ceiling lining complying with either Options A, B or C below:</p> <p>Option A - Skillion roof with light cladding: surface mass up to 20 kg/m2 of roof cladding</p> <p>Internal lining of minimum 17 kg/m2 plasterboard, such as two layers of 10 mm thick high density plasterboard, on resilient/isolating mountings</p> <p>Internal lining of minimum 17 kg/m2 plasterboard, such as two layers of 10 mm thick high density plasterboard</p> <p>No requirements additional to New Zealand Building Code</p>
<u>Roof/ceiling</u>	<p>Ceiling cavity infill of fibrous insulation, batts or similar (minimum density of 7 kg/m3)</p> <p>Ceiling penetrations, such as for recessed lighting or ventilation, shall not allow additional noise break-in</p> <p>Roof type and internal ceiling lining complying with either Options A, B or C below:</p> <p>Option A - Skillion roof with light cladding: surface mass up to 20 kg/m2 of roof cladding</p> <p>Internal lining of minimum 25 kg/m2 plasterboard, such as two layers of 13 mm thick high density plasterboard</p>

36.6

36.7

36.8





	<p>Option B - Pitched roof with light cladding: surface mass up to 20 kg/m² of roof cladding</p> <p>Internal lining of minimum 17 kg/m² plasterboard, such as two layers of 10 mm thick high density plasterboard</p>
	<p>Option C - Roof with heavy cladding: surface mass between 20 kg/m² and 60 kg/m² of roof cladding</p> <p>No requirements additional to New Zealand Building Code</p>
Glazed areas	<p>Aluminium frames with full compression seals on opening panes</p> <p>Glazed areas shall be less than 35% of each room floor area</p> <p>Either, double-glazing with:</p> <ul style="list-style-type: none"> a laminated pane of glass at least 6 mm thick, and a cavity between the two panes of glass at least 12 mm deep; and a second pane of glass at least 4 mm thick <p>Or, any other glazing with a minimum performance of Rw 33 dB</p>
Exterior doors	<p>Exterior door with line-of-sight, to any part of the state highway road surface or to any point 3.8 metres above railway tracks</p> <p>Solid core exterior door, minimum surface mass 24 kg/m², with edge and threshold compression seals; or other doorset with minimum performance of Rw 30 dB</p> <p>Exterior door shielded by the building, so there is no line-of-sight to any parts of the state highway road surface or any points 3.8 metres above railway tracks</p> <p>Exterior door with edge and threshold compression seals</p>

AND;

4. INSERT new clause;

(xx) Mechanical ventilation

if windows must be closed to achieve the design noise levels in clause 1, the building is designed, constructed and maintained with a mechanical ventilation system that;

- (a) For sleeping rooms, achieves the following requirements:
 - i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and
 - iii. provides relief for equivalent volumes of spill air;
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and
 - v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.
- (b) For other habitable spaces, is as determined by a suitably qualified and experienced person.



Sub #	Provision number	Support/Oppo se/ Seek Amendment	Submission/Comments/Reasons Plan Change 55 Patumahoe South	Relief Sought (as stated or similar to achieve the requested relief)
7	1430.8. Assessment – restricted discretionary activities (2) clause (i)	Support	Patumahoe Road crosses the Mission Bush Branch line at an actively controlled level crossing approximately 15metres south of the Patumahoe Road/ Hunter Road intersection. The extent of any improvements at the level crossing can be identified via a future Level Crossing Safety Impact Assessment (LCSIA) report and provision for such reporting is included in the Plan Change. The crossing is a public crossing and the Auckland Council is responsible for its safety and maintenance. Developer contributions towards road improvements at the crossing may be required so that it operates safely as a result of traffic generated from the development area. Alternative active modes such as cycling and pedestrian movement should also be catered for at the crossing.	<p>36.10</p> <p>Insert after proposed clause (2) <i>Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95)_r or</i></p> <p>(b) is a single storey framed residential building with:</p> <ul style="list-style-type: none"> i. <u>a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u> ii. <u>vibration isolation separating the sides of the floor slab from the ground; and</u> iii. <u>no rigid connections between the building and the ground.</u> <p>AND</p> <p>5. INSERT new clause referring to all preceding clauses;</p> <p>(xxx) A report is submitted to the council demonstrating compliance with the clauses above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.</p> <p>36.11</p>
8	1430.8. Assessment – restricted discretionary activities clause (2) (n)	Support with amendment	<p>Patumahoe Road crosses the Mission Bush Branch line at an actively controlled level crossing approximately 15metres south of the Patumahoe Road/ Hunter Road intersection. The extent of any improvements at the level crossing can be identified via a future Level Crossing Safety Impact Assessment (LCSIA) report and provision for such reporting is included in the Plan Change. The crossing is a public crossing and the Auckland Council is responsible for its safety and maintenance. Developer contributions towards road improvements at the crossing may be required so that it operates safely as a result of traffic generated from the development area. Alternative active modes such as cycling and pedestrian movement should also be catered for at the crossing.</p> <p>Consequential change to accommodate restricted discretionary criteria for any applications to waive the railway noise and vibration standards. The clause should be expanded to include assessment criteria relating to the circumstances under which noncompliance will be assessed.</p>	<p>36.12</p> <p><u>Retain</u> as notified</p> <p><u>Retain with amendment</u> to clause (2) (n) to add sub criteria as follows;</p> <p><u>(n) Compliance with Railway Noise and Vibration Standards in Sub-precinct E including:</u></p> <ul style="list-style-type: none"> <u>(i) Whether the sensitive activity could be located further from the railway corridor;</u> <u>(ii) The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance;</u> <u>(iii) Special topographical, building features or ground conditions which will mitigate vibration impacts</u> <p><u>Retain</u> as notified</p> <p>36.13</p>
9	1430.8.1. Assessment criteria (4) Additional assessment criteria for subdivision in sub-precinct E (b) Roading, clauses (iii) and (iv)	Support	Increases in usage at level crossings may impact the safe and efficient operation of both the road and railway network. The criteria permit an assessment about the need for level crossing improvements to be undertaken relative to traffic levels generated from the development.	<p>36.14</p> <p><u>Retain</u> as notified</p>



**Watercare Services Limited**

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www.watercare.co.nz

Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 55 (Private) – Patumahoe South

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz

DATE: 20 November 2020

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

1. INTRODUCTION

1.1. Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 ("**CCO**") and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.4 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. 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 and the Auckland Future Urban Land Supply Strategy.¹

2. SUBMISSION

2.1. General

This is a submission on a change proposed by Askew Consultants Limited to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 22 October 2020 (“**Proposal**”).

The Applicant proposes to rezone approximately 34.9ha of Rural – Rural Production zoned land at Carter Road (“**Plan Change Area**”) as follows:

- Central Section: 22.4ha of land southeast of the Patumahoe Domain, bounded by Patumahoe Road to the east and the Paerata-Waiuku railway line to the south – Land within the Central section rezoned to Residential - Single House, Business - Light Industrial and Open Space zones.
- Western Section: 3.5ha of land immediately southwest of the Patumahoe Domain, bounded by Mauku Road to the west – Land within the Western section rezoned to Residential - Single House zone.
- Eastern Section: 9.0ha of land east of Patumahoe Road and bounded by a natural escarpment and Hunter Road – Land within the Eastern section rezoned to Future Urban zone.

The Applicant also proposes a new sub-precinct, Sub-precinct E, within the Patumahoe Precinct to be applied to the Plan Change Area.

Watercare opposes the Proposal.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare’s existing and planned water and wastewater network are appropriately considered and managed in accordance with Resource Management Act 1991 (“**RMA**”).

In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Taungahuru Te Mahere Taungahuru 2018 – 2028/The 10-year Budget Long-term Plan 2018 – 2028, the Auckland Future Urban Land Supply Strategy 2015 and 2017, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2016 - 2036. It has also considered the relevant RMA documents including the Auckland Unitary Plan (Operative in Part) and the National Policy Statement on Urban Development Capacity 2016 which (among other matters) requires local authorities to ensure that at any one time there is sufficient housing and business development capacity which:

¹ Local Government (Auckland Council) Act 2009, s58.

- (a) in the short term, is feasible, zoned and serviced with development infrastructure (including water and wastewater);
- (b) in the medium term, is feasible, zoned and either:
 - (i) serviced with development infrastructure, or
 - (ii) the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002; and
- (c) in the long term, is feasible, identified in relevant plans and strategies, and the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.²

2.2. Specific parts of the Proposal

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

- (a) the proposed water and wastewater servicing arrangement; and
- (b) the effects of the Proposal on Watercare's existing and planned water and wastewater network.

Watercare has reviewed the Proposal and does not consider that the manner in which the Applicant intends to service the water and wastewater requirements of the Proposal is technically feasible. The Proposal will consequently result in unacceptable adverse effects on Watercare's existing and planned water and wastewater infrastructure network.

Specifically, the Proposal does not provide adequate information to address the following:

- (a) How necessary additional water storage to service the Plan Change Area will be provided.
- (b) The availability of suitable land to accommodate upgrades required to service the Plan Change Area.
- (c) Confirmation of how those upgrades are intended to be funded.

2.2.1. Water supply servicing for the Plan Change Area

Currently, there is no water supply infrastructure to service the Plan Change Area. The closest available water supply network is located on the corner of Patumahoe Road and Carter Ave, being the Patumahoe Reservoir and water pump station.

The Patumahoe Reservoir and water pump station does not have the capacity to service the Plan Change Area.

The existing water storage is only sufficient to service the current live zoned land. The water storage assessment has determined that an upgrade to the existing Patumahoe water

² National Policy Statement on Urban Development Capacity 2016, policy PA1.

reservoir would be required to enable the development.³ The developer will need to provide suitable land adjacent to the current reservoir to meet the appropriate hydraulic grade line and provide funding to expand the existing asset in order for water supply to be provided to the Plan Change Area.

Design and testing for firefighting pressure and provision for fire hydrants within the road reserve will be required to be addressed at resource consent stage.

The design of all water supply infrastructure, including sizing for future reticulation, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

2.2.2. Wastewater servicing for the Plan Change Area

The wastewater network has the capacity to service the initial stages of the Plan Change Area up to 180 development unit equivalents ("DUEs"). As stated in Watercare's initial assessment,⁴ the increased wastewater flow from developing up to 180 DUEs in the Plan Change Area is expected to have no more than a negligible effect on the existing network.

The capacity assessment⁴ has assessed only the proposed number of dwellings specified by the Applicant.⁵ However, the zoning sought by the Applicant as part of the Proposal would enable greater than this number of DUEs to be developed in the Plan Change Area. The applicant has not requested an assessment of the total number of potential dwellings under the Proposal.

If the number of houses and other non-residential activity in the Plan Change Area exceeds 180 DUE, the existing pump station and rising main through to the Pukekohe network is likely to need to be upgraded as well as potential local network upgrades downstream in the Pukekohe area. If these wider upgrades are triggered by the Plan Change, the Applicant will be required to construct and fund any upgrades triggered for the wider network, i.e. potentially a new pump station and rising main to Pukekohe and local network upgrades in Pukekohe.

In order to adequately assess the full effects of the Proposal on Watercare's existing and planned wastewater infrastructure network, the following further information regarding the proposed wastewater servicing is required:

- (a) a comprehensive description of the development potential impacts of further subdivision and build out of the residential zoned land, as well as the impacts of proposed Sub-precinct E;
- (b) an assessment of the wastewater infrastructure upgrades that might be required to service the additional development; and
- (c) confirmation of how those upgrades intend to be funded.

³ Undertaken by Watercare subsequent to the initial assessment provided to the Applicant's consultants in November 2018 – refer Attachment 2 of the application materials.

⁴ Refer Attachment 2 of the application materials.

⁵ Refer Attachment 2 of the application materials for Watercare's initial assessment and Appendix 5B for the letter provided to Watercare by the Applicant's consultants to inform Watercare's assessment which advised that a development of 180 lots was proposed.

Proposed network plans, including the pump stations proposed by the Applicant as set out in the Infrastructure Report submitted with the application, will need to be assessed at resource consent stage for appropriate alignment, sizing and operational requirements.

The Applicant's current proposal to service the future development area via new public reticulation located within the new roading network⁶ is not acceptable to Watercare as operationally Watercare will require any new infrastructure to be installed within private sites or on the public berm, as opposed to the within the road network. The developer will be required to provide adequate berm and road size to accommodate the minimum clearances for all infrastructure near the proposed Watercare assets, which will be assessed at the Engineering Plan Approval stage.

All wastewater infrastructure will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

3. DECISION SOUGHT

37.1

Watercare seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.

In its current form, the Proposal would not adequately meet those requirements, and could therefore result in adverse effects on the environment that cannot otherwise be avoided, remedied or mitigated.

Watercare requests that the following information be provided in order for it to adequately assess the effects of this Proposal:

37.2

- (a) How the additional water storage to service the Plan Change Area will be provided.
- (b) The availability of suitable land to accommodate the necessary upgrades to service the Plan Change Area, including identification of suitable land adjacent to the Patumahoe Reservoir to meet the appropriate hydraulic grade line to expand the existing asset in order to provide water supply to service the Plan Change Area.
- (c) An additional assessment of the full potential impacts of the rezoned land, including the proposed Sub-precinct E.
- (d) Any additional existing upgrades, and proposed wastewater infrastructure that will be required to accommodate additional flows.
- (e) Confirmation of how both the water and wastewater upgrades are intended to be funded.⁷

⁶ Refer Plan Change Request, AEE and Section 32 Report, section 5.4.2.

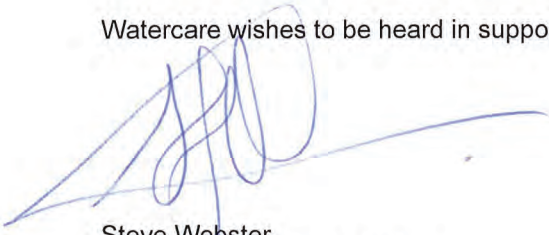
⁷ The Applicant's section 32 assessment records that "on-going maintenance costs for the new infrastructure which will be managed by Auckland Council/ Watercare Services as public assets". All infrastructure to service the Proposal will be required to be built and funded by the developer.

37.2

In the absence of the information set out above being provided by the Applicant to address the concerns set out in this submission, Watercare seeks that the Plan Change be declined.

HEARING

Watercare wishes to be heard in support of its submission.



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:

Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470
Email: ilze.gotelli@water.co.nz

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 notified proposal for policy statement or plan change or variation

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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) Shravan Miryala on behalf of Counties Power Ltd.

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

Address for service of Submitter

PO Box 147105, Ponsonby, Auckland-1021

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Please see attached submission prepared by Align Ltd. dated 20 November 2011.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- 38.1 | Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- 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)

20 November 2020
Date

Notes to person making submission:

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

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

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

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

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

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

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

Auckland Unitary Plan
Plan Change 55 (Private):
Patumahoe South
Submission



Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

Plan: Auckland Unitary Plan - Proposed Plan Change 55 (Private) Patumahoe South

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Shravan Miryala, Planning Consultant, Align Limited

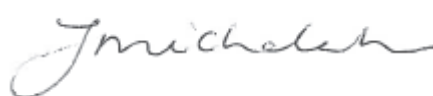
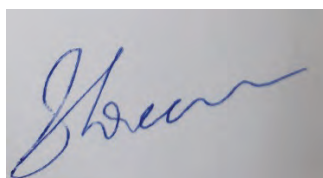
File Reference: COUNT039

Version:

Issue 2.0	20 November 2020	For client review
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Distribution:

Rachel Bilbe	Counties Power	Email
AC Policy Team	Auckland Council	Online Submission



Produced by:

Shravan Miryala

Review by:

Jo Michalakakis

Align Limited

Date: 20 November 2020

Limitations:

This report has been prepared for the client according to their instructions. The information in this report should not be used by anyone else, or for any other purpose. Some of the information presented in this report is based on information supplied by the client. Align Limited does not guarantee the accuracy of any such information. Any advice contained in this report is subject to this limitation.

1. Introduction

This document provides a submission on Plan Change 55 (Private): Patumahoe South (sub - precinct E) requested by Askew Consultants Limited. The document contains a table with submission points generally supporting the plan change and flagging some considerations to Askew Consultants Limited.

Overall, Counties Power Ltd. (CPL) are strong in their support of the plan changes and have the ability to supply power to enable this development.

There are no suggested amendments to provisions however, the submission points below in section 4 and the table raise some considerations to be aware of. The submission references the following aspect of the Proposed Plan Change:

- Standard I430.6.13 (1)(b);
- I430.8(2)(f-g) Assessment – restricted discretionary activities; and
- I430.8.1(4)(e) Additional assessment criteria for subdivision in sub-precinct E.

Counties Power wishes to be heard in support of their submission.

2. About Counties Power

Counties Power 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 (RMA).

Counties Power owns, manages, and operates the electricity distribution network in south Auckland, north Waikato and Hauraki District areas, collectively serving over 44,000 customers, with a system length of 3,200km covering an area of approximately 2,250km². The Auckland Council portion of the network covers 830km² and makes up 37% of the Counties Power network. In the Auckland Region, this includes urban centres such as Pukekohe, Waiuku and Southern Papakura; rural residential areas like Hunua; and rural areas with very low customer density. It also includes Patumahoe, the area subject to proposed Plan Change 55.

Counties Power is 100% consumer owned and is managed by the Counties Power Consumer Trust for the benefit of its consumers and their communities. Information about the Trust can be obtained from www.countiespowertrust.co.nz.

By length, 72% of the Counties Power network is rural overhead, however the urban networks supplying Pukekohe, Waiuku, Tuakau, Pokeno, Drury and parts of Papakura comprise a split of overhead and underground assets. Generally, the eastern part of the network is newer, higher in network connection densities and subject to high levels of growth in the areas adjacent to motorway and

state highway corridors. The western side of the network is older, more remote, lower density and has less growth in terms of new connections and load requirements on the network.

3. Counties Power Electricity Network Operation and Location

Counties Power has two points of supply from Transpower's National Grid via GXPs at Glenbrook and Bombay. From there, power is distributed to consumers via nine zone substations and an extensive network of lines, cables, transformers, and other equipment. The Glenbrook GXP supplies the western substations at 33kV whilst Bombay GXP supplies the eastern substations at 110kV and 22kV.

Counties Power's network is made up of both High Voltage (HV) and Low Voltage (LV) lines made up as follows:

HV network comprises:

- sub-transmission lines (33kV and 110kV) which carry electricity from the Grid Exit Point (GXP) to zone substations or between zone substations. Typically serving 500 to 12,000 customer connections.
- feeder lines (11kV and 22kV) which carry electricity from zone substations to transformers or in some cases direct to customers with a large demand (e.g. some industrial customers). These typically serve 80 to 2,500 customer connections.

LV Network (400V) comprises lines from transformers to individual connection points, typically serving 1 to 20 customer connections.

More than 20 years ago, Counties Power decided to provide for future growth by converting the backbone of its network from 33kV (for sub-transmission) and 11kV (for feeders) to 110kV and 22kV respectively. These voltages carry significant loads with a reasonably unobtrusive overhead line network and have provided the consumer-shareholders of Counties Power with a network that is cost effective to construct, flexible and resilient.

Counties Power owns network infrastructure in the form of overhead lines and underground cables located in the road reserve within the Plan Change 55 Area. There are existing 11kV overhead distribution lines on the north-eastern side of Patumahoe Road adjacent to the Future Urban Zone, being opposite the Light Industrial and Residential Zones and further overhead 11kV lines along the west side of Carter Road and the east side of Mauku Road, both of which are zoned for Residential purposes. A diagram is included in Appendix 1 which shows the location of Counties Power assets.

Lines constructed in the road reserve are protected by the terms of the Electricity Act 1992, the New Zealand Electrical Code of Practice for Electrical

Safe Distances (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003.

If and where these overhead lines are to be retained, the design and location of any new buildings, must be considered in light of NZECP34 but this will occur outside of the RMA processes. If there is a requirement to relocate or underground existing overhead infrastructure, the developer will be required to contribute toward the cost.

New electrical infrastructure and underground reticulation can be made available to connect the Residential and Industrial zones to the electricity network, subject to negotiation and satisfactory financial contribution from the developer, and suitable space being made available in a timely manner.

4. Submission points

- CPL support the rezoning of land from rural to residential and industrial. CPL have existing overhead (**OH**) infrastructure on the east side of Mauku Road and Patumahoe Road and the west side of Carter Road. All cross sections in the roading hierarchy show sufficient room in the back berm for underground reticulation but this area has also been identified for planting. If required, these OH lines can be undergrounded at the developers (Askew Consultants Limited) cost as the subdivision progresses.
- If the OH lines are to remain, CPL advises that clearance must be maintained between the OH lines and any proposed street trees as required under the Electricity (Hazards from Trees) Regulations 2003 (Tree Regulations). Compliance with the Tree Regulation should influence the choice and proximity of planting as required by Standard I430.6.13(1)(b) and matters of discretion and assessment criteria under Rule I430.8(2)(f-g) and I430.8.1(4)e respectively. Similarly, appropriate species of plants should be chosen to avoid conflict with underground electricity infrastructure within the back berm where roots could potentially cause faults to occur in underground reticulation, as well as difficulty in accessing cables without affecting tree roots in particular.
- CPL without prejudice note that "sufficient capacity is/can be available to support this level of development". If the development needs or requires network upgrades, this will form part of the Capital Contribution payable by the developer.

Chapter: Patumahoe (South) Sub-Precinct E

Rules/Standards	Provision	Position	Reason for position	Relief Sought
<p>1430.6.13 (1)(b). Staging in Sub-precinct E</p>	<p><u>1430.6.13</u> 1) Before any S224(c) certificates or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130, the following works shall be constructed and completed to the Council's satisfaction: (b) a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land</p>	<p>Support</p>	<p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted. Each category of road (or service lane) must provide suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation between the different utilities, landscaping and other road users. Roots from trees and other plants can cause problems where there are underground cables in terms of access for maintenance of the cables and faults.</p>	<p>If the OH lines are to remain, CPL advises that clearance must be maintained between the OH lines and any proposed street trees. These clearances are required under the Electricity (Hazards from Trees) Regulations 2003; Counties Power seek consultation regarding the species of trees/shrubs proposed by any Standard in the vicinity of overhead lines in all Sub-precincts (to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the species of the tree. Retain provisions as</p>

38.2

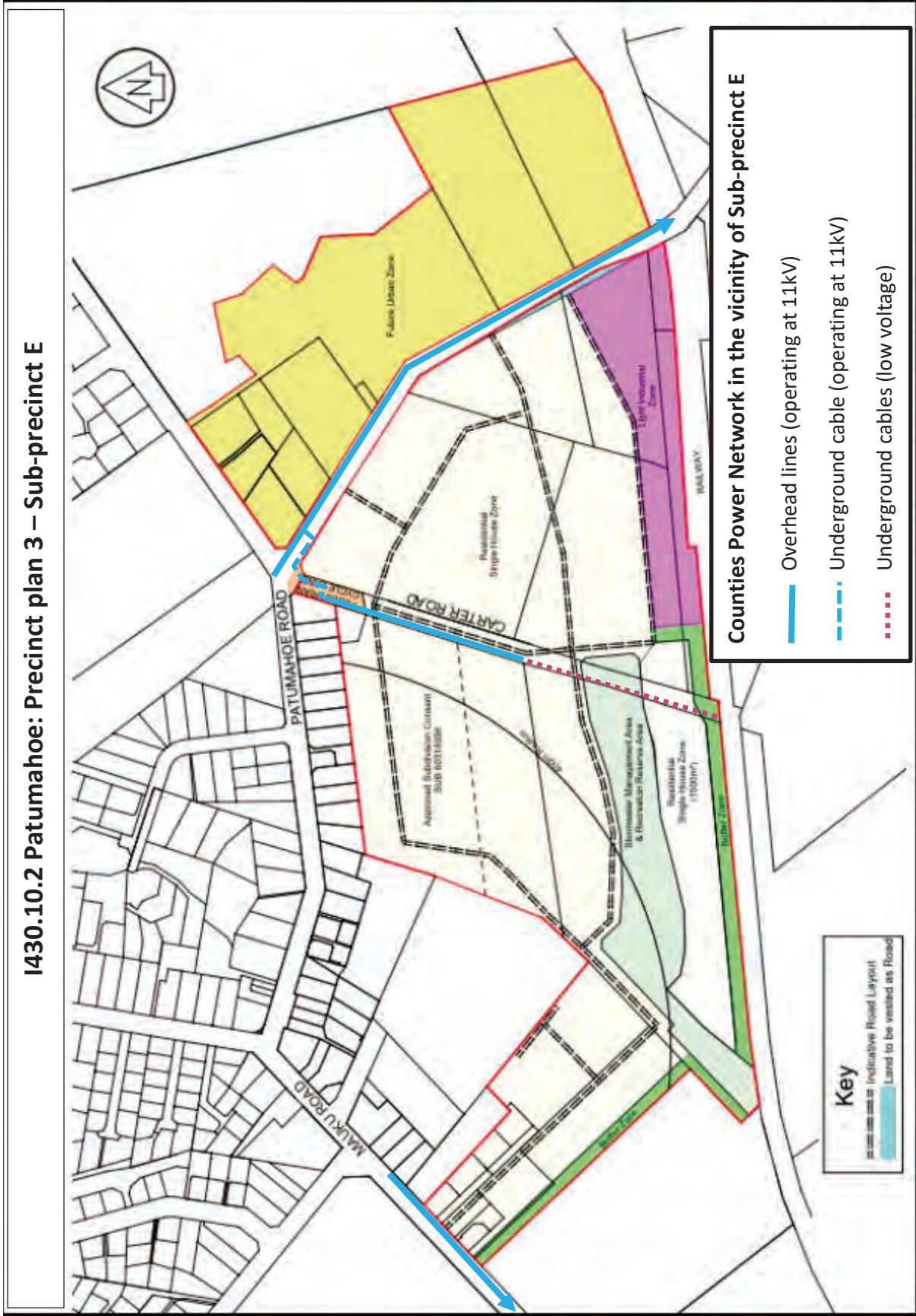
38.3

38.4

	being developed;		Electricity infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with CPL. This is of particular importance where existing overhead lines are to be retained but is also relevant in terms of access to, and the safe operation of existing and new underground cables. Roots from trees and other plants can cause problems where there are underground cables in terms of access for maintenance of the cables, network pillars and faults. Note: The proposed cross-sections are supported by Counties Power. CPL has existing underground assets installed in the "sidewalk" area as defined in Fig 11 Shared Path Cross Section.	notified/proposed.
Assessment – restricted discretionary activities	Matter of discretion	Position		
1430.8. Assessment – restricted discretionary activities	1430.8 (2) (f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (Roading Hierarchy) and Figures 6 – 11 (Cross Sections) below; (g) protection and planting of vegetation;	Support		
1430.8.1(4)(e) Additional assessment criteria for subdivision in sub-precinct E.	1430.8.1(4)(e) Whether plantings and other landscape features will result in a maintenance free mature landscape, inso much as is practical.	Support		

Appendix 1 – Counties Power Assets Diagram

I430.10.2 Patumahoe: Precinct plan 3 – Sub-precinct E



SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: Auckland Council

Auckland Council
Unitary Plan
Private Bag 92-300
AUCKLAND 1142

Attn: Planning Technician

Name of Submitter: Federated Farmers of New Zealand

This is a submission on the following proposed change to a plan ("the Proposal"):

Patumahoe South Plan Changes

Auckland Council Unitary Plan (Operative in Part), Private Plan
Change 55.

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

SUBMISSION TO AUCKLAND COUNCIL

ON:

PATUMAHOE SOUTH PLAN CHANGE 55

1 INTRODUCTION

- 1.1 Federated Farmers of New Zealand (“Federated Farmers” or the “Federation”) thanks the Auckland Council (“the Council”) and Askew Consultants Limited (on behalf of the property owners) (“the Owners”) for the opportunity to make a submission on the proposal by the Owners to rezone approximately 36 ha of rural land in Patumahoe South for urban purposes, extending the existing settlement of Patumahoe and providing Single House, Light Industrial, Future Urban and Open Space zones (“the Proposal”).
- 1.2 In regard to this submission, Federated Farmers has engaged in some limited consultation with a proportion of its members who have interests in the parts of the Auckland Council area that are affected by the Proposal.
- 1.3 Federated Farmers looks forward to such further consultation with the Council and the Owners about the Proposal as may be appropriate.
- 1.4 Accordingly, Federated Farmers would appreciate the opportunity to discuss this submission in greater detail. Federated Farmers seeks the opportunity to participate in any relevant hearings and meetings that might be held.

2. GENERAL COMMENTS

- 2.1 The broad purpose of this submission is to state Federated Farmers’ general support for the Proposal.
- 2.2 Nevertheless, Federated Farmers wishes to see it ensured that such reverse sensitivity issues that might arise as between the land involved in the Proposal and farmland in the vicinity of that land, are properly addressed.

3. SPECIFIC COMMENTS

3.1 The Proposal should proceed

- 3.1.1 The specific provisions of the proposal that my submission relates to are:

The whole of the Proposal

- 3.1.2 My submission is:

Federated Farmers generally supports the Proposal.

- 3.1.3 I seek the following decision from the local authority:

Accept the Proposal as a whole, while taking proper account of reverse sensitivity matters.

39.1

3.2 Reverse Sensitivity Matters need to be Properly Addressed

3.2.1 The specific provisions of the proposal that my submission relates to are:

The whole of the Proposal.

3.2.2 My submission is:

A matter that is of concern to members when development situations arise such as those advanced in the Proposal, is that of the potential for conflicts between the new land uses that are proposed and existing land uses, and with that the associated issues of reverse sensitivity.

In general terms, it is considered that those who live and who undertake normal rural type activities on farmland in close proximity to the site where the Proposal is to take place should be able to continue to carry on their activities without having their lives disturbed once works on the site commence, and they should be able to continue to carry on their activities after the rezoning is completed and as the foreshadowed industrial development takes place.

It is considered that any new development associated with the Proposal should include adequate internal buffer zones so as to allow future activities that might take place on surrounding farmland, to take place, such as residential development, and the development of home stays, farm stay accommodation, home occupations, etc. Federated Farmers would be extremely concerned should any externalisation of the effects of the rezoning in the Proposal take place, with the cost of the effects of the rezoning being borne by adjacent land owners rather than the owner of the land that is undergoing redevelopment.

Federated Farmers has reviewed the application, and it appears to the Federation that that adequate account is taken of reverse sensitivity matters in the Proposal.

3.2.3 I seek the following decision from the local authority:

Accept the Proposal as a whole, while ensuring that proper account is taken of reverse sensitivity matters.

4. **ABOUT FEDERATED FARMERS**

4.1 Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.


4.2 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and

- Our members adopt responsible management and environmental practices.

4.3 I wish to be heard in support of my submission.

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



Richard Gardner
Senior Policy Advisor, Federated Farmers of New Zealand

20 November 2020

Electronic address for service of submitter: rgardner@fedfarm.org.nz

Telephone: (09) 379-0057

Postal address (or alternative method of service under section 352 of the Act):

Richard Gardner
Senior Policy Advisor
Federated Farmers of New Zealand
Private Bag 92-066
Auckland

Contact person: Richard Gardner, Senior Policy Advisor

20 NOV 2011

Pukekohe Service Centre

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

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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 George Harper

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

Address for service of Submitter

19/21 Woodhouse Rd
Patumahoe

Telephone:

07 8688575

Fax/Email:

dauidgeorgharper@windlesskiwi.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 55

Plan Change/Variation Name

Patumahoe South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Continuing urban development in Patumahoe and surrounding Franklin districts

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are: There should be no more urban development in Patumahoe or south Auckland/Franklyn west of Papakura including Karaka, Kingsseat, Whiapa, Mauku, Puni, Pukekohe, Bombay, Buckland, Tunkau, and Mangatarata on prime agricultural. Auckland city needs to be contained within its present boundaries - no exceptions (continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- 40.1 Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- 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

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

19/11/2020
Date

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

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

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

I could / could not gain an advantage in trade competition through this submission.
 If you could gain an advantage in trade competition through this submission please complete the following:

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

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



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Auckland Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
PO Box 6345
Wellesley
Auckland 1141

Attention: Sian Stirling

Phone: 09 300 9722

Email: sian.stirling@beca.com

This is a submission on the Proposed Plan Change 55 (Private) Patumahoe South (the Proposed Plan Change).

Background

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. 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.

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. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

The Ministry of Education's submission is:

Future school network impacts

The Proposed Plan Change is seeking to rezone approximately 34.9ha of land from rural land to Residential – Single House, Business – Light Industry, Open Space and Future Urban Zone.

In 2019, the Ministry of Education developed the National Education Growth Plan 2030 (NEGP), which provides a co-ordinated approach for addressing school-aged population growth across New Zealand. The NEGP identifies a number of catchments across the country and considers the anticipated demand and growth patterns so that the Ministry can ensure the school network is delivered in the right place at the right time.



The Pukekohe Paerata Tuakau area (which includes Patumahoe) is categorised as a 'Complex Growth' area under the NEGP. Complex Growth areas are *"desirable and there continues to be a population growth despite limited room for expansion outwards. Local planning efforts are focused on redevelopment activities, intensification, or urban renewal to increase capacity or in response to other social and economic drivers"*. The NEGP identified that within the wider catchment there is a large area of future urban zoned land which will enable up to 7,200 dwellings as well as an additional 6,000 dwellings in Paerata over the next ten years. It is anticipated that by 2030, an additional 2,373 primary school students will need to be accommodated in the catchment.

- 41.1 The Proposed Plan Change and growing rate of subdivision in Patumahoe and the wider area will gradually put pressure on Patumahoe School's student roll. The Ministry requests regular engagement with Auckland Council and the developer to understand the housing typologies being proposed, the staging and timing of the subsequent development. This will allow the Ministry to appropriately plan for the potential impact of the development on the school network including the investigation of the provision of new schools and planning for interim and significant upgrades to existing schools.

Traffic

- 41.2 The Proposed Plan Change will increase the number of vehicle trips along the road frontage of Patumahoe School. The Ministry supports the proposed safety improvements to mitigate traffic effects on pedestrian safety. The proposed raised zebra crossing will slow traffic down outside the school and improve the safety for students crossing the road.
- 41.3 The Ministry supports the partial closure of Carter Road to be converted into a walking and cycling pathway. This will provide students with a safe pedestrian link into the Proposed Plan Change area that will have footpaths along all new roads and strong walking and cycling connections to the surrounding development. Quality pedestrian and cycle connections to schools have health and safety benefits for children and reduce traffic generation at pick up and drop off times. The closure of the northern section of Carter Road will also improve the safety of the Patumahoe Road / Clive Howe Road intersection, as Carter Road is on the inside of the horizontal curve of the intersection creating limited visibility for drivers outside the school.
- 41.4 The Ministry also supports the proposed speed reduction to 30km/hr in the wider Proposed Plan Change area.

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

Sian Stirling

Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 20 November 2020

SUBMISSION ON PLAN CHANGE 55 (PRIVATE): PATUMAHOE SOUTH

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

TO: Auckland Council (By email unitaryplan@aucklandcouncil.govt.nz)

NAME OF SUBMITTER: Karam Dhadli also known as Karampreet Singh (**Dhadli** or the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 55: Patumahoe South (**PPC55** or the **Application**) to the Auckland Unitary Plan – Operative in Part (**AUP-OP**).
2. The Submitter could not gain an advantage in trade competition through this submission.
3. This submission relates to the entire Application.
4. The submitter is particularly interested in the extent of land which is sought to be rezoned.
5. The Submitter generally supports the Application and seeks that the boundary of the proposed rezoned land be located further west in order to enable the more efficient provision of development capacity and residential land supply for the growth of Patumahoe.

BACKGROUND

6. The Submitter owns a 2.4290ha block of land at 30 Mauku Road, Patumahoe. The land is zoned Rural Production and is situated some 150 – 200m southwest of the edge of the village centre. It contains a residential dwelling and land used for horticulture (strawberry and courgette). It adjoins the western boundary of the plan change area.
7. PPC55 seeks to rezone approximately 34.5ha of land from primarily Rural Production to Residential – Single House, Business – Light Industry, Open Space – Informal Recreation and Future Urban zones; and apply I403 Patumahoe Precinct to the land, with amendments to I430 Patumahoe Precinct. Among other outcomes, PPC55 has the effect of enabling growth of the existing settlement, providing for a greater range and density of commercial and residential activities to locate in the plan change area.

REASONS FOR SUBMISSION

8. The Submitter generally supports the outcomes sought in the application. The Submitter considers that PPC55 appears aligned with Auckland Council's objectives to promote strategic growth and a quality compact urban form. PPC55 is understood to provide for between 6-8 years of housing growth as well as land for commercial or industrial growth that is not otherwise enabled by present zoning, which will generate positive social and economic outcomes for the Patumahoe settlement. The benefits arising from the Application as summarised in Section 3.3 of the Envivo *AEE Report* and the consistency with the strategic framework (Section 8) are generally agreed with.
9. The submitter considers, however, that PPC55 does not provide sufficient, longer-term capacity for the sustainable growth of Patumahoe and that additional land may be required based on projections.
10. The submitter also has concerns that PPC55 does not result in the most logical boundary to the expanded urban area. While the PPC55 analysis interrogates land within the proposed plan change area it does not contemplate other land, such as the submitter's site, that is equally or more proximate to the village centre and which has many of the same natural and physical characteristics, transport linkages, infrastructure servicing options, accessibility to facilities, spatial and urban design opportunities and landscape values as the land that has been included.
11. Without limiting the generality of the foregoing, to elaborate on the above, and by way of example –
 - a. PPC55 encompasses additional land to the south of that which is identified in the Franklin District Growth Strategy 2021. This indicates that further, carefully considered expansion/s could be undertaken in a manner that provides for managed growth without detracting from an urban form and village scale.
 - b. Growth in a westerly direction could result in an equally logical spatial pattern for the growth area when overlooking the settlement area as a whole. It would enable future expansion in a central, connected and walkable location close to the village centre and in keeping with amenity values and suburban built character.
 - c. By way of context, the Submitter's site is directly opposite land on Patumahoe Hill which has been upzoned to Single House Zone (Patumahoe Precinct). That neighbouring land is currently under development for residential housing. The gateway to the recreational trail through that development faces the Submitter's site.
 - d. Similarly, the rear boundary of the submitter's site abuts Rural Production land that is proposed to be rezoned under PPC55 as Open Space – Informal Recreation. (Confirmation of this zoning is sought as proposed *Figure 5 – Roading Hierarchy* shows this as a residential lot?)

- e. A 400m radius has been applied from the southeast corner of Patumahoe Road and Mauku Road within which a smaller residential lot size is proposed to apply under PPC55. Most of the Submitter's site lies within this same radius.
- f. PPC55 states that the plan change area 'is a logical extension of the current settlement' and will 'sit within the physical 'boundary edges (i.e. the southern railway line and eastern escarpment)'. This is agreed however there does not appear to be a clear geographical / physical limit / edge or other robust demarcation provided to justify the western edge of the plan change area where it will dissect relatively small, rural-zoned landholdings.
- g. Land to the west of the Submitter's site is part of an almost 50ha contiguous rural landholding. Hence the urban/rural boundary transition including a Landscape Buffer could equally logically be positioned at the west boundary of the Submitter's site while maintaining a defensible edge.
- h. The Submitter's land would be well-placed to logically connect with the transport linkages and infrastructure servicing that is planned for the plan change area. The Submitter's site is referenced in 'design tests' included within the *Urban Design Assessment* by Ian Munro, and presents in principle as a logical lot and roading layout.
- i. As outlined in Section 6.0 of the *Agfirst Soil and Resource Report for Patumahoe Rezoning Proposal*, Rural Production-zoned land within the plan change area that is proposed for rezoning includes Lot 11 (3.46ha of which is suitable for horticultural production), Lot 12 (1.77ha of which is / was used for arable production (most recently sweetcorn)), Lot 13 (3.78ha remaining for productive use, of which 2.24ha comprises kiwifruit), Lot 14 (1.3ha available for horticultural production), Lot 18 (2.6ha 'well suited' to horticultural production) and Lot 19 (3.11ha of land occupied by a poultry farm and avocados on the balance land). At 2.4290ha and also facing challenges in terms of productivity and viability in its present use, the Submitter's site has similar attributes.
- j. PPC55 states that the outcome for the 3ha of land that is currently utilised for poultry farming within the proposed Future Urban zone will be determined by a future structure planning exercise. A similar approach could be applied if additional land to the west of the plan change area was included to enable sequential provision for growth, without applying a 'live' urban zoning.

DECISION SOUGHT

12. The Submitter seeks the following decision from Auckland Council:

- 42.1 a. Approve PPC55 subject to -
- i. confirming the zoning of land abutting the rear boundary of the Submitter's site as Open Space zoned land; and
 - ii. reviewing and, if necessary, refining the extent of the plan change area to ensure this best achieves sustainable growth and the efficient use of land and is the most appropriate method to achieve the purpose of the Resource Management Act 1991; and
- OR
- 42.2 b. Approve PPC55 subject to amending the AUP-OP maps and text to -
- i. extend the plan change area to include the Submitter's site and to apply an appropriate zone to the land to enable settlement growth, for instance as Future Urban Zone and/or Residential -Single House zone and/or a Business-Light Industry zone; and
 - ii. apply the proposed Patumahoe Sub-Precinct E to the Submitter's site.
- OR
- 42.3 c. In the event that the PPC55 is approved without inclusion of the Submitter's site within the plan change area, require –
- i. the imposition of a sufficiently wide, planted Landscape Buffer adjoining the entire boundary of the Submitter's site; and
 - ii. the registration of a 'no complaints' covenant on those residential sites along the western boundaries of Sub-Precinct E adjoining the Submitter's site in respect of the effects of lawful activities undertaken on its land
- to create separation at the zone interface and ensure protection against reverse sensitivity effects.
- AND
- 42.4 d. Consequential amendments as necessary to achieve the relief sought above.

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

14. The Submitter would consider presenting a joint case if others make similar submissions.

Signed

A handwritten signature in black ink, appearing to read 'NBremner', is displayed on a light blue rectangular background.

Nicole Bremner

Dated 20/11/20

On behalf of the Submitter, Karam Dhadli also known as Karampreet Singh

Electronic address for service of submitter:

By email: nicole@planorama.co.nz

Telephone: 0272046210

Postal address: P O Box 810, Oneroa, Waiheke Island, Auckland 1840

Contact details

Full name of submitter: Douglas Rex Embling

Organisation name:

Agent's full name:

Email address: dembling@xtra.co.nz

Contact phone number: 021953429

Postal address:
44 Woodhouse Road
Patumahoe
Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

All changes requested in the proposed plan change.

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

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

The reason for my or our views are:

The plan change request seeks to rezone an area of land containing 97% prime soil. Prime soil is defined as "versatile soils easily adapted to a wide range of agricultural uses".

In the current world of climate change and Covid-19 problems it is imperative that land with a significant ability to sustain food production is retained for this purpose.

The future of New Zealand is strongly reliant on a sustainable food production industry.

Land zoned Rural Production must not be rezoned.

43.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 20 November 2020

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

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

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

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

Yes

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

Contact details

Full name of submitter: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Agent's full name:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 55 (Private)

Plan change name: PC 55 (Private): Patumahoe South

My submission relates to

Rule or rules:

Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:

Please see attached submission.

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

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

The reason for my or our views are:

Please see attached submission.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Please see attached submission.

Submission date: 20 November 2020

Supporting documents

HNZPT Submission PPC55 - Patumahoe South - 20 11 20.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

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

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

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

No

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



20th November 2020

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PC 55 (PRIVATE): PATUMĀHOE SOUTH

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed private change to the Auckland Unitary Plan (Operative in Part) (the proposal):

PC 55 (Private): To rezone approximately 34.5 hectares of land from primarily Rural Production to Residential – Single House, Business – Light Industry, Open Space – Informal Recreation and Future Urban zones; and apply I403 Patumāhoe Precinct to the land, with amendments to I430 Patumāhoe Precinct.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand’s historical and cultural heritage.

3. The specific provisions of the proposal that Heritage New Zealand’s submission relates to are:

- The plan change in its entirety.

4. Heritage New Zealand’s submission is:

- Heritage New Zealand wishes to have the proposed plan change provisions amended.

5. The reasons for Heritage New Zealand’s position are as follows:

- 5.1 The Patumāhoe area has played an important role as a place of Māori settlement and cultivation as well as a centre of transport and trade, with the name ‘Patumāhoe’ recalling a significant battle that took place in the area.
- 5.2 Heritage New Zealand supports mana whenua in the exercising of kaitiakitanga and seek that appropriate provisions are incorporated in the precinct plan to give effect to the stated purpose of the plan change with regard to enhancing cultural values associated with the subject land. These should more fully address the Māori cultural heritage values that have been identified in the CIAs completed to date by Ngāti Tamaoho and Ngāti Te Ata Waiohua,

and following further consultation occurring with Te Akitai Waiohua, and with any other iwi groups with an interest in the area as may occur.

- 5.3 The plan change request states at Page 21 that *'the recommendations of Ngāti Te Ata and Ngāti Tamaoho are acknowledged and will be accommodated where possible during future development of the subject land'*. Heritage New Zealand however seeks that provisions are included in the precinct plan to provide greater surety that this will occur through the resource consent and subdivision process.
- 5.4 Amendments to the plan change should include provision for the incorporation of Te Aranga principles into the design of future development, such as the use of ancestral names for new reserves, roads, walkways and cycleways; the incorporation of Mahi Toi into urban and landscape design; and other cultural heritage interpretation – to support mana whenua in the exercising of kaitiakitanga and to enhance public understanding of the cultural heritage values of the area as referenced in the two CIAs prepared in conjunction with the plan change.
- 5.5 While no archaeological sites are currently recorded within the plan change area it may potentially contain archaeological remains pertaining to both Māori settlement and 19th century European settlement.
- 5.6 The land has an extensive horticultural and farming history, and the Patumahoe area was known to have included historic Maori horticultural activities to help supply European 19th century settlements, and caches of agricultural tools (e.g. Ko) could be found in former swampier areas.
- 5.7 Heritage New Zealand therefore confirm that it would be appropriate for the applicant to follow the precautionary approach proposed at Page 52 of the 'Plan Change Request, AEE & Section 32 Assessment' – *'to obtain an archaeological authority from Heritage New Zealand prior to any works commencing in any case of accidental discovery'*, based on the potential for there to be some archaeological remains relating to Maori horticultural activities.

6. Heritage New Zealand seeks the following decision from the local authority:

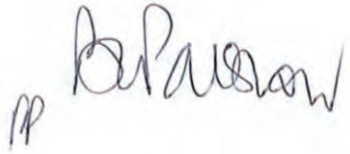
- Accept the proposed plan change with amendments to Include appropriate provisions within the precinct plan to fully address Māori cultural heritage values identified and require the incorporation of Te Aranga principles into development through the resource consenting process.

7. Heritage New Zealand does wish to be heard in support of our submission.

- 8. If others make a similar submission, Heritage New Zealand will consider presenting a joint case with them at a hearing.**

44.1

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sherry Reynolds', with a small 'SR' monogram to the left.

Sherry Reynolds
Director Northern Region

Address for Service:
Susan Andrews
PO Box 105 291, Auckland
09 307 9920
sandrews@heritage.org.nz

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

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



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

Attn: Planning Technician
Auckland Council
Level 24, 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/Ms/Miss/Ms(Full Name)

PETER CLAUDE HARDY

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

Address for service of Submitter

PO BOX 162 PUTAMAHOE

Telephone:

0274586156

Fax/Email:

hardy.p@extra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 55

Plan Change/Variation Name

Putamahoe South

The specific provisions that my submission relates to are:

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

Plan provision(s)

PC 55, Appendix 4 Appendix 2

Or

Property Address

Putamahoe South

Or

Map

Or

Other (specify)

Asken subdivision

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I wish to have the provisions identified above amended Yes No

45.1

The reasons for my views are:

The proposal do not adequately recognise the long term transport requirements of Patumehal village. This subdivision offers an opportunity to improve safety and far more potentially lessen the central village congestion and future congestion. Not enough thought has been

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

Am not against the proposed subdivision in overall principle but it could be done much better

Please note. I have lived in Patumehal my whole life (71 years) and while retired as a registered valuer have a

- 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 20/11/2020

Notes to person making submission:

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

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

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

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

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

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

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

Contact details

Full name of person making a further submission: Barry Raema Stephens

Organisation name:

Full name of your agent:

Email address: pattychicks@hotmail.com

Contact phone number:

Postal address:
75 Patumahoe Road Patumahoe
Sth Auckland
Auckland 2679

Submission details

This is a further submission to:

Plan change number: Plan Change 55

Plan change name: PC 55: Patumahoe South (Private)

Original submission details

Original submitters name and address:
Barry&Raema Stephens

Submission number: 4

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number rezoning

The reasons for my or our support or opposition are:
We support the proposal submission number 35 which adjoins our property number 4. We also have onsite a modern transformer and sufficient water supply to service all blocks.

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:
To make 75 Patumahoe road a live submission

Submission date: 16 December 2020

Attend a hearing

I or we wish to be heard in support of this submission: No

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Land owner

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

16 December 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further Submission for Proposed Private Plan Change 55 – Patumahoe South

Please find attached Auckland Transport's further submission to the submissions lodged on Proposed Private Plan Change 55 Patumahoe South for Askew Consultants Limited.

If you have any queries in relation to this further submission, please contact me at sam.mcgough@at.govt.nz, or on +64 944 74225.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Sam'.

Sam McGough
Assistant Planner, Land Use Policy and Planning North / West

Further submission by Auckland Transport on Proposed Private Plan Change 55 – Patumahoe South

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 55 from Askew Consultants Limited to rezone land for urban purposes and introduce a new sub-precinct, Sub-precinct E, within the existing Patumahoe Precinct.

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 Auckland Transport represents a relevant aspect of the public interest and also has an interest in the proposal that is greater than the interest that the general public has. Auckland Transport's grounds for specifying this are that it is a Council-Controlled Organisation of Auckland Council ('the Council') and Road Controlling Authority for the Auckland region.
- 1.2 Auckland Transport's legislated purpose is "to contribute to an effective, efficient and safe Auckland land transport system in the public interest."

2. Scope of further submission

- 2.1 The specific parts of the submissions supported or opposed, and the reasons for that support or opposition, are set out in **Attachment 1**.
- 2.2 The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

- 3.1 Auckland Transport wishes to be heard in support of this further submission.
- 3.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Transport

Christina Robertson
Group Manager: Strategic Land Use and Spatial Management
16 December 2020

Address for service of further submitter:

Sam McGough, Assistant Planner
Auckland Transport
20 Viaduct Harbour Avenue
Auckland Central
Auckland 1010
Email: sam.mcgough@at.govt.nz

Attachment 1

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
4.2	Barry John Stephens pattychicks@hotmail.com	Rezone 75 Patumahoe Road to a live submission [zoning] instead of future urban.	Oppose	It is not appropriate to live zone 3.1 hectares of land at 75 Patumahoe Road without proper assessment, including provision of necessary transport assessments and technical analysis. Any proposal to extend the live zoning in the plan change area must be accompanied and supported by an Integrated Transport Assessment and precinct provisions which implement any transport mitigation identified. This opposition to the live zoning is consistent with Auckland Transport's original submission which opposes the Future Urban zone in this location.	Disallow
8.2	William Thomas Colgan maryjane.harve@gmail.com	To include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone	Oppose	Any proposal to extend the live zoning of the plan change area must be accompanied and supported by an Integrated Transport Assessment and precinct provisions which implement any transport mitigation identified. This opposition to the live zoning is consistent with Auckland Transport's original submission which opposes the Future Urban zone in this location.	Disallow
15.2	Philippa Williams williamsbj@gmail.com	Amend the plan change so that the new road placement (Intersection D) is reconsidered	Oppose	Auckland Transport believes the indicative road connecting the development to Mauku Road is necessary to achieve a well-connected roading network within Sub-precinct E.	Disallow
30.1	Kāinga Ora developmentplanning@hnzc.co.nz	Remove Standard 1430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E in its entirety from the precinct provisions.	Oppose	In its original submission, Auckland Transport sought an amendment to Objective 4 and a new policy to support the provisions proposed in 1430.6.17 to protect development in Sub-precinct E from railway noise and vibration. Removal of this	Disallow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
34.2	Alpito Hill Limited Attn: Peter Kraakman petrus_kraakman@hotmail.com	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.	Oppose	standard is inconsistent with Auckland Transport's submission. Auckland Transport believes the indicative road connecting the development to Mauku Road is necessary to achieve a well-connected roading network within Sub-precinct E.	Disallow
35.5 and 35.6	The Surveying Company Attn: Scott and Judith Gavin leigh@subdivision.co.nz	1. Seeks that the sites at 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road are rezoned to Residential Single House. 2. Seeks any other alternative relief that will enable the subject site at 23 Clive Howe Road and adjoining/surrounding sites to be used for urban (residential) use.	Oppose	Any proposal to extend the live zoning of the plan change area must be accompanied and supported by an Integrated Transport Assessment and precinct provisions which implement any transport mitigation identified. This opposition to the live zoning is consistent with Auckland Transport's original submission which opposes the Future Urban zone in this location.	Disallow
42.2	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner nicole@planorama.co.nz	b. Approve PPC55 subject to amending the AUP-OP maps and text to - i. extend the plan change area to include the Submitter's site and to apply an appropriate zone to the land to enable settlement growth, for instance as Future Urban Zone and/or Residential -Single House zone and/or a Business-Light Industry zone; and ii. apply the proposed Patumahoe Sub-Precinct E to the Submitter's site	Oppose	Any proposal to extend the live zoning of the plan change area must be accompanied and supported by an Integrated Transport Assessment and precinct provisions which implement any transport mitigation identified. This opposition to the live zoning is consistent with Auckland Transport's original submission which opposes the Future Urban zone in this location.	Disallow

Contact details

Full name of person making a further submission: Philippa and Todd Williams

Organisation name:

Full name of your agent: Pip Williams

Email address: williamspipj@gmail.com

Contact phone number: 0211552103

Postal address:
24B Mauku Road
RD4
Patumahoe
Pukekohe
Pukekohe 2679

Submission details

This is a further submission to:

Plan change number: Plan Change 55

Plan change name: PC 55: Patumahoe South (Private)

Original submission details

Original submitters name and address:
Philippa Williams, 24B Mauku Road, RD4, Patumahoe, 2679

Submission number: 15

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number the entire submission

The reasons for my or our support or opposition are:

1. Having read through all the initial submissions to this proposal it is apparent that the applicants have not considered the negative impact this development would have on our community of Patumahoe.

It is also clear to see that consultation with the community, affected neighbouring properties in particular, has been neglected. In fact, information provided by the applicants in regard to the consultation process is a blatant lie. Many landowners neighbouring the area have been completely neglected in this process and have not had any communication whatsoever. We are included in this group and are completely gobsmacked as to how our property can be included within this proposed plan space with no contact at all from the applicants. The information included in the proposed plan states that

In the preparation of this plan change members of the applicant group have made contact a number of times with all relevant neighbouring landowners. A meeting was held in Patumahoe with all neighbours at the Patumahoe Rugby Club in August 2018 to establish neighbourhood support for the plan change. Each neighbour was either in support of the application or neutral to the application

proceeding. In September 2019 members of the applicant group have contacted each neighbour to update them on the progress of the application. The only neighbours that they have not been able to contact are the owners of the property at 104 Patumahoe Road

I can guarantee that this is incorrect information as we have had zero contact with the applicant group, we were not in attendance at the meeting of August 2018 as nobody contacted us to say that this was happening. Is there any way we can access the minutes of this meeting?
How are Askew Consultants Ltd allowed to include false information in their application?

How can the applicants neglect to inform us of our property's inclusion in their plan? When Peter Kraakman applied to extend his storage shed business next door to us he sought our approval and we signed documents to allow this to go ahead. Our property has not been affected by his development at all, yet he gained permission from us before going ahead. The Proposed Plan from Askew Consultants Ltd has a huge impact on our property and our lifestyle and there has been no communication from them at all.

2. Auckland Transport state that the Future Urban Land Supply Strategy (FULSS) does not include additional expansion to the area of Patumahoe

The RPS contains objectives and policies relating to rural and coastal towns and villages. Objective B2.6.1(2) seeks that there is adequate infrastructure. Policy B2.6.2(1)(b) and (g) requires expansion of existing rural and coastal towns and villages to be undertaken in a manner that incorporates adequate provision for infrastructure and provides access to the town or village through a range of transport options including walking and cycling. Policy B2.6.2(3) enables significant expansions of existing rural and coastal towns and villages through the structure planning and Plan Change processes. There has not been any structure planning undertaken by the Council for Patumahoe and, as noted above, there is no additional expansion identified in the Auckland Plan Development Strategy for Patumahoe.

There is no need for an extra 200-250 houses in our area as extra housing has been planned for in other areas of Auckland.

3. Watercare state in their submission that

The Proposal does not consider that the manner in which the Applicant intends to service the water and wastewater requirements of the Proposal is technically feasible.

And that

The Patumahoe Reservoir and water pump station does not have the capacity to service the plan change area.

This is another indication that the area of Patumahoe is already at full capacity. There is a new development currently under construction on 'Patumahoe Hill' and once this is complete there is simply not the infrastructure or resources to accommodate any further expansion.

4. The access road to Mauku Road is of huge concern to us. No consideration has been given to existing properties in the indicated road area. How can this happen?

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 16 December 2020

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Our property is included in the proposed plan without our knowledge or consent.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

17 December 2020

Attn: Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Submission sent via email: unitaryplan@aucklandcouncil.govt.nz

**FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 55 (PRIVATE):
PATUMAHOE SOUTH IN THE AUCKLAND UNITARY PLAN OPERATIVE IN
PART**

1. Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service makes this further submission on the Proposed Plan Change 55 (Private) Patumahoe South (“**the proposed plan change**”) in support of/in opposition to original submissions to the proposed plan change.
2. Kāinga Ora is a person who has an interest in the proposed plan change that is greater than the interest the general public has, being an original submitter on the proposed plan change with respect to its interests as a Crown agency responsible for the provision of state housing, and its housing portfolio in Auckland.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the proposed plan change provisions to the extent that they directly affect the relief sought in its own submission, which seeks removal of specific provisions from the proposed plan change i.e. Precinct Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E. Kāinga Ora believes the proposed standard is unnecessary and is overly onerous. The benefits achieved and the costs added to land owners have not been quantified and considered as unreasonable.
4. The reasons for this further submission are:
 - (a) The reasons set out in Kāinga Ora’s primary submission on the proposed plan change.

(b) In the case of the Primary Submissions that are opposed:

- (i) The Primary Submissions do not promote sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);
- (ii) The relief sought in the Primary Submissions is not the most appropriate in term of section 32 of the RMA;
- (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
- (iv) The Primary Submissions are inconsistent with the policy intent of Kāinga Ora’s submissions.

(c) In the case of Primary Submissions that are supported:

- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
- (ii) The reasons set out in the Primary Submissions to the extent that they are consistent with Kāinga Ora’s submission; and
- (iii) Allow the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.

(d) Such additional reasons (if any) in respect of each of the Primary Submissions supported or opposed as are set out in the **attached** Schedule.

5. The specific relief in respect of each Primary Submission that is supported or opposed is set out in the **attached** Schedule.
6. Kāinga Ora wishes to be heard in support of its further submission.
7. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

Dated this 17th day of December 2020



Brendon Liggett
Manager Development Planning
Urban Planning and Design

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598, Greenlane, Auckland

Email: developmentplanning@kaingaora.govt.nz

Kāinga Ora's Further Submission for Plan Change 55 (Private) - Patumahoe South

Sub #	Sub Point	Submitter Name	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
28	28.7	Auckland Council Attn: Austin Fox	Decline, but if approved, seeks amendment	Decline the plan change [in relation to reverse sensitivity]	Oppose in part	Kāinga Ora opposes this relief sought for the rationale as sets out in its primary submission.
28	28.13	Auckland Council Attn: Austin Fox	Decline, but if approved, seeks amendment	If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to these imposed in other areas around Patumahoe, with a greater use of native species.	Oppose in part	Kāinga Ora opposes this relief sought for the rationale as sets out in its primary submission.
31	31.1	Horticulture New Zealand Attn: Lucy Deverall	Amend the plan change	Amend the proposed precinct provisions so that: - an additional 5m to afford further separation distance to better assist in avoiding reverse sensitivity issues - landscaping includes shelter belts to ensure avoidance of any risk of reverse sensitivity arising from sprays, noise and smell, and - public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity	Oppose in part	Kāinga Ora opposes this relief sought for the rationale as sets out in its primary submission.
33	33.7	Auckland Transport Attn: Sam McGough	Approve the plan change with the amendments I requested	Amend Objective 4 as follows: '(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses <u>and the railway network.</u> '	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
33	33.9	Auckland Transport Attn: Sam McGough	Approve the plan change with the amendments I requested	Amend I430.3 to add a policy that recognises the requirements to protect development in Sub-precinct E from railway noise and vibration.	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.2	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain I430.2. Objectives (1), (3) and (4) as notified	Support	Kāinga Ora supports retaining objective 4 as notified as this objective relates to minimising reverse sensitivity effects on adjoining rural activities and land use. The rationale for this is set out in Kāinga Ora's primary submission.
36	36.3	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain I430.10.2 Patumahoe: Precinct plan 3 - Sub-Precinct E, with amendment: Add a notation to Precinct plan 3 – Sub-Precinct E to show the location of the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E, adjoining the railway, referred to in I430.6.9 (4).	Oppose in part	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.4	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain Table I430.4.2 Activity table, as notified	Oppose	Kāinga Ora opposes retaining the activity table as notified. Amendment to Activity Table I430.4.2 will be required to address the relief sought by Kāinga Ora. The rationale for this is set out in its primary submission.
36	36.5	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain Standard I430.6.9. Landscape buffers in sub-precincts B, C, and D and E clauses (3) and (4) relating to sub Precinct E, as notified	Oppose in part	Kāinga Ora opposes this submission for the reasons set out in its primary submission.

Kāinga Ora's Further Submission for Plan Change 55 (Private) - Patumahoe South

Sub #	Sub Point	Submitter Name	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
36	36.6	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain Standard I430.6.17, with amendment as follows: 1. Insert after the Table in (1); <u>or;</u> <u>is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u>	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.7	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Amend Standard I430.6.17 clause (b) as follows: (b) Compliance may be achieved by adopting the following construction schedule specified by Kiwirail (refer to Schedule XX Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions October 2018).	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.8	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a construction schedule for indoor noise [Refer to page 4 of submission for construction schedule].	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.9	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a new clause: <u>(xx) Mechanical ventilation</u> <u>If windows must be closed to achieve the design noise levels in clause 1, the building is designed, constructed and maintained with a mechanical ventilation system that:</u> <u>(a) For sleeping rooms, achieves the following requirements:</u> <u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u> <u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u> <u>iii. provides relief for equivalent volumes of spill air;</u> <u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u> <u>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u> <u>(b) For other habitable spaces, is as determined by a suitably qualified and experienced person.</u>	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.10	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert after proposed clause (2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95); <u>or</u> <u>(b) is a single storey framed residential building with:</u> <u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u> <u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u> <u>iii. no rigid connections between the building and the ground.</u>	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.

Kāinga Ora's Further Submission for Plan Change 55 (Private) - Patumahoe South

Sub #	Sub Point	Submitter Name	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
36	36.11	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Within Standard I430.6.17, insert a new clause referring to all preceding clauses; <u>(xxx) A report is submitted to the council demonstrating compliance with the clauses above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.</u>	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
36	36.13	Kiwirail Holdings Limited Attn: Pam Butler	Approve the plan change with the amendments I requested	Retain I430.8. Assessment – restricted discretionary activities clause (2) (n) with amendment to clause (2) (n) to add sub criteria as follows: (n) Compliance with Railway Noise and Vibration Standards in Sub-precinct E <u>including</u> ; <u>(i) Whether the sensitive activity could be located further from the railway corridor;</u> <u>(ii) The extent to which the noise and vibration criteria are achieved and the effects of any noncompliance;</u> <u>(iii) Special topographical, building features or ground conditions which will mitigate vibration impacts</u>	Oppose	Kāinga Ora opposes this submission for the reasons set out in its primary submission.
39	39.1	Federated Farmers of New Zealand Attn: Richard Gardner	Approve the plan change with the amendments I requested	Accept the Proposal as a whole, while taking proper account of reverse sensitivity matters.	Oppose	Kāinga Ora opposes this relief sought in so far as it relates to the retention of Standard I430.6.17. The rationale for this is set out in its primary submission.
42	42.3	Karam Dhadli also known as Karampreet Singh Attn: Nicole Bremner	Approve the plan change with the amendments I requested	In the event that the PPC55 is approved without inclusion of the Submitter's site within the plan change area, require – i. the imposition of a sufficiently wide, planted Landscape Buffer adjoining the entire boundary of the Submitter's site; and ii. the registration of a 'no complaints' covenant on those residential sites along the western boundaries of Sub-Precinct E adjoining the Submitter's site in respect of the effects of lawful activities undertaken on its land to create separation at the zone interface and ensure protection against reverse sensitivity effects.	Oppose in part	Kāinga Ora opposes this submission for the reasons set out in its primary submission.

Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991
FORM 6



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

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

For office use only Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Helven + Beverley Eastman

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

Address for service of Further Submitter

24a Mauku Road P.O. 4 Pakelohē 2679

Telephone:

0272462223

Fax/Email:

helvenandbeverley@aucklandcouncil.govt.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (or opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 55
Plan Change/Variation Name	Patumahoe South

I support : **Oppose** (tick one) **the submission of:**

(Please identify the specific parts of the original submission)

(Original Submitters Name and Address)

Submission Number

Point-Number

Helven and Bev Eastman

11.

Appendix 4

Traffic impact.

24a Mauku Rd P.O.
Pakelohē 2679

The reasons for my support / opposition are:

Separate page.

(continue on a separate sheet if necessary)

Ben + Kelvin Eastman.
Submission 11.

24a Mauku Rd
Patumahoe.

The reason for our opposition is: Appendix 4

Tripp Andrews non Askens have not been honest they have been misleading and deceitful to public and council.

In regards to Appendix 4.

the increase of traffic past Patumahoe Primary School & village shops is all ready dangerous when busy.

We are highlighted in the red zone to be subject to a 2 lane road with turning bay on my boundary fence this will increase noise, vehicle, pollution, traffic vibration, reduce privacy all of which we did not move to Patumahoe Village Br. Rural lifestyle

The Road could be relocated further down following the railway & linking with clay Road. creating a ring road, also easing congestion at Mauku/Kingsseat RT intersection.

Please answer: ??

When we moved to 24a Mauku Rd 6 years ago we were approached by our neighbour Mr P. Knackman asking us to lead & look over documentation & proposed plan's or alterations he was planning on an existing shed. if we approved he asked that we sign the consent, in which we did & alterations have been made with no effect on us. however it appears Tripp Andrews & Askens wish to keep this quite even though it will have major implications on us. and the map clearly shows our property on the boundary this is not acceptable.

Also the Soil. you only need to look at the current subdivision taking place on corner of Mauku Rd & Kingsseat Road, the

red fertile soil, that they have been
unable to find clay, so again another
lie from Tripp Andrews / Askews, re soil
quality this is just poor farming skills
and lack of care for pasture.

I seek that:

the whole :

or part (describe precisely which part) _____

of the original submission be **allowed**

disallowed

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

D. Eastman

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

16-12-2020

Date

PLEASE COMPLETE THE FOLLOWING SECTION

Please tick one

I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)

Appendix 4

I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)

Notes to person making submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority

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

Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991
FORM 6



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

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

For office use only Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Gary Neil McClean

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

Address for service of Further Submitter

22 Mauku Road RD4 Pukekohe 2679

Telephone:

0211109628

Fax/Email:

jkata@extra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (or opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 55
Plan Change/Variation Name	Patumahoe South

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

<u>24</u>	<u>Appendix 4 traffic impact</u>
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Gary McClean
22 Mauku Rd

The reasons for my support / opposition are:

Separate Page

(continue on a separate sheet if necessary)

Gary Mclean
Submission 24.

22 Mauku Rd.
Patumahoe

I oppose this My reason Appendix 4 traffic Management.

I oppose a two lane road with turning bay on my boundary & potentially my property. I have had people come onto my property & measure a mark (orange marker) on my front lawn, without my consent.

When my wife asked what they were doing they would not disclose what they were doing on the purpose.

I have not been informed in anyway and find this very misleading to public & Council this is very deceitful.

I ~~supper~~ Agree with my neighbours and present a joint case with Kelvin & Bev Eastman 24a Mauku Rd Patumahoe.

I seek that:

the whole :

or part (describe precisely which part) _____

of the original submission be **allowed**

disallowed

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

P.P. J. Eastman

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

16.12.2020

Date

PLEASE COMPLETE THE FOLLOWING SECTION

Please tick one

I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)

Appendix 4

I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)

Notes to person making submission:

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Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991
FORM 6



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

For office use only Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Richard Gardner

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

Federated Farmers of New Zealand

Address for service of Further Submitter

Private Bag 92-066, Auckland 11142

Telephone: 021 706-138 Fax/Email: (07) 838-2960 / rgardner@fedfarm.org.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (or opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 55
Plan Change/Variation Name	Patumahoe South

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number **Point-Number**

Auckland Council

28

28.1, 28.2, 28.7, 28.8

The reasons for my support / opposition are:

Federated Farmers is very concerned to learn from the Council's submission that more than half of the land that is the subject of the proposal is LUC Class 1 land. This contrasts with the implication in the application materials, and contrasts with the basis upon which Federated Farmers original submission was made, to the effect that only a very small proportion of the land is suitable for intensive horticultural production, with most of the land being described as being unsuitable for rural production. (continue on a separate sheet if necessary)

Federated Farmers supports Unitary Plan Policy B2.6.2, which requires the expansion of existing rural villages to avoid areas of elite soils and avoid where practical areas of prime soils.

I seek that:

the whole :

or part (describe precisely which part) the points in the submission identified above

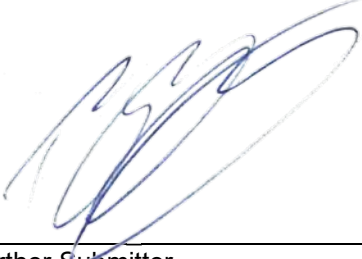
of the original submission be **allowed**

disallowed

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

17 December 2020
Date

PLEASE COMPLETE THE FOLLOWING SECTION

Please tick one

I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)

Federated Farmers is a representative body for farmers in the area of the application, and as such is representative of a relevant aspect of the public interest

I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)

Notes to person making submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority

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

Re: Proposal Plan Change 55 (Private) Patumahoe South:
Reference Submission 45

Further to the above:

While not majorly against the Plan Change, I consider it is considerably lacking in common sense; in particular the proposed subdivision scheme plan 45 designated in 3.3 Pedestrians and Cyclists.

I have lived in Patumahoe approximately 68 of my 71 years.

My questions are:

Why has the plan not included that area of land immediately to the east, north of and adjacent to the railway line and South of Mauku Rd?

This should surely be the next land to be zoned for residential.

I am strongly opposed to the present proposed access to Mauku Rd which would be of severe detriment to the 7 present residential properties and a commercial property owned by P Kraakman, only recently completed.

Patumahoe has in recent years seen considerable growth, most of a reasonable, attractive nature. This MUST be retained. There is an excellent school, excellent sporting facilities and a thriving small commercial centre.

It is surrounded by major market gardening hinterland which generates considerable heavy traffic from early hours and a very busy central commercial centre.

Why haven't the planners factored in the above ?

Any sensible planner should surely be able to see the need and consider the whole district as opposed to an ill thought plan relevant only to the subject subdivision as per the plan submitted.

London, Pukekohe and hundreds of other communities have used ring road design to great advantage. Why would there not be a semi-arterial road from just north of the present Patumahoe railway crossing adjacent to the North of the railway line to link with Day Rd via a 'roundabout' and access to Mauku Rd and then on to Kingseat Rd? This would take all the market garden heavy traffic away from the village centre and passing the school and some 70 residential properties.

By my calculation this would result in the passing of no more than 3 residential properties. Surely this is common sense!. I have mentioned this to a number of residents and have not had anyone disagree.

Incidentally, as a Registered Valuer, I did 3 Town Planning and related Papers at University so am quite conversant with procedures, design, etc. In my opinion the proposed subdivision plan lacks common sense, vision, logic and relevance.

In conclusion, I challenge the writers of the Proposed Plan to critique this suggested design in principle.

Yours faithfully
Peter Hardy

96 Woodhouse Rd,
Patumahoe.
Hardy.p@xtra.co.nz
027 458 6156

FURTHER SUBMISSION ON PLAN CHANGE 55 (PRIVATE): PATUMAHOE SOUTH

Clause 8 of Schedule 1, Resource Management Act 1991 (Form 6)

TO: Auckland Council (By email unitaryplan@aucklandcouncil.govt.nz)

NAME OF FURTHER SUBMITTER: Karam Dhadli also known as Karampreet Singh (the **Submitter**)

SCOPE OF FURTHER SUBMISSION

1. This is a further submission on Proposed Private Plan Change 55: Patumahoe South (**PPC55** or the **Application**) to the Auckland Unitary Plan – Operative in Part (**AUP-OP**).
2. The Submitter has an interest in the proposal that is greater than the public generally, on the basis that they own land directly abutting the plan change area and they are an original submitter on the Application.
3. This further submission is in support of / in opposition to original submissions on the Application as set out in Attachment 1.
4. The reasons for this further submission are as set out in the Submitter's primary submission. Additional reasons for supporting or opposing each of the primary submissions are stated in Attachment 1.
5. The decisions requested by this further submission are also set out in Attachment 1.
6. The Submitter wishes to be heard in support of its submission.
7. The Submitter would consider presenting a joint case if others make similar submissions.

Signed



Nicole Bremner

Dated 17/12/20

On behalf of the Submitter, Karam Dhadli also known as Karampreet Singh

Further Submission in respect of PPC55

Electronic address for service of submitter:

By email: nicole@planorama.co.nz

Telephone: 0272046210

Postal address: P O Box 810, Oneroa, Waiheke Island, Auckland 1840

Further Submission in respect of PPC55

Attachment 1

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
9, 9.1	Doug Lloyd Doug.lloyd@xtra.co.nz	Decline the plan change	Oppose in part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road.	Disallow
11, 11.1	Kelven and Beverley Eastman kelvenandbev@orcon.net.nz	Decline the plan change	Oppose in part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road.	Disallow
14, 14.1	Brad Michie Bradleemichie0601@gmail.com	Decline the plan change	Oppose in part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to	Disallow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
15, 15.1	Philippa Williams williamsbj@gmail.com	Decline the plan change, but if approved, make the amendments requested	Oppose in part	his site at 30 Mauku Road. The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road.	Disallow
15, 15.2	Philippa Williams williamsbj@gmail.com	Amend the plan change so that the new road placement (Intersection D is reconsidered)	Support in part	The submitter is concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road. It may be necessary to review the intersection aspect if additional land is included within the plan change area as sought in Primary Submission 42.	Allow
24, 24.1	Garry Neil McLean jkat@xtra.co.nz	Decline the plan change	Oppose in part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to	Disallow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
27, 27.1	Tamsin Wilson tamsin@secretgarden.co.nz	Decline the plan change	Oppose in part	his site at 30 Mauku Road. The productivity of land needs to be assessed on a case-by-case basis, particularly where this involves existing small, uneconomic lots	Disallow
28, 28.7	Auckland Council Austin.fox@aucklandcouncil.govt.nz	Decline the plan change [in relation to reverse sensitivity]	Support in part	In the event that the submitter's land is not included in the plan change area as sought in Primary Submission 42, appropriate measures will be required to avoid and mitigate reverse sensitivity effects on his site.	Allow
28, 28.8	Auckland Council Austin.fox@aucklandcouncil.govt.nz	In the alternative, any other such relief that would remove potential for reverse sensitivity effects on established rural production activities	Support in part	In the event that the submitter's land is not included in the plan change area as sought in Primary Submission 42, appropriate measures will be required to avoid and mitigate reverse sensitivity effects on his site.	Allow
28, 28.13	Auckland Council Austin.fox@aucklandcouncil.govt.nz	If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to those imposed in other areas around Patumahoe with a greater use of native species	Support in part	In the event that the submitter's land is not included in the plan change area as sought in Primary Submission 42, appropriate measures will be required to avoid and mitigate reverse sensitivity effects on his site.	Allow
29, 29.1	Environmental Defence Society cordelia@eds.org.nz	Decline the plan change	Oppose in part	It may be appropriate to rezone rural land where this	Disallow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
31, 31.1	Horticulture NZ lucy.deverall@hortnz.com	Amend the plan change in the manner outlined in the submission	Support in part	meets the purpose of the RMA 1991, for instance where rural productivity is constrained and rezoning it would provide for sustainable growth of the rural village. In the event that the submitter's land is not included in the plan change area as sought in Primary Submission 42, appropriate measures will be required to avoid and mitigate reverse sensitivity effects on his site. The extent of the landscape buffer and provision for / exclusion of public access requires careful consideration.	Allow
33, 33.15	Auckland Transport sam.mcgough@at.govt.nz	Approve the plan change with the amendments requested; Amend Standard I430.6.13(1)(a)	Oppose in part	The submitter is concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road. Flexibility in the location of the intersection may be desirable	Disallow
33, 33.31	Auckland Transport sam.mcgough@at.govt.nz	Approve the plan change with the amendments requested; Remove Figures 5-11	Oppose in Part	The submitter is concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road. An indicative roading	Disallow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
34, 34.1	Alpito Hill Limited petruskraakman@hotmail.com	Decline the plan change as it relates to the rezoning of 28 Mauku Road and surrounds to Single House Zone unless provisions are put in place to protect the site's land use activities from the effects of Single House Development and use (i.e. reverse sensitivity)	Oppose in Part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road. Aspects of the further submission pertaining to reverse sensitivity effects are not opposed	Disallow
34, 34.2	Alpito Hill Limited petruskraakman@hotmail.com	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3	Oppose in Part	The submitter seeks a logical boundary to the west of the plan change area as set out in the Submitter's Primary Submission 42. The submitter is also concerned to ensure an appropriate location and design for the roading network and intersection with Mauku Road, in respect of access to his site at 30 Mauku Road.	Disallow
35, 35.2	The Surveying Company Limited leigh@subdivision.co.nz	Decline the plan change, but it approved make the amendments requested	Support in Part	The extent of the plan change area may not provide sufficient, longer-term capacity for growth and does not result in the most logical boundary to the expanded urban area.	Allow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
35, 35.2	The Surveying Company Limited leigh@subdivision.co.nz	Seeks that the private plan change is withdrawn and a replacement private plan change is prepared on the basis of a comprehensive structure planning process, including meaningful consultation with the Patumahoe community	Support in Part	The Submitter agrees that it is necessary to review and possibly refine the extent of the plan change area to ensure this best achieves sustainable growth and the efficient use of land and is the most appropriate method to achieve the purpose of the Resource Management Act 1991.	Allow
37, 37.1	Watercare Services Limited ilze.gotelli@water.co.nz	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed	Support in Part	It is important to make comprehensive provision for water storage and wastewater infrastructure for the plan change area, including for any additional land that may be included such as the Submitter's site at 30 Mauku Road	Allow
37, 37.2	Watercare Services Limited ilze.gotelli@water.co.nz	Seeks additional information to adequately assess the effects of this proposal	Support in Part	It is important to make comprehensive provision for water storage and wastewater infrastructure for the plan change area, including for any additional land that may be included such as the Submitter's site at 30 Mauku Road.	Allow
39, 39.1	Federated Farmers of New Zealand rgardner@fedfarm.org.nz	Accept the Proposal as a whole, while taking proper account of	Support in Part	In the event that the submitter's land is not included in the plan change area as	Allow

Submission number	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
		reverse sensitivity matters		sought in Primary Submission 42, appropriate measures will be required to avoid and mitigate reverse sensitivity effects on his site. Controls in this respect require careful consideration.	

Contact details

Full name of person making a further submission: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Full name of your agent:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a further submission to:

Plan change number: Plan Change 55

Plan change name: PC 55: Patumahoe South (Private)

Original submission details

Original submitters name and address:
Please see attached further submission.

Submission number: Please see attached further submission.

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number Please see attached further submission.

The reasons for my or our support or opposition are:
Please see attached further submission.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 17 December 2020

Supporting documents
HNZPT Further Submission PPC55 - Patumahoe South 17 12 20.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Heritage New Zealand Pouhere Taonga 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 historic heritage agency.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



17th December 2020

Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA – PROPOSED PRIVATE PLAN CHANGE 55: PATUMAHOE SOUTH

To: Auckland Council

Name of Submitter: Heritage New Zealand Pouhere Taonga

1. This is a further submission in support of submissions on the following proposed change to the Auckland Unitary Plan (Operative in Part) (the proposal):

Proposed Private Plan Change 55: Patumahoe South

2. Heritage New Zealand is a person who has an interest in the proposal that is greater than the interest the general public has:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) 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.

3. Heritage New Zealand supports the submission of:

- Te Akitai Waiohua Waka Taua Incorporated, Attn: Nigel Denny, akitai.waka.taua@gmail.com.

4. The particular parts of the submission Heritage New Zealand supports are:

- That the plan change be declined for the reason that insufficient consultation has been undertaken with Te Ākitai Waiohua who have cultural interests in Patumahoe.

5. The reasons for Heritage New Zealand's support are:

- Heritage NZ supports mana whenua in the exercising of kaitiakitanga and the submission which seeks appropriate consultation be undertaken.

6. Heritage New Zealand seeks that the submission be allowed such that the proposed plan change appropriately recognises and provides for the significance of this landscape to mana whenua.

7. Heritage New Zealand wishes to be heard in support of our further submission.

Yours sincerely


Sherry Reynolds
Director Northern Region

Address for Service:

Heritage New Zealand Northern Regional Office

PO Box 105 291, Auckland

Telephone: 09 307 9920

Email: PlannerMN@heritage.org.nz
sandrews@heritage.org.nz

Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991
FORM 6



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

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

For office use only Further Submission No:
Receipt Date:

Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) MR WAYNE CEDRIC BOYD & MRS CLAIRE DIANNE BOYD

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

Address for service of Further Submitter

28B MAUKU RD
R.D. 4, PUKEKOHE 2679

Telephone: 027 309 5795 Fax/Email: claire.wayne@slingshot.co.nz

Contact Person: (Name and designation, if applicable)

Scope of Further Submission

This is a further submission in support of (~~or opposition to~~) a submission on the following proposed plan change / variation:

Plan Change/Variation Number	PC 55
Plan Change/Variation Name	Patumahoe South

I support : Oppose (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number	Point-Number
<u>15</u>	<u>15.2</u>

PHILIPPA WILLIAMS
24B MAUKU RD
PATUMAOE

The reasons for my support / ~~opposition~~ are:

OUR PROPERTY IS ALSO
DIRECTLY IMPACTED BY THE PROPOSED NEW ROAD AT
INTERSECTION D. (MAUKU RD) WITHOUT OUR
CONSENT OR KNOWLEDGE.

(continue on a separate sheet if necessary)

I seek that:

the whole :

or part (describe precisely which part) NEW ROAD PLACEMENT (INTERSECTION D)

of the original submission be **allowed**

disallowed

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

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

16/12/20
Date

PLEASE COMPLETE THE FOLLOWING SECTION

Please tick one

I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)

I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)

OUR PROPERTY IS DIRECTLY IMPACTED BY THE
PROPOSED NEW ROAD PLACEMENT
(INTERSECTION D).

Notes to person making submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority

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

APPENDIX FIVE

TABLE OF RECOMMENDATIONS ON SUBMISSIONS

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
1.1	Tania Shine	Decline the plan change	Accept in part
2.1	Joanne Ineson	Approve the plan change with the amendments I requested	Reject
2.2	Joanne Ineson	Seeks a a new AT bus stop with a shelter on Patumahoe Road up by the school, and a shelter for the existing Mauku Road bus stop. Also seeks a better bus service for Patumahoe.	Reject
3.1	Karen Bright	Decline the plan change	Accept
4.1	Barry John Stephens	Approve the plan change with the amendments I requested	Reject
FS01.1	Barry Stephens	<i>Supports</i>	<i>Reject</i>
4.2	Barry John Stephens	Rezone 75 Patumahoe Road to a live submission [zoning] instead of future urban.	Reject
FS01.2	Barry Stephens	<i>Supports</i>	<i>Reject</i>
FS02.1	Auckland Transport	<i>Opposes</i>	<i>Accept</i>
5.1	Deborah Tangney	Decline the plan change	Accept in part
6.1	David Murray McLean	Decline the plan change	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
7.1	David Hopkins	Decline the plan change	Accept in part
8.1	William Thomas Colgan	Approve the plan change with the amendments requested	Reject
8.2	William Thomas Colgan	Include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone	Reject
FS02.2	Auckland Transport	Opposes	Accept
9.1	Doug Lloyd	Decline the plan change	Accept in part
9.1	Karam Dhadli	Oppose in part	
10.1	Michael Graeme Weck	Approve the plan change without any amendments	Reject
11.1	Kelven and Beverley Eastman	Decline the plan change	Accept in part
FS05.1	Kelven and Beverley Eastman	Oppose [The further submitter opposes PC55 rather than their own original submission #11.1]	Accept in part
FS09.2	Karam Dhadli	Oppose in part	Reject
12.1	Louise Brotherton	Decline the plan change	Accept

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
13.1	Te Akitai Waiohau Waka Taua Incorporated	Decline the plan change	Accept in part
FS10	Heritage New Zealand Pouhere Taonga	Supports	Accept in part
14.1	Brad Michie	Decline the plan change	Accept in part
FS09.3	Karam Dhadli	Oppose in part	Reject
15.1	Philippa Williams	Decline the plan change, but if approved, make the amendments I requested	Accept in part
FS09.4	Karam Dhadli	Oppose in part	Reject
FS03.1	Philippa and Todd Williams	Support	Accept in part
15.2	Philippa Williams	Amend the plan change so that the new road placement (Intersection D) is reconsidered.	Accept in part
FS09.5	Karam Dhadli	Support in part	Accept in part
FS02.2	Auckland Transport	Opposes	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS11.1	Claire & Wayne Boyd	Supports	Accept in part
16.1	Karena Brady- Leathem	Decline the plan change	Accept
17.1	Midnight Orchard	Supports the proposal	Reject
18.1	Yvonne Wagner	Decline the plan change	Accept
18.2	Yvonne Wagner	Use Lots 18 & 19 for community gardens and community vegetable allotments.	Reject
19.1	Nicola Ermens	Decline the plan change	Accept
20.1	Anthony Roy Bellhouse	Decline the plan change	Accept
21.1	Lyn Bellhouse	Decline the plan change	Accept
22.1	Wayne and Brenda Hussey	Decline the plan change	Accept
23.1	Lynette Frances Hickey	Decline the plan change	Accept
24.1	Gary Neil McLean	Decline the plan change	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS06.1	Gary Neil McLean	Oppose [<i>Further submitter opposes PC55, not their original submission #24</i>]	<i>Accept in part</i>
FS09.6	Karam Dhadli	<i>Oppose in part</i>	<i>Reject</i>
25.1	Brett Robert Hunter and Bronwyn Hunter	Decline the plan change	Accept
26.1	Peter Joseph Watt	Decline the plan change	Accept in part
27.1	Tamsin Wilson	Decline the plan change	Accept in part
FS09.7	Karam Dhadli	<i>Oppose in part</i>	<i>Reject</i>
28.1	Auckland Council	Decline the plan change to avoid urbanisation on elite and prime soils.	Accept in part
FS07.1	Federated Farmers of New Zealand	<i>Support in part</i>	<i>Accept in part</i>
28.2	Auckland Council	In the alternative, any other such relief that would protect and retain the high productive potential of the soil within the plan change boundary.	Accept in part
FS07.2	Federated Farmers of New Zealand	<i>Support in part</i>	<i>Accept in part</i>
28.3	Auckland Council	Decline the plan change [in relation to a compact urban form]	Accept

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
28.4	Auckland Council	In the alternative, any other such relief that would align the plan change request with the Auckland Plan growth strategy and the FULSS.	Accept in part
28.5	Auckland Council	Decline the plan change [in relation to the National Policy Statement on Urban Development]	Accept in part
28.6	Auckland Council	In the alternative, any other such relief that would align the plan change request with the NPS-UD.	Accept
28.7	Auckland Council	Decline the plan change [in relation to reverse sensitivity]	Accept in part
FS09.8	<i>Karam Dhadli</i>	<i>Support in part</i>	<i>Accept in part</i>
28.7	<i>Federated Farmers of New Zealand</i>	<i>Support in part</i>	
28.7	<i>Kāinga Ora</i>	<i>Oppose in part</i>	
28.8	Auckland Council Attn: Austin Fox	In the alternative, any other such relief that would remove potential for reverse sensitivity effects on established rural production activities.	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS07.1	Federated Farmers of New Zealand	<i>Support in part</i>	<i>Accept in part</i>
FS09.9	Karam Dhadli	<i>Support in part</i>	<i>Accept in part</i>
28.9	Auckland Council	Decline the plan change [in relation to geotechnical issues]	Accept in part
28.10	Auckland Council	In the alternative, any other such relief that would avoid, mitigate, or remedy geotechnical hazards.	Accept in part
28.11	Auckland Council	Decline the plan change [in relation to transport]	Accept
28.12	Auckland Council	In the alternative, any other such relief that would mitigate effects on the wider transport network from the urbanisation proposed by plan change request.	Accept in part
28.13	Auckland Council	If the proposed Plan Change is accepted, then PC55 be amended to incorporate widened landscape buffers similar to those imposed in other areas around Patumahoe, with a greater use of native species.	Accept in part
FS04.2	Kāinga Ora	<i>Oppose in part</i>	<i>Accept in part</i>
FS09.10	Karam Dhadli	<i>Support in part</i>	<i>Accept in part</i>
28.14	Auckland Council	If the proposed Plan Change is accepted, then PC55 be amended to align the amount and location of open space to be provided with Council's Open Space Provision Policy 2016.	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
29.1	Environmental Defence Society Incorporated	Decline the plan change	Accept in part
FS09.11	<i>Karam Dhadli</i>	<i>Oppose in part</i>	<i>Reject</i>
30.1	Kāinga Ora	Remove Standard I430.6.17 Protection from Railway Noise and Vibration in Sub-precinct E in its entirety from the precinct provisions	Accept in part
FS02.3	<i>Auckland Transport</i>	<i>Opposes</i>	<i>Accept in part</i>
30.2	Kāinga Ora	Seeks any consequential relief necessary to satisfy Kāinga Ora's concerns	Accept in part
31.1	Horticulture New Zealand	Amend the proposed precinct provisions so that: - an additional 5m to afford further separation distance to better assist in avoiding reverse sensitivity issues - landscaping includes shelter belts to ensure avoidance of any risk of reverse sensitivity arising from sprays, noise and smell, and - public access be excluded from the buffer strip as this would hinder the ability of the strip to adequately manage reverse sensitivity	Reject
FS04.3	<i>Kāinga Ora</i>	<i>Oppose in part</i>	<i>Accept in part</i>
FS09.12	<i>Karam Dhadli</i>	<i>Support in part</i>	<i>Reject</i>
32.1	David Walsh	Decline the plan change	Accept
33.1	Auckland Transport	Decline the proposed rezoning of 9 hectare on the eastern side of Patumahoe Road from Rural Production to Future Urban zone	Accept

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.2	Auckland Transport	Retain the proposed rezoning of 2.5 hectares at the southern end of the development from Rural Production and Strategic Transport Corridor to Light Industrial.	Reject
33.3	Auckland Transport	Require more information about the impact of the development on the wider transport network, including if the infrastructure improvements identified as providing a contribution to the traffic impact associated with the Plan Change are not realised or not realised by the timeframes identified. If these infrastructure requirements are necessary to support the development to be enabled by this Plan Change in any way, then identify appropriate methods to address them, such as appropriate staging triggers.	Accept
33.4	Auckland Transport	Require analysis with revised trip generation rates based on development level/quantum proposed and any additional mitigation required.	Accept
33.5	Auckland Transport	Require wider network assessment of the effects of this development given that the strategic network assessment did not include the effects of this development and much of the strategic capacity is utilised by others.	Accept
33.6	Auckland Transport	Amend Objective 3(a) as follows. '(3) Development and/or subdivision within the precinct facilitates a transport network that: (a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network.'	Reject
33.7	Auckland Transport	Amend Objective 4 as follows: '(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses and <u>the railway network.</u> '	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS04.4	Kāinga Ora	Oppose	Accept in part
33.8	Auckland Transport	Retain Policy 5.	Reject
33.9	Auckland Transport	Amend I430.3 to add a policy that recognises the requirements to protect development in Sub-precinct E from railway noise and vibration.	Reject
FS04.5	Kāinga Ora	Oppose	Accept in part
33.10	Auckland Transport	Amend the activity table I430.4.2(A5) to specifically identify the 'applicable building and development standards in I430.6'	Reject
33.11	Auckland Transport	Amend the activity table I430.4.2(A7) as follows: (A7) 'Subdivision which does not comply with <u>one or more of the subdivision standards listed in (A6) above</u> '	Reject
33.12	Auckland Transport	Amend Standard I430.6.3 to clarify the standard does not apply to roads to be vested in Auckland Council.	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.13	Auckland Transport	Amend Standard I430.6.5(1) as follows: '(1) All stormwater from impervious areas <u>on sites</u> shall be mitigated to achieve flow attenuation, such that 5m ³ /100m ² of roof area and 3m ³ /100m ² of other impervious areas are attenuation by one (or a combination) of the following methods: ...'	Reject
33.14	Auckland Transport	Amend Standard I430.6.13(1) as follows: '(1) Before any S224(c) certificates <u>for subdivision</u> or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130 in accordance with SUB60318096 and LUC60329723 (<u>while those consents remain valid</u>), the following works shall be constructed and completed to the Council's satisfaction.'	Reject
33.15	Auckland Transport	Amend Standard I430.6.13(1)(a) as follows: '(a) A new road <u>access</u> either from Patumahoe Road or from Mauku Road into the precinct <u>within 50m of one of</u> <u>from</u> the indicative locations shown on Patumahoe: Precinct Plan 3 (<u>and meeting the Sight Distances specified in the Austroads Guide to Road Design</u>);'	Reject
FS09.13	Karam Dhadli	<i>Oppose in part</i>	<i>Accept in part</i>
33.16	Auckland Transport	Reword Standard I430.6.13(1)(b) as follows: '(b) <u>a</u> <u>footpath</u> , <u>appropriate</u> <u>kerb</u> <u>and</u> <u>channel</u> , <u>berm</u> <u>and</u> <u>street</u> <u>trees</u> , <u>and</u> <u>a</u> <u>services</u> <u>corridor</u> <u>along</u> <u>the</u> <u>road</u> <u>frontage(s)</u> <u>adjacent</u> <u>to</u> <u>the</u> <u>portion</u> <u>of</u> <u>land</u> <u>being</u> <u>developed</u> ; '(b) <u>the</u> <u>width</u> <u>of</u> <u>the</u> <u>road</u> <u>from</u> <u>the</u> <u>property</u> <u>boundary</u> <u>of</u> <u>the</u> <u>proposed</u> <u>site</u> <u>to</u> <u>the</u> <u>kerb</u> <u>on</u> <u>the</u> <u>opposite</u> <u>side</u> <u>of</u> <u>the</u> <u>road</u> .'	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.17	Auckland Transport	<p>Reword Standard I430.6.13(1)(c) as follows: '<u>(c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road;</u> '(c) <u>'subdivision creating sites with access from Carter Road'</u></p>	Reject
33.18	Auckland Transport	<p>Reword Standard I430.6.13(1)(c)(i) to clarify what road needs to be formed.</p>	Reject
33.19	Auckland Transport	<p>Reword Standard I430.6.13(1)(c)(ii) as follows: '<u>(ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and</u> '(ii) <u>'the northern portion of Carter Road, which is identified as 'pedestrian / cycle lane' on Precinct Plan 3 is to be closed to vehicle traffic and formed with pedestrian access and separated cycle facilities'</u></p>	Reject
33.20	Auckland Transport	<p>Reword I430.6.13(1)(c)(iii) to clarify how vehicle access is to be provided to the Watercare facility at 6 Carter Road.</p>	Reject
33.21	Auckland Transport	<p>Request clarification on the loss of access for Lot 12 DP83912 and ongoing provision of such if required.</p>	Reject
33.22	Auckland Transport	<p>Amend Standard I430.6.13, and other parts of the precinct provisions as relevant, to require the vesting of land as road adjacent to Patumahoe Road as identified on Precinct Plan 3.</p>	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.23	Auckland Transport	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant including identification on Precinct Plan 3, to require the upgrade of Patumahoe Road frontage in conjunction with subdivision and development. This includes separated walking and cycling facilities to be provided along the western side of Patumahoe Road extending to Woodhouse Road and vesting of land to accommodate this infrastructure.	Reject
33.24	Auckland Transport	Insert a new heading ' <u>I430.8.1A Matters of discretion</u> ' and renumber consequently if required.	Reject
33.25	Auckland Transport	Reword I430.8(2) as follows: '(2) Subdivision and infringement of subdivision standards <u>other than those standards listed in (A2) and (A6)</u> '.	Reject
33.26	Auckland Transport	Delete the matter of discretion at I430.8(2)(c) as follows: (e) ' <u>Compliance with minimum site size requirements</u> '	Reject
33.27	Auckland Transport	Remove the matter of discretion at I430.8(2)(f) as follows: '(f) <u>the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (road Hierarchy) and Figures 6-11 (Cross Sections) below;</u> Insert a new matter of discretion for I430.8(2) as follows: '(x) <u>The adequacy of the transport infrastructure and services to provide for the subdivision</u> '	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.28	Auckland Transport	Amend the matter of discretion at I430.8(2)(h) as follows: '(h) establishment of <u>suitable-safe and efficient</u> road access from Patumahoe Road to Sub-precinct E and <u>the internal roading network including</u> , footpaths and cycleways within the Sub-precinct;'	Reject
33.29	Auckland Transport	Amend the matter of discretion at I430.8(2)(i) as follows: '(i) need for and provision of road safety improvements to these sections of Patumahoe and/or Mauku Roads, <u>including at the intersection with Woodhouse Road, adjacent to to mitigate the transport effects of development in</u> Sub-precinct E;'	Reject
33.30	Auckland Transport	Retain the matter of discretion at I430.8(2)(j)	Reject
33.31	Auckland Transport	Remove Figures 5 – 11 in the Precinct Plan, showing the roading hierarchy and cross sections of roads and a shared path. Replace the cross-sections with an approach that identifies the minimum road reserve widths, functional requirements, and particular components such as separated cycle facilities. <i>Oppose in part</i>	Reject
FS09.14	Karam Dhadli	<i>Oppose in part</i>	<i>Accept in part</i>
33.32	Auckland Transport	Amend the Precinct Plan to clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council.	Reject
33.33	Auckland Transport	Amend assessment criterion I430.8.1(1)(b) as follows: '(b) For Sub-precinct E, the extent to which an activity a development complies with the Patumahoe: Precinct Plan 3 and implements the <u>identified transport infrastructure</u> .'	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.34	Auckland Transport	Amend assessment criterion I430.8.1(1)(c) as follows: '(c) For Sub-precincts A, B, C, <u>and D</u> and E whether the design of any roads, vehicle access ways or pedestrian walkways is consistent with the relevant Precinct Plan and relevant Figures 1- 4 or 5-9 above'.	Reject
33.35	Auckland Transport	Amend assessment criteria at I430.8.1(2) as follows: '(2) Subdivision and infringement of subdivision standards <u>other than those standards listed in (A2) and (A6)</u> '	Reject
33.36	Auckland Transport	Amend assessment criterion I430.8.1(2)(a) as follows: '(a) For Sub-precincts A, B, C, <u>and D</u> and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant Precinct Plan and relevant Figures 1- 4 and 5-14 above.'	Reject
33.37	Auckland Transport	Insert new assessment criterion for I430.8.1(2) as follows: '(x) For Sub-precinct E, the extent to which <u>the subdivision implements the transport infrastructure identified on Precinct Plan 3</u> '	Reject
33.38	Auckland Transport	Delete assessment criterion I430.8.1(2)(b) as follows: '(b) Whether site sizes meet the minimum requirements in Standard I430.6.7 above. '	Reject
33.39	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(i) as follows: '(i) <u>Whether the subdivision will implement any works</u> are required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and'	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.40	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(ii) as follows: '(ii) Whether <u>the subdivision will implement any safety improvements required to the local road network are facilitated by subdivision in order to safely accommodate the additional activity address any transport effects associated with development in Sub-precinct E.</u> '	Reject
33.41	Auckland Transport	Amend assessment criterion I430.8.1(4)(b)(iii) as follows: '(iii) Whether <u>the subdivision provides for any safety improvements are required to maintain the safe operation of the railway level crossing on Patumahoe Road, and</u> '	Reject
33.42	Auckland Transport	Delete assessment criterion I430.8.1(4)(b)(iv) as follows: '(iv) Whether subdivision and development in Sub-precinct E contributes proportionately to any required safety improvements to the level-crossing. '	Reject
33.43	Auckland Transport	Amend assessment criterion I430.8.1(4)(c)(i) as follows: '(i) Whether <u>the establishment of reading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct Plan 3, Auckland Council Codes of Practice and the Auckland Design Manual</u> '	Reject
33.44	Auckland Transport	Insert two new criteria for I430.8.1(4)(c) as follows: '(x) <u>Whether the staging of development is aligned with the delivery of transport infrastructure needed to service the development</u> '(x) <u>Whether the establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure in existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.</u> '	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.45	Auckland Transport	<p>Amend assessment criterion 1430.8.1(4)(f) as follows: '(f) The extent to which subdivision design and associated provisions <u>address</u> ensure that the specific Standards 1430.8(1)(b-d) and matters of discretion in 1430.8(2)(b, e, f-1) applicable to Sub-precinct E achieve their respective purpose(s).'</p>	Reject
33.46	Auckland Transport	<p>Amend Precinct Plan 3 to delete the section of 'indicative road layout' located adjacent to the south-west boundary of the Patumahoe Recreation Reserve. Amend Precinct Plan 3 to include other transport works required to support the proposal including:</p> <ul style="list-style-type: none"> • Pedestrian crossings on Patumahoe Road • Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road • Pedestrian and potential cycling connection through Patumahoe Recreation Reserve • Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection • Additional bus stops on Patumahoe Road • Identification of roads for speed reduction measures. <p>Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.</p>	Reject
33.47	Auckland Transport	Amend Precinct Plan 3 to remove one of the proposed intersections onto Patumahoe Road but retain the intersection adjacent to the industrial zone.	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
33.48	Auckland Transport	Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.	Reject
33.49	Auckland Transport	Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.	Reject
33.50	Auckland Transport	Amend the Precinct Plan to require two pairs of bus stops meeting Auckland Transport standards to be provided along Patumahoe Road in conjunction with subdivision and development of Sub-precinct E. The indicative location of the bus stops should be identified on Precinct Plan 3.	Reject
33.51	Auckland Transport	Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.	Reject
34.1	Alpito Hill Limited	Decline the plan change as it relates to the rezoning of 28 Mauku Road and surrounds to Single House Zone unless provisions are put in place to protect the site's land use activities from the effects of Single House development and use (ie reverse sensitivity).	Accept
FS09.15	Karam Dhadli	<i>Oppose in Part</i>	<i>Reject</i>
34.2	Alpito Hill Limited	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS02.4	Auckland Transport	Opposes	Accept in part
FS09.16	Karam Dhadli	Oppose in Part	Accept in part
35.1	The Surveying Company	Decline the plan change, but if approved, make the amendments I requested	Reject
FS01.3	Barry Stephens	Supports	Reject
35.2	The Surveying Company	Seeks that the private plan change is withdrawn and a replacement private plan change is prepared on the basis of a comprehensive structure planning process, including meaningful consultation with the Patumahoe community;	Reject
FS01.4	Barry Stephens	Supports	Reject
FS09.17	Karam Dhadli	Support in Part	Reject
35.3	The Surveying Company	Seeks that the subject site at 23 Clive Howe Road is included within the private plan change area and the Patumahoe Precinct;	Reject
FS01.5	Barry Stephens	Supports	Reject
35.4	The Surveying Company	Seeks that the subject site at 23 Clive Howe Road and the adjoining site at 75 Patumahoe Road are rezoned Residential Large Lot and are subject to a subdivision standard which requires all new lots to have a minimum size of 2000m2 and an average size of 4000m2.	Reject
FS01.6	Barry Stephens	Supports	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
35.5	The Surveying Company	Seeks that the sites at 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road are rezoned to Residential Single House.	Reject
FS02.5	<i>Auckland Transport</i>	<i>Opposes</i>	<i>Accept</i>
FS01.7	<i>Barry Stephens</i>	<i>Supports</i>	<i>Reject</i>
35.6	The Surveying Company	Seeks any other alternative relief that will enable the subject site at 23 Clive Howe Road and adjoining/surrounding sites to be used for urban (residential) use.	Reject
FS02.6	<i>Auckland Transport</i>	<i>Opposes</i>	<i>Accept</i>
FS01.8	<i>Barry Stephens</i>	<i>Supports</i>	<i>Reject</i>
36.1	Kiwirail Holdings Limited	Support I1430.1 Precinct Description, with amendment to read: “...The Paerata-Waiuku <u>Mission Bush</u> Branch railway line forms the southern boundary of the precinct....”	Reject
36.2	Kiwirail Holdings Limited	Retain I430.2. Objectives (1), (3) and (4) as notified	Reject
FS04.6	<i>Kāinga Ora</i>	<i>Support</i>	<i>Reject</i>
36.3	Kiwirail Holdings Limited	Retain I430.10.2 Patumahoe: Precinct plan 3 - Sub-Precinct E, with amendment: Add a notation to Precinct plan 3 – Sub-Precinct E to show the location of the landscape buffer area along the southern boundaries of the Light Industrial zone of Sub-precinct E, adjoining the railway, referred to in I430.6.9 (4).	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
FS04.7	Kāinga Ora	Oppose in part	Accept in part
36.4	Kiwirail Holdings Limited	Retain Table I430.4.2 Activity table, as notified	Reject
FS04.8	Kāinga Ora	Oppose	Accept in part
36.5	Kiwirail Holdings Limited	Retain Standard I430.6.9. Landscape buffers in sub-precincts B, C, and D and E clauses (3) and (4) relating to sub Precinct E, as notified	Reject
FS04.9	Kāinga Ora	Oppose in part	Accept in part
36.6	Kiwirail Holdings Limited	Retain Standard I430.6.17, with amendment as follows: 1. Insert after the Table in (1); <u>or</u> ; is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks	Reject
FS04.10	Kāinga Ora	Oppose	Accept in part
36.7	Kiwirail Holdings Limited	Amend Standard I430.6.17 clause (b) as follows: (b) Compliance may be achieved by adopting the following construction schedule specified by Kiwirail (refer to Schedule XX Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions October 2018).	Reject
FS04.11	Kāinga Ora	Oppose	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
36.8	Kiwirail Holdings Limited	Within Standard I430.6.17, insert a construction schedule for indoor noise [Refer to page 4 of submission for construction schedule].	Reject
FS04.12	Kāinga Ora	Oppose	Accept in part
36.9	Kiwirail Holdings Limited	<p>Within Standard I430.6.17, insert a new clause: <u>(xx) Mechanical ventilation</u> <u>if windows must be closed to achieve the design noise levels in clause 1, the building is designed, constructed and maintained with a mechanical ventilation system that:</u> <u>(a) For sleeping rooms, achieves the following requirements:</u> i. <u>provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code;</u> and ii. <u>is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u> iii. <u>provides relief for equivalent volumes of spill air;</u> iv. <u>provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u> v. <u>does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u> <u>(b) For other habitable spaces, is as determined by a suitably qualified and experienced person.</u></p>	Reject
FS04.13	Kāinga Ora	Oppose	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
36.10	Kiwirail Holdings Limited	<p>Within Standard I430.6.17, insert after proposed clause (2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95)-<u>or</u></p> <p>(b) is a single storey framed residential building with:</p> <ul style="list-style-type: none"> i. <u>a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u> ii. <u>vibration isolation separating the sides of the floor slab from the ground; and</u> iii. <u>no rigid connections between the building and the ground.</u> 	Reject
FS04.14	Kāinga Ora	Oppose	Accept in part
36.11	Kiwirail Holdings Limited	<p>Within Standard I430.6.17, insert a new clause referring to all preceding clauses; (xxx) <u>A report is submitted to the council demonstrating compliance with the clauses above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise.</u></p>	Reject
FS04.15	Kāinga Ora	Oppose	Accept in part
36.12	Kiwirail Holdings Limited	Retain I430.8. Assessment – restricted discretionary activities (2) clause (j) as notified	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
36.13	Kiwirail Holdings Limited	Retain 14.30.8. Assessment – restricted discretionary activities clause (2) (n) with amendment to clause (2) (n) to add sub criteria as follows: (n) Compliance with Railway Noise and Vibration Standards in Sub-precinct E <u>including:</u> (i) Whether the sensitive activity could be located further from the railway corridor. (ii) <u>The extent to which the noise and vibration criteria are achieved and the effects of any noncompliance;</u> (iii) <u>Special topographical, building features or ground conditions which will mitigate vibration impacts</u>	Reject
FS04.16	Kāinga Ora	Oppose	Accept in part
36.14	Kiwirail Holdings Limited	Retain 14.30.8.1(4)(b)(iii) and (iv) as notified	Reject
37.1	Watercare Services Limited	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.	Accept
FS09.17	Karam Dhadli	Support in Part	Accept in part

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
37.2	Watercare Services Limited	<p>Seeks that the following information be provided in order for it to adequately assess the effects of this Proposal:</p> <p>(a) How the additional water storage to service the Plan Change Area will be provided.</p> <p>(b) The availability of suitable land to accommodate the necessary upgrades to service the Plan Change Area, including identification of suitable land adjacent to the Patumahoe Reservoir to meet the appropriate hydraulic grade line to expand the existing asset in order to provide water supply to service the Plan Change Area.</p> <p>(c) An additional assessment of the full potential impacts of the rezoned land, including the proposed Sub-precinct E.</p> <p>(d) Any additional existing upgrades, and proposed wastewater infrastructure that will be required to accommodate additional flows.</p> <p>(e) Confirmation of how both the water and wastewater upgrades are intended to be funded.</p>	Accept
FS09.18	Karam Dhadli	Support in Part	Accept in part
38.1	Counties Power Ltd	Accept the Plan Change	Reject
38.2	Counties Power Ltd	If the overhead lines are to remain, Counties Power Limited advises that clearance must be maintained between the overhead lines and any proposed street trees. These clearances are required under the Electricity (Hazards from Trees) Regulations 2003;	Reject
38.3	Counties Power Ltd	Seeks consultation regarding the species of trees/shrubs proposed by any Standard in the vicinity of overhead lines in all Sub-precincts (to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the species of the tree.	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
38.4	Counties Power Ltd	Retain provisions as notified/proposed, subject to submission points raised above: - I430.6.13 (1)(b) - I430.8 (2) - I430.8.1(4)(e)	Reject
39.1	Federated Farmers of New Zealand	Accept the Proposal as a whole, while taking proper account of reverse sensitivity matters.	Reject
FS04.18	Kāinga Ora	Support	Reject
FS09.19	Karam Dhadli	Support in Part	Reject
40.1	David George Harper	Decline the plan change	Accept
41.1	Ministry of Education	Requests regular engagement with Auckland Council and the developer to understand the housing typologies being proposed, the staging and timing of the subsequent development. This will allow the Ministry to appropriately plan for the potential impact of the development on the school network including the investigation of the provision of new schools and planning for interim and significant upgrades to existing schools.	Reject
41.2	Ministry of Education	No specific decision requested but supports the proposed safety improvements to mitigate traffic effects on pedestrian safety	Reject
41.3	Ministry of Education	No specific decision but supports the partial closure of Carter Road to be converted into a walking and cycling pathway	Reject

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
41.4	Ministry of Education	No specific decision requested but supports the proposed speed reduction to 30km/hr in the wider Proposed Plan Change area	Reject
42.1	Karam Dhadli	<p>Approve PPC55 subject to -</p> <ul style="list-style-type: none"> i. confirming the zoning of land abutting the rear boundary of the Submitter's site as Open Space zoned land; and ii. reviewing and, if necessary, refining the extent of the plan change area to ensure this best achieves sustainable growth and the efficient use of land and is the most appropriate method to achieve the purpose of the Resource Management Act 1991; and 	Reject
42.2	Karam Dhadli	<ul style="list-style-type: none"> b. Approve PPC55 subject to amending the AUP-OP maps and text to - <ul style="list-style-type: none"> i. extend the plan change area to include the Submitter's site and to apply an appropriate zone to the land to enable settlement growth, for instance as Future Urban Zone and/or Residential -Single House zone and/or a Business-Light Industry zone; and ii. apply the proposed Patumahoe Sub-Precinct E to the Submitter's site. 	Reject
FS02.7	Auckland Transport	Opposes	Accept

Sub Point	Submitter Name	Summary	Planners recommendation Accept / Accept in part / Reject
42.3	Karam Dhadli	In the event that the PPC55 is approved without inclusion of the Submitter's site within the plan change area, require – i. the imposition of a sufficiently wide, planted Landscape Buffer adjoining the entire boundary of the Submitter's site; and ii. the registration of a 'no complaints' covenant on those residential sites along the western boundaries of Sub-Precinct E adjoining the Submitter's site in respect of the effects of lawful activities undertaken on its land to create separation at the zone interface and ensure protection against reverse sensitivity effects.	Reject
FS04.19	Kāinga Ora	<i>Oppose in part</i>	<i>Accept</i>
42.4	Karam Dhadli	Seeks consequential amendments as necessary to achieve the relief sought above [Submission points 42.1, 42.2 and 42.3].	Reject
43.1	Douglas Rex Embling	Decline the plan change	Accept in part
44.1	Heritage New Zealand Pouhere Taonga	Accept the proposed plan change with amendments to include appropriate provisions within the precinct plan to fully address Māori cultural heritage values identified and require the incorporation of Te Aranga principles into development through the resource consenting process.	Reject
45.1	Peter Hardy	Seeks that the proposal recognises the long term transport requirements of Patumahoe Village.	Accept in part

APPENDIX SIX
STATUTORY MATTERS

National policy statements

Relevant Act/ Policy/ Plan	Section	Matters
National Policy Statement on Freshwater Management (NPS-FM) 2020	Objective	<p>Objective 1: The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
	Policies	<p>Policy 2: Tangata whenua are actively involved in freshwater management (including decisionmaking processes), and Māori freshwater values are identified and provided for.</p>
		<p>Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.</p>
		<p>Policy 15: Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.</p>
National Policy Statement on Urban Development 2020 (NPS-UD)	Well-functioning urban environments, competitive land and development markets, and climate change	<p>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</p> <p>Objective 8: New Zealand’s urban environments:</p> <ul style="list-style-type: none"> (a) support reductions in greenhouse gas emissions; (b) and are resilient to the current and future effects of climate change. <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: <ul style="list-style-type: none"> 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

Relevant Act/ Policy/ Plan	Section	Matters
		<ul style="list-style-type: none"> (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.
	Responsive planning	<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity. <p>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <ul style="list-style-type: none"> (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.

Relevant regional policy statement provisions of Auckland Unitary Plan

Section	Matters
Chapter B2.2 Urban Growth Objectives B2.2.1(1), (2), (3) and (5) Policies B2.2.2(1), (4)	<p>Objective (1) A quality compact urban form that enables all of the following:</p> <ul style="list-style-type: none"> (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;

Section	Matters
	<p>(f) better maintenance of rural character and rural productivity; and</p> <p>(g) reduced adverse environmental effects.</p> <p>Objective (2) Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).</p> <p>Objective (3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.</p> <p>Objective (5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.</p> <p>Policy (1): Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.</p> <p>Policy (4): Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.</p>
<p>Chapter B2.3 Quality Built Environment Objectives B2.3.1(1), (2), (3) Policies B2.3.2(1) – (4)</p>	<p>Objective (1) A quality-built environment where subdivision, use and development do all of the following:</p> <ul style="list-style-type: none"> (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change. <p>Objective (2) Innovative design to address environmental effects is encouraged.</p> <p>Objective (3) The health and safety of people and communities are promoted.</p> <p>Policy (1) Manage the form and design of subdivision, use and development so that it does all of the following:</p> <ul style="list-style-type: none"> (a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;

Section	Matters								
	<p>(b) contributes to the safety of the site, street and neighbourhood;</p> <p>(c) develops street networks and block patterns that provide good access and enable a range of travel options;</p> <p>(d) achieves a high level of amenity and safety for pedestrians and cyclists;</p> <p>(e) meets the functional, and operational needs of the intended use; and</p> <p>(f) allows for change and enables innovative design and adaptive re-use.</p> <p>Policy (2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:</p> <p>(a) providing access for people of all ages and abilities;</p> <p>(b) enabling walking, cycling and public transport and minimising vehicle movements; and</p> <p>(c) minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.</p> <p>Policy (3) Enable a range of built forms to support choice and meet the needs of Auckland’s diverse population.</p> <p>Policy (4) Balance the main functions of streets as places for people and as routes for the movement of vehicles.</p>								
<p>Chapter B2.4 Residential growth Objectives B2.4.1(2), (4), (5), (6) Policies B2.4.2(1), (4)</p>	<p>Objective (2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.</p> <p>Objective (4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland’s diverse and growing population.</p> <p>Objective (5) Non-residential activities are provided in residential areas to support the needs of people and communities.</p> <p>Objective (6) Sufficient, feasible development capacity for housing is provided, in accordance with Objectives 1 to 4 above, to meet the targets in Table B2.4.1 below:</p> <p>Table B2.4.1: Minimum Dwelling Targets</p> <table border="1" data-bbox="557 1682 1187 1865"> <thead> <tr> <th data-bbox="560 1686 722 1771">Term</th> <th data-bbox="722 1686 895 1771">Short to Medium 1 - 10 years (2016 – 2026)</th> <th data-bbox="895 1686 1035 1771">Long 11 - 30 years (2027 – 2046)</th> <th data-bbox="1035 1686 1184 1771">Total 1 – 30 years (2016 – 2046)</th> </tr> </thead> <tbody> <tr> <td data-bbox="560 1771 722 1861">Minimum Target (number of dwellings)</td> <td data-bbox="722 1771 895 1861">189,800</td> <td data-bbox="895 1771 1035 1861">218,500</td> <td data-bbox="1035 1771 1184 1861">408,300</td> </tr> </tbody> </table> <p>Policy (1) Provide a range of residential zones that enable different housing types and intensity that are appropriate to the residential character of the area.</p>	Term	Short to Medium 1 - 10 years (2016 – 2026)	Long 11 - 30 years (2027 – 2046)	Total 1 – 30 years (2016 – 2046)	Minimum Target (number of dwellings)	189,800	218,500	408,300
Term	Short to Medium 1 - 10 years (2016 – 2026)	Long 11 - 30 years (2027 – 2046)	Total 1 – 30 years (2016 – 2046)						
Minimum Target (number of dwellings)	189,800	218,500	408,300						

Section	Matters
	<p>Policy (4) Provide for lower residential intensity in areas:</p> <ul style="list-style-type: none"> (a) that are not close to centres and public transport; (b) that are subject to high environmental constraints; (c) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and (d) where there is a suburban area with an existing neighbourhood character.
<p>Chapter B2.6 Rural and coastal towns and villages Objectives B2.6.1(1), (2) Policies (1) – (4)</p>	<p>Objective (1) Growth and development of existing or new rural and coastal towns and villages is enabled in ways that:</p> <ul style="list-style-type: none"> (a) avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and (b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production; and (c) avoid areas with significant natural hazard risks; (d) are consistent with the local character of the town or village and the surrounding area; and (e) enables the development and use of Mana Whenua's resources for their economic well-being. <p>Objective (2) Rural and coastal towns and villages have adequate infrastructure.</p> <p>Policy (1) Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:</p> <ul style="list-style-type: none"> (a) maintains or enhances the character of any existing town or village; (b) incorporates adequate provision for infrastructure; (c) avoids locations with significant natural hazard risks where those risks cannot be adequately remedied or mitigated; (d) avoids elite soils and avoids where practicable prime soils which are significant for their ability to sustain food production; (e) maintains adequate separation between incompatible land uses; (f) is compatible with natural and physical characteristics, including those of the coastal environment; and

Section	Matters
	<p>(g) provides access to the town or village through a range of transport options including walking and cycling.</p> <p>Policy (2) Avoid locating new or expanding existing rural and coastal towns and villages in or adjacent to areas that contain significant natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character, unless the growth and development protects or enhances such resources including by any of the following measures:</p> <ul style="list-style-type: none"> (a) the creation of reserves; (b) increased public access; (c) restoration of degraded environments; (d) creation of significant new areas of biodiversity; or (e) enablement of papakāinga, customary use, cultural activities and appropriate commercial activities. <p>Policy (3) Enable the establishment of new or significant expansions of existing rural and coastal towns and villages through the structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.</p> <p>Policy (4) Enable small-scale growth of and development in rural and coastal towns and villages without the need for structure planning, in a manner consistent with policies B2.6.2(1) and (2).</p>
<p>Chapter B2.7 Open Space and recreation facilities</p> <p>Objective B2.7.1(1), (3)</p> <p>Policies B2.7.2(2), (3), (4), (7)</p>	<p>Objective (1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.</p> <p>Objective (3) Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.</p> <p>Policy (2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.</p> <p>Policy (3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.</p> <p>Policy (4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.</p> <p>Policy (7) Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities.</p>
<p>Chapter B3.2 Infrastructure</p> <p>Objective B3.2.1(5)</p> <p>Policies B3.2.2(1), (2)</p>	<p>Objective (5) The functional and operational needs of infrastructure are recognised.</p> <p>Policy (1) Enable the efficient development, operation, maintenance and upgrading of infrastructure.</p> <p>Policy (2) Recognise the value of investment in existing infrastructure.</p>

Section	Matters
<p>Chapter B3.3 Transport Objective B3.3.1(1) Policies B3.3.2(4)</p>	<p>Objective (1) Effective, efficient and safe transport that:</p> <ul style="list-style-type: none"> (a) supports the movement of people, goods and services; (b) integrates with and supports a quality compact urban form; (c) enables growth; (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community <p>Policy (4) Ensure that transport infrastructure is designed, located and managed to:</p> <ul style="list-style-type: none"> (a) integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and (b) provide effective pedestrian and cycle connections.
<p>Chapter B6.2 Recognition of Te Titiri o Waitangi partnerships and participation Objectives B6.2.1(1), (2) Policy B6.2.2(1)</p>	<p>Objective (1) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga.</p> <p>Objective (2) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.</p> <p>Policy (1) Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following:</p> <ul style="list-style-type: none"> (a) recognises the role of Mana Whenua as kaitiaki and provides for the practical expression of kaitiakitanga; (b) builds and maintains partnerships and relationships with iwi authorities; (c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans; (d) recognises the role of kaumātua and pūkenga; (e) recognises Mana Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga;

Section	Matters
	<p>(f) acknowledges historical circumstances and impacts on resource needs;</p> <p>(g) recognises and provides for mātauranga and tikanga; and</p> <p>(h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.</p>
<p>Chapter B6.3 Recognising Mana Whenua values</p> <p>Objectives B6.3.1(1), (2)</p> <p>Policies B3.3.2(1) – (3)</p>	<p>Objective (1) Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making.</p> <p>Objective (2) The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.</p> <p>Policy (1) Enable Mana Whenua to identify their values associated with all of the following:</p> <ul style="list-style-type: none"> (a) ancestral lands, water, air, sites, wāhi tapu, and other taonga; (b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values; (c) biodiversity; (d) historic heritage places and areas; and (e) air, geothermal and coastal resources. <p>Policy (2) Integrate Mana Whenua values, mātauranga and tikanga:</p> <ul style="list-style-type: none"> (a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including: <ul style="list-style-type: none"> (i) ancestral lands, water, sites, wāhi tapu and other taonga; (ii) biodiversity; and (iii) historic heritage places and areas. (b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health; (c) in the development of innovative solutions to remedy the long-term adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and (d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources. <p>Policy (3) Ensure that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values.</p>
<p>Chapter B7.3 Freshwater systems</p>	<p>Objective (1) Degraded freshwater systems are enhanced.</p> <p>Objective (2) Loss of freshwater systems is minimised.</p>

Section	Matters
<p>Objectives B7.3.1(1), (2), (3) Policies B7.3.2(1) – (6)</p>	<p>Objective (3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.</p> <p>Policy (1) Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following:</p> <ul style="list-style-type: none"> (a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of new growth or intensification; (b) ensuring catchment management plans form part of the structure planning process; (c) controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce existing adverse effects where those systems or water are degraded; and (d) avoiding development where it will significantly increase adverse effects on freshwater systems, unless these adverse effects can be adequately mitigated. <p>Policy (2) Identify degraded freshwater systems.</p> <p>Policy (3) Promote the enhancement of freshwater systems identified as being degraded to progressively reduce adverse effects.</p> <p>Policy (4) Avoid the permanent loss and significant modification or diversion of lakes, rivers, streams (excluding ephemeral streams), and wetlands and their margins, unless all of the following apply:</p> <ul style="list-style-type: none"> (a) it is necessary to provide for: <ul style="list-style-type: none"> (i) the health and safety of communities; or (ii) the enhancement and restoration of freshwater systems and values; or (iii) the sustainable use of land and resources to provide for growth and development; or (iv) infrastructure; (b) no practicable alternative exists; (c) mitigation measures are implemented to address the adverse effects arising from the loss in freshwater system functions and values; and (d) where adverse effects cannot be adequately mitigated, environmental benefits including on-site or off-site works are provided. <p>Policy (5) Manage subdivision, use, development, including discharges and activities in the beds of lakes, rivers, streams, and in wetlands, to do all of the following:</p>

Section	Matters
	<p>(a) protect identified Natural Lake Management Areas, Natural Stream Management Areas, and Wetland Management Areas;</p> <p>(b) minimise erosion and modification of beds and banks of lakes, rivers, streams and wetlands;</p> <p>(c) limit the establishment of structures within the beds of lakes, rivers and streams and in wetlands to those that have a functional need or operational requirement to be located there; and</p> <p>(d) maintain or where appropriate enhance:</p> <ul style="list-style-type: none"> (i) freshwater systems not protected under Policy B7.3.2(5)(a); (ii) navigation along rivers and public access to and along lakes, rivers and streams; (iii) existing riparian vegetation located on the margins of lakes, rivers, streams and wetlands; and (iv) areas of significant indigenous biodiversity. <p>Policy (6) Restore and enhance freshwater systems where practicable when development, change of land use, and subdivision occur.</p>
<p>Chapter B9 Rural environment</p> <p>Objectives B9.2.1(1) – (4)</p> <p>Policies B9.2.2(1)</p> <p>Objectives B9.3.1(1), (2), (3)</p> <p>Policies B9.3.2(2)</p>	<p>Objective (1) Rural areas make a significant contribution to the wider economic productivity of, and food supply for, Auckland and New Zealand.</p> <p>Objective (2) Areas of land containing elite soil are protected for the purpose of food supply from inappropriate subdivision, urban use and development.</p> <p>Objective (3) Rural production and other activities that support rural communities are enabled while the character, amenity, landscape and biodiversity values of rural areas, including within the coastal environment, are maintained.</p> <p>Objective (4) Auckland's rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development.</p> <p>Policy (1) Enable a diverse range of activities while avoiding significant adverse effects on and urbanisation of rural areas, including within the coastal environment, and avoiding, remedying, or mitigating other adverse effects on rural character, amenity, landscape and biodiversity values.</p> <p>Objective (1) Land containing elite soils is protected through land management practices to maintain its capability, flexibility and accessibility for primary production.</p> <p>Objective (2) Land containing prime soil is managed to enable its capability, flexibility and accessibility for primary production.</p> <p>Objective (3) The productive potential of land that does not contain elite or prime soil is recognised.</p>

Section	Matters
	Policy (2) Encourage activities that do not depend on using land containing elite and prime soil to locate outside these areas.

Relevant Auckland-wide provisions of Auckland Unitary Plan

Section	Matters
Chapter E1 Water quality and integrated management Objective E1.2(1) Policies E1.3(8), (11)	<p>Objective (1) Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.</p> <p>Policy (8) Avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater and coastal water by:</p> <ul style="list-style-type: none"> (a) taking an integrated stormwater management approach (refer to Policy E1.3.10); (b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments; (c) minimising or mitigating changes in hydrology, including loss of infiltration, to: <ul style="list-style-type: none"> (i) minimise erosion and associated effects on stream health and values; (ii) maintain stream baseflows; and (iii) support groundwater recharge; (d) where practicable, minimising or mitigating the effects on freshwater systems arising from changes in water temperature caused by stormwater discharges; and (e) providing for the management of gross stormwater pollutants, such as litter, in areas where the generation of these may be an issue. <p>Policy (11) Avoid as far as practicable, or otherwise minimise or mitigate adverse effects of stormwater diversions and discharges, having particular regard to:</p> <ul style="list-style-type: none"> (a) the nature, quality, volume and peak flow of the stormwater runoff; (b) the sensitivity of freshwater systems and coastal waters, including the Hauraki Gulf Marine Park; (c) the potential for the diversion and discharge to create or exacerbate flood risks; (d) options to manage stormwater on-site or the use of communal stormwater management measures;

Section	Matters
	<p>(e) practical limitations in respect of the measures that can be applied; and</p> <p>(f) the current state of receiving environments.</p>
<p>Chapter E3 Lakes, rivers, streams, wetlands Objectives E3.1(2) – (4)</p>	<p>Objective (2) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.</p> <p>Objective (3) Significant residual adverse effects on lakes, rivers, streams or wetlands that cannot be avoided, remedied or mitigated are offset where this will promote the purpose of the Resource Management Act 1991.</p> <p>Objective (4) Structures in, on, under or over the bed of a lake, river, stream or wetland are provided for where there are functional or operational needs for the structure to be in that location, or traverse that area.</p>
<p>Chapter E25 Noise and vibration Objectives E25.1(1) – (4)</p>	<p>Objective (1) People are protected from unreasonable levels of noise and vibration.</p> <p>Objective (2) The amenity values of residential zones are protected from unreasonable noise and vibration, particularly at night.</p> <p>Objective (3) Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.</p> <p>Objective (4) Construction activities that cannot meet noise and vibration standards are enabled while controlling duration, frequency and timing to manage adverse effects.</p>
<p>Chapter E27 Transport Objectives E27.2(1), (2)</p>	<p>Objective (1) Land use and all modes of transport are integrated in a manner that enables:</p> <p>(a) the benefits of an integrated transport network to be realised; and</p> <p>(b) the adverse effects of traffic generation on the transport network to be managed.</p> <p>Objective (2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.</p>
<p>Chapter E36 Natural Hazards and Flooding Objectives E36.2(2) Policies E36.3 (32), (33)</p>	<p>Objective (2) Subdivision, use and development, including redevelopment in urban areas, only occurs where the risks of adverse effects from natural hazards to people, buildings, infrastructure and the environment are not increased overall and where practicable are reduced, taking into account the likely long term effects of climate change.</p> <p>Policy (32) Require risk assessment prior to subdivision, use and development of land subject to instability.</p> <p>Policy (33) Locate and design subdivision, use and development first to avoid potential adverse effects arising from risks due to land instability hazards, and, if avoidance is not practicably able to be totally</p>

Section	Matters
	achieved, otherwise to remedy or mitigate residual risks and effects to people, property and the environment resulting from those hazards.
Chapter E38 Subdivision – Urban Objective E38.2(4) Policy E38.3(18)	<p>Objective (4) Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner and provided for to be in place at the time of the subdivision or development.</p> <p>Policy (18) Require subdivision to provide for the recreation and amenity needs of residents by:</p> <p>(a) providing open spaces which are prominent and accessible by pedestrians;</p> <p>(b) providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and</p> <p>(c) providing for pedestrian and/or cycle linkages.</p>

APPENDIX SEVEN
SPECIALIST ASSESSMENTS



Private Plan Change – Patumahoe South (PPC55)

Urban Economic Effects Assessment

27 April 2021 – final



Private Plan Change – Patumahoe South (PPC55)

Urban Economic Effects Assessment

Prepared for

Auckland Council

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1 Introduction

1.1 Overview and Structure

Introduction

The purpose of this report is to provide technical specialist input to Auckland Council's Section 42A Hearing Report in relation to the Private Plan Change 55¹ (PPC55) at Patumahoe South. The report identifies the key economic effects that could occur as a result of the plan change and outlines the extent to which these are addressed within the applicant's assessment. The memo also covers matters raised in the submissions.

I have undertaken a review of the private plan change on behalf of Auckland Council in relation to urban economic effects².

Qualifications and Experience

I am an Associate Director at Market Economics Ltd (M.E) and have 14 years' experience working in the field of urban economics. I have experience in quantitative and qualitative analysis, spatial analysis (GIS) and economic research methods and interpretation. This has been applied to inform and support policy and evaluation, including the preparation and presentation of evidence at hearings.

My experience covers major commercial, industrial and residential sectors, and key infrastructure, including understanding their effects on urban form. I have analysed the spatial economic structures of regional economies, assessing patterns of urban growth. I have project experience across many locations in New Zealand, including most major urban economies.

Prior to joining M.E, I was employed at Auckland Council. During this time, I conducted economic analysis and evaluation to inform the Auckland Unitary Plan. This included the preparation and presentation of evidence within the Auckland Unitary Plan hearings setting.

I hold a Master of Science, specialising in economic geography, with first class honours from the University of Auckland (2006). Prior to that I completed a Bachelor of Science in Geography from the University of Auckland (2004).

Structure

This report is structured as follows. The remainder of this section outlines the key details of PPC55 that are relevant to the economic assessment, then lists the documents that I have taken into account in my review. Section 2 outlines the key urban economic issues that need to be considered as a result of PPC55. Section 3 contains my review of the applicant's economic assessment. Section 4 then assesses whether the economic effects identified in Section 2 have been addressed taking into account information contained

¹ Private Plan Change in relation to Patumahoe South from Askew Consultants.

² The initial review (pre-notification) also covered the land productivity assessment for the purposes of informing a clause 23 further information request. Auckland Council have commissioned an agricultural economist to review the applicant's further information provided on land productivity and provide input to inform the Section 42A Hearing Report.

within the review. My response to urban economic issues raised in the submissions is contained in Section 5. The overall recommendation and conclusions are contained in Section 6.

1.2 Background

A private plan change (PPC55) has been notified that would result in urban expansion on the southern side of Patumahoe. The PPC55 site is 34.5 ha in size and covers land that contains elite and prime soils adjacent to the existing southern edge of Patumahoe Village. The site is displayed in Figure 1-1. It is bounded by the existing urban edge along Mauku and Patumahoe Roads, the railway line, and, on the eastern side, the extent of the first row of land parcels on the eastern side of Patumahoe Road to the intersection with Hunter Road. Carter Road runs through the middle of the site.

Figure 1-1: Boundary of PPC55 Site



Most of the PPC55 area is currently zoned Rural Production. A small part of the area (approx. 3.1 ha) is already zoned as Single House Zone (SHZ), with an existing resource consent for 30 dwellings. A small area along the edge of the railway line is zoned Strategic Transport Corridor Zone. The land is currently used for a combination of residential lifestyle properties, and agricultural uses (as stated in the applicant’s economic report). There are also some areas of vacant rural land.

The SHZ forms the predominant proposed zoning for the PPC55 site. A small share of the residential zoning is for larger lots³. These are intended to be located along the southern edge of the PPC55 site to limit any reverse sensitivity issues arising from the adjacent Light Industrial Zone (LIZ) land and railway corridor. PPC55 also contains 2.5 ha of LIZ on the southern edge of the site. The eastern part of the site (approx. 9 ha) is intended to have Future Urban Zone (FUZ) to provide for future urban uses.

In total, the PPC55 site would provide for 200 dwellings. The applicant's economic report estimates that that LIZ would accommodate 80 employees once it reaches full capacity.

1.3 Documents Relevant to the Review

In writing this report, I have reviewed the applicant's economic report, written by Property Economics Ltd ("the PEL report"), the economic response to the request for further information (RFI), and the relevant sections of the assessment of environmental effects:

- Property Economics Ltd, 2019 *Patumahoe Plan Change Economic Assessment*, prepared for Askew Consultants Ltd, September 2019.
- Tripp Andrews, 2020 *RE: Patumahoe – Comments to Council's Feedback.*, letter to Auckland Council, 16 April 2020.
- Dawson, J., 2020 *Private Plan Change – Askew Consultants Limited, Patumahoe South*, letter to Auckland Council, 23 April 2020.
- Envivo Ltd, 2019 Private Plan Change Request to the Auckland Unitary Plan: Operative in Part Patumahoe South, Plan Change Request Assessment of Effects and Section 32 Assessment, prepared for Askew Consultants Ltd, 1 October 2019.

In an earlier review, to inform the purposes of the RFI, I reviewed the applicant's land productivity assessment:

- Scarrow, S. and Barber, A., 2019 *Horticultural Productivity Within Patumahoe Proposed Plan Change*, prepared for Julian Dawson, Barrister, 16 September 2019.

In my review, I rely on the findings of Auckland Council's draft agricultural productivity report (Ford, 2021)⁴, including discussions with the author, and discussions with the author of Auckland Council's infrastructure assessment report. I have not reviewed a copy of the infrastructure report itself, but have had discussions with the author about the assessment and key findings. I also rely on the findings of Auckland Council's soils assessment of the PPC55 site:

- Hill, R. and Curran-Cournane, F., 2020 *Patumahoe Private Plan Change LUC site assessment summary tables*, prepared for Auckland Council.

³ I note that the PEL report specifies the larger residential lots on the southern edge of the PPC55 site are Large Lot Residential Zone, while the AEE only mentions the Single House Zone (but does state that these will be larger residential lots). For the purposes of my assessment, I have assumed these are within the Large Lot Residential Zone and my calculations of the Single House Zone area by location include these as Large Lot Residential Zone.

⁴ Ford, S., 2021 *Memo: Technical Specialist report – Productivity to contribute to Councils section 42A hearing report*, draft, 5 March 2021.

I have also read to the following related documents that provide contextual information relevant to the proposed plan change site and assessment of economic effects:

- Auckland Council, 2016 *Auckland Unitary Plan*, Regional Policy Statement, B2 Tahuhu whakaruruhau a-taone – Urban growth and form and B9 Toitu te tuawhenua – Rural environment.
- Auckland Council, 2017 *Auckland Future Urban Land Supply Strategy*, July 2017.
- Auckland Council, 2018 *Auckland Plan 2050*, June 2018.
- Franklin District Council, 2008 *Franklin District Growth Strategy 2051*, Version 1.0.
- Hanmore, I., 2019 *Soil and Resource Report for Patumahoe Rezoning Proposal*, prepared by Agfirst, April 2019.
- Luong, M., Yin, C. and Clearwater, P. 2015 *Joint Statement of Evidence by Michael Luong, Cindy Yin and Patrick Clearwater on Behalf of Auckland Council (Planning – Rural and Coastal Settlements – South)*, Topic 017 RUB South.
- Luong, M. 2016 *Evidence Report on Submissions on Behalf of Auckland Council by Michael Luong Patumahoe Precinct*, Topic 081f Rezoning and Precincts (Geographical Areas). (AUP hearings)
- Ford, S. 2017 *Statement of Evidence of Stuart John Ford on Behalf of Auckland Council, Self Family Trust vs. Auckland Council*. (Agricultural and Resource Economist evidence for Crater Hill and Pukaki Peninsula Environment Court hearing).

2 Key Urban Economic Issues

2.1 Appropriateness of Location for Urban Growth: Agricultural Productivity

There are several urban economic issues relating to PPC55. Key among these is establishing whether the site is an appropriate location for urban growth. At the outset, it is imperative to determine whether there is any current or future potential for productive uses on the site. The site contains elite (58% of site area) and prime (41% of site area) soils and falls within the important horticultural production area for Auckland and New Zealand.

Productive agricultural uses are dependent upon the location of high quality soils, while urban uses do not share this reliance. It is important to consider not only current productive potential, but also future potential as the economics of agricultural activity may change through time as marketplace conditions may change. Large projected population growth in Auckland, increasing future demand for food production, is an important factor. The site is located within proximity of the large Auckland urban market and is therefore located to sustainably supply current and future food demand.

Furthermore, it is important to recognise that rural to urban land use changes are typically unidirectional – once land is urbanised it is seldom able to revert back to productive rural uses in the future in response to growing demand for food.

I rely on the report produced by Stuart Ford, Auckland Council’s consulting agricultural economist to determine the productive potential of the site for agricultural uses. This is addressed in Section 4.1.

2.2 Appropriateness of Location for Urban Growth: Southern Auckland Urban Growth Pattern

The assessment also needs to determine whether the site is an appropriate location for urban growth within the context of the wider growth pattern for southern rural Auckland. Key questions are where are the most appropriate locations for growth to occur within this spatial structure; and whether it is appropriate for Patumahoe to expand.

The distribution of urban growth across the spatial structure has important effects on the spatial efficiency of households (travel and access to amenity), the viability of urban centres (including their provision of social and other infrastructure to serve their surrounding communities), infrastructure efficiency and land use integration, and the nature and character of Patumahoe Village if it were to expand.

The growth direction for southern rural Auckland is set out in the Future Urban Land Supply Strategy (FULSS), the Auckland Plan (AP), the Auckland Unitary Plan (AUP), and previously, within the Franklin District Growth Strategy (FDGS). The strategies/plans anticipate Pukekohe establishing as a key node within Auckland’s southern rural area, with some growth also provided for within the smaller rural towns and villages.

It is important to determine whether PPC55 would be likely to be consistent with the growth strategy and whether or not it is likely to challenge the anticipated growth pattern. It needs to be determined whether urban expansion of Patumahoe is likely to undermine the intended concentration of growth into the main satellite centre of Pukekohe. It also needs to be determined whether the expansion of Patumahoe would result in significant infrastructure cost relative to the strategy set out in the FULSS.

2.3 Appropriateness of Location for Urban Growth: Spatial Structure of Patumahoe

The appropriateness of PPC55 as a location for urban growth also needs to be considered at a local level. If Patumahoe were to expand, then it needs to be determined whether PPC55 represents an appropriate location for this expansion. PPC55 amounts to a significant proportional increase in the number of dwellings within Patumahoe, which would therefore be likely to have an effect on the village's urban form. In turn, this affects the amenity received by individuals and households through the efficiency of their spatial interactions within the village.

2.4 Effects within Patumahoe

PPC55 may also have a number of economic effects that would predominantly occur at the local scale within the Patumahoe settlement and immediately surrounding area. These are set out below:

- Changed demand for local businesses. Increased household and employment numbers would increase demand for local businesses.
- A change in the amenity for the local Patumahoe commercial centre. Increased demand and the provision of additional business capacity (within the LIZ) may increase the level of business activity (in relation to numbers and types of businesses) within Patumahoe.
- Change in the character of Patumahoe village. A large proportional increase in the number of urban dwellings may affect the existing character of Patumahoe.
- Distribution of activity between business zones within Patumahoe may affect the spatial structure of the centre. It is important to understand the appropriate distribution of activity across the existing commercial centre zone and the proposed LIZ area to determine whether the LIZ may undermine the existing centre.
- Economic impact of construction activity. The initial construction period of the subdivision, dwellings and LIZ activity may have a temporary economic impact on Patumahoe.
- Reverse sensitivity effects with adjacent land uses. Further urban expansion of Patumahoe may generate reverse sensitivity effects with agricultural productive uses at the urban edge. Activity within the LIZ may have reverse sensitivity effects with surrounding residential land uses.

- Ability of the existing commercial centre zone to meet increased demand. It is important to determine whether the existing commercial centre zone is appropriately scaled (in extent and type) to meet increased demand from additional households.

3 Review of Applicant’s Economic Assessment

I have undertaken a review of the applicant’s economic assessment – “the PEL report”. The assessment covers a range of aspects related to PPC55 and provides assessment of some of the potential economic effects of the proposal. Part of the scope of the PEL report relies on the conclusions of the applicant’s land productivity report (Scarrow and Barber, 2019). This section provides my key findings from the review of the PEL report. It firstly assesses each of the key sections within the report. It then considers the economic analysis in relation to the key economic issues of PPC55 I have outlined in Section 2.

3.1 Residential Market

The PEL report provides an assessment of the Patumahoe residential market. It identifies an existing base of 1,050 households (as at 2018) in the Patumahoe Census Area Unit (CAU). The report projects an increase of 450 to 600 additional households in Patumahoe over the next 20 years to reach a total size of 1,500 to 1,650 households by 2038.

These projections are provided for the Patumahoe CAU, which covers both the existing urban village area as well as a substantial area of surrounding rural and rural lifestyle areas. This is important because the projections therefore include growth in both urban households within the village as well as growth in non-urban lifestyle properties outside of the urban area. Only a portion of the 450-600 additional households would represent demand for urban dwellings.

In the subsequent RFI response, the applicant stated that there were 378 urban dwellings within Patumahoe. From this, I assume that the remainder are either rural or lifestyle dwellings within the remainder of the CAU surrounding Patumahoe⁵.

If this same structure were applied to the growth, then it would imply a growth of 160 to 220 urban dwellings from 2018 to 2038 (under the medium and high projection series). If instead a higher share (66% rather than 36%) of the growth were to occur as urban growth, then this would result in a net additional 330 to 400 urban dwellings.

The PEL report does not directly state the share of future urban dwelling demand that would be met through PPC55. However, if the above ratios were applied, then it would meet 50% to 100% of the future Patumahoe growth. There is an existing estimated capacity within Patumahoe of 148 dwellings. This includes the SHZ area on Patumahoe Hill (76 dwellings) which is currently being developed, the 30 dwellings consented on the SHZ area of the PPC55 site, and a further vacant infill capacity of 42 dwellings (as

⁵ I note that the RFI response states that the CAU contains a total of 693 dwellings. This differs to their earlier figure of 1,050 dwellings for the CAU used in their projections. I have used the original household count (of 1,050) in my assessment to align with the applicant’s projections.

identified by the economics RFI response). It is important to also consider other locations where demand could be met within the surrounding area.

The PEL report goes on to assess residential price growth in the Patumahoe and wider Auckland markets. It states that there has been strong growth in the market, with the median house price in Patumahoe reaching around \$900,000.

I further consider the residential analysis later within this section in my assessment against the key economic effects.

3.2 Industrial Market

The PEL report considers that the PPC55 industrial land will benefit Patumahoe through the provision of local employment opportunities. It estimates that the LIZ area would accommodate an additional 80 jobs at full capacity. The report states that there is a large amount of vacant industrial land (388.2 ha) in the Franklin area. Although not stated within the report, if the same ratios were applied, this would equate to a capacity for around 12,500 employees.

The PEL report states that industrial land in Franklin meets a combination of local demand as well as demand arising from other parts of Auckland. Growth in Auckland land values causes industrial activity to seek cheaper locations, such as within Franklin, as they are displaced by higher value commercial sectors in other parts of Auckland. However, the PEL report also states that Patumahoe is unlikely to meet non-local demand as it is distant from the main highway connections to the Auckland urban market. It states that most LIZ capacity will meet local demand arising from within and around Patumahoe.

The PEL report provides an assessment of employment activity by industry sector through time (2000 to 2018) for Patumahoe and the wider catchment area⁶. The assessment shows the largest areas of growth occurring within the household services and sectors likely to seek an industrial zone location. It shows a corresponding decrease in agricultural employment activity.

The PEL report uses the employment assessment to establish the future demand potential for the proposed LIZ area. It also uses the assessment to suggest there is decreasing demand for agricultural activity around Patumahoe. However, during the subsequent RFI response, the author states that they have not used this assessment to determine a drop in demand for productive agricultural uses on the site.

The PEL report uses the assessed industrial employment increases to calculate the effect of an additional 80 employees. I return to this in the following sub-section.

I consider that the PEL report has sufficiently demonstrated that capacity in the proposed LIZ is likely to be taken up through time due to growing demand in the corresponding employment sectors. I agree that there is growing industrial demand in Franklin with a share originating from elsewhere within Auckland. I also agree that industrial land in Patumahoe would instead be more likely to meet local demand (including from the surrounding rural land uses) given its location away from main highways.

⁶ The wider area is defined as the Franklin and Papakura Local Board areas.

In my view, the estimated capacity of the LIZ land falls within a reasonable range, and would be likely to have the estimated yield as capacity is taken up through time. However, I consider that the estimated capacity is likely to represent a gross employment size for the land rather than net additional employees from the PPC55 site. If PPC55 proceeded, then it would reduce the agricultural employment that would otherwise occur on the site.

Despite a smaller change in employment, I consider that the type of effect would be the same. The addition of employees (if there were a net increase) would correspondingly increase demand for local businesses.

In my view, the PEL report employment analysis does not adequately demonstrate that demand for agricultural land uses has decreased through time in Patumahoe or the wider Franklin area. I note that the PEL author confirms (during the RFI response) that this finding has not informed their conclusion on the demand for agricultural uses on the site⁷. However, I address this aspect as it is a finding from the analysis stated within the report.

While the assessment shows the change in employment numbers, it does not identify the quantity of land used for each type of activity or how this may have changed through time. Changes in employment may not necessarily reflect changes in agricultural land use due to such factors as changes in the registered base location of workers, changing technologies and the labour intensity of production, and the distribution of workers across multiple sites. I consider that a more appropriate approach would involve also assessing other information on land use such as the Statistics New Zealand Agricultural Production Statistics. This dataset provides information on the number of hectares planted by horticulture type and region through time.

3.3 Construction Economic Effect of PPC55

The PEL report estimates the economic impact of PPC55 on Patumahoe. This would occur as an initial construction effect from the construction of dwellings and LIZ buildings; and would occur for the duration of the construction activity. A further effect would then occur (“ongoing operational costs”) from the additional demand generated for local businesses by additional households and employees within the PPC55 site.

The PEL report quantifies the initial construction effect both at both the Franklin district level and at the local Patumahoe level. It captures the direct expenditure within the economy on construction (including labour and materials inputs). It then also quantifies the flow-on indirect effects to other industries through the increased demand for inputs to the direct construction expenditure (type 1 multipliers) and then the effect of induced expenditure within the local economy by employees through wages earned during construction (type 2 multipliers). The report presents the full investment as the total effect of the construction.

I find that the construction costs used within the analysis are reasonable and the residential costs are consistent with the earlier mentioned assumed dwelling sales price of \$900,000.

⁷ The PEL report author stated that the lack of potential for productive uses on the PPC55 site is instead solely reliant on the findings of the applicant’s land productivity assessment.

However, it is important to note that the figure is a total gross expenditure and does not represent a net value added to the economy. It includes the costs required to generate the construction activity – it is not net of input costs. The net value added would be lower once input costs are removed.

The analysis also assumes that the entire effect is a net addition to the local Franklin or Patumahoe economies. For this to occur, the assessment would have to assume that PPC55 would result in the district growing to larger extent (i.e. by all 200 dwellings) than would otherwise occur – i.e. dwellings to meet demand would not otherwise be constructed elsewhere within the Franklin area. This would involve assuming that the construction labour would remain unutilised in the absence of PPC55. I consider that a share of the activity would instead represent a transfer, rather than net, effect where the activity would have otherwise occurred elsewhere within the Franklin area in the absence of the PPC.

In my view, PPC55 is unlikely to generate additional growth in the wider Franklin area above the level of growth that would occur in the area generally. This is supported by the large amount of residential development capacity within the district, including the large areas of future urban expansion around Pukekohe. The same is likely to be true for Patumahoe where it is likely that the Patumahoe construction sector labour and materials would also be likely to be engaged in other residential construction, such as in nearby Pukekohe. Construction workers in Patumahoe are not constrained to only undertaking construction work within Patumahoe.

3.4 Ongoing Economic Impact of Additional Households and Employees in PPC55

The PEL report estimates that the additional households and employees would increase demand locally within Patumahoe. It estimates that additional retail demand would translate into an additional 230m² of sustainable retail floorspace.

I have reviewed the assumptions used within the PEL report and consider this to be a reasonable estimate of additional sustainable floorspace. I therefore correspondingly agree that PPC55 would increase the commercial household sector amenity to households by way of the ability to support additional household sector commercial activity within Patumahoe.

I also consider the PEL report findings that some amenity may arise to households via the additional activity that could occur within the LIZ are reasonable. While the LIZ is likely to attract activity that predominantly serves business demand, there may be a minor share of activity within some businesses that would serve household demand.

3.5 Other Benefits

The PEL report briefly lists a set of benefits that relate to the specific location of urban growth within Patumahoe. These include infrastructure efficiencies, land use efficiency and the future urban zone. I comment on the first two below and the future urban zone in the following section:

- **Infrastructure efficiencies.** The report claims the location would not require additional infrastructure and would be able to connect into existing networks. Assessment is not contained within the PEL report in relation to infrastructure.

As stated in Section 2.2, the efficiency of infrastructure provision is an important effect relating to the anticipated growth pattern across the wider Franklin area. I understand the additional infrastructure cost is currently being assessed by Auckland Council. I make further comment in Sections 4 and 6.

- **Land Use Efficiency.** The PEL report assumes (based on the applicant's land productivity report) that agricultural activities are unviable on the site and it is therefore beneficial to transition to higher value land uses.

I understand, from Auckland Council's land productivity assessment, that the PPC55 site is unlikely to be used for productive agricultural uses.

3.6 Future Urban Zone

The PEL report states that the Future Urban Zone (FUZ) component of PPC55 represents the next logical place for growth to occur within Patumahoe, beyond the proposed live-zoned area in the remainder of the PPC55 site. It states that future growth in this location would create an efficient spatial structure of Patumahoe as it is adjacent to the existing urban edge and forms concentric development from the main commercial centre and areas of social infrastructure. The report states that identifying this area as the location for future urban growth would provide greater certainty to enable more efficient infrastructure planning.

I agree that, if future urban growth were to occur within Patumahoe, then the proposed location represents an efficient location for that growth. This is due to the reasons set out in the PEL report in relation to the future spatial economic structure of Patumahoe. I also agree that, if it were appropriate for further growth to occur, then the identification of a location would potentially enable economic efficiencies in the infrastructure planning.

However, it is important to note that the assessment has not demonstrated the need for any additional future urban expansion of Patumahoe. I consider that the SHZ component of the PPC55 site, together with existing live-zoned capacity, provides sufficient capacity to cater for the potential urban component of the projected household growth. I further discuss this in Section 6.3.

3.7 Costs

The PEL report defines the economic costs of the proposal as a loss of direct expenditure on the existing agricultural operations on the site and potential infrastructure costs. It states that agricultural sector losses would be small as the activities do not draw in labour from outside of Patumahoe and that existing uses are likely to be financially unviable. It further states that there are not likely to be infrastructure costs as additional infrastructure is not required to support PPC55 beyond the provision of localised infrastructure (e.g. roads), which is internalised into the development costs.

The PEL report considers that there are no other costs associated with the lost agricultural productive potential of the site as the applicant's land productivity report has identified no likely viable agricultural uses. It has therefore not assessed the lost productive potential.

Auckland Council's agricultural productivity report confirms that productive agricultural uses are unlikely to be viable on the site. I rely on the findings of this report and therefore consider that an assessment of the costs of lost productive potential does not form an information gap in the assessment.

The PEL report has not specifically assessed the infrastructure costs of the proposal. I rely on discussions with the author on the findings of Auckland Council's infrastructure assessment which considers that there are likely to be significant infrastructure costs beyond the costs which are internalised within the development. I consider infrastructure costs in Section 6. I have not reviewed a copy of the report itself, but have had discussions with the author about the assessment and key findings.

3.8 Distribution of Business Activity within Patumahoe

The PEL report contains a description of the optimal distribution of commercial activity by scale and type across different areas within Patumahoe. It considers the type of activity that may locate within the proposed LIZ and the type of activity that should instead locate within the existing Neighbourhood Centre Zone.

The report recommends retaining the focus of retail, household services and small offices within the existing Neighbourhood Centre Zone. It is more efficient for these activities to centrally serve the surrounding residential area from this zoned area.

The report identified a range of activities likely to locate within the LIZ. These correspond to the activities enabled by the zone, and it states these are likely to predominantly serve local demand. The PEL assessment considers the following provisions appropriate within the zone to enable it to efficiently function and retain an efficient distribution of activity within the village:

- Site sizes of between 1,000 and 5,000 m².
- Provisions for smaller ancillary offices up to 200m².
- Provisions for trade retail suppliers as these are not suited to the existing commercial area.
- 1-2 cafes and retail up to 300m² per store. A maximum of two food related retail stores.

I generally agree (exceptions below) with the PEL assessment on the appropriate distribution of activity across the existing Neighbourhood Centre Zone and proposed LIZ if it were to occur. I consider that the conceptual reasoning set out within the PEL report represents a logical approach. Exceptions to this are:

- Floorspace limits should reflect those in the AUP LIZ (food and beverage up to 120m² per site; dairies up to 100m² gross floor area (GFA)).
- Provision should not be made for additional retail types beyond those already enabled by the AUP in the LIZ.

- Ancillary office caps should remain at 100m² per site.

3.9 Summary of PEL Report Review

In summary, I consider that the PEL report addresses some of the likely economic issues associated with PPC55. It demonstrates a large relative increase in the size of Patumahoe and (the response to the RFI) compares this to the growth capacity within the wider Franklin area. Despite the large relative increases, the report has not assessed the impacts on the character of the village.

I predominantly agree with the optimal distribution of business activity assessment within Patumahoe if PPC55 were to proceed. I note that the report has not considered the ability for the existing Neighbourhood Centre Zone to accommodate the additional sustainable floorspace or whether the centre is appropriately scaled and zoned to meet the additional demand from an expanded rural settlement.

I do not agree with the report's estimate of the economic effect of construction activity. The effect is not net; and I consider most of the effect is instead a transfer effect where the growth would alternatively be likely to occur elsewhere within the wider area. The proposal is not likely to generate additional household growth that would not otherwise occur elsewhere in Franklin, and local labour is not constrained to only being utilised within Patumahoe. In my view, it is therefore a locational issue as to the appropriateness of the location for growth within the wider Franklin growth pattern.

I agree with the analysis of additional floorspace and amenity provided within Patumahoe. Not all of the growth is a net effect as the demand is likely to be transferred from elsewhere. However, location is not neutral, where greater relative increases to the range of goods and services accessible to households would occur.

The lost agricultural potential, and the economic effects associated with this loss, have not been assessed as the PEL report relies on the findings of the applicant's land productivity assessment. I rely on Auckland Council's land productivity report to consider that this does not form an information gap in the applicant's assessment.

I consider there are some economic effects that have not been identified within the report or consequently assessed. In my view, the report has not fully established whether the PPC55 site is an appropriate location for urban growth. The assessment has only been undertaken at the local scale within Patumahoe. It has not fully considered this in relation to the anticipated growth pattern across the Franklin area – a key question is whether Patumahoe should expand. Furthermore, if Patumahoe were to expand, then the report needs to establish whether this is an appropriate location for it to expand. I note however, that some of these aspects are covered within the AEE, which I consider in Section 4.

4 Assessment of Economic Effects and Management Methods

This section considers whether there has been sufficient assessment to identify and understand the likely economic effects and, taking these into consideration, whether any adverse effects are likely to be adequately managed through the plan change methods. A key aspect in understanding the likely effects is to establish whether the PPC55 site is an appropriate location for urban growth. This is relevant within the wider southern rural Auckland pattern of growth as well as a location for growth, at the local level, within Patumahoe. This section evaluates the economic assessment and other information provided by the applicant together with Auckland Council's independent evaluations and relevant planning and strategy documentation to determine whether the effects in Section 2 can be adequately understood.

4.1 Location for Growth – Agricultural Productivity

Given the presence of elite soils, it is imperative any loss of agricultural productive uses is understood. I rely on the Auckland Council agricultural productivity report to determine if loss of productive potential would occur. I understand from Auckland Council's draft productivity report and discussions with the author, that although there are elite and prime soils, the site is unlikely to contain productive use potential. This is largely due to land fragmentation issues and the significant number of other, more viable, locations upon which to establish agricultural uses. I therefore consider that the economic effects of lost productive potential are unlikely to occur and do not form an information gap in the assessment.

4.2 Location for Growth – Alignment with Southern Auckland Urban Growth Pattern

It is also important to determine whether expansion of Patumahoe by way of PPC55 aligns with the anticipated pattern of urban growth in Auckland's southern rural area. This has been partially addressed in the applicant's economic report, with further information contained within the RFI response on economic matters. I have then considered the information further within the context of the following relevant planning documents:

- i. Auckland Unitary Plan (AUP)
- ii. Auckland Future Urban Land Supply Strategy 2017 (FULSS)
- iii. Franklin District Growth Strategy 2008 (FDGS)⁸

⁸ Auckland Council have requested that I also assess PPC55 in relation to the FDGS.

Auckland Unitary Plan

The AUP aims for a quality compact urban form where growth is predominantly provided for through a combination of further intensification within existing urban areas as well as urban expansion within the rural urban boundary (RUB). Where appropriate, urban growth is also provided for in other areas, including rural villages, with appropriate infrastructure. Growth in rural villages needs to avoid elite soils with food productive potential and be consistent with the local character. Where there is significant urban expansion, it should occur through structure plans. Beyond the extent of zoned area, the AUP does not specify an anticipated level of household growth within Patumahoe or across rural villages in aggregate in southern rural Auckland (or at the regional level).

There is live zoned (Single House Zone) land in Patumahoe with a capacity for 109 additional dwellings. Around three-quarters of this land is currently under development, with all sections pre-sold; and the remainder forms part of the PPC55 area with a resource consent for 30 dwellings.

Auckland Future Urban Land Supply Strategy

The FULSS states that there is capacity required for up to 400,000 additional dwellings in Auckland by 2047 (from 2017), with up to 40% of growth occurring outside of the existing urban area. Nearly two-thirds of this growth should occur on the FUZ land and yet to be urbanised live zoned land (100,000 dwellings); and around one-third (60,000 dwellings) in rural and coastal towns, rural villages, country living and other rural areas.

The FULSS covers areas of urban expansion where additional infrastructure is required for urban growth. It identifies capacity within urban areas for 124,000 dwellings on live zoned land (not yet urbanised) and FUZ land. There is a further identified capacity for nearly 12,000 additional dwellings within rural settlements. Two-thirds of the rural settlement capacity (7,600 dwellings) is located within Southern Auckland.

Within this, Patumahoe has a capacity of just 109 dwellings, corresponding to the live-zoned area within the AUP. It does not contain any future planned infrastructure-served capacity.

The FULSS states that “any ad-hoc or out of sequence approach to development will have major funding implications for all providers, affect the ability to coordinate delivery and is likely to have major implications on the ability to service other areas. This in turn may have significant consequences on the ability to provide sufficient development across Auckland (p8)”.

Franklin District Growth Strategy

The FDGS provides a series of growth targets by urban location across Franklin District out to 2051 (from 2004). It anticipates that 80% of growth (2004 – 2051 = 18,000 households) would occur within existing urban areas or rural settlements.

The FDGS sets out the anticipated growth pattern across the Franklin District through a series of household growth numbers to show the planned future size of each area. The strategy anticipates that Patumahoe Village would grow from 234 households in 2004 to 415 households in 2021 and 700 households by 2051.

The applicant estimates that Patumahoe current has an urban dwelling count of 378 dwellings, which is similar to the 2021 415 household growth target in the FDGS. A further net increase of around 300 dwellings/households would be required to reach the 2051 growth target.

The FDGS anticipates that Patumahoe household growth will be accommodated through a range of growth within the existing urban edge as well as outward urban expansion. The strategy also defines the anticipated future urban extent of Patumahoe. It identifies approximately 32 ha for future urban residential growth in Patumahoe. This covers a larger future urban extent than contained within the AUP. Nearly two-thirds of this (20 ha; 63%) is additional to the area already zoned for future urban uses under the AUP. Around 14 ha of this additional land falls within the PPC55 area. In combination, around half (17ha) of the PPC55 site is either live zoned or identified for future urban expansion under the FDGS.

Summary

I consider that this information, together with that provided by the applicant enables the alignment with the anticipated growth pattern to be indicated. I consider that PPC55 largely aligns with the level and spatial extent of growth anticipated by the FDGS. There is some alignment with the growth patterns in the AUP and AP as it states that some growth may occur within rural villages. However, the proposal does not align with the FULSS, which directly sets out the geographic detail of the Auckland Plan Development Strategy. There may be an economic effect, through the additional infrastructure cost, through a non-alignment with the FULSS. The FULSS has not specifically evaluated the PPC55 site, and therefore has not determined its alignment with the principle of the strategy in relation to its effect on the cost of infrastructure. I understand this has been examined by Auckland Council as part of the PPC55 evaluation process. I provide further comment in Section 6.

4.3 Location for Growth – Patumahoe Spatial Structure

I consider that the applicant's assessment, together with my review of other related documents, shows that the PPC55 site would represent an efficient location for growth if it were appropriate for Patumahoe to expand. The potential future spatial structure would have concentric urban growth around the main commercial centre of Patumahoe. This would enable potential future households to access amenity from the village centre.

4.4 Effects within Patumahoe

The assessment shows that PPC55 represents a significant expansion to the size of Patumahoe. This is likely to result in some change to the character of Patumahoe. However, its total potential future size (current plus future potential) means that it is likely to still function as a small rural village. The proposed development is similar to that which has already occurred on the western side of the village.

I consider that an efficient distribution of business activity between the existing Neighbourhood Centre Zone and the proposed LIZ is able to be achieved with the following provisions:

- Site sizes of between 1,000 and 5,000 m².

- Ancillary office caps should remain at 100m² per site (in comparison, the PEL report proposes 200m² per site).
- Floorspace limits should reflect those in the AUP LIZ (food and beverage up to 120m² per site; dairies up to 100m² GFA). (In comparison, the PEL report recommends 1-2 cafes and retail up to 300m² per store. A maximum of two food related retail stores).
- Provision should not be made for additional retail types beyond those already enabled by the AUP in the LIZ.

5 Submissions

A number of points relating to the economic effects of urban growth have been raised in the submissions. I have assessed the matters relating to Patumahoe within the urban growth pattern of southern rural Auckland. And the economic effects occurring within Patumahoe. A number of submissions have also identified the loss of productive agricultural soils. These will be responded to within the agricultural productivity report.

The submissions points, and my responses, are set out below.

Changing Character of Patumahoe Village

Several submitters state that the PPC55 proposed level of dwelling growth would change the small rural character of the village. This point was raised in submission numbers 3, 12, 16, 19, 25, 29 and 32.

I consider that the proposed development would result in a substantial expansion to the size of Patumahoe. It would increase the dwellings by 40% to 50%, and expand the base of commercial activity (by type and size) within the village.

I agree that this would result in some change to the character of Patumahoe Village. The expansion would be a similar nature to that which has already occurred on the western side of the village.

In my view, while there would be some change to the character of the village, from an economic perspective, it would continue to function as a small rural village. The level of growth is above that anticipated by the FULSS, but is within the level of growth set out under the FDGS.

Alternative Locations for Growth

Several submissions state there are better alternative locations for growth. They suggest growth should instead occur within the large areas provided for within Paerata and Pukekohe. These include submission numbers 12, 19, 21, 23, 25, 28 and 33.

I agree that these areas form the main locations for growth within the strategic planning framework and are more efficient locations for growth in relation to the provision of infrastructure. However, the plans also allow for some growth to occur within the rural villages. The level of growth in PPC55 is small relative to the areas of future urban expansion provided for within Pukekohe and is unlikely to challenge the development of these areas as the main location for urban expansion within the southern rural area.

Spatial Structure of Patumahoe Village

Submission 10 states that PPC55 would centralise the residential area of Patumahoe around the local commercial centre, therefore having a positive effect on the spatial structure of Patumahoe.

I agree that, if Patumahoe were to expand, then the PPC55 site would represent a logical expansion of its spatial structure. Urban development in this location would create a pattern of concentric residential growth around the main commercial centre and social infrastructure nodes within Patumahoe. This would enable efficient access of households to the amenity within the commercial centre.

Demand for Commercial Buildings

Submission 10 also states that the proposed LIZ would meet the local demand for commercial buildings in Patumahoe.

I agree that the LIZ would meet local demand for business space within Patumahoe. The applicant's economic assessment has demonstrated an increase in demand through time for the types of activities that would seek a LIZ location.

Local Employment to Support Growth

Some submissions (numbers 19 and 21) state that there are insufficient local employment opportunities to support further household growth within Patumahoe.

In my view, employment and residential activity do not need to be balanced at a highly localised level. There are a number of key employment locations within the wider area where residents may seek employment. The 2018 Census Travel to Work data shows that nearly three-quarters of employed Patumahoe residents worked outside of Patumahoe. Of these, a large share (29%) worked in Pukekohe, and over half, within the wider southern Auckland rural area. The remainder worked in Southern Auckland, with only a minor share beyond that (within the CBD and City Fringe area).

Furthermore, I consider that the LIZ within PPC55, together with the increased demand for household sector activities, would increase the local employment opportunities within Patumahoe.

Amenity to Support Local Growth

Submissions 25 and 26 state that the local commercial centre within Patumahoe is unable to support additional demand from household growth.

I agree that this has not been assessed within the applicant's economic assessment. I note that the applicant's report finds that additional household demand will support an additional 230m² of retail and household services floorspace within the centre.

There are a number of sites within Patumahoe's Neighbourhood Centre Zone that are currently vacant or contain older buildings (where redevelopment could potentially occur). The estimated capacity of these sites significantly exceed the level of additional floorspace demand for household sector activities. I further note that a share of demand could be met through increased productivity within existing floorspace. On this basis, I do not consider that the existing commercial area will be unable to meet the additional demand from households from an economic capacity perspective.

I also consider that the existing Neighbourhood Centre Zone is likely to be appropriate for the existing commercial centre within Patumahoe under both the current and future size of household demand. The zone allows for a level of household sector commercial activity to serve local demand. Activities enabled within the zone include small format retail, hospitality and household services. Within this, it provides for supermarkets up to 450m²; and supermarkets up to 2,000m² subject to an assessment (by way of a Restricted Discretionary activity status).

If the zoning were increased to Local Centre Zone, then the range of activities within the zone would expand. The key difference would be allowance for supermarkets up to 2,000m² GFA. It is unlikely however,

that there would be sufficient demand for a supermarket (above the existing 450m² GFA limit) to establish within Patumahoe.

Existing Capacity for Growth

Submission 42 states that further land should be zoned for future urban growth in Patumahoe. It claims that the growth projections mean that further land, in addition to that contained within PPC55, is required to meet future urban demand. In contrast, Submission 27 states that existing developments are sufficient to cater for future growth.

I have reviewed the population projections contained within the applicant's economic assessment, and estimated the likely urban component of these projections. The projections suggest that Patumahoe CAU total urban and non-urban households will grow from 1,050 households in 2018 to between 1,500 and 1,650 households by 2038 – a net increase of between 550 and 600 households. This includes both urban households within Patumahoe as well as lifestyle and rural households in the surrounding area.

The applicant's economic RFI response estimates there are currently 378 urban households. If the urban share of households remained constant through time, then this would result in demand for an additional 150 to 200 urban dwellings. If the share of urban households increased to around two-thirds (currently at around one-third), then this would result in demand for around an additional 300 to 400 urban dwellings. If the urban share of households increased, then this would result in a total size of around 700 to 800 urban households by 2038. This is comparable or greater than the 2051 urban household size of Patumahoe anticipated within the FDGS (i.e. 700 households).

Currently there is capacity for an additional 148 dwellings within Patumahoe without PPC55. This includes 76 dwellings within the Patumahoe Structure Plan area (already under development and pre-sold), 30 consented dwellings in the SHZ of Carter Road (which forms part of the PPC55 site) and 42 vacant sites (as identified in the applicant's economic RFI response). If PPC55 occurred, then this would result in a further 170 dwellings (200 dwellings, including those on the existing live zoned area). In addition, I estimate that a further 80 to 90 dwellings could be accommodated on the proposed FUZ if it were used for residential activity with a similar density. In total, this would equate to a capacity for around 400 additional dwellings.

The estimated capacity is comparable to the top of the projected range for additional urban households (i.e. high growth series and increased share of growth as urban). A net increase of 400 urban households would result in a total size of around 800 households for Patumahoe, which is larger than that anticipated under the FDGS (as well as the FULSS, which is much lower at around 550 households). In my view, these projections and capacity estimates do not suggest the need for further FUZ to accommodate growth beyond that already contained within PPC55.

The level of residential capacity already available within Patumahoe (around 150 additional dwellings) corresponds to around the lower range of the projected urban household growth (around 160 additional urban dwellings).

Compact Urban Form

Submission 28 states that it is not appropriate for urban expansion to occur on the PPC55 site. It states that growth should concentrate within the existing urban footprint. The Auckland Plan states that around 6% of growth should occur within the rural area, and that this should be concentrated into the larger rural node

of Pukekohe where sufficient capacity for expansion has already been provided. Urbanisation of the PPC55 site would be beyond that allowed for in the FULSS. The submission also considers that it represents urban growth occurring outside of the village area. It states that urban growth on the PPC55 site would not support the compact urban form objectives. It would undermine the Auckland Plan Development Strategy and AUP.

I consider that the proposal does not support the compact urban form objectives to concentrate urban growth into the main rural node of Pukekohe. However, I also consider that it is unlikely to undermine this objective. The AUP provides for some growth to occur within rural villages at the same time as concentrating most growth into the main node of Pukekohe. I note that the level of urban expansion (dwelling growth) of Patumahoe from PPC55 is within that anticipated by the earlier FDGS. It is unlikely that growth of the scale contained within PPC55 would challenge the ability of Pukekohe to establish as the key urban node within southern rural Auckland.

In my view, there is an important distinction between urban growth that occurs on the edge of an existing urban area vs. that which occurs away from an urban area. PPC55 would result in the expansion of Patumahoe Village and would form part of the village's future urban footprint. It would expand the village concentrically around the existing commercial centre, which enables households to efficiently access the amenity within the commercial zone and key social infrastructure.

I agree that further urban growth of Patumahoe is not included within the FULSS. I rely on the Auckland Council transport infrastructure assessment report to determine if further out-of-sequence infrastructure is required to provide for growth in this area. I address this in Section 6.

6 Conclusions and Recommendations

This section provides a summary of the review and assessment of PPC55. It summarises the adequacy of the applicant's assessment of economic effects (Section 6.1). It then compares the alignment of PPC55 with the Auckland Unitary Plan and Regional Policy Statement (Section 6.2) and other relevant strategies and plans (Section 6.3). Information gaps are identified in Section 6.4. The overall recommendation based on the assessment of economic effects is contained in Section 6.5.

6.1 Assessment of Economic Effects

I consider that the economic effects of PPC55 are, in most areas, adequately understood. An assessment of the effects has been made through a combination of the economic assessment provided by the applicant (including the RFI response), further assessment of this information in relation to relevant planning and strategy documents, and Auckland Council's agricultural productivity assessment. Further information from Auckland Council's infrastructure assessment also informs the economic effects of infrastructure requirements from urbanisation in this location.

I consider that the proposal is unlikely to have adverse economic effects in relation to the lost agricultural productive potential. I rely on Auckland Council's agricultural productivity assessment which finds that the land is unlikely to be able to be used productively in the absence of PPC55.

The information shows the positioning of PPC55 within the wider context of the southern rural urban growth pattern. A key issue is whether Patumahoe should expand within this structure – i.e. understanding the effect an expanded Patumahoe would have on the overall growth pattern. Given the location of PPC55 relative to the existing village spatial structure, I would consider the proposal to represent an expansion of Patumahoe Village.

From an economic perspective, the information shows the proposal is unlikely to undermine the key elements of the growth structure. While it does not concentrate growth into Pukekohe as the key node, it is unlikely to undermine the ability of Pukekohe to further develop as a key node within the growth pattern. I note that the planning strategy anticipates some growth within small rural villages while simultaneously establishing Pukekohe as the key rural node.

However, the assessment shows that the expansion of Patumahoe in this location is not included within the FULSS, which provides the geographic detail of the Auckland Plan Development Strategy. The PPC55 site has not been specifically assessed by the FULSS. If urban development of the PPC55 site is likely to result in significant infrastructure investment (excluding that internalised by the development), then it is unlikely to represent an efficient location for growth and an adverse economic effect would arise. I rely on Auckland Council's infrastructure assessment to determine whether there would be a cost through significant additional infrastructure investment, which is addressed in Section 6.

I consider that the economic effects that would occur within Patumahoe are also sufficiently understood. The assessment shows the effect on Patumahoe's spatial structure. Urbanisation of the PPC55 site would

result in concentric development around the existing Neighbourhood Centre Zone. The AEE has described this as an efficient location for households to obtain amenity value from the existing commercial centre and key social infrastructure within Patumahoe.

The large proportional expansion in Patumahoe's household base would result in some change to the character of the village. This change is likely to be similar to that which has already occurred through development on the western side of the village. The potential future size of Patumahoe means that it is likely to continue to function economically as a small rural village.

In my view, the applicant's assessment has not demonstrated that the proposal would result in significant economic benefits from the construction phase of the project. I consider that most of these would represent transfer effects that would otherwise occur elsewhere within the Franklin area in the absence of PPC55.

I consider that the assessment has demonstrated economic benefits are likely to occur within Patumahoe through the provision of a LIZ and the additional commercial demand from households. The LIZ would meet growing demand for activity that would seek an industrial location in Patumahoe. The assessment quantifies the additional demand for household sector activities (retail, hospitality and services) from the additional households. Together with the activities enabled within the LIZ, the applicant's assessment has demonstrated that this would increase the amenity available to existing and potential future Patumahoe households. I consider there is sufficient capacity within the existing commercial centre zone to accommodate the increased demand.

The applicant's assessment has considered the appropriate distribution of business activities across the proposed LIZ and existing commercial centre zone within Patumahoe. I consider the amendments to the proposed provisions – as set out in Section 4.4 - should apply in relation to the parameters recommended in the applicant's economic assessment.

6.2 Consistency with the Auckland Unitary Plan (AUP) and Regional Policy Statement (RPS)

I consider that there are some areas where PPC55 is consistent with the AUP and RPS and some areas where it is not consistent. The key areas for consideration, in relation to economic effects, are:

- Urbanisation of land containing elite and prime soils.
- Quality compact urban form.
- Infrastructure servicing.

I address these below.

Urbanisation of Land Containing Elite and Prime Soils

The proposal involves urbanisation of land containing elite and prime soils. I rely on Auckland Council's soils assessment which finds that 58% of the site is made up of elite soils and 41% contains prime soils. I rely on Auckland Council's agricultural productivity assessment which finds that productive agricultural uses are unlikely to be viable on the site in the absence of PPC55.

The RPS provides for the growth and development of rural villages (Objective B2.6.1.(1)), but this growth should avoid areas containing elite soils (Objective B2.6.1.(1)(b)). The expansion of rural villages is required to avoid elite soils and, where practicable, prime soils (Policy B2.6.2.(1)(d)). The expansion of Patumahoe through urbanisation of the PPC55 site would involve urbanisation of land containing elite and prime soils. It is therefore inconsistent with the RPS Rural and coastal towns and villages objectives and policies in relation to avoiding urban expansion on elite soils.

The AUP Rural Environment Chapter also seeks to protect the “finite resource of elite quality soils from urban expansion (B91.1. Issues)”. There is an objective to protect land containing elite soil for food production (Objective B9.2.1.(2)) and rural areas outside of rural villages (Objective B9.2.1.(4)) from urban use and development. Policy B9.3.2.(1) is to avoid use and development on land containing elite soils, with Policy B9.3.2.(2) to encourage activities that do not depend upon using elite soils to locate elsewhere.

PPC55 is inconsistent with the above RPS and AUP Rural Chapter (9) as it involves urban expansion on elite soils (where the urban uses do not depend on the elite soil quality). In many cases, expansion onto elite soils has adverse economic effects in relation to loss of agricultural productivity (due to the dependence of the soils location), with consequent rises in food prices. However, I consider that this is unlikely to generate an economic effect in relation to lost agricultural productive potential. I understand that Auckland Council’s agricultural productivity assessment has found that the site is unlikely to be used for productive agricultural uses in the absence of PPC55. The economic effect through lost agricultural productivity is therefore unlikely to occur.

Quality Compact Urban Form

PPC55 would result in urban expansion beyond the area currently zoned for future urban growth. Importantly, this expansion would occur adjacent to the existing urban edge of Patumahoe and would result in the expansion of Patumahoe Village (rather than expansion away from the urban edge). This section considers the alignment of an expanded Patumahoe with the RPS and AUP. The issue of infrastructure integration is considered in the following sub-section.

The RPS aims to achieve a quality compact urban form (Section B2.2 Urban growth and form). Urban growth is intended to be concentrated into the existing urban area as well as provided for within other areas such as rural villages (Obj. B2.2.1(4) and Pol. B2.2.2(4)). The objective is for growth (including in rural villages) to be integrated with the provision of appropriate infrastructure (Obj. B2.2.1(5)).

The RPS section on rural and coastal towns and villages (B2.6) provides for growth of rural villages (Obj. B2.6.1(1)). Policies B2.6.2(1) to (5) set out the requirements for expansion of rural villages. Significant expansion to existing villages are provided for through structure planning in Policy B2.6.2(3); and small-scale growth, without the need for structure planning, in Policy B2.6.2(4).

I consider that, from an economic perspective, PPC55 is partially consistent with the RPS in providing for the expansion of existing rural villages. The location of PPC55 on the existing urban edge of Patumahoe means that it can be characterised as an expansion of Patumahoe. The expansion of Patumahoe does not support the establishment of Pukekohe as the main urban centre within southern rural Auckland. However, it is of an insufficient scale, by itself, to challenge this growth pattern. Together with other similar expansion of rural villages, it could begin to become significant in the change to this structure.

As above, I note that it is inconsistent with the requirement of Policy B2.6.2(1)(d) to avoid elite soils, and address the alignment with the policy in the following sub-section.

The resulting spatial structure of Patumahoe means that it is likely to be consistent with Policy B2.6.2(1)(g). The concentric nature of the new spatial structure means that development is close to the existing commercial centre and key social infrastructure within Patumahoe. The close proximity means that walking and cycling options are more likely.

PPC55 would result in a large relative increase (+50%) in the size of Patumahoe. However, I consider that it is still likely to be consistent with RPS Objective B2.6.1(1)(d) and Policy B2.6.2(1)(a) that growth is consistent or enhances the local character of the village from an economic perspective.

Infrastructure Servicing

The urban growth and form RPS section objective is for growth within rural villages to be “integrated with the provision of appropriate infrastructure (Obj. B2.2.1(5))”. The rural and coastal towns and villages section of the RPS requires that the expansion of Patumahoe Village “incorporates adequate provision for infrastructure (Pol. B2.6.2(1)(b))”.

PPC55 would involve urbanisation of an area not included within the FULSS. The FULSS has not specifically considered the PPC55 site as a location for urban expansion. However, Auckland Council has undertaken further assessment on the site in relation to existing infrastructure capacity and likely servicing costs. I rely on Auckland Council’s assessment to determine whether, from an economic perspective, PPC55 is consistent with this aspect of the RPS.

Auckland Council’s infrastructure assessment has identified there are capacity issues with existing infrastructure required to serve the PPC55 area. Significant investment in infrastructure would be required that is beyond the costs likely to be internalised by the development. Location of growth, in relation to infrastructure servicing costs, is not neutral. There would be an ongoing higher infrastructure cost to serve the development at the PPC55 site than if the development were to occur in another more centralised location that was more efficient in relation to the existing and planned future infrastructure networks.

On this basis, I consider that PPC55 is inconsistent, from an economic perspective, with the RPS Rural and Coastal Towns and Villages section Objective B2.6.1(2) and Policy B2.6.2(1)(b). In relation to the infrastructure cost, it is also inconsistent with RPS Urban Growth and Form Objective B2.2.1(1)(c) and Objective B2.2.1(5).

6.3 Consistency with Other Strategies/Plans

I have considered the alignment of PPC55, in relation to economic effects, with the following strategies/plans beyond the AUP:

- Franklin District Growth Strategy 2051 (FDGS)⁹.

⁹ Franklin District Council, 2008 *Franklin District Growth Strategy: Planning the Future of Franklin 2051*.

- Auckland Future Urban Land Supply Strategy (FULSS)¹⁰.
- Auckland Plan 2050 (AP)¹¹.

Franklin District Growth Strategy (FDGS)

I have considered the alignment of PPC55 with the FDGS at the request of Auckland Council. Although predating the AUP, AP and FULSS, the FDGS provides the latest detailed planning assessment undertaken on the PPC55 site and Patumahoe as a whole.

The FDGS (2008-2051) anticipates moderate population growth within Patumahoe. It expects Patumahoe to become more self sufficient by 2051, with employment opportunities within close proximity in larger centres.

The FDGS sets out the anticipated household growth of Patumahoe by 2021 and 2051. By 2021, it estimates there will be 415 households (similar to the current estimate), and by 2051, 700 households. Beyond these snapshots, the FDGS does not provide a distribution of the projected growth through time.

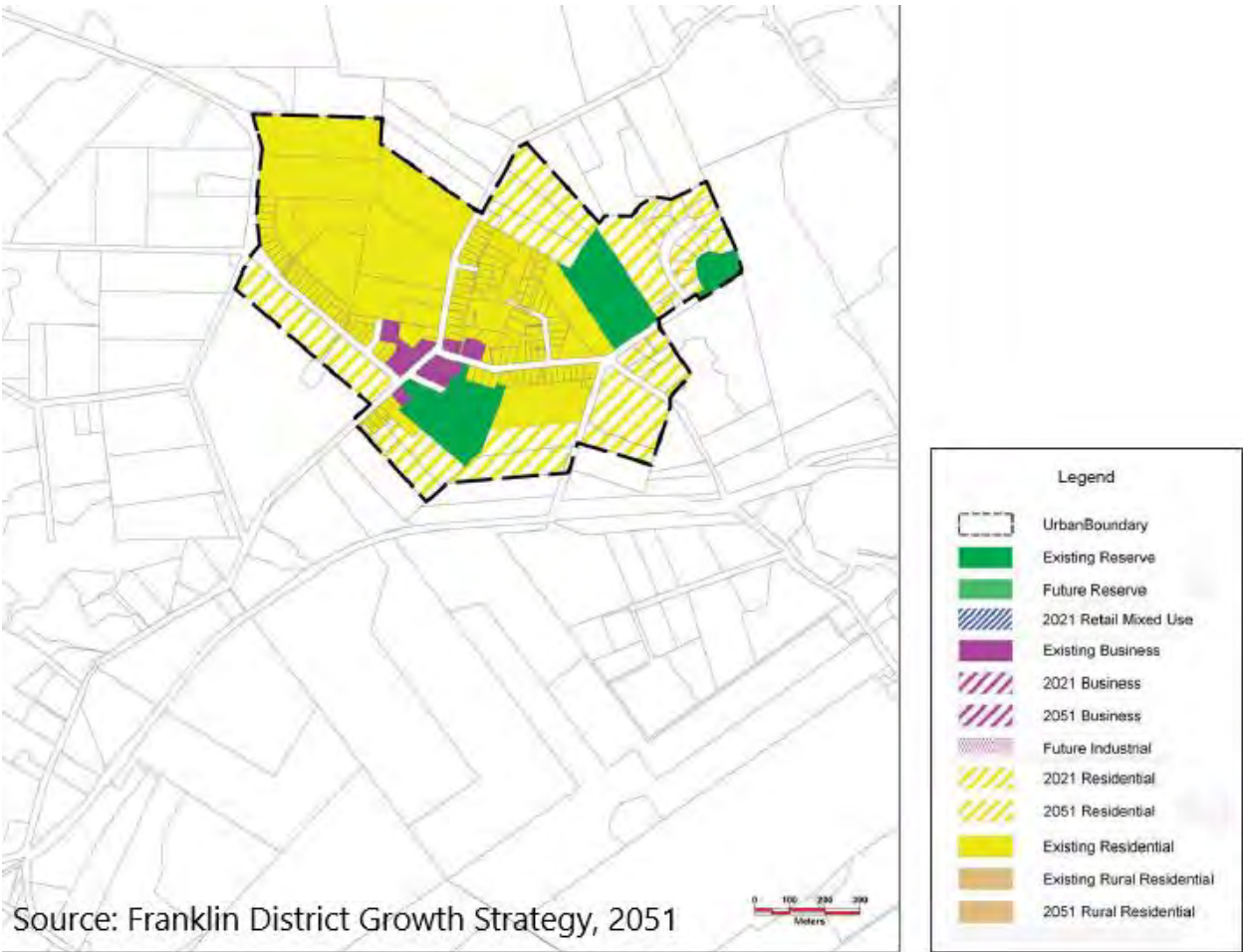
The strategy states that the planned residential growth will occur through a combination of infill intensification within the 2008 existing urban area together with urban expansion around the edges of Patumahoe. The FDGS identifies the areas suitable for future urban expansion through a map of planned future residential zones. This is shown in Figure 6-1 below. It identifies approximately 32ha of land for future urban residential uses (beyond that already zoned). Approximately 19 ha is along the southern and western side of Patumahoe, with 13 ha in the northeast¹².

¹⁰ Auckland Council, 2017 *Auckland Future Urban Land Supply Strategy*, July 2017.

¹¹ Auckland Council, 2018 *Auckland Plan 2050*, June 2018.

¹² Approximately 12 ha of the total 32 ha is already live-zoned as Single House Zone in the AUP, with the balance of 20 ha additional future residential zoning to that contained within the AUP. The AUP also contains an additional approx. 4.7 ha on Patumahoe Hill, which is not included within the FDGS.

Figure 6-1: Franklin District Growth Strategy Future Urban Area of Patumahoe (2051)



The planned future shape of Patumahoe takes into account constraints (soils, aquifers, slope and elevation) to urban expansion and the creation of a walkable catchment around the existing village commercial centre.

I consider that PPC55 is largely consistent with the FDGS. This is based on the potential future dwelling capacity and the extent of the proposed residential zoned areas. I set this out below.

The potential future size of Patumahoe from current and future potential dwellings is set out in Table 6-1. The middle column of the table shows the existing dwellings and components of the estimated future dwelling capacity contained within the currently live-zoned areas as well as future potential capacity in PPC55. The last column shows the potential future size of Patumahoe from existing plus future potential dwellings.

Table 6-1: Current and Potential Future Dwellings by Location in Patumahoe

Estimated Current Dwellings and Potential Future Additional Dwelling Capacity	Estimated Dwellings	Combined Size (current dwellings + potential future capacity)
Estimated current dwellings	378	
<i>Estimated Future Capacity (current)</i>		
Patumahoe Hill subdivision	76	
Estimated vacant sites	42	
Current Single House Zone (in PPC55 site)	30	
Total Additional Capacity (current)	148	526
<i>Estimated Future Capacity (additional from PPC55)</i>		
Balance of Single House Zone (PPC55 site)	170	
Estimated Future Urban Zone (PPC55 site) ¹	80-90 (estimate)	
Total Additional Capacity (additional from PPC55)	250-260	
Estimated Combined Future Capacity (current + PPC55)	402	780
Estimated Combined Future Capacity (current + PPC55, excl. FUZ)	318	696

Source: PPC55 Economic Assessment and RFI response; Searle Group subdivision website; Auckland Council resource consent.

¹ This has been estimated from the extent of the FUZ within the PEL report and has not been explicitly stated within the PEL report.

Currently there is capacity for an additional 148 dwellings within Patumahoe. If all taken up, this would result in a total size of 526 dwellings. The SHZ component of PPC55 includes a further 170 dwellings (30 are already counted), resulting in a combined capacity of 318 additional dwellings. This would bring the total size of Patumahoe to 696 dwellings.

The potential future use of the FUZ area of PPC55 has not been specified. If it were also used for residential purposes (at existing Patumahoe SHZ densities), then I estimate this would provide a further capacity of around 80 to 90 dwellings. This would result in a potential future size of around 770 to 790 dwellings.

Based on the above analysis, I consider that the future urban residential household size enabled by PPC55 is consistent with the future growth anticipated by the FDGS. A total size of 696 dwellings on the PPC55 SHZ, existing dwellings and existing capacity is equal to the future size of 700 dwellings in the FDGS.

I also consider that the location and spatial extent of the proposed urban expansion is relatively consistent with the FDGS future spatial form. A significant proportion of the PPC55 site is covered by the area identified for future urban residential expansion under the FDGS.

I have estimated the proportions (from GIS analysis) of the PPC55 site in relation to the areas covered by the existing SHZ and the FDGS in Table 6-2. The first column describes the portion of the PPC55 site as it relates to the existing live zoned SHZ and the FDGS areas of residential expansion. The second column shows the area (in ha) of each location described. The third and fourth columns show the share of the total PPC55 site and the share of the PPC55 SHZ component respectively.

Table 6-2: Estimated Area of PPC55 Site Relative to Existing Zoning and FDGS Future Residential Expansion Areas

PPC55 Area	Area (Ha)	Share of Total PPC55	Share of PPC55 SHZ
Existing Single House Zone	3.1	9%	19%
Proposed SHZ within FDGS future residential expansion area	10.5	30%	63%
Proposed FUZ within FDGS future residential expansion area	2.2	6%	
Proposed SHZ outside FDGS	2.9	8%	18%
Proposed FUZ outside FDGS	6.9	20%	
Proposed Other outside FDGS	9.4	27%	
Total PPC55 area	35.0	100%	
PPC55 area within current SHZ and FDGS future expansion area	15.8	45%	
PPC55 area outside current SHZ and FDGS future expansion area	19.3	55%	
Share of PPC55 SHZ in existing SHZ and FDGS future expansion area	13.6	39%	82%

Source: GIS analysis of FDGS and PPC55.

Overall, just under half (45%; 15.8 ha) of the total site is covered by the existing SHZ area and FDGS. The area covered includes most of the proposed SHZ, which is the main component of the residential expansion. In total, 82% of the proposed SHZ is either already included in the AUP SHZ (19% of the proposed SHZ) or covered by the FDGS areas of future expansion (63%). Only 18% (2.9 ha) of the proposed SHZ is outside of these areas.

Most of the area beyond the FDGS area of urban expansion contains the LIZ, larger residential lots, wetland/reserve area (combined, 49%) and FUZ (36%). Around 15% of the proposed additional area of expansion beyond that of the FDGS is made up of SHZ (2.9 ha).

Furthermore, the PPC55 would result in a spatial structure that is centred around the existing commercial centre. I consider this structure reflects the principles of a walkable catchment centred around the village centre used to guide the future shape of Patumahoe within the FDGS.

I note that the FDGS does not contain any further business land, and that PPC55 differs in this respect.

Auckland Plan (AP)

The AP aims to achieve a quality compact urban form. Development is to be focussed within existing and new urban areas (including within rural villages); and it seeks to have limited expansion into the rural hinterland areas. Urban expansion into new areas is directed to occur together with integrated infrastructure provision.

Approximately 6% of growth is expected to occur within the rural area. This includes the key node of Pukekohe as a satellite town from the main Auckland urban area. The Plan does anticipate some growth within smaller rural towns and villages. Growth in the rural areas is limited to maintain the rural productive focus.

The AP (as set out in the Development Strategy) does not identify any future urban expansion for Patumahoe beyond the SHZ are in the AUP. This area matches that contained within the FULSS. However, the urbanisation of the PPC55 site per se, does not align with the AP Development Strategy. The site is not included within areas set out for future development. While not assessed in the AP, I understand that the Auckland Council PPC55 infrastructure assessment finds that development in this area would result in significant infrastructure costs as it would exceed the existing capacity and would result in a pattern of infrastructure that would be inefficient to maintain (relative to an alternative location anticipated by the

Development Strategy). Therefore, I consider that the PPC55 site development does not align with the Auckland Plan, from an economic perspective, in relation to the infrastructure costs.

I consider that PPC55 has some partial alignment with the principles of the AP where the AP anticipates a small share of growth within small rural towns and villages. The potential expanded Patumahoe footprint, by itself, is unlikely to challenge the AP objective to concentrate rural growth into the main node of Pukekohe. However, I recognise that if similar development were to also occur in other locations, then in aggregate this development pattern could become significant in relation to that sought under the AP.

I consider that urbanisation of the PPC55 site would support the compact urban form objective at a local scale. Growth is concentrated around the existing commercial centre and social infrastructure, thereby increasing the accessibility of amenity to households.

Auckland Future Urban Land Supply Strategy (FULSS)

In total, the FULSS states that up to 40% of Auckland's dwelling growth is expected to occur outside of the 2010 Metropolitan Urban Limit (MUL). Just over one-third (37.5% of growth outside the MUL, or 15% of total growth) of this is expected to occur within the rural area, with the rest to occur through future expansion of existing urban areas. It identifies infrastructure servicing capacity for 124,400 dwellings on future urban areas (including, not yet urbanised live-zoned land); and a further capacity of 11,600 additional dwellings in rural settlements. Around two-thirds of the rural settlement capacity is in the south (7,600 dwellings), and just under half (45%; 5,100 dwellings) in the Franklin area (excluding Pukekohe). These include Karaka North, Kingseat, Clarks Beach, Glenbrook Beach and Patumahoe. In addition, Pukekohe has capacity for an additional 14,300 dwellings.

Urbanisation of the PPC55 site is not consistent with the FULSS. This is because the FULSS does not identify any further expansion of Patumahoe Village beyond the area already live-zoned within the AUP. The FULSS has not specifically assessed the PPC55 site in relation to infrastructure costs or efficiency.

The FULSS states that "any ad-hoc or out of sequence approach to development will have major funding implications for all providers, affect the ability to coordinate delivery and is likely to have major implications on the ability to service other areas. This in turn may have significant consequences on the ability to provide sufficient development capacity across Auckland (p8)".

I understand that Auckland Council have assessed the ability for existing infrastructure to serve the PPC55 site and the cost of additional infrastructure. It identifies capacity issues that would arise if land in Patumahoe, beyond that set out in the FULSS, were urbanised, resulting in significant infrastructure investment that would exceed that likely to be internalised by the development. Moreover, it would result in a growth pattern that would be inefficient to operate and maintain with infrastructure.

6.4 Information Gaps and Areas of Clarification Required

Any economic effects arising from the Future Urban Zone component of PPC55 are not yet able to be understood. The economic effects would depend upon the intended future live zone (and capacity within the zone), the infrastructure costs, and the timing of the zone.

6.5 Potential for Residential Lifestyle Uses

I consider that if the PPC55 site is unable to be used for productive agricultural uses and if the infrastructure cost means it is not appropriate to be fully urbanised, then it may be suitable for residential lifestyle uses.

Figure 6-2 and Figure 6-3 show the land value per ha by land use type for the PPC55 site and area surrounding Patumahoe¹³. The PPC55 parcels have been displayed by current use type, and shown within the wider context of land use values of the surrounding area.

The graphs show a correlation between parcel size, use type and land value. The PPC55 parcels currently in residential or other urban uses, and some of the residential lifestyle parcels, reflect the value profile of the Patumahoe urban area. The land values on these parcels are substantially higher than the rural land use value profile and are therefore unlikely to revert back to rural uses.

The remaining land parcels in rural uses are consistent with the land size value profile of surrounding land parcels. The PPC55 rural use land parcels are at the smaller end of the rural parcel size scale, and are consistent with the rural lifestyle and smaller rural land value profiles.

¹³ 'Lifestyle – Patumahoe Surrounds' includes lifestyle ratings parcels in the area within approximately 1.5 to 2km of Patumahoe's urban edge. 'Patumahoe Wider – Rural' includes ratings parcels with a rural productive use in the wider rural area surrounding Patumahoe. The area selected includes Auckland region properties south of Glenbrook Road, east of Waiuku township and west of the intersection between Ostrich Road and Glenbrook Road. This area has been selected to exclude the influence of future urbanisation of rural parcels surrounding Pukekohe.

Figure 6-2: Land Value per M2 by Land Use in Patumahoe and PPC55 (Sites up to 2ha)

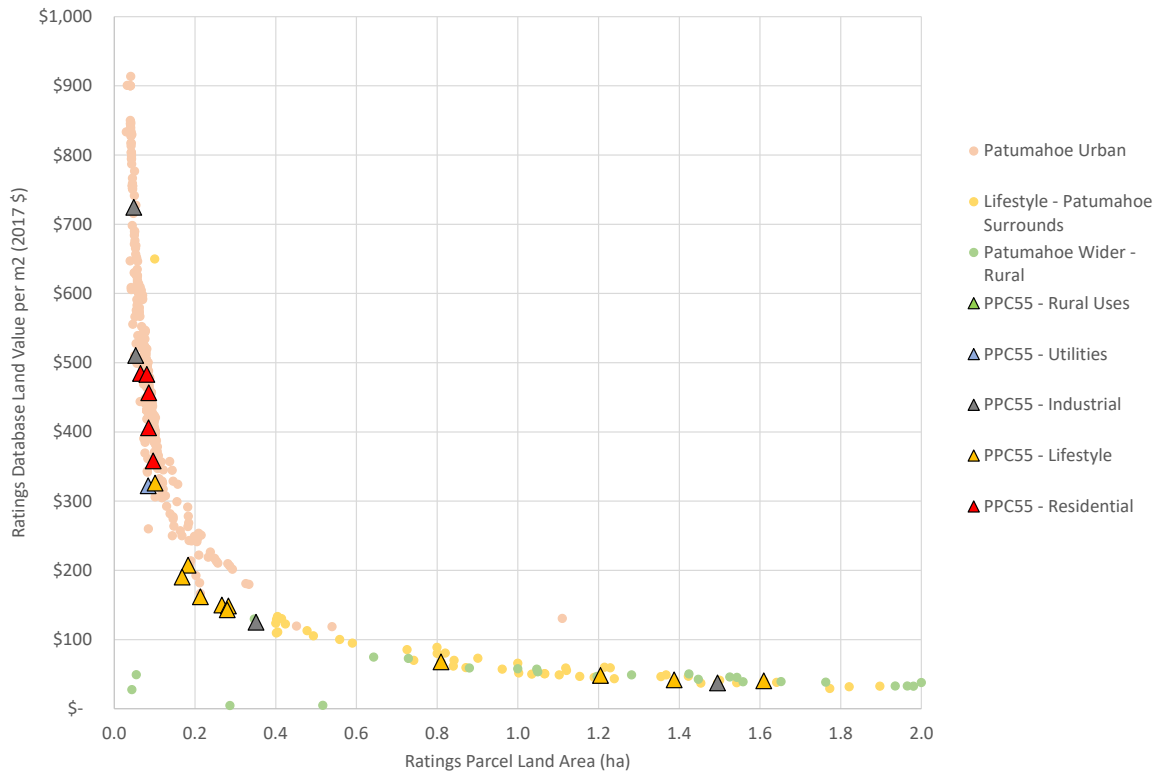
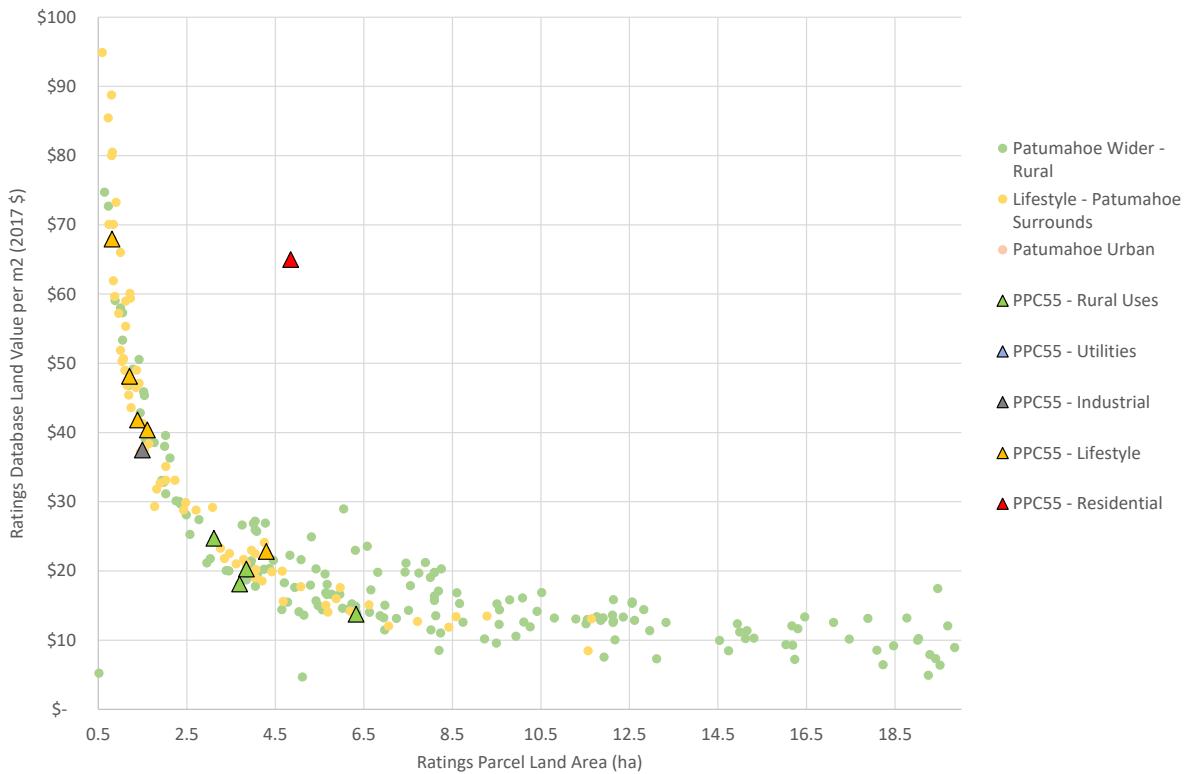


Figure 6-3: Land Value per M2 by Land Use in Patumahoe and PPC55 (Sites 0.5 to 20ha)



6.6 Overall Recommendation

Overall, there is likely to be only limited grounds from an economic perspective to support PPC55. There are economic grounds to oppose PPC55 in relation to the wider infrastructure cost (which would, in part, be borne by the wider community), but there are also concurrently areas of limited support due to partial alignment with strategic planning objectives, and a positive spatial economic structure, if considered only at the local scale. If the PPC55 site is unable to be used for productive agricultural uses and if the infrastructure cost means it is not appropriate to be fully urbanised, then it may be suitable for residential lifestyle uses.

The agricultural land productivity assessment has shown that it is unlikely that productive agricultural uses would be viable on the site. Consequently, there are unlikely to be any significant economic costs associated with the loss of agricultural productive potential from the site.

Therefore, a key question becomes whether Patumahoe should be able to expand within the wider growth context of southern rural Auckland. The AUP anticipates some expansion of small rural towns and villages with the management of key issues, including soils and provision of infrastructure (being of most relevance to economic effects).

I consider that the proposed expansion of Patumahoe, by itself, would not challenge the ability for Pukekohe to establish as the main rural node of activity within the southern rural area. The enabled expansion of Patumahoe is relatively consistent with, and largely anticipated by, the FDGS. The level of dwelling growth is within that set out by the FDGS. The FDGS also identifies areas as appropriate for future urban expansion, which cover large parts of the PPC55 site, including most of the proposed SHZ area.

PPC55 is likely to have adverse economic effects in relation to infrastructure provision (both in the initial outlay and ongoing servicing costs) that would accrue, in part, to the wider community. At the sub-regional scale it would produce a pattern of growth that is only partially consistent with strategic planning direction due to the higher infrastructure costs than if the development were to occur in a more efficient location identified within the FULSS.

I consider that if the PPC55 site is unable to be used for productive agricultural uses and if the infrastructure cost means it is not appropriate to be fully urbanised, then it may be suitable for residential lifestyle uses. The land value profile of the PPC55 land parcels are in residential, urban and (some) lifestyle uses are generally above the rural use land values and are consistent with Patumahoe's urban land value profile, meaning that the parcels are unlikely to revert back to rural uses. The remaining land parcels in rural uses are consistent with the land size value profile of surrounding land parcels. The PPC55 rural use land parcels are at the smaller end of the rural parcel size scale, and are consistent with the rural lifestyle and smaller rural land value profiles.

If it is appropriate for Patumahoe to expand, then I would support the future spatial structure of Patumahoe created by PPC55. I consider that, if expansion were to occur, then urbanisation of this site would result in an efficient spatial economic structure of Patumahoe. It would create concentric development around the existing commercial centre and areas of social infrastructure. This is likely to result in the accessibility of amenity for future households. The provisions on the distribution of business activity across the existing commercial centre zone and the proposed LIZ is set out in Section 4.4.

PPC55 is likely to result in some change to the character of Patumahoe Village as it represents a substantial proportional increase to the existing household base. I consider that the future scale of Patumahoe is still likely to reflect a rural village character and is similar to the recent urban expansion which has already occurred.

I do not consider that there are likely to be any significant net economic benefits in relation to the construction activity of PPC55. This is because most of this would be a transfer effect which would be likely to instead occur elsewhere within the region.

The appropriateness for urban growth, at the local scale, is unique in this location in Patumahoe given it's concentric location to the existing commercial centre, the rail line barrier and the limited potential for productive agricultural uses on the site.

In my view, any further proposed expansion of Patumahoe beyond PPC55, or other urban areas within Auckland's southern rural area, would need to be carefully assessed. At a broader scale, an assessment would need to take into account any economic effects from a loss of agricultural productive potential and the effects on the urban spatial growth structure. At a local scale, it would need to consider the projected scale of growth and resulting urban spatial structure. The assessment suggests that any further growth of Patumahoe beyond PPC55 would exceed both the demand projections and previously anticipated growth in the FDGS.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

19 April 2021

To: Chloe Trenouth, Consultant planner for Auckland Council

From: Nicole Bitossi, Senior Urban Designer,
Motu Design Ltd, on behalf of Auckland Council.

Subject: Plan Change 55 (Private) Patumahoe South
Urban Design Assessment of Effects
Specialist Technical Review

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1. Introduction

- 1.1. I have undertaken a review of the Private Plan Change 55 on behalf of Auckland Council in relation to urban design effects. Plan Change 55 is a private plan change request to the Auckland Unitary Plan (Operative in Part) ('AUP') from Askew Consultants Limited ('ACL') under Schedule 1 to the Resource Management Act 1991 ('RMA').
- 1.2. ACL are seeking to rezone land, amend the provisions of the Patumahoe Precinct and add a new sub-precinct. The focus of the plan change request is to rezone 34.9ha of Rural Production zone located to the south and east of the neighbourhood centre to Single House Zone, Light Industrial Zone and Future Urban Zone ('FUZ'). This will form a new Sub-precinct, Sub-precinct E, and will have its own sub-precinct provisions.

Experience and Qualifications

- 1.3. I hold a Bachelor of Landscape Architecture from Unitec, and a Master of Urban Design (Hons) from the University of Auckland.
- 1.4. I am a senior urban designer at Motu Design, where I have been employed since 2015. Prior to that I worked as a landscape architect both here in New Zealand and in the UK. I have a total of 12 years experience of urban design and landscape architecture. Over the last 6 years I have worked with Auckland Council as a Specialist Urban Designer carrying out design review for Resource Consent applications, as well as providing urban design services for private development.
- 1.5. My previous work experience relevant to this proposed plan change includes:
- 1.6. Plan Change 21 - Auckland Unitary Plan - Brightside Road - Urban Design Services and assistance with compiling the application for Southern Cross - A Private Plan change to rezone land from Mixed Housing Suburban and Single House Zone to Special Purpose – Healthcare Facility and Hospital zone. (for Southern Cross Hospitals 2019 – 2020).
- 1.7. Plan Change 30 - Auckland Unitary Plan - Master planning and Urban Design Assessment for a private plan change to rezone land surplus to club requirements from Special Purpose – Major Recreation Facility Zone to Business – Light Industry Zone. (Counties Racing Club, Pukekohe 2019)
- 1.8. Plan Change 47 – Auckland Unitary Plan – Plan Change review on behalf of Auckland Council regarding amending the provisions of Flat Bush Sub-precinct H and minor changes to the Sub-precinct boundaries.
- 1.9. Proposed Auckland Unitary Plan - Urban Design Expert Evidence on behalf of Auckland Council, 2015-16, in response to submissions and including recommended changes to provisions for Kingseat Precinct Provisions.

Documents Reviewed

1.10. In writing this memo, I have reviewed the following documents:

- All of the submissions received

- Plan Change Request, Assessment of Effects and Section 32 Assessment by Envivo planning consultants, 26 June 2020, and:
 - Appendix 1: CIA, Ngati Te Atata
 - Appendix 1A: CIA, Ngati Tomohoho
 - Appendix 2: Urban Design Assessment
 - Appendix 3: Landscape and Visual Assessment
 - Attachment 5: Proposed Amendment to AUP
 - Attachment 6: AUP Assessment
 - Attachment 7: s32 Evaluation Table

- Clause 23 documents
 - Planning, landscaping and Urban Design response
 - Proposed Precinct Plan and Proposed Zoning Map

1.11. I have also reviewed Resource Consent plans for LUC60329723

1.12. In addition to the above, I have taken into consideration the following strategic planning and urban design guidance documents:

- Regional Policy Statement – Auckland Unitary Plan
- Future Urban Land Supply Strategy (2017) (**'FULSS'**)
- Franklin Local Board Plan (2017)
- Pukekohe-Paerata Structure Plan (2019)

2. Context

2.1. Patumahoe is a rural village, located approximately 6km (as the crow flies) west of Pukekohe, and 10km east of Waiuku. The village is surrounded by pasture and rural production activities.

2.2. Significant low-density residential development has occurred within Patumahoe, almost doubling the land area for housing within the last 10 years. The original part of village has a range of different house types, setbacks, orientation from the street and space for specimen tree planting in both front and rear gardens. In contrast, the newly developed area consists of little variation in housing typologies, roof form and colour with little space for tree planting.

- 2.3. The village centre is located at the intersection of the main roads entering Patumahoe. It is predominantly single storey, and the floor area has remained largely unchanged for the past 10 years. Currently, shops include a bakery, pub and hotel, a café, takeaway, a four square, boutique retail and building service stores. Patumahoe School is located approximately 500m to the east of the village centre.
- 2.4. Patumahoe has a range of open spaces and recreational opportunities, with the Domain located behind the village centre, the sportsfields and playground to the north of Patumahoe Road, and a walking track that follows the Whangamarie Stream linking Clive Howe Road to Henry's Reserve.
- 2.5. The Domain provides amenity and recreational opportunities to the surrounding neighbourhood, however, it currently has poor activation and surveillance due to its location to the rear of the village centre.
- 2.6. The subject area lies to the south of the existing village centre, bordered by Mauku Road to the west, Patumahoe Road to the east, the rail line to the south, and the existing housing to the north. The Urban Design Assessment prepared by the applicant has a good description of the subject site.
- 2.7. Patumahoe is located outside of the Rural Urban Boundary. Nearby Pukekohe and Paerata have substantial areas of FUZ and residential zoned greenfield land that has yet to be developed. This alongside greenfield land zoned for FUZ or residential zones in Drury, Hingaia and Opaheke will allow for significant growth in the south. These areas have all been included in the FULSS and are part of transport and infrastructure planning in the wider regional context.

3. The Proposed Plan Change

- 3.1. The proposed plan change seeks rezone 34.98 hectares of Rural Production land to the south and east of the village centre to Single House Zone, as well as FUZ, Open Space and Light Industrial zones.
- 3.2. According to the Assessment of Effects prepared by Envivo, the proposal will enable:
 - *the logical expansion of the Patumahoe settlement, onto land in close proximity to the existing town centre. This will enable the development of approximately 200 - 250 dwellings in a manner that complements the character of the existing township; and*
 - *the zoning of approximately 2.5ha of Light Industrial land that will facilitate the establishment of approximately 100 local jobs, without competing with the existing town centre or generating adverse environmental effects; and*

- the improvement of local transport connections, and the safety and efficiency of the local road network within Patumahoe. ¹

- 3.3. The proposed plan change includes changes to the Patumahoe Precinct, including introducing a new Sub-Precinct E, with a corresponding Sub-precinct Plan and provisions.

4. Summary of Urban Design Issues

- 4.1. The proposed plan change raises urban design issues at both a wider regional level and a local level. At the regional level, this involves the suitability of the site for low-density residential development. At the local level, concerns relate to how to ensure a series of good urban design outcomes appropriate to the proposed residential and light industrial zoning, and integration into the existing Patumahoe neighbourhood. Key issues include:

- Suitability of the site for low-density residential development within the wider regional context
- Integration of proposed residential and light industrial activity into the existing neighbourhood
- Connectivity through the plan change area to the existing Patumahoe village, school and open spaces
- Alignment of the key urban design elements that drive the proposed Structure Plan with the proposed Precinct plan and provisions
- Effect of the proposal on the character of Patumahoe village
- Defensible boundaries
- Ensuring a Light Industrial zone that provides local employment and services but does not compete with the neighbourhood centre
- Necessity of the Future Urban Zone in the eastern sector of the plan change area
- How to ensure Mana Whenua values are integrated into design processes and development outcomes

Pre-lodgement

- 4.2. I was not involved with this Plan Change until after Clause 23 response and submissions had been received.

¹ Enviro Assessment of Effects and Section 32 Assessment, p1-2

Adequacy of Information

- 4.3. In assessing the potential effects of the proposed plan change alongside the issues raised by submitters, the following gaps in the information provided and/or assessed were identified:
- I consider there is insufficient information to understand the urban design implications of the relationship between the approved resource consent for the subdivision in the central sector of the plan change area within the proposed Precinct Plan 3.
 - An assessment of the likelihood of the Mauku Road connection in response to the submissions made from residents on Mauku Road, and the effect on the connectivity across the site if this road does not eventuate.

5. Applicant's assessment

- 5.1. The applicant has provided a specialist urban design assessment of the proposed plan change, undertaken by Ian Munro.

Methodology

- 5.2. I consider the applicants team of specialists have used a reasonably robust methodology for the assessment of urban design effects, and the formation of proposed precinct provisions, based on the site conditions when the report was undertaken in 2019, however as mentioned above, it does not consider the approved subdivision in the central sector.
- 5.3. The Urban Design Assessment includes the preparation of a detailed site and context analysis, a Structure Plan, Concept Master Plan and Concept Development Plan by Ian Munro to test a possible development scenario. The Urban Design report analysis illustrates a clear rationale for development within the proposed plan change area, and the integration of the proposed residential zoned area to the existing village and neighbourhood centre, and how the edges of the plan change area will be defined.
- 5.4. The options analysis sets out the different spatial scenarios and land use scenarios that were tested. I agree with the rationale for the inclusion of the western and central sectors of the plan change area, as spatially, they are a logical location for development within walkable catchment of the Patumahoe neighbourhood centre, open spaces and school. However, the rationale for the location of the south-western boundary of the western sector is unclear, as it is not based on any landscape or topographical features.
- 5.5. The Urban Design Assessment does not consider the wider strategic context in terms of suitability of Patumahoe as a location for residential intensification.

Development Scenario

- 5.6. A concern I have about the development scenario (illustrated in the Concept Master Plan in the Urban Design Assessment) is that this is unrealistic due to the approved subdivision consent that sets out a different block and movement structure. This will impact movement across the plan change area, and the active road frontage along the edge of the Domain will not be able to be achieved.
- 5.7. The development scenario has not been carried through into the Precinct Plan within the central sector of the plan change area. The Precinct Plan takes the approved subdivision into account, and shows a different road alignment along the eastern side of the Domain.
- 5.8. Whilst I consider the proposed development scenario has limited relevance in terms of the portion of the plan change area subject to the approved subdivision consent, there is still enough information to assess the urban design issues, effects and merits of the proposed plan change. I have also undertaken some additional analysis to consider the implications of the subdivision consent, alongside considering issues raised by submitters. (Refer to Section 7).

6. Urban Design Assessment

- 6.1. Having assessed all of the information provided and submissions made, I have concerns at a regional level, regarding the suitability of Patumahoe for further low-density housing.
- 6.2. Should residential development be considered appropriate, I am supportive of the concept master plan shown in the urban design assessment. However, some of the key block structure and connections shown in this plan are unlikely due to the approved subdivision that is currently undergoing earthworks in the central sector of the site, and have not been carried through to the Precinct Plan 3.
- 6.3. I would recommend changes to I430.10.2 Patumahoe: Precinct Plan 3 – Sub-precinct E to ensure integration with the existing Patumahoe village, the west-east connection through the site, and the Domain frontage road. These points are discussed further below.
- 6.4. Subject to these changes, overall I consider that at a local level, there is the potential for minor urban design benefits, including increased vibrancy of the village centre, better use, activation and safety of the Domain, and the provision of more housing (should this be deemed necessary). I generally agree with the Urban Design Assessment undertaken by Ian Munro but note the following matters of particular relevance to my urban design assessment of effects.

Suitability of the site for low-density residential development within the wider regional context

- 6.5. I have concerns regarding whether Patumahoe is an appropriate location for further low-density residential development, or whether it exacerbates sprawl in an area that is not well serviced by

public transport, and not included in the FULSS and wider transport and infrastructure planning. Low density residential development in remote areas results in higher carbon emissions particularly related to transport and fuel consumption, something that should be considered in Auckland's current climate emergency.

- 6.6. The question also remains whether it is worth consuming quality soils for residential development that may not be necessary given the large amounts of greenfield FUZ and residential zoned land that hasn't yet been built on around Pukekohe, Paerata and Drury.

Structure Plan

- 6.7. From an urban design perspective, the proposal performs well at the local scale. The location is logical, as it spatially rounds off the existing residential zoned area and enables development close to a range of activities. The indicative street layout and block structure will encourage a walkable neighbourhood, with shops, hospitality, services, open spaces and the school within walking distance. A pedestrian route through the Domain will be important to ensuring walkability by way of a connection to the neighbourhood centre shops and services. While it is outside of the plan change area I would suggest a formed path along the northern and western edges of the Domain to ensure walkability to the neighbourhood centre year-round.
- 6.8. Connectivity through the Proposed Plan Change area depends on the three road access points from Patumahoe Road, and one access from Mauku Road. These access points at both the western and eastern edges are important for creating a new housing area that is well connected and offers a choice of routes. The west-east route from these access points mean some traffic will be diverted from the main road running through the neighbourhood centre and allow an alternative route, as well as providing pedestrian connections that are key to ensuring a walkable neighbourhood.
- 6.9. Pedestrian and cycling connections are created along the open space network. The existing Domain and sports fields to the west and north of the plan change area respectively, will be connected along the proposed stormwater reserve and open space, up Carter Road, including the section will be closed off to vehicles.
- 6.10. The Structure Plan shown in the Urban Design Assessment proposes a road located along the eastern Domain boundary, with the purpose of providing a positive frontage, activity and overlooking of the Domain. It would also allow easy access to the Domain, and to the pedestrian route through the Domain to the Patumahoe Road and the Village Centre to the north.
- 6.11. While this approach is supported, these key urban design elements that inform the Structure Plan have not been carried through to the Precinct Plan, and are unlikely to eventuate due to the approved subdivision that is currently undergoing earthworks to the east of the Domain.
- 6.12. The approved resource consent application shows a row of houses between the new road and the Domain, which will result in a poorer urban design outcome for the Domain than that shown in the Concept Master Plan.

- 6.13. The approved and future subdivision also leaves an awkward depth of land between its southern boundary and the proposed stormwater management area. The depth could result in rear lots, and/or rear boundaries along the reserve edge. As with the Domain, the road along the stormwater reserve edge is important for activation, integration and safety.
- 6.14. The road connection shown in the 'Future Stage' of LUC60329723 is not shown on the Precinct Plan, and it is assumed that future roads in this area will have to align with Precinct Plan 3 when resource consent is applied for, should this plan change be approved.
- 6.15. Please refer to Section 7 for recommended changes to Precinct Plan 3 to ensure key connections and street frontages through the plan change area.

Neighbourhood Centre

- 6.16. The neighbourhood centre is currently made up of a number of single storey retail, food and beverage, and building services shops or showrooms. There appears to be scope for further development within the existing neighbourhood centre zone, as set out in the Clause 23 Planning response (p2). The demand for services by an increased population could result in some of the vacant land and residential land within the neighbourhood centre zone being converted into buildings more suitable for the neighbourhood centre. This has the potential to increase the interest and vibrancy of the neighbourhood centre, and reduce the need to travel out of Patumahoe with more services available .
- 6.17. It should also be noted the Neighbourhood Centre zone allows for buildings up to 3 storeys in height. However, intensification of the neighbourhood centre could occur in such a way that the rural character is retained.

Light Industrial zone

- 6.18. If the area is to be urbanised, the Light Industrial zone is supported, as mentioned in the AEE and Urban Design Assessment it provides local employment, and a location for commercial activity and services that are not appropriate for the neighbourhood centre zone, such as vehicle mechanics, storage facilities, service stations etc. The proposed location on the opposite side of the railway from the timber yard is practical, as it reduces reverse sensitivity (ie dust and noise) by confining this area to a corner of the outer periphery of the village.
- 6.19. There is the possibility of reverse sensitivity implications between the proposed Light Industrial zone along its northern interface with the single house zone. There are many instances across Auckland where a Light Industrial zone is located immediately adjacent to, or across the road from a residential zone. The road shown on the Precinct Plan separates the two zones, and would go

some way to mitigating reverse sensitivity by creating distance and a buffer between the two uses. As such, the location of the road shown on the Precinct Plan is supported.

- 6.20. As the Light Industry zone allows dairies and food and beverage as a permitted activity, there is concern the Light Industrial area has the potential to compete with the neighbourhood centre. While it may be appropriate for a dairy and café in this location to service the working population and visitors to the Light Industrial area, as well as nearby dwellings in the south-eastern portion of the PPC area, it is important it does not compete with the neighbourhood centre. As such, it is recommended a precinct provision is added to limit the total floor area available for such activities, ie to limit development to one dairy and one café.

Boundaries of Plan Change Area

- 6.21. The southern and eastern boundaries are marked by strong defensible edges, made up of the rail line to the south, and the steep escarpment to the east.
- 6.22. However, there are concerns around the 'Defensible' boundary on south-western side of the western sector of the site. There are no topographical, landscape features or roads that make this an obvious boundary. A strong boundary here is necessary to avoid development sprawling further south between Mauku Road and the rail line. As such, a wider landscape buffer is recommended in order to provide a strong edge. Alternatively, a road connecting to Mauku Road could form an obvious boundary. Some options for the location of the boundary and boundary treatment have been explored under section 7.

Future Urban Zone

- 6.23. From an urban design perspective, the FUZ in the eastern sector may not be necessary. Again, the balance of quality of soil for food production, the need for housing and the rural character needs to be considered.
- 6.24. The block structure and walking, cycling and open space connections proposed for the western and central sectors are able to occur without this area.
- 6.25. Concerns have been raised regarding reverse sensitivity between the rural production zone and residential zone on opposite sides of Patumahoe Road, with particular regard to the chicken sheds that are currently located within the eastern sector. If the eastern sector was to remain rural production zone rather than FUZ or a live residential zone, I agree that the reverse sensitivity effects that are currently experienced between the two would likely be continued in the future, or be exacerbated due to the number of new dwellings that would be constructed within close proximity. It should be noted, that the owner of 75 Patumahoe Road who runs the chicken farm stated in their

submission that the contract with Tegel is due to expire in the near future due to the age and condition of the sheds.

- 6.26. Proposed precinct provision I430.6.16 addresses reverse sensitivity by way of a no complaints covenant for dwellings within 200m of the poultry sheds. I am unable to provide further comment on whether this is the most effective strategy in terms of smells, noise and air quality.
- 6.27. The eastern escarpment is a logical boundary to the eastern side of Patumahoe. Should the eastern sector be given a residential or FUZ zoning, the escarpment and gully would reduce reverse sensitivity between rural production and residential zones due the distance created by the gully.
- 6.28. However, should the eastern FUZ not be necessary for residential development to address housing needs in the wider regional context, or appropriate given potential effects to wider transport and infrastructure networks, I also consider Patumahoe Road could equally form the eastern boundary.

7. Proposed Precinct Plan and Provisions

Precinct Provisions

- 7.1. If the area was to be urbanised, the proposed Precinct Provisions are generally supported. The approach of 800m² lots, with smaller lots sizes (600m²) within a 5 minute walk of the village centre, and larger lots of up to 1500m² adjacent to the rail line is in-line with residential development in the other Patumahoe Sub-precincts. The proposed lot size supports the rural village character, with larger lots than would typically be found within the Single House Zone. The 600m² promotes walkability to the neighbourhood centre, and the 1500m² lots adjoining the railway allow for separation and buffer planting along the rail interface.
- 7.2. As mentioned previously, a wider landscape buffer is recommended for the south-western boundary of the western sector to strengthen the defensible boundary.
- 7.3. Regarding the Light Industrial zone, it is recommended a precinct provision is added that limits the total floor area of dairies and food and beverage across the whole of the Light Industrial zone, so that there is a maximum of one of each of these. This is to ensure the vibrancy of the village centre is not compromised by another competing area.

Precinct Plan

- 7.4. Regarding the Precinct Plan, the key connections that promote walkability and activation and safety of the Domain are not possible due to the approved subdivision.
- 7.5. It is recommended changes are made to the Precinct Plan to address this, as well as re-assessing the western boundary location, buffer planting, and the location of the road providing access from Mauku Road. I have considered the following possibilities:



Option 1: Road forms boundary to the plan change area, and an additional road to the south of the Domain. Access from Mauku Road moved further to the south to avoid properties where landowners are in opposition to the plan change.



Option 2: Landscape buffer forms boundary to the plan change area, and an additional road to the south of the Domain. Mauku Road connection location unchanged.

- 7.6. Of these, I consider Option 2 best addresses these issues, as it provides a street along the southern edge of the Domain, and a wider landscape buffer forms the defensible boundary. However, Option 1 would also be acceptable if it improves the likelihood of the east-west connection as it avoids properties where landowners are in opposition to the plan change. Option 1 would have an awkward block dimension that may result in some rear lots in the middle of the western-sector block, but it is unlikely to be more than 2-3 lots.
- 7.7. I would recommend a more robust assessment of the location of this boundary and connection from Mauku Road, that also takes into consideration the comments from submitters that live within the proposed boundary of the western sector.
- 7.8. Regarding the road locations shown on the Precinct Plan 3, I would prefer indicative roads are shown on the Precinct Plan to ensure key connections, park edge roads and the road buffer between the Light industrial zone and single house zone are constructed. This is consistent with the approach taken for Precinct Plans 1 and 2, where indicative road locations have been shown. The assessment criteria could allow discretion for changes to the road alignment at Resource consent stage.
- 7.9. Should the roads be removed from the Precinct Plan, there is the need for robust development controls and assessment criteria that will ensure both the east-west connection and Domain edge road are provided for.

Roading Hierarchy and Cross Sections (Figures 5-11)

- 7.10. Discrepancies are noted between Figure 5: Roading Hierarchy and the Precinct Plan. It is recommended Figure 5 is updated to reflect the road layout shown in the Precinct Plan, that also considers the options outlined above, and ensuring it ties into the layout for the approved resource consent. The Cross Sections shown on Figures 6-11 also need to be amended so that the houses shown meet the front yard requirements of the zone, rather than being placed on the front boundary.
- 7.11. The Cross Sections (Figures 6-11) show wide road reserves with generous berms and planting strips. Sub-Precinct A also has wide road reserves, that have been planted with smaller scale street

trees. When entering Sub-Precinct A, there is a view of an expanse of single storey grey roofs. There is the opportunity for a better outcome within Sub-Precinct E for large street trees to be included within the road reserves, that over time, will grow higher than the typical roof line, visually breaking it up and providing a sense of scale and setting to the development. Large trees are also aligned to the rural-residential character, and there is unlikely to be enough space on individual lots for large specimen trees. As such, a precinct provision is recommended to this effect.

- 7.12. Cross sections shown in Figure 6: Patumahoe Road and Figure 7: Greenway show cycle lanes or shared paths that are separated from traffic by a planting strip. This approach is supported as it provides safe and attractive routes that will promote active modes of transport and reduce car dependency.
- 7.13. In principle I support the use of indicative cross sections for the key pedestrian and cycle routes, such as Patumahoe Road, Carter Road and the east-west route, showing an overall width and some key dimensions.
- 7.14. It may also be beneficial to graphically portray the cross sections in a style more consistent with Figures 1-3 that already form part of the precinct provisions.
- 7.15. Alternatively, I could potentially support the removal of the Figures 6-11 provided there are robust precinct provisions and development controls that would ensure the following:
 - Generous berms and tree planting as noted above, that contribute to the rural residential character
 - Separated cycle or shared paths along the east-west route, and along Carter Road and Patumahoe Road

8. Submissions

- 8.1. The plan change was notified and a total of 45 submissions received, as well as 11 further submissions. The concerns raised can be grouped into the following topics:
 - Transportation and infrastructure (at both the regional and local level)
 - Appropriateness of residential development on quality soils
 - Pressure on existing services
 - Rural and village character
 - Reverse sensitivity
 - Expression of mana whenua values
 - Future Urban Zone (extent of the boundary whether it should be live-zoned)
 - Location of the western boundary and Mauku Road connection
- 8.2. The majority of these overlap with transportation and infrastructure, soils, integrated planning and expression of mana whenua values. I have not commented on these and refer to the relevant

specialists. Of specific relevance to urban design at the local level, are those relating to the rural and village character, the location of the boundary and road connection of the western plan change area, and the appropriateness of the FUZ in the eastern sector.

- 8.3. The Auckland Council submission strongly opposes the proposal. It regards Patumahoe as unsuitable for future growth within the regional context, particularly in relation to the RPS sections on urban growth and form, and rural environment. This takes soils, the need for compact urban form (as set out in the Auckland Plan), and greenfield land set aside for development in Pukekohe and Paerata in the FULSS into account. Cumulative effects on the wider transport network have not been addressed.
- 8.4. Auckland Transport supports the proposal (subject to resolution of their concerns), but notes that as further urban development in Patumahoe has not been identified in the FULSS, it will not have been considered within wider infrastructure planning. It also notes the cumulative effects on the wider transport network have not been properly addressed.

Rural Character and Village Character

- 8.5. A number of submissions raise concerns regarding change to the village character, that will likely result from increased number of houses and area of rural land given over to residential development, as well as increased population.
- 8.6. With subdivision that has already occurred in Sub-Precinct A, as well as development under construction/earthworks on Patumahoe Hill, the village character has already been altered. The proposal will further introduce more development similar to what has already occurred over the last 10 years. As well as this, the greater population and traffic volumes will have a further impact on the character of the residential areas and the village centre.
- 8.7. Part of the effect on character is of the increase in traffic through the village centre. This is already a car dominated space, but has the potential to become more-so with a greater population, particularly if the alternative west-east connection shown in Precinct Plan 3 does not eventuate.
- 8.8. The increase in population does however allow potential for more vibrancy within the village centre, with more services being available within the village, and reducing the need to travel to other centres. While the neighbourhood centre zone allows buildings up to 3 storeys in height, this needs to be balanced with the character of the area.
- 8.9. Submission 23 notes the approach to Patumahoe as a 'gradual introduction to the village when travelling from Pukekohe'. If the plan change is approved, the entrance to Patumahoe would be extended to the rail line with the Light Industrial Zone located at the entrance to the village.
- 8.10. Auckland Councils Landscape Architect, Ainsley Verstraeten has provided a good description of the rural character, and suggests the precinct provisions could go further in order to maintain rural character and amenity values. I agree with this approach.

Western plan change area boundary location and vehicle access from Mauku Road

- 8.11. There are a number of submissions opposing the plan change from residents and landowners located on, and surrounding the western sector of the proposed plan change area. This group say they haven't been consulted with. Some say they have no plans to move on and are concerned the plan change area and in particular, the road connecting to Mauku Road is located either through or along the boundary of their properties.
- 8.12. This raises concerns about the likelihood of the Mauku Road connection being implemented. As mentioned previously, this road forms part of the key west-east connection that will allow an alternative route than through the village centre, as well as providing pedestrian connections that are key to ensuring a walkable neighbourhood.

Appropriateness of the FUZ in the eastern sector

- 8.13. Several submissions address the FUZ in the eastern sector, noting there is already residential activity in the northern part of the eastern sector, limited use of the land for rural production, and reverse sensitivity between the few rural activities that exist on the eastern sector with surrounding residential activity. Submission 35 questions the eastern boundary of the FUZ area, and considers the boundary should be located further to the east.
- 8.14. Submitters 4 and 8, from 75 and 95 Patumahoe Road both use their properties for rural food production but note the soil and drainage limitations. They support residential development in the eastern sector, but think this area should be a live residential zone rather than FUZ.
- 8.15. Auckland Transport oppose the application of FUZ zoning to the eastern sector as it *'is not identified in Auckland Plan's 30 year Development Strategy nor in the FULSS so will not have been considered in any wider infrastructure planning.'* They note the applicant has not appropriately addressed the transport effects on the wider transport network.
- 8.16. Should the FUZ eastern sector be included within the plan change, I agree with the application documents that the boundary should be located along the steep escarpment, as this is an obvious landscape feature that will form a strong defensible edge. I do not agree with submission 35 that the FUZ should extend further to the east.
- 8.17. I also disagree with submitters 4 and 8, that this area should be live zoned, without first being subject to the same level of design analysis that has been applied to the western and central sectors of the site.

How to ensure Mana Whenua values are integrated into design processes and development outcomes

- 8.18. There were two submissions relating to Mana Whenua issues. Heritage New Zealand (submission 44) in particular, suggested additional provisions are included to provide greater certainty that the recommendations from Ngati Te Ata and Ngati Tamaoho as outlined in their Cultural Assessment reports, and the incorporation of Te Aranga principles are carried forward through the resource consent and subdivision process.
- 8.19. I am not an expert in how to address Mana Whenua issues, but in principle would support the introduction of assessment criteria to this effect. It would also be important to get further input from Mana Whenua on how to address this.

9. Conclusions and recommendations

- 9.1. Having reviewed the information provided, and the submissions made, I have reached the following overall conclusions:

Applicants Assessment of Effects

- 9.2. I consider that the applicant has undertaken a robust urban design assessment of the proposed plan change based on the site conditions when the report was undertaken in 2019. However, achieving the domain frontage and key connections across the site is unlikely given the approved subdivision in the central sector that is now under construction.
- 9.3. Modifications to the Precinct Plan to address road locations, as well as a more robust delineation and rationale for the location of the western boundary will assist in addressing concerns, and further strengthen the urban design outcomes anticipated from the plan change.

Consistency with the Auckland Unitary Plan

- 9.4. RPS B2.2 Urban Growth and Form and B2.6 Rural and coastal towns and villages objectives (summarised) promote growth in a way that optimises the efficient use of the existing urban area, social facilities, infrastructure and transport networks while maintaining and enhancing the environment, rural character and rural productivity. The RPS anticipates some development within rural and coastal towns and villages.
- 9.5. I have concerns regarding the suitability of Patumahoe for urbanisation, in terms of the wider strategic context and in relation to the RPS objectives and policies, but refer to soil, transport, infrastructure, sustainability and economic experts for a more detailed assessment.

- 9.6. The proposal is largely consistent with Appendix 1 Structure Plan Guidelines, in relation to section 1.4.5 Urban Development, however the Domain frontage road and strength of the western boundary are important to achieving all of the requirements are met.
- 9.7. The proposal has the potential achieve quality compact form at a local level that will promote walking and cycling if key connections are ensured in the Precinct Plan and provisions. Precinct provisions will also be important for maintaining the rural village character.

Effect to any relevant National Policy Statement

- 9.8. I have considered the National Policy Statement – Urban Development 2020 (NPS-UD) in my review of the proposed plan change, however, I have not undertaken a detailed assessment of the proposed plan change against the provisions of the NPS-UD.
- 9.9. As the NPS-UD focuses on ‘urban environments’ of at least 10,000 people, it does not directly apply to Patumahoe. However, additional housing in Patumahoe could contribute to the development capacity required across the Auckland Region.
- 9.10. The NPS-UD promotes growth and development capacity in suitable locations. While the plan change area is near the Patumahoe neighbourhood centre zone, it is not well-served by public transport, and there may not be a high demand for housing given the amount of greenfield residential and FUZ zoned land nearby in Pukekohe and Paerata. As above, I have concerns regarding the suitability of Patumahoe for further growth but refer to soil, transport, infrastructure, sustainability and economic experts for a more detailed assessment.

Consistent with any other relevant non-RMA strategies / plans

- 9.11. have undertaken a brief review of the FULSS (2017), Franklin District Growth Strategy (2007), Franklin Local Board Plan (2017), and the Pukekohe-Paerata Structure Plan (2019), and consider the application proposes development beyond what was anticipated by these strategies and plans.

Outstanding Information Gaps

- 9.12. Information gaps relate to uncertainty of the key movement connections across the site as noted above, and how these will be incorporated into the Precinct Plan and/or Precinct Provisions.

Overall Recommendation

- 9.13. While I have concerns regarding the suitability of the plan change area for intensification within the wider regional context, if a decision was made to urbanise this part of Patumahoe, I am able to

support the proposed plan change at the local level subject to the modifications recommended below, as it will provide for:

- Housing within the walkable catchment of the neighbourhood centre, with good walking and cycling connections to services, open spaces and the school
- Employment opportunities within the Light Industrial area, and services that will reduce the need to travel to other centres
- Increased vibrancy within the village centre with more retail and services available
- Improved activation and safety of the Domain
- The urban design effects can be managed through the combination of proposed precinct provisions, and the recommended changes noted below.

Summary of recommended modifications

- A precinct provision is added to limit the number of dairies and cafes within the Sub-Precinct E Light Industrial area to one of each
- The landscape buffer along the south-western boundary of the western sector is increased to 20m in width
- Large specimen trees are included within the road reserves of Sub-Precinct E
- The Cross Sections shown on Figures 6-11 are amended so that the houses shown meet the front yard requirements of the zone
- Changes are made to the Precinct Plan to ensure:
 - a robust location and definition of the western boundary;
 - location of the connection from Mauku Road;
 - Domain frontage road;
 - East-west connection from Mauku Road to Patumahoe Road that links into the road layout for the approved subdivision area in the central sector
- Figure 5 is updated to reflect the road layout shown in the revised Precinct Plan

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

16 June 2021

To: Chloe Trenouth, Consultant Planner for Auckland Council
From: Alyssa Jones, Growth and Spatial Strategy at Auckland Council
Megan Howard, Infrastructure Strategy at Auckland Council
Szening Ooi, Transport Strategy at Auckland Council

Subject: Private Plan Change – PC55 Patumahoe South – Strategic Assessment

1.0 Introduction

- 1.1 This memo provides a combined assessment regarding the consistency of proposed plan change 55 (PPC 55) with key elements of Auckland Council strategy and policy including:
- the quality compact approach, as captured in the Auckland Plan (2050) Development Strategy and the Future Urban Land Supply Strategy
 - the 30-year Infrastructure Strategy
 - the Auckland Unitary Plan objectives and policies relating to efficient infrastructure provision
 - the emissions reductions targets set in Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.
- 1.2 In writing this memo, the following documents have been reviewed:
- Plan Change Request: Assessment of Effects and Section 32 Assessment
 - Appendices to the Plan Change request relating to Transport, Economics, Infrastructure, Stormwater Management, and correspondence with Watercare, Auckland Transport and KiwiRail
 - Clause 23 request for further information and responses relating to planning, parks and open space, transport, stormwater and flooding, water and wastewater
 - Plan Change 55: Summary of Decisions Requested – specifically submissions from Auckland Transport, Watercare, and Auckland Council
 - Plan Change 55: Summary of Decisions Requested
 - Specialist reports – economics, parks and open space, transport and infrastructure.

2.0 The approach to Auckland's growth

2.1 Quality Compact Approach

Auckland is expected to experience significant growth over the next 30 years. To address the growth challenge, the Auckland Plan 2050 has adopted a quality compact approach to accommodating growth. This means that most of this growth will occur in the existing urban area, some growth will occur in a planned and sequenced way in identified future urban areas and limited growth will occur within the existing urban extent of rural towns and settlements.

The approach signals the long-term development priorities for Auckland. These are:

- significant redevelopment and intensification in areas that are already developed
- newly established communities in the future urban areas
- enabling business growth by supporting flexible and adaptable business areas
- limiting residential growth in rural areas to ensure that rural production can continue and develop, while maintaining rural values.

The benefits of taking this approach include:

- better use of existing infrastructure – growing within existing urban areas makes more efficient use of existing assets. Providing physical and social infrastructure costs less per household, which results in a higher overall level of service
- improved transport outcomes – a compact urban form brings more people closer to their place of work. Greater population density supports faster, more frequent public transport

services. Both reduce congestion on the road network and create a more efficient transport network overall.

- rural productivity and character can be maintained – encouraging growth within urban areas helps to protect rural environments. Growth creates more opportunities for environmental enhancement, particularly as part of infrastructure upgrades
- greater social and cultural vitality – concentrating activity into urban centres and neighbourhoods provides a wider variety of activities to meet the full range of people's needs. This brings diversity and vibrancy into the urban environment which in turn enhances interaction and social cohesion.

Growth is enabled throughout most of Auckland's urban footprint¹. The Auckland Plan 2050 Development Strategy indicates that significant growth is anticipated to occur in certain areas. It is expected to be concentrated in the city centre, nodes, development areas and future urban areas. Growth in the existing urban area has been sequenced and prioritised through the adoption of Nodes and Development Areas. Redevelopment in these areas will be of a scale that will require substantial infrastructure and service investment. Only a small amount of growth is anticipated in the wider rural area. The Development Strategy states that this growth is likely to relate to environmental enhancement and existing vacant lots.

Approach to rural growth

As part of the quality compact approach to growth, the Auckland Plan 2050 states that residential growth in Auckland's rural areas will mainly be focused in the rural nodes of Pukekohe and Warkworth. Less growth is anticipated in smaller towns and villages, of which Patumahoe is one. This growth will likely occur on vacant lots in the existing urban extent surrounding the town. In the rural area, to ensure that rural production can continue and develop, land fragmentation and reverse sensitivity must be minimised to safeguard Auckland's land and soil resources.

Timing and Sequencing of growth

In 2015 the Auckland Council adopted the Future Urban Land Supply Strategy (FULSS). This was reviewed in 2017 to reflect changes, particularly through the decisions from the Auckland Unitary Plan process.

The FULSS was developed to provide a long-term, proactive, planned approach to the supply of large areas of rural land for urbanisation. Through the Auckland Unitary Plan approximately 15,000 hectares of land were zoned future urban, a pipeline for the next 30 years. Growth in these areas is expected to require substantial investment in infrastructure and services over a sustained period of time. The FULSS helps to inform council, central government and the private sector in their infrastructure forward planning, delivery and investment decisions.

In 2018 the Auckland Plan 2050 was adopted by Council. Within the Auckland Plan, the Development Strategy gives direction to Council infrastructure providers as to where and when growth will occur and informs the timing and sequencing of infrastructure investment in Auckland Council Asset Management Plans. As part of reviewing the Development Strategy, the timing and sequencing of future urban areas from the FULSS was incorporated into the Development Strategy. This complemented the adoption of development areas and nodes in the existing urban area as a mechanism to understand and support urban areas where significant growth is anticipated over the next 30 years.

Statutory Requirements

As part of the Auckland Plan, the Development Strategy was developed to meet the requirements of the Local Government (Auckland Council) Act LGACA (section 79). However, it was also developed to meet the requirements of the National Policy Statement on Urban Development Capacity (NPS UDC) and was adopted as council's Future Development Strategy in June 2018.

Additionally, as a requirement of LGA 2002 (section 101B) council produces an infrastructure strategy (for a period of at least 30 consecutive financial years) as part of its Long-term Plan.

¹ The urban footprint is a new concept that builds on the concepts of a quality compact Auckland and a Rural Urban Boundary. The urban footprint defines the extent of Development Strategy evidence report June 2018 8 Auckland's existing urban area together with the significant future urban areas sequenced for urbanisation over 30 years

The infrastructure strategy must outline how the local authority intends to manage its infrastructure assets, taking into account the need to:

- (a) renew or replace existing assets; and
- (b) respond to growth or decline in the demand for services reliant on those assets; and
- (c) allow for planned increases or decreases in levels of service provided through those assets; and
- (d) maintain or improve public health and environmental outcomes or mitigate adverse effects on them; and
- (e) provide for the resilience of infrastructure assets by identifying and managing risks relating to natural hazards and by making appropriate financial provision for those risks.

The above strategy documents are consideration as a current council strategy

In August 2020, the NPS UDC was replaced by the National Policy Statement on Urban Development (NPS UD). Council is currently developing its response to give effect to the provisions of the NPS UD. This will include plan changes (to be notified by August 2022) and a review of the Future Development Strategy (FDS), to inform the 2024 LTP.

However, it is also relevant to consider the NPS UD requirements including Policy 8 of the NPS UD which states that:

- Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
- (a) unanticipated by RMA planning documents; or
 - (b) out-of-sequence with planned land release.

2.2 Auckland's Growth

This section summarises the anticipated household, population and employment growth for Auckland as a whole, the Franklin Local Board area and the area surrounding Patumahoe between 2021 and 2051 using Auckland Council's Growth Scenario – i11v6. The purpose of this analysis is to show how the anticipated growth in Patumahoe fits within the context of regional growth and growth within the Franklin Local Board area.

Anticipated Growth for Auckland

Table 1 shows the anticipated household, population and employment growth for Auckland between 2021 and 2051².

Table 1: Auckland's anticipated growth – 2021 to 2051 (Auckland Council Growth Scenario, i11v6)

	Auckland region		
	2021	2051	30-year growth
Household	562,490	847,267	284,777
Population	1,666,599	2,331,181	664,582
Employment	705,461	960,521	255,060

Between 2021 and 2051, Auckland is anticipated to grow by 285,000 households and 665,000 people. It is also anticipated that there will be 255,000 more jobs.

Anticipated growth in the Franklin Local Board area

² Auckland Council's Growth Scenario – i11v6 (August 2020)

Table 2 shows that Franklin Local Board will experience significant growth over the next 30 years. The vast majority of this growth is likely to occur in the Drury-Opāheke Structure Plan Area and in the Pukekohe-Paerata Structure Plan Area³.

Table 2: Franklin Local Board's anticipated growth – 2021 to 2051 (Auckland Council Growth Scenario, i11v6)

	Franklin Local Board		
	2021	2051	30-year growth
Household	29,110	61,867	32,757
Population	76,592	153,058	76,466
Employment	24,163	46,466	22,303

Within the local board area, the population is anticipated to double, and the number of households is anticipated to more than double.

It is anticipated to grow the most of all local board areas in Auckland, both proportionally and by quantum. Overall, 12 per cent of Auckland's total growth is anticipated to occur in Franklin Local Board.

Anticipated growth for Franklin, of approximately 22,000 jobs over the 30-year period in employment is also significant. It represents almost 9 per cent of Auckland's growth in jobs.

Anticipated growth in Patumahoe

As shown in Figure 1, Patumahoe Village spans across two MSM⁴ zones: Zone 584 and Zone 590.

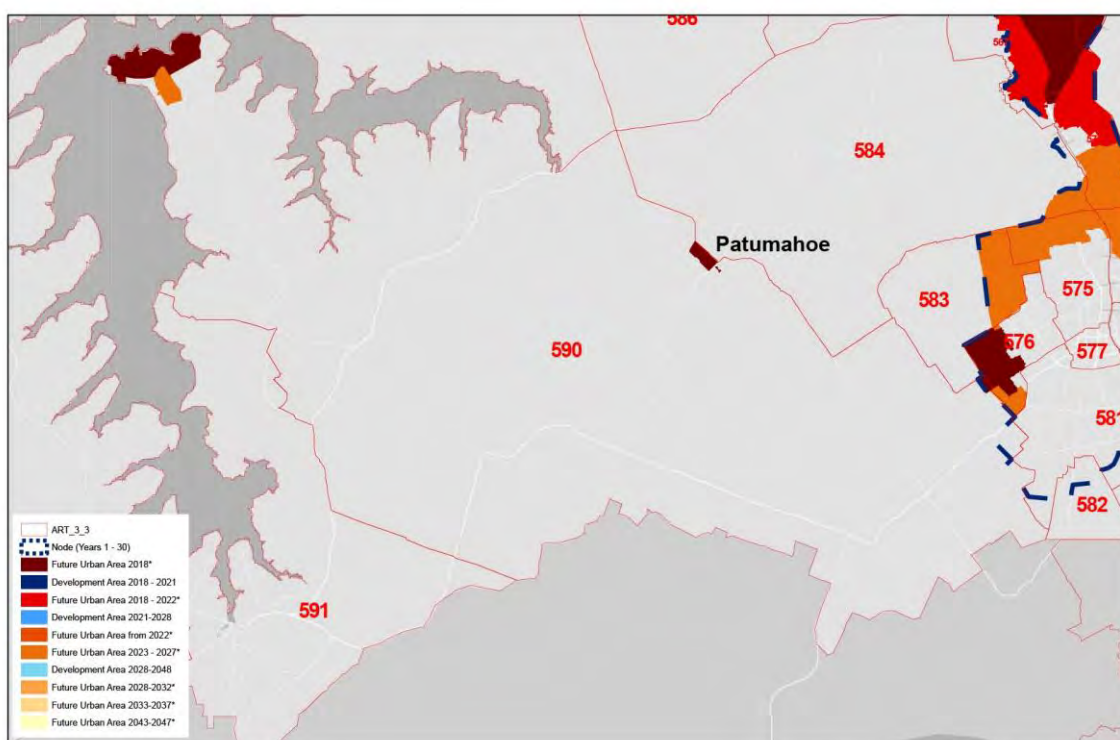


Figure 1: MSM zones

³ The Drury-Opāheke Structure Plan estimates, 22,000 houses, 60,000 people and 12,000 jobs at full build out. However, not all this area is in the Franklin Local Board area. The Pukekohe-Paerata Structure Plan estimates 12,522 houses, 33,809 people and 5,018 jobs at full build out.

⁴ Macro Strategic Model zones - geographic catchments of aggregated Census meshblocks based on transport activity patterns and socio-economic data

PPC 55 largely falls within Zone 590. This zone is largely rural but also contains future urban areas in Glenbrook Beach and the Patumahoe Hill Structure Plan Area. MSM zone 584 is largely rural but does contain very small areas of future urban land on the south eastern boundary. This is associated with the Pukekohe future urban area.

Table 3 summarises the 30-year anticipated growth in MSM zones 584 and 590⁵.

Table 3: Anticipated growth for MSM zone 584 and 590 – 2021 to 2051 (Auckland Council Growth Scenario, i11v6)

MSM zone	Household			Population			Employment		
	2021	2051	30-year growth	2021	2051	30-year growth	2021	2051	30-year growth
584	667	1040	373	1994	2763	768	494	526	33
590	1493	2750	1257	4220	6902	2682	1149	1,149	0
Total	2160	3790	1630	6214	9665	3450	1642	1,675	32

Between 2021 and 2051, there is anticipated to be growth of 1630 households, 3,450 people and 32 jobs across the two MSM zones.

Within MSM 590, the FULSS anticipates approximately 1,050 dwellings in Glenbrook Beach⁶ and 109 dwellings for the Patumahoe Hill Structure Plan Area⁷, total 1,159 dwellings not including general infill growth. PPC 55 would increase this to 1,409 dwellings not including the development capacity within existing Patumahoe Village contained on 42 vacant sites⁸.

2.3 Applicant's growth assessment

This section comments of the Applicant's assessment of projected growth for Patumahoe.

Page 11 of the applicant's economic impact assessment includes an assessment of population and household growth for Patumahoe using Statistics New Zealand projections. A map showing the geographic area the projections relate to was not included in the report. It is assumed the geographic area is the Patumahoe CAU from the 2017 Census Area Unit (CAU) dataset.

As shown in Figure 2 below, the 2017 CAU boundary contains an area much broader than Patumahoe, which is largely rural. Therefore, it cannot be assumed that all growth projected in the Patumahoe CAU will occur in Patumahoe Village itself.

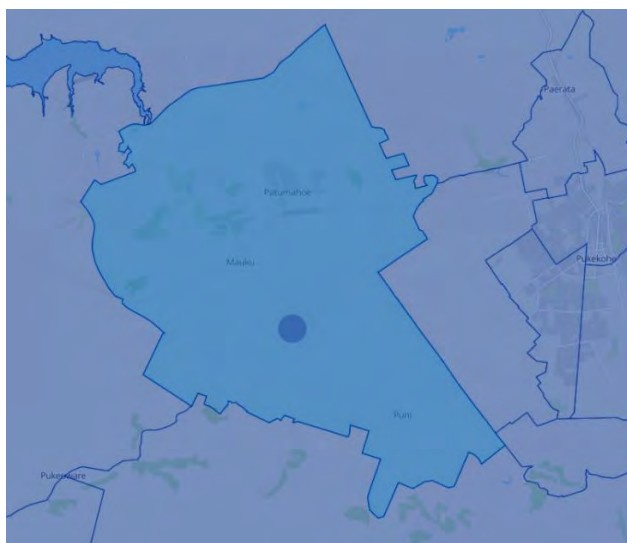


Figure 2 Patumahoe CAU 2017

⁵ Auckland Council's Growth Scenario – i11v6 (August 2020)

⁶ In the FULSS, 843 dwellings are live zoned, the remaining 207 dwellings are sequenced in the second half of decade 1 – 2023-2027

⁷ 109 dwellings are live zoned in the FULSS

⁸ Auckland Council's Urban Economic Effects Assessment report for PPC 55 (Fairgray, 2021)

Auckland Council's Urban Economic Effects Assessment report states that the projections provided for the Patumahoe CAU cover both the existing urban village area as well as a substantial area of surrounding rural and rural lifestyle areas. The report notes that this is important because the projections therefore include growth in both urban households within the village as well as growth in non-urban lifestyle properties outside of the urban area.

"The projections suggest that Patumahoe CAU total urban and non-urban households will grow from 1,050 households in 2018 to between 1,500 and 1,650 households by 2038 – a net increase of between 550 and 600 households. This includes both urban households within Patumahoe as well as lifestyle and rural households in the surrounding area (Fairgray, 2021)."

Auckland Council's Rates Assessment data can be used to estimate number of dwellings within a small area, like Patumahoe. The data indicates there were around 380 dwellings in Patumahoe Village in 2017, around a third of total dwellings in the Patumahoe CAU. Therefore, only a portion of the projections for the Patumahoe CAU may eventuate in Patumahoe Village itself.

2.4 Does proposed PPC 55 deliver the quality compact approach?

The applicant argues that PPC 55:

Promotes the development of a quality compact urban form for the settlement that is easily accessible from the town centre, community and recreational facilities, school and sports facilities;

The applicant has applied the quality compact approach at the local scale but, in doing so, has removed it from its regional context. The Auckland Plan 2050 prioritises most growth in the existing urban area and some growth in future urban areas to ensure growth in rural towns and villages is limited. This generally means that the urban area of rural towns and villages will not be extended. Therefore, from a strategic perspective, PPC 55 is not consistent with the regional application of the quality compact approach to growth.

Makes efficient use of land within the plan change area, while providing for a development outcome that is consistent with the established character and amenity of Patumahoe;

The zoning pattern proposed as part of PPC 55 is consistent with the zoning pattern in the existing Patumahoe area. However, development in PPC 55 could increase the size of Patumahoe by over 50 percent, when compared to the existing dwellings from Auckland Council's rate assessment data. Development of PPC 55 has the potential to significantly change the established character and amenity of Patumahoe. Therefore, it cannot be assumed that the development will be consistent with the established character and amenity of Patumahoe.

Will enhance linkages to existing reserve and open space areas and establishes a new open space network with multi-modal access (walk, cycle, motor vehicle);

Although the applicant demonstrates enhancement of linkages within Patumahoe, it does not promote multi-modal linkages to employment areas outside Patumahoe. As explained in Section 4 below, 78 per cent of movements out of Patumahoe are by private vehicle and the applicant has not provided sufficient evidence to show that PPC 55 would result in a different transport pattern.

3.0 Impact on long-term infrastructure planning

3.1 Efficient infrastructure provision

Auckland Council's strategic direction towards a quality compact city is evident in the Auckland Unitary Plan (AUP). A number of interrelated objectives and policies embed the quality compact approach into the AUP, including with particular reference to infrastructure provision, for example:

*B2.2.1(1) A quality compact urban form that enables all of the following:
(c) better use of existing infrastructure and efficient provision of new infrastructure;*

And related objectives and policies B2.3.1(1)(d), B2.4.2(6), B2.5.1(3)(b), B2.5.2(8), B2.6.1(2), B2.6.2(1), B3.2.1(1)&(5), B3.2.2(1)&(2).

These provisions contain two common aims that are relevant to this application:

- that new development can be adequately serviced by infrastructure; and
- that infrastructure is efficiently provided, operated, maintained and upgraded.

The first of these points has been considered by technical specialists from each of Auckland Council's infrastructure portfolios (Watercare, Auckland Transport, and Auckland Council's parks and stormwater departments) and by other infrastructure providers, so will not be addressed further here.

On the second point, efficient infrastructure is not defined in the Auckland Unitary Plan. It is considered that the efficiency of infrastructure is a balance of inputs and outputs, with an aim of delivering the greatest service or benefit to the community/environment at the least cost (effectively a cost benefit analysis). The contributing factors are numerous and are not always easily quantified but can be considered in relation to the following:

Expansive v compact development patterns

The cost of development is, to a large degree, driven case-by-case by local factors such as land suitability, infrastructure form and hazards as well as development patterns. However, some generalisations can be made about the link between the density of development and the cost-efficiency of infrastructure provision. In principle, higher density development means that a larger population can be served by the networked infrastructure, at a lower cost per capita⁹. Additionally, though not necessarily directly comparable, the infrastructure cost of expansive growth into the greenfields is generally 2-4 times that of increasing densities in the brown fields¹⁰ that can make good use of existing infrastructure. Therefore, it is usually less efficient to provide infrastructure to low-density, greenfield development.

At a whole-of-city level, this principle was tested in the development of the Auckland Plan 2012 through the pricing of the infrastructure required to service different growth scenarios. The most compact and dense scenario was found to be most cost effective to service overall¹¹.

Case-by-case costs

When considering the infrastructure costs and benefits of an individual development it is important to consider those costs and benefits borne by the direct beneficiaries of the development and by the wider community.

1) Costs borne by the developer

The infrastructure costs of a development borne by the developer commonly include the following.

The capital costs of providing infrastructure within the development area. This would often include local roads and three-waters assets for connecting to the wider network or catchment. These assets are usually constructed by the developer for eventual vesting in Council. Individualised funding agreements are also a common feature for capturing the costs of development, particularly when it is more efficient for Council to take on the provision of local infrastructure where it may be better integrated with neighbouring developments or provide better outcomes for the wider community. An example of this is where a developer may contribute to a Council-provided a catchment-wide stormwater solution such as treatment pond instead of providing treatment specifically for the development area.

Indirect capital costs of growth infrastructure are also, in principle, borne by the developer. This may include, for example, the cost of upgrading an arterial road or water treatment plant on which the development will increase pressure. Auckland Council group has tools to capture these indirect infrastructure costs, including Auckland Council's development contributions (which contributes to transport, stormwater and parks) and Watercare's Infrastructure Growth Charges (for water supply and wastewater). It is known that these tools do not yet capture the full costs of development and,

⁹ Do Denser Urban Areas Save on Infrastructure? Evidence from New Zealand territorial authorities. Policy Quarterly, 2016

¹⁰ [SGS-Economics-and-Planning-Comparative-costs-of-infrastructure-across-different-development-settings.pdf](https://www.infrastructurevictoria.com.au/SGS-Economics-and-Planning-Comparative-costs-of-infrastructure-across-different-development-settings.pdf) (infrastructurevictoria.com.au)

¹¹ [appendix-3-1-5a.pdf](https://www.aucklandcouncil.govt.nz/appendix-3-1-5a.pdf) (aucklandcouncil.govt.nz)

while this varies from location to location, the infrastructure required to support growth is often subsidised (by more than 50 per cent¹²) by the ratepayer and taxpayer.

2) *Costs borne by the community*

It is on the basis of the costs above, that a developer would normally make a cost benefit assessment – the cost to service the development versus the service (benefits) for which potential property owners would be willing to pay. However, a truer assessment of the efficiency of growth infrastructure would also include the costs and benefits carried by the wider community, including the following.

The costs to operate and maintain the new infrastructure. These are funded by the community through rates and user charges in the same way that our existing infrastructure is funded. The operational expenditure generated by growth infrastructure will vary case-by-case, but it is logical to assume that if infrastructure that has been established inefficiently, that the ongoing cost of maintaining that asset will only decrease the cost/benefit ratio or efficiency of the infrastructure. For example, the community will need to fund the operation and maintenance of a new stormwater network in the development area. If the development had instead occurred in a location where there is an existing network with capacity, or that could be altered to a degree, there may have been no, or minimal, additional maintenance and operational costs for the community.

Uncertainty generates costs. Infrastructure investment is typically large and takes time (multiple years from a project inception to construction) and planning for this type of investment is most efficient when there is a high level of certainty. This certainty often plays out through infrastructure planning that is anchored to:

- Growth plans – in this case the Auckland Plan 2050, FULSS and the Auckland Unitary Plan;
- The outcomes that need to be delivered by the service, commonly captured as Levels of Service (LoS) and generally established on a three-yearly basis. These LoS measure outcomes from the infrastructure services such as congestion levels for transport or flooding for stormwater; and
- Resource-based bottom lines, for instance water supply and wastewater capacity is heavily influenced by the amount of water available and the consented discharge limits.

Unanticipated development that requires diversion from the growth plan can generate costs (and therefore reduce efficiency) by:

- Duplicating or diverting planning effort – this can result in significant costs in the context of a multi-year planning, design, consenting, and construction process.
- If infrastructure providers have reduced certainty of the likely growth pressures in an area they are forced to take on additional risk in their network planning. For example, infrastructure providers are always faced with decisions around sizing pipe or road assets for the current level of demand, the addition of a new development or an eventual build out of a catchment (or a number of scenarios in between). Elevated uncertainty around growth increases the level of risk associated with these decisions and these risks translate to cost as oversized infrastructure costs the community extra to build operate and maintain, and undersized infrastructure costs the community to upgrade again in a short timeframe, while the asset still has useful life.

For these reasons, the integration of land use planning and infrastructure development is generally considered efficient and is encouraged. This is reflected in the National Policy Statement on Urban Development 2020, which also recognises the value of integrating urban development decisions with infrastructure planning and funding decisions (Objective 6).

It is worth noting also that there are potential benefits associated with unanticipated growth infrastructure. Growth in demand and growth infrastructure projects may provide opportunities or justification for wider improvements to be provided efficiently via renewals, upgrades, or provision of new or improved services.

¹²<https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/docspolicy2019/how-set-development-contribution-charges.pdf>

In a similar way, it is expected that the potential costs and benefits of uncertainty and change in planned growth would also apply to other publicly funded infrastructure – such as that provided by Waka Kotahi, KiwiRail, the Ministry of Education, the Ministry of Health, and the emergency services - and be borne by the general community via taxes or under provision.

3) *Non-financial costs*

There are various social costs and benefits associated with growth infrastructure development that are not captured in the financial cost of infrastructure, but are nonetheless borne by the community, these include:

- Cost of congestion
- Viability and benefit of public transport, or cost of its absence
- Cost of increasing emissions or benefit of reducing emissions
- Benefits of social infrastructure such as the availability of public open space, or the cost of lack of sufficient public open space.

3.2 Does proposed PPC 55 deliver efficient infrastructure provision?

Existing environment

The proposal for PC55 to extend infrastructure and demands on infrastructure should be considered in the context of both the immediate existing infrastructure and the ability of the wider environment to absorb the additional pressures of the development.

The existing infrastructure in the area services the current rural level of development. Including:

- Roads around the edges of the site;
- A railway along the southern edge of the site;
- Farm drainage and limited public stormwater;
- Public water supply and wastewater provides for adjacent Patumahoe present around the edges of the site;
- No public open space or community infrastructure is present, but Patumahoe Recreation Reserve is adjacent to the site.

With regard to the ability of the wider environment to take on additional pressures of the infrastructure required to service the development, the following is noted:

Auckland Council budgets are tight. The council is in the process of developing the 2021-2031 LTP, which has included clear acknowledgement that the budget balances rising investment demand with reduced investment capacity. In this context, the LTP also includes a more focussed approach to growth – the council is not in the position to cover all the potential costs of growth this focussed approach will direct funding towards the highest priority growth areas¹³. On this basis, it is clear that any new, or unexpected growth cannot be simply accepted, it will either displace investment that is currently prioritised – which increases the risk that our infrastructure portfolios are unable to meet our committed levels of service - or will not be funded in the foreseeable future. By allocating limited infrastructure funding inefficiently to piecemeal development, it is difficult to invest in more efficient planned development and therefore risk servicing fewer dwellings with the same amount of money.

Council's growth plans are also under constant pressure. As at April 2021, 32 private plan changes had been notified since the moratorium on private plan changes to the Auckland Unitary Plan was lifted. These private plan changes together represent accumulating pressure on planned infrastructure investment which, from the perspective of Council's current budget challenges, are at a point where pressure cannot be absorbed and instead would result in displacement of investment that was planned for other priorities.

Anticipated infrastructure

¹³ <https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/the-10-year-budget-2021-2031-long-term-plan-consultation/Documents/10-year-budget-2021-2031-consultation-document.pdf>

Servicing of the PPC 55 site is not yet agreed in concept or developed in detail (noting submissions in opposition or requesting changes and additional information from infrastructure providers such as Watercare and Auckland Transport), but is generally expected to include the following and is planned, at least in part, for vesting in Council:

- Development of a stormwater network including pipes and a treatment/detention wetland.
- There is a significant amount of infrastructure required to supply this proposal, not including the internal supply throughout the development. All infrastructure associated with the supply to, from and within the development would need to be fully funded by the developer. Water and wastewater networks would require extension and upgrades, which has been indicated by Watercare Services Ltd as likely to cost surplus of \$60 million.
- An internal road network and connections to existing AT roads.
- Potential provision of public open space.

The application document states that the proposal *“Utilises available capacity within the existing network infrastructure (particularly in wastewater) and proposes a new internal reticulated network, to be established as the subject land is subdivided, that does not necessitate any public expenditure ”* .

As discussed below, a contrary view is held and it is considered that the proposal does not make good use of existing capacity and does not necessitate public expenditure.

Assessment – does the proposal represent efficient infrastructure?

Clear data is not available to quantify the efficiency of the anticipated infrastructure in order to estimate the effect of the PPC 55. However, the efficiency of the infrastructure provision is a relevant objective of the AUP and it is possible to provide an indication of how PPC 55 aligns with factors discussed above. In this regard, the following is noted:

Efficiency Factor	Assessment
Density of development	PPC 55 is low density and adds additional low density development to the wider area in the south of the region. This is generally indicative of low-efficiency infrastructure.
Greenfields / Brownfields	PPC 55 is located in a rural greenfields area that was unplanned for, which broadly indicates a greater cost (lower efficiency) to provide infrastructure than in the brownfields and does not make use of any planned infrastructure. However, the location of PPC 55 adjacent to existing transport, water supply and wastewater network lessens the extent of the greenfield factor.
Contribution to direct costs of development	In principle, the beneficiaries of PPC 55 will be asked to pay the direct and indirect costs of infrastructure provision for the development via Development Contributions, Infrastructure Growth Charges and potentially individualised funding agreements. This should ensure that the infrastructure costs to the developer are less than the benefits generated by infrastructure servicing, however, as Council is generally unable to fully recover these costs, this does not provide clear indication of the efficiency of the proposal.
Generation of wider capital costs/benefits	<p>PPC 55 will alter the assumptions that form the base of water supply, wastewater and transport plans for the region’s south. The development would create additional pressure for bulk infrastructure required to service the wider southern growth area. Any additional pressure can result in the need to bring forward upgrades, reduce the length of time that a project is effective in delivering outcomes, or reduce the levels of service that can be delivered.</p> <p>This is understood to be a particularly relevant example in the case of the pressure that the PPC 55 development would place on the broader water and wastewater network. In principle, bulk infrastructure is funded through the Infrastructure Growth Charge. In this case, the additional connections generated by the development have the potential to trigger significant expenditure on bulk services. The associated costs have not yet been assessed, but are expected to far exceed the revenue that would be generated by the Infrastructure Growth Charge:</p> <ul style="list-style-type: none"> • The Pukekohe wastewater treatment plant (which the development would connect to) has been sized to deliver for the population that is projected and

	<p>planned for within the existing connected area and future urban zones. Any extension beyond this population would erode Watercare’s ability to deliver services within that area.</p> <ul style="list-style-type: none"> • The consented discharge from the Pukekohe wastewater treatment plant is also connected to the population planned within the existing connected area and future urban zones. An increase in this population could breach current consent requirements and potentially require that the consent be altered at significant cost. As the outcome of a consent process cannot be anticipated, this creates added uncertainty and risk to the wastewater infrastructure planning. <p>Watercare advice that is being relied upon by the applicant is dated 2018 and was provided on the basis of a development potential of 180 dwellings. As PPC 55 now includes up to 250 dwellings and a light industrial development, additional clarification from Watercare would be useful to understand at which point the proposed development would trigger these potentially significant bulk infrastructure costs, and therefore whether PPC 55 could result in unacceptable costs to be shouldered by the community.</p>
Generation of wider operational costs/benefits	<p>PPC 55 has the potential to generate unanticipated and potentially inefficient operational expenditure in perpetuity.</p> <ul style="list-style-type: none"> • Public transport – the development would trigger the need for additional bus facilities, as indicated in Auckland Transport’s submission. Any additional facilities would need to be operated and maintained in the long term, while servicing a relatively low-density area of development. • As currently drawn, PPC 55 would add both open space and stormwater reserve land that is expected to be vested in Council. If the nature, size and design of this land is not appropriate for the infrastructure needs of the site and community, it may add unnecessary maintenance and operational costs to be shouldered by the ratepayer.
Generation of social costs/benefits	<ul style="list-style-type: none"> • Increased congestion, in an area that currently experiences significant congestion • No evidence has been provided in regard to opportunities generated by the project for infrastructure improvements, renewals, growth projects or otherwise to piggyback off the infrastructure projects triggered for PPC 55. It is not anticipated that there is any notable community wide benefit to be derived from the infrastructure incorporated in the development as it is either local to the development (parks and stormwater) or already planned in response to pressures in the wider south of the Auckland Region.

Considering the points above, the infrastructure provision for PPC 55 is not entirely inconsistent with the relevant objectives and policies of the AUP, but does not provide a good example of efficient infrastructure and service provision. The proposal is located adjacent to existing infrastructure networks and will comply with the requirements to contribute to the infrastructure costs that it is inducing via the charging of DCs and IGCs. However, the costs of infrastructure provision, operation and maintenance are likely to be much more significant than those captured and will, in one way or another, result in costs borne by the wider community. Within the context of the Council’s current financial challenges, it is also worth noting that no costs are budgeted for this development and any additional, unanticipated, costs will require funds to be diverted from other investments that are currently prioritised. Alternatively, any costs generated by the development or to mitigate its effects may not reach the top of any prioritisation in the foreseeable future.

4.0 Te Tāruke-ā-Tāwhiri: Auckland’s Climate Plan

4.1 Auckland’s response to the climate change emergency – transport emissions

Carbon Dioxide (CO₂) is the primary greenhouse gas emitted by road transport modes. CO₂ is a long-lived greenhouse gas (GHG), meaning it accumulates and has long-lasting implications for climate.

The scale of population growth in Auckland and how it is distributed will have material effects on travel demand, mode choice and emissions.

Quality compact growth can support the emissions reduction and mode shift agenda articulated in Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan, the Climate Change Commission's draft advice and the Government Policy Statement on Land Transport 2021-2031. For transport the relevant attributes of quality compact growth include:

- relatively high development densities,
- land use diversity
- street network connectivity
- destination accessibility
- relatively short distances to high quality public transport.

Quality compact development can support emissions reduction and mode shift by mitigating Vehicle Kilometres Travelled (VKT) among new residents and providing a locus for ongoing efficient and effective investment in walking and cycling and public transport, benefitting the incumbent population.

Te Tāruke-ā-Tāwhiri and the Climate Change Commission's draft advice both articulate targets pertaining to reductions in VKT:

- Te Tāruke-ā-Tāwhiri (Auckland region-specific) – 12 per cent reduction in total private vehicle VKT by 2030 against a 'business-as-usual' scenario
- Climate Change Commission (national) – 7 per cent reduction in average household travel distance per person by 2030 against a 2018 baseline.

4.2 Does proposed PPC 55 contribute to Auckland's transport emission targets?

The proponent's transport consultant concludes that the new development enabled through PPC 55 will generate in the order of 3,090 new private vehicle trips per weekday including around 2,340 from low-density residential and around 750 from light industry. These volumes are estimated from generic trip generation rates published by the New South Wales Roads and Maritime Services, reflecting relatively low mode shares of overall travel for public transport, walking and cycling. The consultant states (p31 of the ITA): "...trips to/from Patumahoe will still heavily depend on private transport..."

Most home-based trips will be district or subregional in nature because of the low number of local employment opportunities relative to residential units in Patumahoe: the transport consultant allows for 0 per cent internal trip capture in the network assessment. Furthermore, there are limited local non-employment destinations to attract trips (including walking and cycling trips) and safe local leisure routes available.

PPC 55 is a straight-line distance of around 38 kilometres and a road network distance of about 51 kilometres from the Auckland central business district.

In their comments on the draft ITA, Auckland Transport notes (p1) "*No wider network improvements are proposed by AT for walking and cycling. There are no network linkages and no likelihood of network linkages from known cycleway plans and funding sources.*"

Patumahoe has a high proportion of existing residents who travel to work by car. In the 2018 Census, 78 per cent of respondents residing in Patumahoe drove a car, truck or van to work. In comparison, only 5 per cent travelled by public transport or active modes to work.

The journey-to-work mode share profile for Patumahoe is similar to other rural townships such as Pukekohe and Riverhead but car driver mode share is much higher compared with metropolitan centres such as Takapuna and Newmarket (see Figure 3). This reflects differences in access to and the accessibility of jobs by public transport, plus the accessibility of jobs by convenient and safe walking and cycling networks.

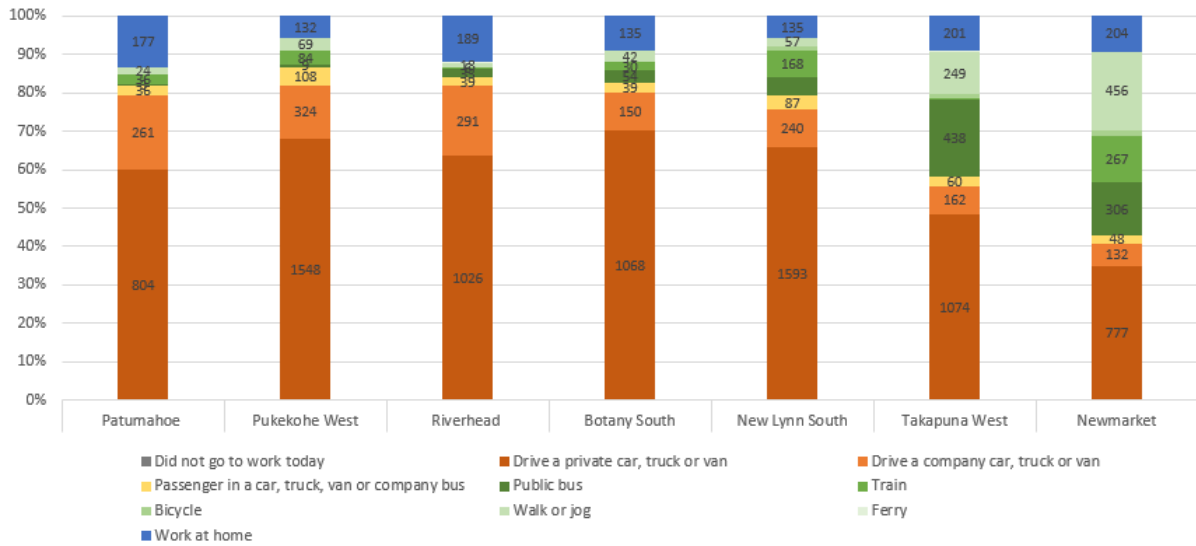


Figure 3 Comparison of main means of travel to work for select locations (SA2) (Source: StatsNZ, Census 2018)

Patumahoe is projected to have relatively low levels of employment accessibility in the next ten years. Transport modelling undertaken of the ATAP 2021-2031 investment package shows very low numbers of jobs accessible within a 30-minute car ride and 45-minute public transport ride for Patumahoe (see Figure 4 and Figure 5).

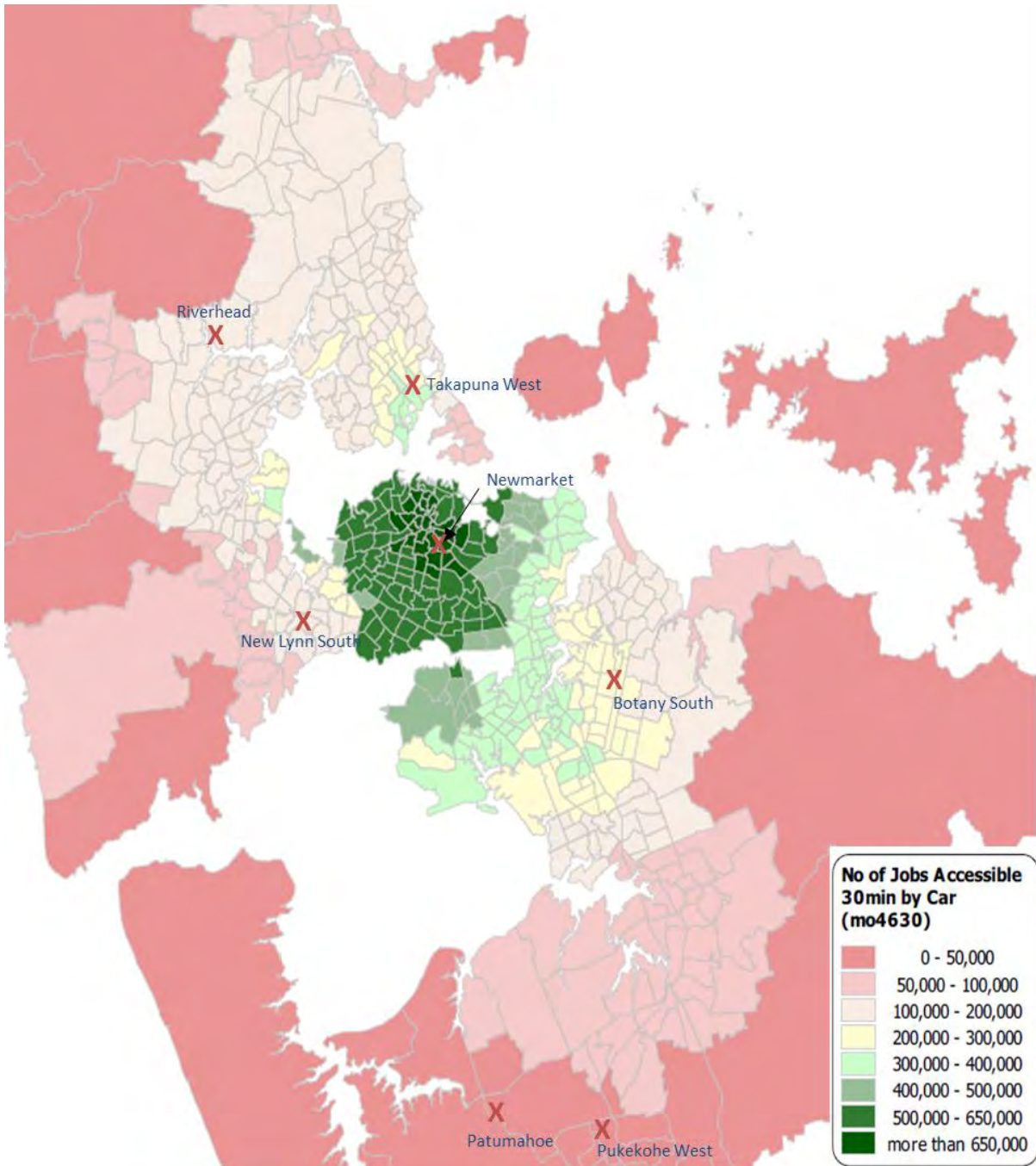


Figure 4 Projected number of jobs accessible in 30 minutes by car – 2031 AM peak period (Source: transport modelling associated with ATAP 2021-2031)

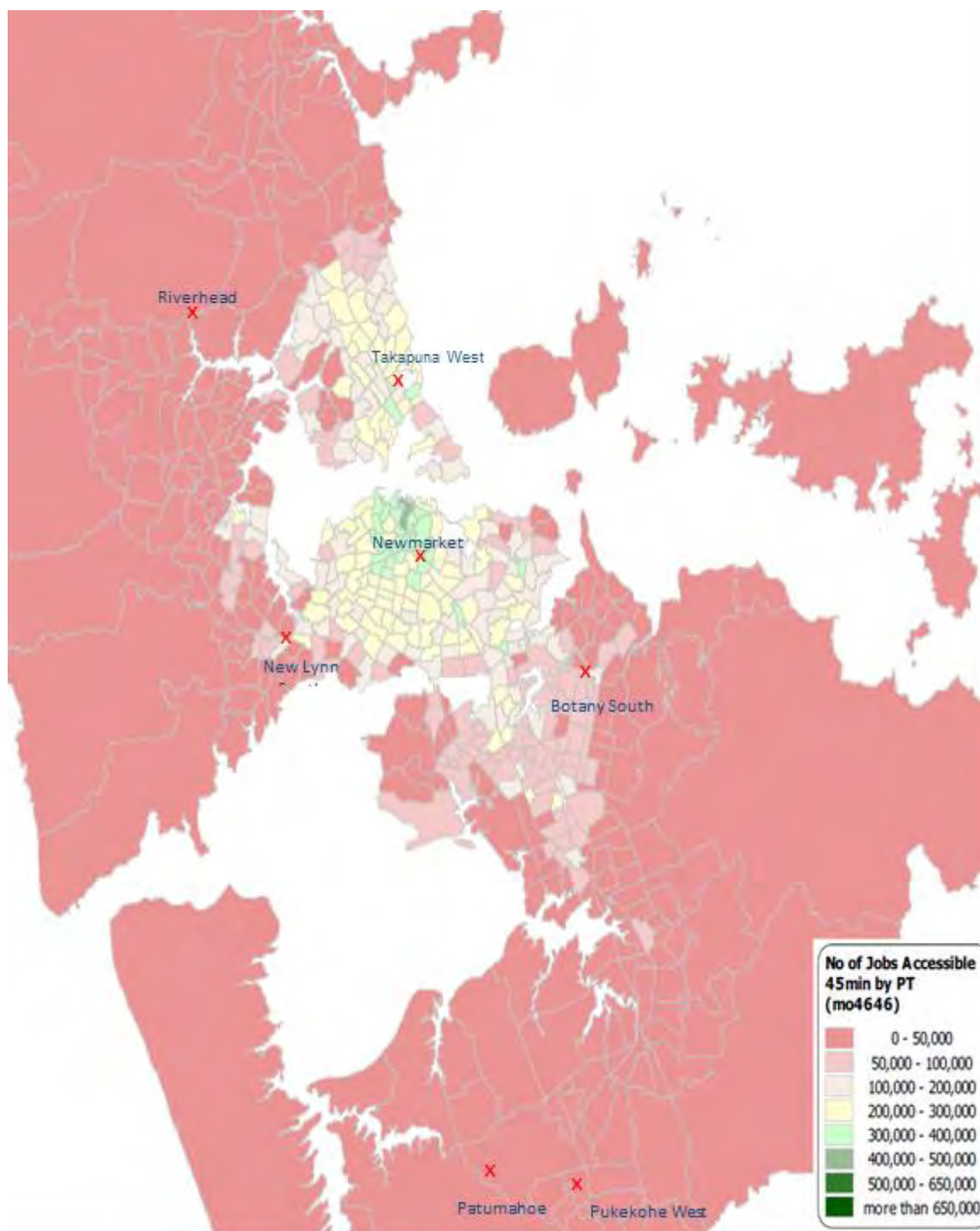


Figure 5 Projected number of jobs accessible in 45 minutes by public transport – 2031 AM peak period (Source: transport modelling associated with ATAP 2021-2031)

There is limited evidence that the development as proposed will achieve the outcomes asserted by the transport consultant in the ITA; namely that (p36) “...the plan change will provide the opportunity for Patumahoe to be better integrated to the wider transport network; it will offer better internal connectivity and will encourage active travel modes such as walking and cycling.”

In particular, Auckland Transport notes (p5 of their comments on the draft ITA) “The proposal has weaknesses in Focus Area 5 [of the Auckland Plan] Better integrate land-use and transport, since this Focus Area concentrates on encouraging growth into areas with better travel choices.”

While the development yield associated with PPC 55 is relatively modest, a significant majority of trips are likely to be by private vehicles and outside of Patumahoe, adding to VKT and contrary to action required to fulfil the goals and targets articulated in Te Tāruke-ā-Tāwhiri and the Climate Change Commission's draft advice. The urgency and scale of emissions reduction required in accordance with Te Tāruke-ā-Tāwhiri, especially means any negative climate impacts of growth should be avoided.

4. Conclusions and recommendations

This memo has assessed PPC 55 consistency with notable and relevant aspects of Auckland Council's strategy, policy and plans, in particular:

- The Auckland Plan 2050 Development Strategy (including the Future Urban Land Supply Strategy);
- Objectives relating to the efficient provision of infrastructure in the Auckland Unitary Plan;
- 30-year Infrastructure Strategy; and
- Te Tāruke-ā-Tāwhiri Auckland's Climate Plan.

The assessment shows that the proposal does not deliver on the stated objectives of these documents and may, in fact work against them. Specially:

PPC 55 is not consistent with the quality compact approach at a regional scale as the proposed growth in this rural location is contrary to the growth areas prioritised through the Auckland Plan 2050. The wider Franklin Local Board area is expected to experience growth pressures over the next 30 years. However, the capacity already planned for via the Auckland Plan 2050 and FULSS is sufficient to accommodate this growth, therefore PPC 55 is not needed to satisfy an unmet demand.

The location of the site, adjacent to some existing infrastructure is not entirely inefficient to service. However, the proposed development location is likely to generate significant additional costs and pressures for our infrastructure networks which will be borne, to a large degree, by the wider community. The financial costs come at a time when Auckland Council has little ability to accommodate additional pressures and therefore, if met, would be at the expense of other community needs.

PPC 55 is relatively small, but its location in the urban fringe – removed from employment centres and other key destinations, coupled with a lack of any planned improvements to enable walking, cycling and public transport connections to the wider network, would likely generate a high percentage of private vehicle travel by residents. This is not consistent with national and regional climate goals, which seek to significantly reduce transport emissions by curbing private vehicle travel.

Based on the assessment presented in this memo, PPC 55 is not supported due to its inconsistency with the Quality Compact approach to growth, the likely unplanned additional infrastructure cost generated, and the pressure placed on existing networks, as well as inconsistency with national and regional climate goals, such as those in Te Tāruke-ā-Tāwhiri – Auckland's Climate Action Plan.

1st June 2021

To: Chloe Trenouth – Consultant Planner, Auckland Council
From: Iresh Jayawardena, Senior Healthy Waters Specialist, Healthy Waters
Nimal Gamage, Senior Healthy Waters Specialist (Catchment Planning)

Subject: Private Plan Change – PC55 – Patumahoe South – Stormwater Assessment

1.0 Introduction

- 1.1 We have undertaken a review of the private plan change, on behalf of Auckland Council in relation to effects on the stormwater management
- 1.2 The proposed plan change 55 (PC55) seeks to rezone approximately 35 ha of land from Rural – Production and a small portion of Residential Single House to a mix of urban zones as Residential-Single House, Light Industrial and Open Space. The proposal also rezones the 9ha of Rural – Production land as Future Urban.
- 1.3 The PC55 enables the development of approximately 200 – 250 new dwellings within the land to be zoned as Residential-Single house; and approximately 2.5 ha land for Light – Industrial development.
- 1.4 Future greenfield development in the PC55 area also seeks to utilise the Auckland-Wide Regional Network Discharge Consent (NDC) to authorise diversion and discharge of stormwater. Following a meeting held between Healthy Waters and Mr Jack MacDonald on November 2020, a further updated Stormwater Management Plan (SMP) version D, dated 6th May 2021, was received in supports of PC55. Healthy Waters has reviewed the recent SMP. However, at the time of drafting this memo, the provisional approval was not granted for adoption by Healthy waters under Council's Region Wide NDC.
- 1.4 In writing this memo, we have reviewed the following documents:
 - Patumahoe South: Private Plan Change request assessment of effects and section 32 assessment (ref 27143), dated 26th June 2020 and prepared by Envivo
 - Stormwater Management Plan – version D, dated 6th May 2021 and prepared by Tripp Andrews
 - Clause 23 comments to Council's stormwater and flooding feedback, dated 16th April 2020 and prepared by Tripp Andrews
 - Infrastructure Report, version B, dated 26th June 2020 and prepared by Tripp Andrews
 - Proposed amendments to I430. Patumahoe Precinct Plan
- 1.5 Submissions received in relation to stormwater matters have also been reviewed and assessed.

2.0 Key stormwater Issues

- 2.1 The key stormwater management issues are summarised below; these are discussed further in section 4

Hydrology mitigation

- 2.2 The geological formation of the plan change area contains volcanic basalts and Kaawa formation. Subsurface investigation of the plan change area indicates the site is underlying South Auckland Volcanic soils. A large portion of the plan change area (Catchment 1 and Catchment 2) is also covered by High-Use Stream Management Area overlay, High-Use Aquifer Management Overlay and the Quality-Sensitive Aquifer Management Overlay under Auckland Unitary Plan (AUP).

2.3 Mauku stream flows adjacent to the proposed plan change area. The immediate receiving environment for the stormwater discharge from the proposed large wetland is the Mauku Stream, a High Use Stream Management Area under the AUP. It is identified that the Mauku sub-catchment in the Franklin area contains streams that are threatened by high-use or take of groundwater (AUP D3.3 (1) (h)). Therefore, the High Use Stream Management Area overlay under the AUP ensures that taking is enabled while maintaining these streams' life-supporting capacity. The objectives and policies of RPS Chapter B7.3 seek to avoid adverse effects on freshwater systems from inappropriate subdivision and development. Policies B7.4.2 (11) (c) requires promoting the efficient allocation of freshwater by:

(c) safeguarding spring flows, surface waterbody base flows, ecosystem processes, life-supporting capacity, the recharge of adjacent aquifers, and geothermal temperature and amenity;

AUP Chapter D3 High-Use Stream Management Area overlay provides objectives (D3.2 (1)) and policies (D3.3 (1)(h) and (2)) to manage and safeguard streams within the catchments. It is considered that PC55 does not place a demand to take water from the stream directly. However, the proposed development from PC55 will create impervious areas that will adversely affect groundwater recharge and, thereby, the stream's baseflow.

2.4 Given the PC55 area is underlain by volcanic soils, which have high infiltration rates, there is a good potential to utilise soakage as a stormwater management method. Soakage will further assist streams in maintaining a healthy base flow and recharging the aquifer systems. Subject to geotechnical assessment, the revised SMP provides scope for incorporating soakage to recharge groundwater. The revised SMP also provides scope to utilise stormwater retention, such as rainwater harvesting to on-site mitigation, where soakage is not practicable.

Water quality treatment

2.5 In terms of water quality treatment, the PC55 intends to provide water quality treatment for the entire plan change area using the proposed wetland detention basin. The wetland is to be designed as per GD 01, Auckland Council Guideline Document - Stormwater Management Devices in the Auckland Region 2017.

Flooding

2.6 The PC55 SMP proposes to provide a reticulated pipe network designed for 10% AEP flows to convey runoff from individual lots to the stormwater network, which will discharge to a stormwater wetland located in the south-eastern part of the catchment. The wetland will be designed to attenuate post-development stormwater flows to pre-development levels up to 1% AEP to mitigate the potential for downstream flooding, stream erosion and stormwater quality treatment from the entire PC55 area.

3.0 Applicant's assessment

- 3.1 The applicant's s32 Planning Report and the Stormwater Management Plan discuss the assessment of stormwater management and its effects.
- 3.2 Section 5.4 of the Planning Report describes the proposed stormwater management approach for the land to be rezoned. The Stormwater Management Plan discusses details of the existing site characteristics, catchment/sub-catchments, and the nature of the receiving environment.
- 3.3 Section 8 of the SMP describes that:
- Stormwater runoff from the 50%, 10% and 1% AEP storm events will be appropriately mitigated on-site before discharge to the downstream environment
 - The development provides groundwater recharge as a priority to maintain stream baseflows supporting the two methods of on-site stormwater mitigation as per standard I430.6.5.
 - All post-development runoff flows up to 1 per cent AEP will be managed to the pre-development levels to avoid any actual or potential adverse effects on the downstream.

- The pipe network will be designed to accommodate runoff events up to and including 10 per cent AEP, and runoff from individual properties will be connected to the network. It will be discharged to the proposed wetland via two outlets structures.
- A wetland will be designed in accordance with GD01 to ensure peak velocities of 0.1m/s for up to 50% AEP and 0.5m/s for up to 10% AEP storm events
- Wetland will be designed to provide attenuation of 2, 10 and 100-years AEP stormwater detention of flows from the entire plan change site, including the quality treatment (75 per cent total suspended solid removal)
- Detailed design of the network, including wetland, will be carried out as part of the Engineering Plan approval stage at the time of subdivision.

3.4 As discussed in Section 2 of this memo, the PC55 area discharges to the Mauku Stream, and the site is located within the High-Use Stream Management Overlay. The PC55 SMP identifies that proposed stormwater management is designed to maintain the base water levels of surface streams.

3.5 Applicants' stormwater management approach for the entire development area consists of a centralised communal device, i.e. a wetland, to manage stormwater quantity and quality.

4.0 Assessment of stormwater effects and management methods

4.1 The area within PC55 is located within the upper reaches of the Mauku catchment. This catchment drains to the Manukau Harbour via the Mauku Stream, which are Significant Ecological Areas (SEAs). The Auckland Unitary Plan Operative in part (AUP) has objectives and policies that seek to maintain and enhance the values associated with each SEA.

4.2 The application materials reviewed consider whether appropriate measures are taken to avoid, remedy/ or mitigate any stormwater flow effects, stormwater quality; streams; wetlands, water features, and flooding perspectives on the receiving environment.

Hydrology mitigation

4.3 The PC55 site is not located within Stormwater Management Area Flow (SMAF) Overlays under the AUP. Since the plan change area underlain by volcanic soils which have high infiltration rates, there is a good potential to utilise on-site retention via soakage pits or infiltration trenches.

4.4 The amended I430 Patumahoe Precinct Plan proposes to extend the current operative standard I430.6.5 On-site stormwater mitigation in sub precincts B, C, D into PC55 Sub Precinct E. The standard I430.6.5, including the applicant's amendments in sub-precinct E, indicates the following on-site stormwater mitigation requirements.

I430.6.5. On-site stormwater mitigation in sub-precincts B, C, D and DE

(1) All stormwater from impervious areas shall be mitigated to achieve flow attenuation, such that 5m³/100m² of roof area and 3m³/100m² of other impervious areas are attenuation by one (or a combination) of the following methods:

(a) Stormwater soakage pits where geotechnical conditions allow.

(b) Stormwater rain tanks where geotechnical conditions do not allow for effective soakage, or to provide generally for rainwater harvesting.

4.5 The method proposed in Standard I430.6.5 on-site stormwater mitigation in sub-precinct E is consistent with the on-site stormwater mitigation method suggested in the revised SMP prepared for PC55. Accordingly, developments within PC55 provides groundwater recharge as a priority to maintain stream baseflows supporting the two methods of on-site stormwater mitigation as per standard I430.6.5.

(a) stormwater soakage pits where geotechnical conditions allow

(b) stormwater rain tanks where geotechnical conditions do not allow for effective soakage

- 4.6 The stream hydrology is proposed to manage post-development flows to pre-development levels up to the 1% AEP event. This method allows for the maintenance of pre-development hydrology and thereby helps avoid downstream flooding and erosion.
- 4.7 The PC55 development does not provide stormwater retention for road corridor areas. However, the proposed wetland is to be designed to provide full detention. This method is considered acceptable.

Water quality treatment

- 4.8 The PC55 stormwater management approach proposes a reticulated stormwater network discharging to a centralised communal device (a wetland to manage both stormwater quantity and quality) for the entire development area.

Flood management

- 4.9 Furthermore, the applicant's SMP proposes to provide flood attenuation up to 1% AEP storm event on-site using the proposed stormwater wetland. However, the applicant has not demonstrated the need to attenuate up to a 1% AEP storm event on-site. If flood attenuation is not required, up to 1% AEP on-site, a smaller wetland could provide stormwater quality treatment and stream erosion mitigation. Furthermore, a smaller wetland structure will remove any safety risks associated with a large dam. Flood attenuation for a 100-year storm event will be required if there are downstream properties with buildings at risk of flooding or structures such as road culverts/bridges with insufficient capacity. This information will be assessed at the detail design stage.
- 4.10 Key statutory considerations relating to matters of this technical assessment are summarised below.

Statutory consideration

- 4.11 National Policy Statement for Freshwater Management (2020) and Regional Policy Statement in AUP Chapter B7 contains provisions that are relevant to the avoidance and management of adverse effects on the freshwater environment and the maintenance and enhancement of these freshwater systems through the development, including (but not limited to):

B7.3.1 (1) Degraded freshwater systems are enhanced.

B7.3.1 (2) Loss of freshwater systems is minimised.

B7.3.1 (3) The adverse effects of changes in land use on freshwater are avoided, remedied, or mitigated

And

B7.3.2 (1) – (6)

- 4.12 The RPS policy provides a strong direction for avoiding adverse effects and enhancing degraded freshwater systems. The RPS also provides an integrated and balanced approach whereby sustainable use of land and resources to provide for growth and development is allowed when there is no practicable alternative, and adverse effects are managed.
- 4.13 Management of stormwater is in large part governed by AUP Chapters E1, E8, E9 and E10. The policy framework set out in Chapter E1 Integrated Water Management addresses the identification and development of stormwater solutions for the development area (particularly policies E1.3.(8) (9) and (10)). The policies direct a higher standard of stormwater management for greenfield development and improvement to water quality that is currently degraded.
- 4.14 It is considered that the proposed PC55 precinct plan provisions and the SMP, subject to proposed amendments, are designed to give effect to the anticipated outcomes of the higher-order policy cascade.

Comments on the PC55 precinct plan provisions as proposed

- 4.15 The proposed PC55 aims to utilise the existing I430 Patumahoe Precinct Plan to the PC55 area by applying a new sub-precinct, named Sub-precinct E, and subsequently extends the I430 policy cascade into sub precinct E, including I430 Activity rules and standards to address stormwater management.
- 4.16 The PC55 seeks the following amendments as a result of applying Sub Precinct E within the existing I430 Patumahoe Precinct:
- a) amend Policy I430. 3 (7) to include sub precinct E
 - b) amend the existing rules/ standards and assessment criteria in the I430 Patumahoe Precinct Plan within the new sub-precinct E relative to stormwater management.
 - c) Insert a new Activity Table I430.4.2 with new activity rules into the I430 Patumahoe Precinct Plan as outline below:
 - insert Rule (A6) and (A7) in the new Activity Table 1430.4.2 to provide stormwater management
 - insert rule (A7) in the activity Table I430.4.2 to provide for subdivision not complying with standards listed in Rule (A6) as a Non-Complying Activity
 - d) amend Standard I430.6.5 On-site stormwater mitigation to insert Sub precinct E
 - e) insert new Standard I430.6.14 Stormwater Management in Sub-precinct E
 - f) insert sub-precinct E to I430.8.1 Assessment Criteria (1) (2) and
 - g) insert additional assesment criteria (4) for subdivision in sub precinct E that contain Stormwater (4) (a) (i) – (iv) and (c) (iii)
- 4.17 I430.10.2 Patumahoe Precinct Plan 3 – Sub-precinct E proposes for stormwater management area to be indicated in the plan. In my view, it is appropriate to have an indicative location of stormwater management area within precinct plan 3 because:
- it warrants the land area required to provide for large communal devices, such as the proposed stormwater wetlands as identified in the SMP at the future subdivision and development stages.
 - It helps integrate communal stormwater devices with other infrastructure such as parks, open spaces or reserves for future development.
 - devices will be located in a readily accessible location to provide for maintenance requirements

The land required for detailed stormwater management will identify at the subsequent resource consent stage¹. In my view, once the land for stormwater management has identified, this land (with stormwater management devices) can be rezoned into open space at the Council's annual plan change for rezoning land into open spaces.

- 4.18 Page 10 of the SMP identifies that this FUZ land is located within a self-contained sub-catchment, sub-catchment 3, and this sub-catchment 3 discharges to Whangamaire Stream situated to the east of the PC55 site. The proposed FUZ land does not form a part of the stormwater management plan. This FUZ land is also shown on I430.10.2 Patumahoe Precinct Plan 3 – Sub-precinct E of the applicant's s32 report (Attachment 5). Given no technical evidence to support this portion of the land's future development, particularly from stormwater management, I suggest the proposed FUZ should be removed from the PC55 area.

¹ This process occurs at the Engineering Plan Approval (EPA) stage, where devices may be vested in the Council's ownership

- 4.19 I note some of the I430 Patumahoe Precinct provisions use stormwater management terminologies that are not in use in the stormwater management provisions of the AUP, i.e., Stormwater Ponds, low impact stormwater management techniques etc. However, the concepts behind the terms are similar, and I acknowledge that the applicants have used the same terminology within PC55 in Sub-Precinct E to keep consistency in the plan. It is not within this assessment's scope to comment on the old terminology used in the existing AUP. Therefore, I do not raise further concerns regarding those provisions.
- 4.20 Overall, it is considered that proposed amendments in the PC55 - Sub precinct E are consistent within I430 Patumahoe Precinct and the AUP and will ensure consistency of the management of stormwater effects within PC55 future development.
- 4.21 Therefore, I support the inclusion of the applicant's amendments listed above to the I430 Patumahoe Precinct as these provisions are updated to implement the delivery of the integrated stormwater management outcomes. However, I recommend some minor modifications to the wording of the I430.8.1 Assessment Criteria (2)(d).

Relief sought:

- (d) Whether the subdivision is in accordance with the Patumahoe Stormwater Network Discharge Consent or other relevant approved network discharge consent

5.0 Submission

- 5.1 Submissions on the proposed plan change were reviewed, and noted that the majority of submissions relate to broader traffic and elite/prime soils and productive lands issues of the PC55. Submissions that are relevant to stormwater are summarised as follows –

Submission 33.13 – Auckland Transport

- 5.2 Whilst Auckland Transport submission is mainly relevant to traffic and transport-related matters, and comments are included relevant to the proposed stormwater management provisions.
- 5.3 As indicated in submission 33.13, Mr McGough suggests inserting the word 'on-site' into Standard I430.6.5 (1) On-site stormwater management in Sub-Precinct B, C, D and E. Onsite mitigation requirement applies to individual lots and excludes public roads. To avoid future confusions of the use of standard I430.6.5 (1), I agree with Mr McGough's views and recommend changes the standard as follows:

- (1) All stormwater from impervious areas shall be mitigated on-site to achieve flow attenuation, such that 5m³/100m² of roof area and 3m³/100m³ of other impervious areas are attenuation by one (or a combination) of the flowing methods: ...

6.0 Other matters

Auckland-wide Stormwater Network Discharge Consent (NDC)

- 6.1 The NDC provides for the management and operation of both current and future stormwater networks in the region. As development within the PC55 area will involve a discharge of stormwater from a greenfield development into a SEA, condition 13 of the NDC anticipates that an SMP may be adopted by the consent holder into the consent either through a change to conditions under section 127 of the Resource Management Act 1991 (RMA) or following the approval of a notified plan change. If an SMP is to be adopted following the approval of a notified plan change, the SMP must have been prepared to support the notified plan change, and the plan change must be consistent with the SMP. The SMP must also be consistent with the NDC's Schedule 2 (which set out the NDC's strategic objectives, outcomes, and six-yearly targets) and Schedule 4 (the requirements for authorised changes to the NDC).
- 6.2 When writing this technical memo, the revised SMP provided in support of the PC55 was not adopted under the regionwide NDC. In the revised SMP, stormwater management has been addressed for the most part. However, internal discussions are not fully completed yet regarding the amendments proposed to satisfy the provisional approval to be adopted under the NDC. I will provide an update on this process at the time of hearing if needed.

7.0 Conclusions and recommendations

- 7.1 The plan change aims to enable rezoning of the rural land to provide additional residential and light industrial growth within the Patumahoe area. The proposal will allow the future development of approximately 200 dwellings and 2.5 ha of land for light industrial growth.
- 7.2 The stormwater runoff generated from the PC55 future development will be served by a reticulated stormwater network. With regards to the management of existing overland flow paths, natural hazards and downstream flood-related risks, the anticipated effects from the proposed plan change can be adequately mitigated.
- 7.3 Stormwater on lots will be managed through the precinct specific rules requiring up to 5m³ of Stormwater retention/ 100m² of roof area. Flood attenuation up to 1% AEP storm event on-site will be provided using the proposed stormwater wetland, and no stormwater devices are proposed within the road corridor. The proposed wetland will provide full detention.
- 7.4 I am satisfied that the PC55 adequately assessed the effects of stormwater management on the receiving environment. The existing I430 Patumahoe Precinct Plan to the PC55 area applies a new sub-precinct, named Sub-precinct E, and subsequently extends the I430 policy cascade into sub precinct E, including I430 Activity rules and standards to address stormwater management. Therefore, I support the private plan change 55 from the perspective of stormwater management.

Memo: Technical Specialist report – Productivity to contribute to Councils section 42A hearing report.

22/06/2021

To: Chloe Trenouth, Planner for Auckland Council

From: Stuart Ford, The AgriBusiness Group

Subject: Private Plan Change – PC55 – Productivity Assessment

1 Introduction

1.1 Background

I have undertaken a review of the private plan change PC55, on behalf of Auckland Council in relation to Productivity effects.

The AgriBusiness Group has experience working with the land owners in the greater Auckland region through Stuart Ford working with Horticulture NZ and the Pukekohe Vegetable Growers Association initially on the report titled “ Nutrient Performance and Financial Analysis of Lower Waikato Horticulture Growers” and then subsequently on the Proposed Auckland Unitary Plan and preparing economic and resource use evidence as to the issue of subdivision of the elite and prime land held within the region. Last year he was employed by Horticulture NZ to give evidence on the financial impacts of Environment Waikato Plan Change 1 on the range of horticultural land uses within the Waikato region, which bounds Auckland at Pukekohe. During these projects he was able to gain considerable knowledge of and data to support his evidence preparation particularly on the various rotations that are practiced by the vegetable growers in the region.

Stuart was also involved in the Environment Court case between the appellants, the Self Family Trust and Auckland Council and gave evidence regarding the suitability of the land as primarily elite soils on both the Pukaki Peninsula and at Crater Hill for intensive horticultural production and the viability of that land under a range of possible land uses.

Subsequent to that engagement Stuart has been involved in other matters regarding the potential rezoning of land where he has performed assessments of the agricultural and horticultural potential of elite and prime soils at Clevedon, Patumahoe and at Waiau Pa.

Through this experience Stuart has been able to form a sound understanding of the productive and financial performance of the elite and prime soils across the full range of potential agricultural and horticultural land uses that are able to be farmed across the Auckland region.

1.2 Documents

In writing this memo, I have reviewed the following documents:

Enviro 2020: Private Plan Change Request to The Auckland Unitary Plan: Operative in Part Patumahoe South. Plan Change Request, Assessment of Effects and Section 32 Assessment.

AgFirst 2019: Soil and Resource Report for Patumahoe Rezoning Proposal

Fruition Horticulture and AgriLink NZ 2019: Horticultural Productivity Within Patumahoe Proposed Plan Change.

Landsystems 2020: Patumahoe Private Plan Change LUC site assessment summary tables.

Landsystems 2020: Field Observations – Patumahoe South.

Landsystems 2021: s42A specialist input report Elite and Prime soils.

Environment Court 2018: Decision on NZEnvC 49, Self Family Trust v Auckland Council.

Environment Court 2020: Decision on NZEnvC 214, Following remission back from the High Court.

High Court 2019: Interim Judgement on NZHC 276, Self Family Trust v Auckland Council and F and J Gock v Auckland Council.

High Court 2019: Final Judgement on NZHC 276, Self Family Trust v Auckland Council and F and J Gock v Auckland Council.

Hicks Dr D 2018: Soils at Pukaki Peninsula, Prepared for Auckland Council in connection with Auckland Unitary Plan Appeal ENV-2016-AKL-000199 (Self Family Trust).

Hicks Dr D 2018: Soils at Crater Hill, Prepared for Auckland Council in connection with Auckland Unitary Plan Appeal ENV-2016-AKL-000199 (Self Family Trust).

Lynn L et al 2009: Land use capability survey handbook, 3rd edition.

Auckland Unitary Plan Operative in part: J1 Definitions.

Curran-Cournane F 2019: Statement of evidence to the Environment Court following remission back for the High Court.

Landsystems 2021: Section 42A specialist input report Elite and Prime soils.

2 Key Productivity Issues

The key issues from a productivity perspective are the definition of the soils in relation to the Elite and Prime classification, the interpretation of their productive capacity and the importance of their significance of their productive capacity in terms of their protection.

2.1 Soils Classification.

The definition of the soils as to whether they are Elite or Prime is detailed in the Auckland Unitary Plan, Operative in Part as:

Land containing elite soils.

Land classified as Land Use Capability Class 1 (LUC1). This land is the most highly versatile and productive land in Auckland. It is:

- *well-drained, friable, and has well-structured soils;*
- *flat or gently undulating; and*
- *capable of continuous cultivation.*

Includes:

- *LUC1 land as mapped by the New Zealand Land Resource Inventory (NZLRI);*
- *other lands identified as LUC1 by more detailed site mapping;*
- *land with other unique location or climatic features, such as the frost-free slopes of Bombay Hill;*
- *Bombay clay loam;*
- *Patumahoe clay loam;*
- *Patumahoe sandy clay loam; and*
- *Whatitiri soils.*

Land containing prime soils

Land identified as land use capability classes two and three (LUC2, LUC3) with slight to moderate physical limitations for arable use. Factors contributing to this classification are:

- *readily available water;*
- *favourable climate;*
- *favourable topography;*
- *good drainage; and*
- *versatile soils easily adapted to a wide range of agricultural uses.*

2.2 The interpretation of the soils productive capacity.

It is my opinion that the productive capacity of a soil should be determined by reference to *Federated Farmers of New Zealand (Inc) Mackenzie Branch v Mackenzie District Council* where it is stated that "*The viability of a farm should be assessed objectively rather than on a landowner's subjective view*".

Although the current land use should be taken into account when assessing the productive capacity of land that assessment should be made on an objective view of the highest and best use of the land regardless of what the current owner is achieving or thinks what the productive potential of the land is.

2.3 The significance of the productive capacity in terms of protection.

It is important to note that in their decision on the plan (Chapter B2.2.2(2)(j)) the Panel noted that:

Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that;

... while ...

(j) avoiding elite soils and avoiding where practicable prime soils which are significant for their ability to sustain food production.

And that in its recommendations (at 3.4) the Panel noted the requirement to "avoid Elite soils" but said that:

... this is not an absolute but is in the overall context of the soil's significance for its ability to sustain food production across the values for which elite soils are protected.

The significance of the area of Elite and Prime soils for their ability to sustain food production was also an issue addressed in the High Court decision on the Self Family Trusts appeal where the court found that:

(b) its assessment of whether the relevant areas of premium soils were significant for their ability to sustain food production (to the extent undertaken) proceeded in error of law by:

(i) failing to take into account the insignificant area concerned in the context of the total area of elite and prime soils in the Auckland region; and

(ii) taking into account the principle of incremental loss in the context of RUB location or relocation involving lands already surrounded by urban development.

It is my interpretation that the court decision says that the scale of the area of Elite and Prime soils should also take into account in determining whether the area in contention is worthy of protection and an assessment should be made as to whether the productive capacity of the soil is significant within the Regional context.

The High Court's decision was then referred back to the Environment Court stating that *significance must be determined "in the context of the total area of elite and prime soils in the Auckland region"*¹

The Environment Court in their subsequent ruling traversed the issue of what would be an appropriate quantitative comparator that could be used in determining the significance of the Elite and Prime soils.

They express concerns about using a regional percentage figure because:

This baseline takes no account of the level of actual use of these soils for the critical purpose of sustainable food production.

This baseline allows for no consideration of the time dimension.. and that

...this method of estimating quantitative significance is manifestly incremental in nature, and the High Court has found that such a criterion is not appropriate in the policy context of plan development and coherent decisions on RUB location.

They then go on to identify the following three comparators:

- *Whether or not the de minimus exception argument is relevant.*
- *The relevance of the cumulative loss of elite and prime soils over time, and*
- *The implications of using the more accurate FARMLUC soils classification data...*

They then concluded after testing these three comparators that a *...simple (single) quantitative measure of regional significance, such as a regional percentage figure, is not considered a sufficient or appropriate criterion by itself....*

The Court then turned their mind to three sub topics:

What the soil classification system tells us.

The attributes of the Elite soils generally; and

The future commercial viability of rural production activities, particularly horticulture.

¹ 2020NZEVC 214 Para 49.

What we take from the ruling of the Court is that while any one of the quantitative comparators is not sufficient to determine the result it is important to consider all the possible comparators and make a judgement on the balance of the whole.

3 Applicant's assessment

3.1 AgFirst's Report

The AgFirst report does not go into any conventional reporting detail on their methodology of assessing the soil types on the subject land apart from displaying three photographs of soil profiles with a description of each soil type.

They report that the land consists of 32.1 ha and it is held in 26 titles of which 21 are relatively small in terms of parcel size (< 2 ha) and are currently used for a combination of residential, lifestyle and commercial use. The remaining 19.4 ha are all utilised for primary production.

The distribution of the soils is reported in the figure titled "Soil map of the proposed rezoning lots in Patumahoe". In his Table 2: "Attributes and LUC classification of the proposed rezoning area" they report that the area consists of 22.3 ha of Patumahoe Clay Loam which is the predominant soil type.

In their Table 2 they classify the Patumahoe Clay Loam as a LUC 2 soil. The justification for doing so is described in a note under the table which states that "*The 3rd Edition LUC Survey Handbook categorises LUC class 1 land as having fine textured soils – silt loam or fine sandy silt loam and LUC class 2 as including soils with a clayey texture. On this basis Ph soil cannot be categorised as LUC class 1 but at best, Class 2*".

It is not for me to judge the LUC categorisation of the soil from a pedological view point but I find it somewhat strange that an expert on land capability would divert their opinion on the characteristics of a soil type that would influence their opinion on the LUC to the dictates of a handbook which at best should be regarded as a guide rather than a dictate as to the appropriate LUC assigned.

The high level definitions of the land use capability classes given in the handbook are:

Class 1 : the most versatile multiple-use land with minimal physical limitations for arable use.

Class 2 : very good land with slight physical limitations to arable use, readily overcome by management and soil conservation practices.

In assessing the potential limitations in his Table 2 they assess that it is well drained, has nil current erosion, has no apparent climatic limitations but in his assessment of the greatest production limitation he lists them as "*soil characteristics due to clayey nature of the soil*". In their Soil Profile description they state that the Patumahoe Clay Loam can be described as having the following characteristics:

0-190mm: Friable, fine nut with strong development, sticky, plastic, very dark grey (10YR 3/1) clay loam.

190-400mm: Friable to firm, fine nut, with moderate to strong development, sticky and slightly plastic, yellowish brown (10YR 5/6 – 10YR 5/8) clay loam/clay.

It would be my contention that the soil type is very friable and that the limitation as to the clayey nature of the soil could best be described as a minor limitation to the productive capacity of the soil and therefore on a visual assessment would classify it as a LUC 1.

I would also point out that the New Zealand Land Resources Inventory Maps (NZLRI) show the area which is subject to this assessment as LUC 1w. While caution should be taken to the results shown by these maps because of the scale (1:50,000) the land is predominantly identified as Patumahoe Clay Loam so the assessment of the land in that assessment, which is based on the Land use capability survey handbook, has not been influenced by the contention that the soils cannot be classified as LUC 1 because they have a “clayey texture” as it has in the AgFirst report.

The AgFirst report then goes on to discuss the “Potential Productivity” of the block. This assessment is clouded by the fact that they have classified the land as LUC 2, incorrectly in our opinion, and does not at any point discuss the “potential” productivity of the land but gives a limited review of the current land use.

The AgFirst report does not make any attempt to classify the soils as to whether they should be deemed as Elite or Prime which is the major consideration as to the productivity of them in this instance.

The AgFirst report does not come to any conclusions or recommendations, so we presume that it is written as a reference report.

I do not accept that either the methodology or the results of the soils LUC classification and the productive potential of the land subject to this plan change that are used in the AgFirst report as being appropriate.

In the applicants Plan Change Request in section 2.4.1 Soil Classification the author misrepresents the methodology used to determine the appropriate LUC class in the AgFirst report as being one of:

...consideration of a range of characteristics in accordance with the methods described in the 3rd Edition of the Land Use Capability Survey Handbook to assess the suitability of the land for primary production. These include such characteristics as erosion, susceptibility to flooding, wetness, land aspect and topography. Having done so, the report determines that Class 2 and 3 soils are the predominant Land Use Capability Class...

As we have already reported this decision as to the appropriate LUC class that should be assigned to the soil was entirely made on the fact that in the authors opinion the handbook dictates that if the soil exhibits a clayey texture it automatically becomes LUC 2.

The authors of the Plan Change Request report then go on to discuss their assumptions as to whether the soils should be considered elite where they state that:

The presence of Patumahoe clay loams is one aspect included in the definition of the “elite” soils in the AUP:OP (above). However, the definition of “elite” soils requires that the LUC Classification be determined so that “elite” soil is LUC1 and is “...the most highly versatile and productive land in Auckland.” Having done so, the soils of the subject land are not classified as LUC1 and do not possess the necessary productivity to be considered “elite” soils.

This assessment is wrong and completely misrepresents the situation. The definition of elite soils says:

Land containing elite soils.

Land classified as Land Use Capability Class 1 (LUC1). This land is the most highly versatile and productive land in Auckland. It is:

- well-drained, friable, and has well-structured soils;
- flat or gently undulating; and
- capable of continuous cultivation.

Includes:

- LUC1 land as mapped by the New Zealand Land Resource Inventory (NZLRI);
- other lands identified as LUC1 by more detailed site mapping;
- land with other unique location or climatic features, such as the frost-free slopes of Bombay Hill;
- Bombay clay loam;
- Patumahoe clay loam;

The definition of Elite soil does not require it to be LUC 1 as suggested by the authors of the report and it specifically includes the Patumahoe Clay Loam soil type as being considered as Elite and the report of AgFirst does not consider the “necessary productivity” to allow it to be rejected as not being Elite soil.

Therefore there is no justification for the author of the report to come to this conclusion that the soil is not Elite.

3.2 Fruition Horticulture and AgriLink NZ report.(F&A)

The F&A report evaluates the productivity of the land under the following headings.

3.2.1 Soil quality of the land.

The F&A report accepts the AgFirst report and refers to it as “detailed”. They state that during their property visit they corroborated the details in the AgFirst report but do not go into any further explanation of how they corroborated the details in the report.

They then go onto discuss the relatively poor performance of the current Kiwifruit growing operation as an example of why they support the detail of the report. I am of the opinion that this argument is a completely erroneous in term of supporting both the soils and the land use classification details of the report as the current land use has nothing to do with either of these two determinants.

As we have previously stated *“Although the current land use should be taken into account when assessing the productive capacity of land that assessment should be made on an objective view the highest and best use of the land regardless of what the current owner is achieving or thinks what the productive potential of the land is.”*

It is our opinion that this assessment does not entail an objective assessment.

3.2.2 Reverse sensitivity.

Although we agree with the F&A report that the land will most likely be subject to reverse sensitivity complaints we are not convinced, based on our experience, that it is at all likely that *“It is common for kiwifruit growers to either convert to organic production or cease growing altogether as complaints from neighbours make the continued commercial production of fruit difficult.”* and point out that the land was in its current configuration in terms of proximity to neighbours when the

Kiwifruit was planted so we are unsure why it should be considered an issue that cannot be worked through with any potential complainants.

We would also like to point out that the allowance of urban subdivision on the subject land will just push the issue of the potential for reverse sensitivity to the boundary where intensive rural production is just a roads width away from the proposed urban development.

3.2.3 Economic and Trends

I agree with F&A's contention that the trend is for growers to produce off larger areas of land to enable them to gain the economies of scale and that there is an insufficient area of available soil within the subject area to make it attractive for one of these growers to either buy or lease the land. That being said, there is still the potential for one of the smaller growers to take up the land to grow vegetable crops.

3.2.4 Historical land use.

The F&A reports that the majority of land within the subject area has not been used for intensive vegetable production historically, whereas the surrounding area is very intensively used for vegetable production, because of the "*inherent constraints*". Apart from the small potential area available they do not detail what the inherent constraints are.

Again they use an example of a former land use as some sort of support for their subjective estimation of the potential productivity of the land.

3.2.5 Lack of irrigation.

The F&A report maintains that there is no irrigation water available on the land whereas the AgFirst maintains that it is available from the shallow source. Either way it is technically possible for a grower with an existing water right to transfer it to the subject land so this should not be considered an impediment.

3.2.6 Suitability of Lots for Rural Productivity.

The F&A report estimates that there is approximately 16.5 ha available for horticultural production as the remaining area is either not on suitable soils or it is covered in housing. The report then goes on to discuss the suitability based on the current land use and so cannot be considered as an objective view.

3.2.7 Highest and Best use.

The report then assigns a highest and best use lens to the available land as defined by the applicants planners and then assigns a tick or cross assessment as to the land availability for Commercial Rural Use. We generally agree with this assessment although wonder and the consistency of approach used in the assessment for Commercial Rural Use between blocks of land.

I believe that the F&A report is deficient in addressing the matters to be assessed because:

- It accepts the AgFirst report. They state that during their property visit they corroborated the details in the AgFirst report but do not go into any further explanation of how they corroborated the details in the report. It is our opinion that either the methodology or the results of the soils LUC classification and the productive potential of the land subject to this plan change that are used in the AgFirst report as being inappropriate.
- It does not take an objective view in its interpretation of the soils productive capacity.

- It does not take into account the scale of the area of Elite and Prime soils in determining whether the area in contention is worthy of protection and an assessment should be made as to whether the productive capacity of the soil is significant within the Regional context.

Therefore it is our assessment that the F&A report is an inadequate assessment of the suitability of the land to be subject to the proposed land use change.

4 Assessment of productivity effects and management methods.

In this section of the report we carry out our assessment of whether the soils productivity is able to pass the three critical tests of the soils definition, the soils productive capacity and the significance of the soils production in terms of the need to protect the Elite and Prime soils.

4.1 Soils definition.

We have had the opportunity to review the report of Dr Reece (Landsystems). It is our opinion that his methodology is appropriate in terms of the identification of the various soil types on the subject land, his classification of the various LUC categories and his subsequent classification of the proportions of soils which can be classified as Elite and Prime across the whole area and that which is available for arable use.

At his Table 4: *The estimated areas of land containing elite, prime, and other soil by NZ primary parcel (titles)* he identifies that there are 23.47 ha of Elite soils, 7.4 ha of Prime soils across the whole area that is subject to this assessment.

He then goes on to detail his methodology in determining the area of land that could be considered as available for commercial vegetable production and horticultural use which he calls “arable use” and details their location in his Figure 6: *The distribution of land containing elite, prime soils within the practicability available arable use areas*. In his Table 5: *The estimated areas of land containing elite or prime soils for each title within the area of land practicably available for arable use* he presents his analysis of the Titles of the land that are affected (8), the area in total and the split between Elite, Prime (LUC class 2) and Prime (LUC class 3).

He identifies that there are a total of 18.71 ha that can be considered as being available for arable use and of that 8.33 ha (44.5%) is Elite soils, 5.43 ha (29.0%) is Prime LUC class 2 and 4.95 ha (26.5%) is Other soils.

We would note that the Elite soils are not contiguous across the total area of arable soils but are distributed around the outside rim of the total area making up 1.84 ha in title area 12, 2.38 ha in Title area 13a, 1.38 ha in Title area 18a and 1.23 ha in Title area 18b all other Title areas contain less than 1 ha of Elite soils.

We are not aware of the ownership of these Titles so cannot comment on whether they are owned concurrently or not.

We use these figures in our subsequent analysis.

4.2 Soils Productive Capacity

The highest and best use for the soils that are present is either commercial vegetable production or deeper rooted plants such as Kiwifruit and Avocados. This is due to the relatively high natural

fertility of the soils, the deep nature of their profile and their free draining properties. The soils that are best suited to the production of these crops are relatively limited in abundance across the Auckland and Waikato Regions.

It is my opinion the land and soil types are highly suited to a very wide range of horticultural crops which are not deep rooting. These shallow rooting crops include salad greens; root vegetables such as potatoes, kumara, carrots; curcubits such as squash, onions, pumpkins; leafy greens such as cabbage, cauliflower, broccoli, lettuce, spinach; other vegetables such as tomatoes and corn and Berryfruit such as strawberries.

The land which would be suitable for the deep rooted plants would have to be chosen as the very free draining soils and so would be limited to the Elite soils that are identified in the Landsystems report.

4.3 The significance of the available soils.

4.3.1 The scale of the area of Elite and Prime soils.

The scale of the area of Elite and Prime soils should also be taken into account in determining whether the area in contention is worthy of protection and an assessment should be made as to whether the productive capacity of the soil is significant within the Regional context.

Dr Fiona Curran-Cournane details in her evidence in chief to the Environment Courts remission hearing that a new LUC classification for Auckland has been developed to address regional issues and differences with the NZLRI land classification system. This new classification system is called FARMLUC and it has been adopted by the Auckland Council.

In the new FARMLUC classification LUC class 1 soils total 21,011 ha (5%), class 2 total 38,606 ha (9%) and class 3 totals 63,827 total ha (14%).

The area of Elite soils that is involved in this proposed development is 0.040% of the available area of Elite soils, 0.014% of the available Class 2 land that are estimated to be available in the Auckland Region.

On an averaging basis we would expect that their contribution to the regional economy from the highest and best land uses would be in exactly the same proportions as their area. When we consider the fact that the constraints such as the non contiguous nature of their distribution and the land titles and ownership structures potentially limiting the area available this would further reduce their potential percentage share.

It is therefore our opinion that the potential contribution of the Elite and Prime soils can be considered as insignificant within the Auckland Region when compared on a Regional scale.

4.3.2 Whether the area of soils is de minimus.

The area of Elite and Prime soils total 13.76 ha from a total area of 36.76 ha so the factor of de minimus is not a relevant consideration.

4.3.3 The relevance of cumulative loss.

In her evidence in chief to the remissions hearing Dr Curran-Cournane details that 6,632 ha (34%) of Class 1 land is already occupied by AUP zoning with 13,276 (38%) of Class 2 and 11,362 (19%) of Class 3 land similarly affected.

This would indicate that if in time the total area of land that was occupied by the relevant AUP zoning which would mean that it was not available for productive use the area affected by the proposed subdivision would incorporate 0.058% of the Elite soil and 0.021% of the class 2 soil.

These figures are not significant even if the area already occupied by the relevant AUP classification were not available for productive use and so cumulative loss cannot be considered as a relevant consideration.

4.3.4 The implications of using the FARMLUC soil classification system.

FARMLUC has been used in all of the calculations in this report.

5 Submissions

There are 14 objections to the plan change which all mention the Productive soils as a reason for the objection. Many of them site the requirement to protect the Elite and Prime soils because of the need to protect the land in order to sustain food production.

I think that it would be appropriate to respond to their concerns that yes the issue of protection of Elite and Prime soils is a very important consideration in evaluating this proposal but in this case it is not of a significant enough proportion to allow it to override the other considerations.

6 Conclusions and recommendations.

We are of the opinion that the applicants two reports, the AgFirst and the Fruition and AgriLink, do not adequately assess the private plan change effects on the environment.

6.1 Definition of the soils.

Dr Hill identifies that there are a total of 18.71 ha that can be considered as being available for arable use and of that 8.33 ha (44.5%) is Elite soils, 5.43 ha (29.0%) is Prime LUC class 2 and 4.95 ha (26.5%) is Prime LUC class 3. The total of Prime soil is 10.38 ha or 55.5% of the arable soils.

We would note that the Elite soils are not contiguous across the total area of arable soils but are distributed around the outside rim of the total area making up 1.84 ha in title area 12, 2.38 ha in title area 13a, 1.38 ha in title area 18a and 1.23 ha in title area 18b all other Title areas contain less than 1 ha of Elite soils.

6.2 Their productive capacity

We have identified that the highest and best use for the soils that are present is either commercial vegetable production or deeper rooted plants such as Kiwifruit and Avocados. This is due to the relatively high natural fertility of the soils, the deep nature of their profile and their free draining properties. The soils that are best suited to the production of these crops are relatively limited in abundance across the Auckland and Waikato Regions.

It is our conclusion that the trend is for growers to produce off larger areas of land to enable them to gain the economies of scale and that there is an insufficient area of available soil within the subject area to make it attractive for one of these growers to either buy or lease the land.

6.3 The significance of their productive capacity

The area of Elite soils that is involved in this proposed development is 0.040% of the available area of Elite soils, 0.014% of the available Class 2 land that are estimated to be available in the Auckland Region.

On an averaging basis we would expect that their contribution to the regional economy from the highest and best land uses would be in exactly the same proportions as their area. When we consider the fact that the constraints such as the non contiguous nature of their distribution and the land titles and ownership structures potentially limiting the area available this would further reduce their potential percentage share.

It is therefore our opinion that the potential contribution of the Elite and Prime soils can be considered as insignificant within the Auckland Region when compared on a Regional scale.

The area of Elite and Prime soils total 18.71 ha from a total area of 36.76 ha so the factor of de minimus is not a relevant consideration.

The total area of land that was occupied by the relevant AUP zoning which would mean that it was not available for productive use the area affected by the proposed subdivision would incorporate 0.058% of the Elite soil and 0.021% of the class 2 soil. These figures are not significant even if the area already occupied by the relevant AUP classification were not available for productive use and so cumulative loss cannot be considered as a relevant consideration.

6.4 Conclusion

We are of the opinion that we can support the private plan change because the potential contribution of the Elite and Prime soils can be considered as insignificant in terms of their productive capacity within the Auckland Region and therefore doesn't justify that they be protected.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

15 June 2021

To: Chloe Trenouth - Planner for Auckland Council

From: Dr Reece Blackburn Hill, Landsystems

Subject: Private Plan Change – PC55– Productive soils assessment

1.0 Introduction

I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to productive soil effects.

I hold a Doctor of Philosophy in Soil Science from Lincoln University (2000), a Master of Applied Science in Soil Science from Lincoln University (1994), and a Bachelor of Science with a double major in Biological Sciences and Earth Sciences from University of Waikato (1988).

I have completed a Correspondence Certificate in Wine from Eastern Institute of Technology and the Advanced Sustainable Nutrient Management FLRC Short Course from Massey University.

I am a past President of the New Zealand Society of Soil Science (2014-2016), and a current member of the New Zealand Society of Soil Science, New Zealand Association of Resource Management, and the New Zealand Institute of Agricultural & Horticultural Science.

I have more than 25 years' experience working in the soil science discipline, including three years mapping forest soils in Tasmania, 19 years as a Soil Scientist at Waikato Regional Council, and six years as a Soil Consultant at Landsystems, of which I have been full time for the past two years.

I specialise in soil characterisation, soil mapping, land use capability assessment, regional soil policy, soil quality, and catchment and land management. I have applied these skills in numerous projects within Waikato Regional Council and Landsystems, working with individual landowners including farmers and growers, regional and district council staff, Crown Research Organisations, Universities, and Ministry staff (MPI and MfE).

I was lead reviewer for the Ministry for the Environment review of national soil quality monitoring and indicators and established the soil quality monitoring programmes for Waikato Regional Council and Nelson City Council.

I have advised central government and district and regional councils throughout New Zealand in relation to soil management, land use capability, high class soils and the use of soil map information. This included regional council representation on the Land Use Capability Classification System (LUCCS) Governance Group.

I have undertaken property scale soil and Land Use Capability (LUC) assessments to identify high class soils for subdivision applications and farm land management, and regional scale soil mapping in the Waikato, Auckland, Bay of Plenty, Marlborough, and Otago regions.

As part of my role at Waikato Regional Council, I was Lead Technical Writer for the Soils chapter (Chapter 14) of the Waikato Regional Policy Statement which became operative in 2016. Chapter 14 included a policy on High Class Soils (Policy 14.2). I provided soil and land fragmentation technical advice to the Ministry for Primary Industries for the proposed National Policy Statement on Highly Productive Land (NPS-HPL).

In 2020, I provided technical soils expertise to support The Waikato District Plan (Stage 1) review, with my main input focussing on Subdivision Rules and high class soils.

In writing this memo, I have reviewed the following documents:

- PC55-Appendix 8 – Land use capability assessment.
- PC55-appendix-9-land-productivity-assessment.

2.0 Key productive soil issues

The Auckland Unitary Plan (AUP) defines land containing elite soil as:

Land classified as Land Use Capability Class 1 (LUC1). This land is the most highly versatile and productive land in Auckland. It is:

- well drained, friable and has well-structured soils;
- Flat or gently undulating; and
- capable of continuous cultivation.

Includes:

- LUC1 land as mapped by the New Zealand Land Resource Inventory (NZLRI);
- Other lands identified as LUC1 by more detailed site mapping;
- Land with other unique location or climatic features, such as the frost-free slopes of Bombay Hill;
- Bombay clay loam;
- Patumahoe clay loam;
- Patumahoe sandy clay loam; and
- Whatitiri soils.

The AUP defines land containing prime soil as:

Land identified as land use capability classes two and three (LUC2, LUC3) with slight to moderate physical limitations for arable use. Factors contributing to this classification are:

- readily available water;
- favourable climate;
- favourable topography;
- good drainage; and versatile soils easily adapted to a wide range of agricultural uses.

For the definition of land containing elite soil, I consider the naming of specific soils an important point to note. These soils support the majority of commercial vegetable growing in the Auckland region. In considering the protection of the greater regional (and national) land for food production these soils were specifically named, irrespective of their NZLRI based LUC class, but considering the other factors in the respective AUP definitions.

For the definition of land containing prime soil, my interpretation is that land identified as land use capability classes two and three (LUC Class 2 and LUC Class 3) is land containing prime soil, providing it meets the contributing factors of readily available water, favourable climate,

favourable topography, good drainage, and versatile soils easily adapted to a wide range of agricultural uses.

In this report I use the above interpretations of the AUP definitions as my basis for classifying land containing elite and prime soils.

Importance of land containing elite or prime soil

Land containing elite and prime soil is a non-renewable, finite resource. Land containing elite soil¹ represents <1% (4397 ha) of total land area in Auckland which is predominantly located in and around west Pukekohe, renowned for its outdoor vegetable production². LUC Classes 2 and 3 provide an approximation of land containing prime soil³ and represent 12% (55,356 ha) and 15% (65,090 ha), respectively, of land area in Auckland⁴.

The pressures facing land containing elite and prime soil in Auckland region have been well documented and have been recognised nationally⁵. The importance of the issue was recently nationally acknowledged with the announcement of a proposed National Policy Statement for Highly Productive Land (NPS-HPL)⁶. Although only proposed, the discussion document does specifically mention that while highly productive land makes up a small proportion of all land in New Zealand, it provides significant value locally and nationally by providing a number of benefits. Market gardening and vegetable production rely heavily on highly productive land to produce crops that meet consumer expectations at yields that provide a sufficient return for food producers⁷.

Loss of land containing elite and prime soil

The scale and value of horticulture hubs, and the typically flat, well-serviced land that they occupy at urban fringes, makes horticulture more vulnerable to urban expansion than other primary sectors. From 2002 to 2016, New Zealand's area of land previously used for vegetable growing decreased 29 percent, from nearly 100,000 ha to about 70,000 ha⁸.

Aside from the thousands of acres of highly productive market gardening land that went out of production in and around the Auckland Isthmus in the early-mid 1900s (Hunt, 1959), Curran-Cournane et al. (2014) estimate that total of 10,399 ha (8.3%) of Auckland's elite and

¹ Based on an approximation using LUC 1 land.

² Curran-Cournane F et al. (2014). Trade-offs between high class land and development: recent and future pressures on Auckland's valuable soil resources. *Land Use Policy* 39: 146-154.

³ Based on my interpretation of the AUP definition for land containing prime soils not all LUC 2 and 3 land is land containing prime soils.

⁴ Curran-Cournane F et al. (2014). Trade-offs between high class land and development: recent and future pressures on Auckland's valuable soil resources. *Land Use Policy* 39: 146-154.

⁵ Rutledge, D.T., et al. (2010). Thought for food: impacts of urbanisation trends on soil resource availability in New Zealand. *Proceedings of the New Zealand Grassland Association* 72: 241-246.; Andrew, R., Dymond J.R. (2013). Expansion of lifestyle blocks and urban areas onto high-class land: an update for planning and policy. *Journal of the Royal Society of New Zealand* 43: 128-140.; Ministry for the Environment and Statistics New Zealand (2018). *Our Land 2018. Data to 2017 At a Glance*. New Zealand's Environmental Reporting Series. New Zealand Government.

⁶ Ministry for Primary Industries (2019). Discussion document on a proposed National Policy Statement for Highly Productive Land. Ministry for Primary Industries. August 2019.

⁷ Ministry for Primary Industries (2019). Discussion document on a proposed National Policy Statement for Highly Productive Land. Ministry for Primary Industries. August 2019.

⁸ Ministry for Primary Industries (2019). Discussion document on a proposed National Policy Statement for Highly Productive Land. Ministry for Primary Industries. August 2019.

prime land has been lost to various urban development categories, with the majority of loss occurring from 1996 onwards.

NZLRI and FARM LUC classification

Dr Fiona Curran-Cournane in her Environment Court Evidence in Chief for the appeal between Self Family Trust and Auckland Council (ENV-2016-AKL-304-000199), stated that Auckland Council has historically used the New Zealand Land Resource Inventory (NZLRI) system for mapping LUC but now more readily accepts a new LUC classification for Auckland developed to address regional issues and differences with the NZLRI LUC classification system.

The FARM LUC classification system (FARM LUC) retains the NZLRI LUC classes 1 to 8 but replaces the four NZLRI subclasses (indicating general limitations to land use) with twenty specific sub-classes and replaces unit numbers (denoting different kinds of land but three inconsistent number sets) with a single set of character suffixes (**Table 1**).

Table 1. NZLRI and FARM LUC limitation sub-classes.

NZLRI	FARM LUC	Description
<i>Climate and slope</i>		
c	c	Climate constrains crop, grass or tree growth, any other limitations are negligible
c	s	Slope shape or contour precludes cultivation, slope elevation constrains crop, grass or tree growth, any other limitations are negligible
<i>Soil</i>		
s	r	surface stones or rock outcrops
s	p	poor subsoil structure or subsoil pan
s	n	nutrient deficiency
s	a	salinity
s	y	toxicity
<i>Drainage and wetness</i>		
w	x	excessively free-draining
w	w	imperfectly draining or impeded drainage
w	f	flooding (occasional, regular or frequent)
w	o	over-drainage and/or oxidation of peat
<i>Deposition and erosion</i>		
e	e	alluvial or colluvial sediment deposits
e	t	sheetwash or windblow (exposed topsoil)
e	d	blow-outs and dunes (sand)
e	o	scree (stony slope deposits)
e	b	streambank collapses
e	g	gullies (including under-runners)
e	u	slumps or earthflows
e	l	landslides or debris avalanches
e	k	rockfalls

The FARM LUC classification provides a single set of revised LUC classes for the Auckland region, rather than relying on three previous NZLRI based LUC class sources. Details of the FARM LUC are provided in the report by Hicks and Vujcich (2017)⁹.

⁹ Hicks, DL and Vujcich V. (2017). Farm-scale land use capability classification for Auckland. Auckland Council Technical Report TR2017/016.

Reclassification of land in the Auckland region using FARM LUC identified that some classes of land are not as they initially appeared to be at the NZLRI regional scale¹⁰. The main examples provided were that LUC class 1 and class 5 land appeared limited at the 1:50,000 scale and were more extensive when using FARM LUC at the same scale, with a corresponding decrease in land that was previously mapped as LUC class 2 and 6 land, respectively, under the NZLRI increases effectively saw a decrease in land that was previously mapped as LUC class 2 and 6 land, respectively, under the NZLRI. The distribution of NZLRI LUC and FARM LUC classes for the Auckland region is shown in **Figure 1**¹¹.

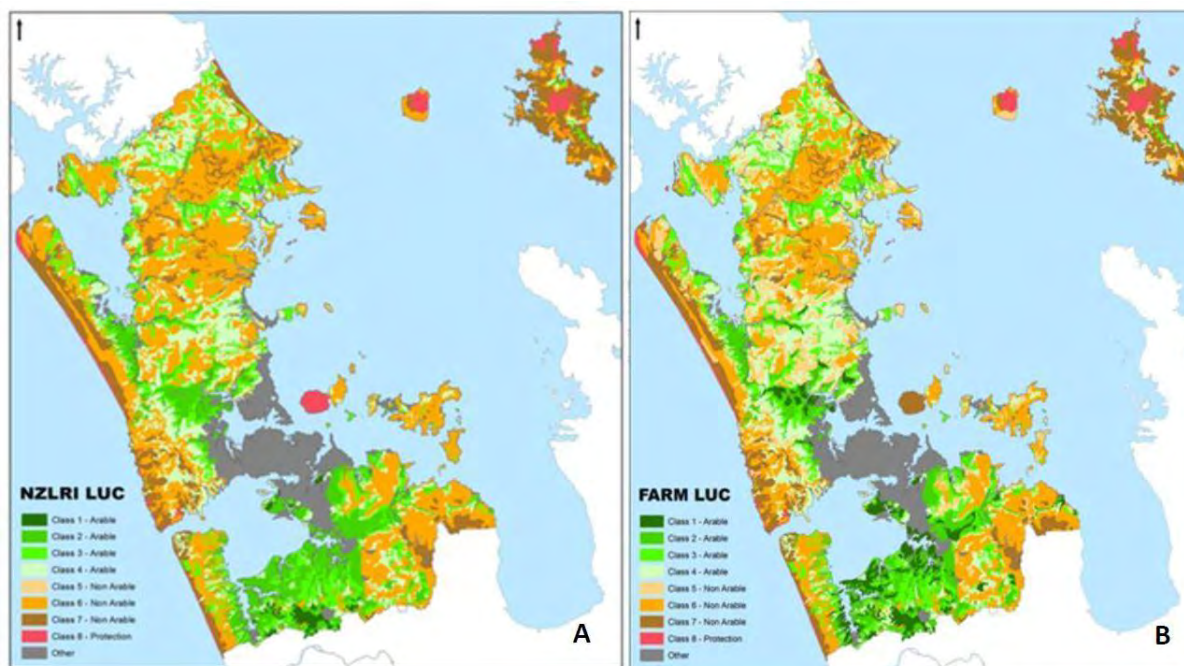


Figure 1. The distribution of NZLRI LUC and FARM LUC classes for the Auckland region.

Of note is that the land in the south of the Auckland region (and in the broader area surrounding the subject area) is predominantly LUC classes 1, 2 and 3 irrespective of the LUC classification used and that applying the FARM LUC visually increases the proportion of LUC Class 1 in the same broader area.

For my assessment of the LUC of the subject site I have included both the NZLRI LUC and the FARM LUC classification classes.

3.0 Assessment of effects

Soil assessment of the PC55 site - methods

On the 1st of November 2019 I undertook a soil and LUC assessment of the PC55 subject area at property scale with the assistance of Auckland Council Land and Soil Scientist Dr Fiona Curran-Cournane. The PC55 area (titles) identified for assessment are shown in **Figure 2**.

¹⁰ Dr Fiona Curran-Cornane, Environment Court Evidence in Chief for the appeal between Self Family Trust and Auckland Council (ENV-2016-AKL-304-000199).

¹¹ Sourced from Dr Fiona Curran-Cornane, Environment Court Evidence in Chief for the appeal between Self Family Trust and Auckland Council (ENV-2016-AKL-304-000199).

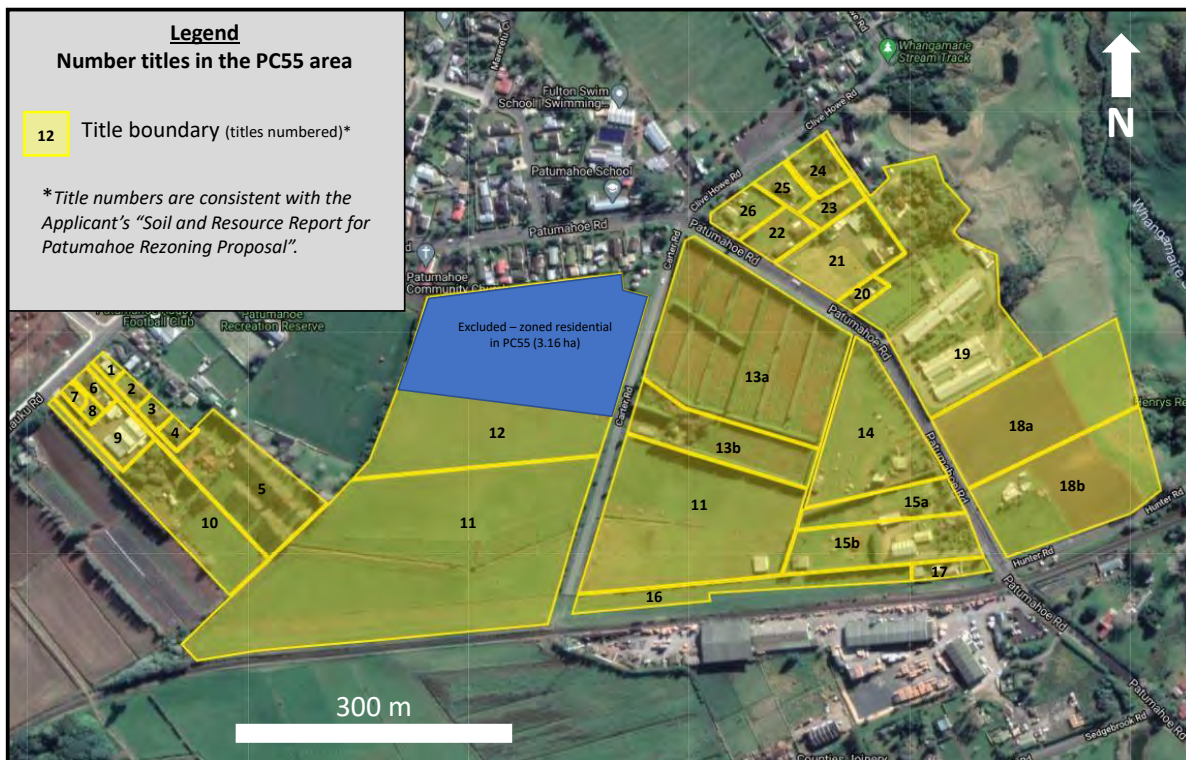


Figure 2. The PC55 area (titles) identified for assessment.

The assessment was intended to provide independent provisional information for to draft soil and LUC maps for comparison with soil and LUC information being provided by the applicant.

Access to the entire PC55 subject area to undertake field observations was limited to the area shown in **Figure 3**.

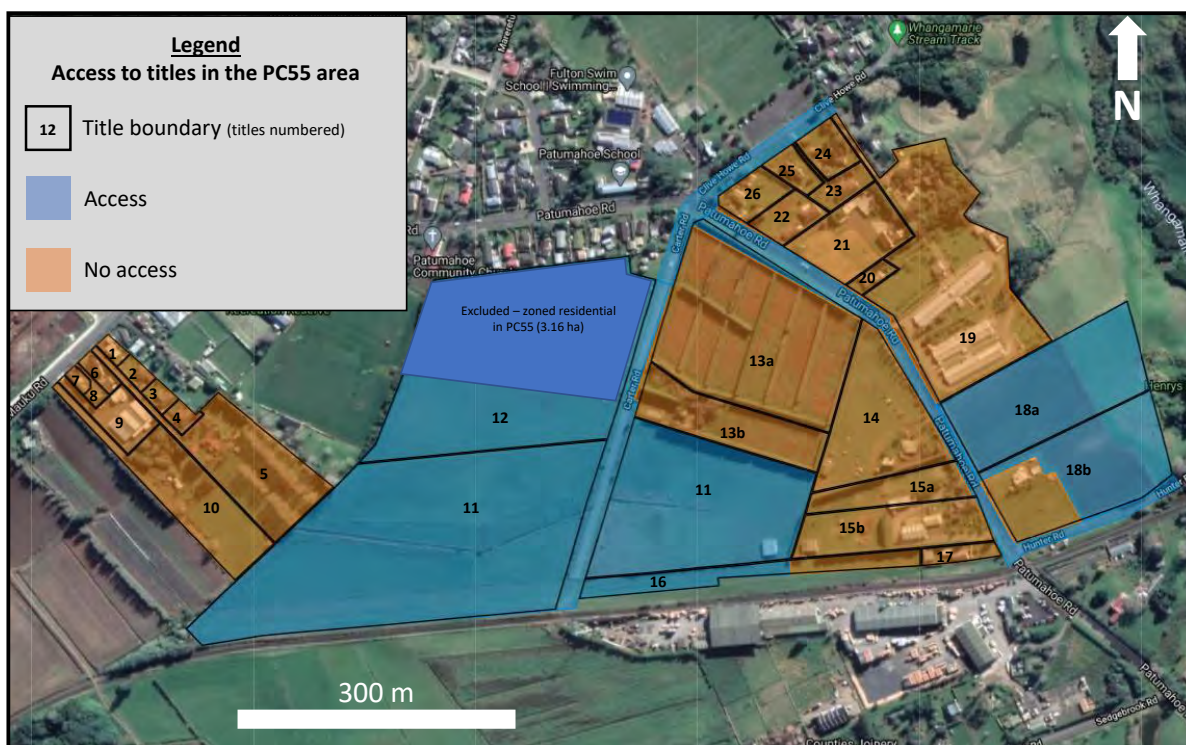


Figure 3. Area of the subject area and surroundings where soil observations could be made.

For areas that could not be accessed, observations on the perimeter of the area, the location of soil boundaries mapped on the areas with observations, aerial photograph interpretation

(using Google Earth historical photos), and position in the landscape were combined to infer the presence and distribution of soils across these areas.

For areas that could not be accessed, observations of slope angle, topography and soil parent material were made over the relevant area. Soil augering (soil borings) up to 80 cm depth were used to assess soil properties such as soil horizons, drainage, plant root depths, texture, structure, and colour. Soil cuttings on the site and along the roadside perimeter were also used to augment soil auger observations. This information was combined to determine soil type and soil boundaries, from which the necessary LUC units could be classified and assigned to map units.

The soil field assessment was based on standard soil survey methods and the Soil Description Handbook (Milne *et al.*, revised edition 1995).

General observations and 22 detailed soil borings were made and described using standard soil description methods. Locations of the soil observations were recorded by GPS (using a Garmin GPSMAP 64s handheld GPS). Soil observations and changes in topography were used to map the distribution of the soils observed. Soil boundaries were mapped in the field using GPS waypoints or hand drawn directly onto printed field base sheets with aerial photography and LIDAR derived contour maps provided by Auckland council staff.

GPS mapped boundaries and field sheet boundaries were used to provide final maps by hand digitizing in Google My Maps.

Other resource information used included Landcare Research's online S-Map and NZLRI attributes available on the LRIS portal¹².

To assist with the land use capability classification of the soils, other physical features were observed. These included: slope, site wetness, evidence of erosion and deposition and areas of soil disturbance and modification. Standard procedures as prescribed in the Land Use Capability Survey Handbook (Lynn *et al.*, 2009)¹³.

Soils in the PC55 subject area

Soil names for the PC55 subject area are defined by Soils of part Franklin County, South Auckland, New Zealand (Orbell, 1977)¹⁴. **Table 2** summarises the main characteristics of these soils.

¹² <https://iris.scinfo.org.nz/>

¹³ Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF 2009. Land Use Capability survey handbook – a New Zealand handbook for the classification of land. AgResearch Hamilton; Manaaki Whenua Lincoln; GNS Science Lower Hutt, New Zealand.

¹⁴ Orbell G.B. (1977). Soils of part Franklin County, South Auckland, New Zealand. New Zealand Soil Survey Report 33. New Zealand Soil Bureau, DSIR, Wellington, New Zealand.

Table 2. The main characteristics of the soils in the subject area.

Soil name (parent material); NZSC	Soil Description (Munsell soil color chart was used for soil colour)	Soil drainage class
Whangamaire clay loam (Wm) (mixed alluvium); Recent Gley (GR)	20 cm of dark brown clay loam with moderate polyhedral structure and few strong brown mottles, over brown to pale brown clay loam weakly developed blocky subsoil often with humic silts and humic clay loam layers. Water table at 75 cm depth at the time of observation.	Poorly and very poorly drained
Whangamaire clay loam (Wm) (mixed alluvium); Recent Gley (GR)	Same description as Whangamaire clay loam but occupying upper terrace not subject to same high water table (slightly better drainage).	Poorly drained
Helvetia clay loam (Hv) (weathered ash on basalt or other rocks); Perch-gley Granular (NP)	20 cm dark brown clay loam topsoil, over 30-40 yellowish brown clay subsoil with common light brown mottles and Mn concretions, over light yellowish brown clay with many mottles.	Imperfectly drained
Patumahoe clay loam (Ph) (weathered ash on basalt or other rocks); Orthic Granular (NO)	15-20 cm dark brown clay loam topsoil with strong polyhedral structure, over yellowish brown or strong brown clay with strong blocky structure. Well drained and moderately well drained with few to common mottles in the lower subsoil indicating a slight wetness limitation.	Well drained and moderately well drained
Patumahoe clay loam, rolling phase (PhR) (weathered ash on basalt or other rocks); Orthic Granular (NO)	Same description as Patumahoe clay loam but occupying steeper (8-15°) slopes.	Well drained and moderately well drained
Whatitiri hill soil (WtH) (weathered ash on basalt); Oxidic Brown (BX)	Variable thickness dark reddish brown clay loam topsoil with strong polyhedral structure, over dark reddish brown clay loam subsoil with a strong blocky structure. Soil depth is variable to bedrock.	Well drained

Figure 3 is the resulting property scale map (approximate scale of 1:3500) of the dominant soils on the subject area. The soil (and LUC) maps differs slightly from the initial information provided to council in that the soil map boundaries have been revised to better match the PC55 subject area, based on land parcels and the subject area boundary provided by the applicant.

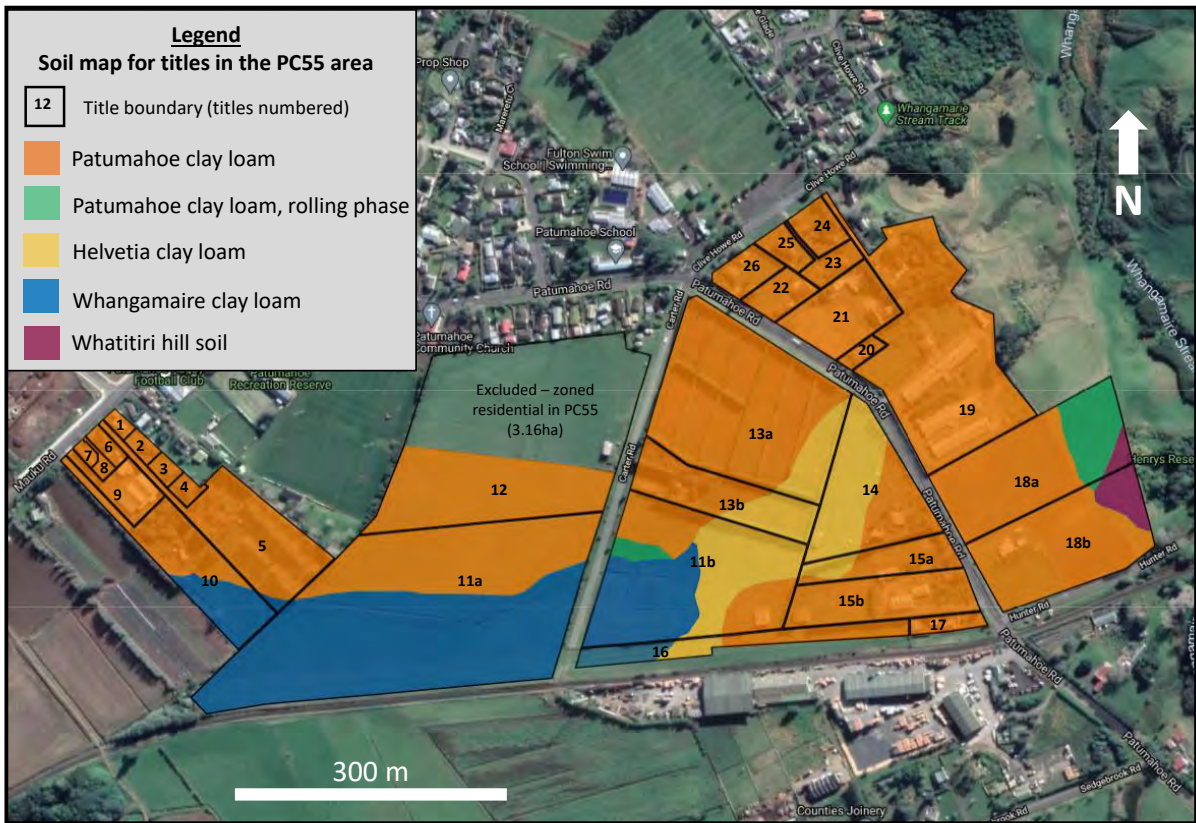


Figure 3. Soil map of the PC55 subject area.

LUC units in the PC55 subject area

Current definitions of land use capability are provided in the Land Use Capability Survey Handbook (Lynn et al., 2009)¹⁵.

The LUC information differs slightly from the initial information provided to council. The LUC classification for some map units have been revised based on re-examination of the field notes and closer consideration of Farm LUC classes. This includes two areas with Whangamaire clay loam (Wm), and the LUC units used for the area of Whatitiri clay loam and Patumahoe clay loam on rolling slopes. The match between soil, other physical features, and land use capability are summarised in **Table 3**.

¹⁵ Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF 2009. Land Use Capability survey handbook – a New Zealand handbook for the classification of land. AgResearch Hamilton; Manaaki Whenua Lincoln; GNS Science Lower Hutt, New Zealand.

Table 3. Soil, other physical features, and land use capability in the subject area.

Soil name (parent material)	Soil drainage class	Slope class(s)	Erosion and deposition (Waikato region extended legend)	LUC NZLRI (Waikato region extended legend) ¹⁶	Farm LUC
Patumahoe clay loam (weathered ash on basalt or other rocks)	Well drained and moderately well drained	A (0-3°) Flat to undulating	Nil to slight sheet when cultivated	1w1	1c
		B (4-7°) Undulating	Moderate rill and sheet when cultivated	2e1	2c
Whangamaire clay loam (mixed alluvium)	Poorly drained	A (0-3°) Flat to undulating	Nil	2w1	2w+e
Helvetia clay loam (weathered ash on basalt or other rocks)	Imperfectly drained	A (0-3°) Flat to undulating	Nil	2s3	1c
Patumahoe clay loam, rolling phase (weathered ash on basalt or other rocks)	Well drained and moderately well drained	C (8-15°) Rolling	Slight to moderate sheet and rill when cultivated	3e2	3e+t
Whangamaire clay loam (mixed alluvium)	Poorly and very poorly drained	A (0-3°) Flat to undulating	Nil	3w1	3w+e
Whatitiri hill soil (weathered ash on basalt)	Well drained	D+E (16-25°) Strongly rolling and moderately steep	Moderate to severe sheet and rill when cultivated	4e2	4c+t

The final LUC classification to define the areas of land containing elite soils, land containing prime soil, and other land, included the following rationale.

A distinction in LUC class was made for Whangamaire soils based on topographic position and the different water tables associated with these areas. The Whangamaire soil area on the lower topography along the south of the subject area was classes as LUC 3w1 as it has a higher water table which is likely to remain for a longer portion of the year than that of the Whangamaire soil on the higher topography in the north of the subject area (LUC 2w1). Irrespective of this difference in LUC classification, both are classed as land containing prime soil.

¹⁶ Walsh S D 1977. NZLRI Waikato region land use capability extended legend (1st edition). Published for the National Water and Soil Conservation Authority by Water and Soil Division, MWD.

Land containing elite soils: LUC 1w1

Patumahoe clay loam was classified as 1w1, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region where the following occurred:

- Flat to undulating slopes (0-3° slopes)
- Soil was well drained (which included well drained and moderately well drained soil drainage classes)

Where soils in a map unit could not be delineated (soil complex map unit), the dominant soil was used for the LUC classification. This occurred for one map unit; Whangamaire clay loam and Helvetia clay loam (Wm+Hv).

Land containing prime soils: LUC 2e1, 2w1, and 2s3

Patumahoe clay loam was classified as LUC 2e1, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region¹⁷ where the following occurred:

- Undulating slopes (4-7° slopes)
- Soil was well drained (which included well drained and moderately well drained soil drainage classes)

Helvetia clay loam was classified as LUC 2s3, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region where the following occurred:

- Flat to undulating slopes (0-3° slopes)
- Soil was imperfectly drained

Whangamaire clay loam was classified as LUC 2w1, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region where the following occurred:

- Flat to undulating slopes (0-3° slopes)
- Soil was poorly drained but was located on higher topography and not subject to a high water table at the time of the assessment (November).

Other land not containing elite or prime soils: LUC 3e1, 3w1, and 4e2

Whangamaire clay loam was classified as LUC 3w1, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region where the following occurred:

- Flat to undulating slopes (0-3° slopes)
- Soil was poorly drained and was located on lower topography and subject to a high water table at the time of the assessment (November).

Patumahoe clay loam was classified as LUC 3e1, based on the LUC classification provided by the NZLRI Extended legend for the Waikato region where the following occurred:

- Rolling slopes (8-15° slopes)
- Soil was well drained (which included well drained and moderately well drained soil drainage classes)

Whatitiri clay loam was classified as LUC 4e2, based on the LUC classification provided

¹⁷ Walsh S D 1977. NZLRI Waikato region land use capability extended legend (1st edition). Published for the National Water and Soil Conservation Authority by Water and Soil Division, MWD.

by the NZLRI Extended legend for the Waikato region where the following occurred:

- Strongly rolling and moderately steep slopes (16-25° slopes)
- Soil was well drained (which included well drained and moderately well drained soil drainage classes)

Figure 4 is the resulting property scale LUC map (approximate scale of 1:3500).

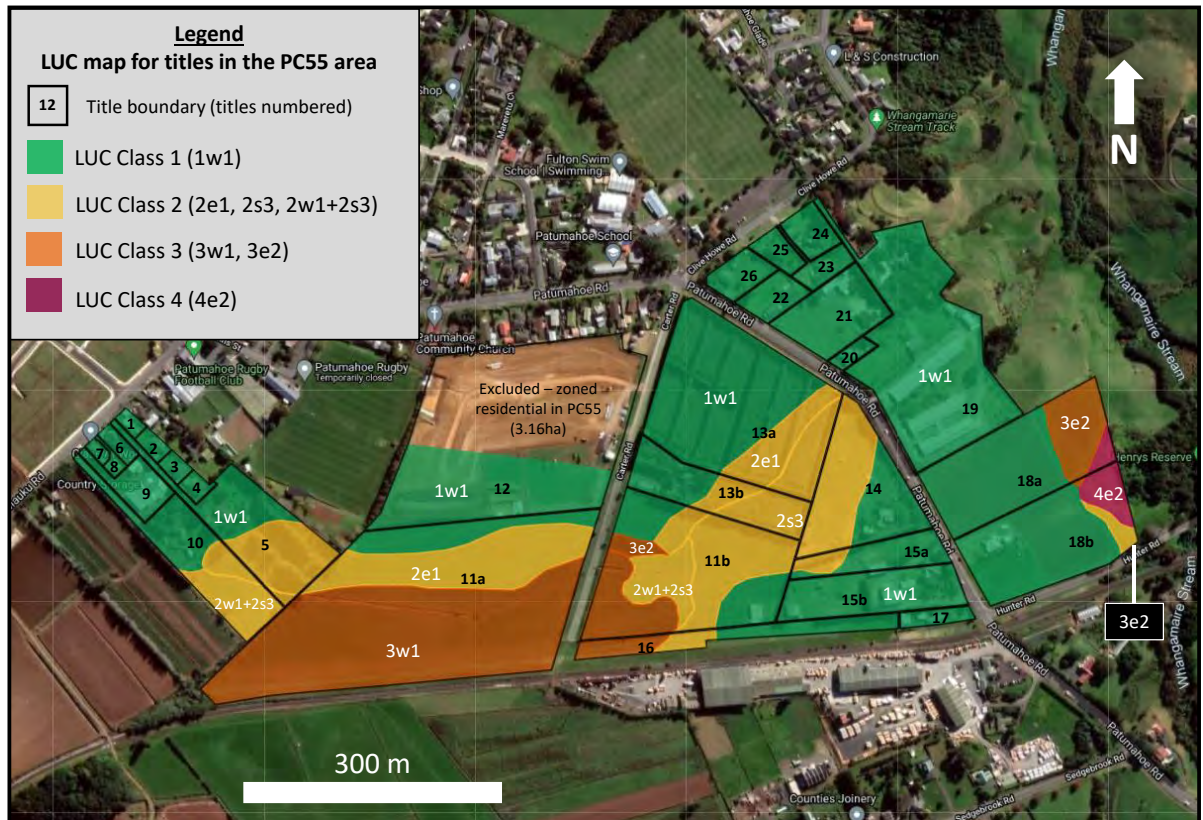


Figure 4. Draft LUC map of the PC55 subject area.

Based on the soil and LUC maps for the subject area (**Figures 3 and 4**), the areas containing elite, prime, and other soil on the subject area can be identified. **Figure 5** shows the distribution of land containing elite, prime, and other soil in the subject area.

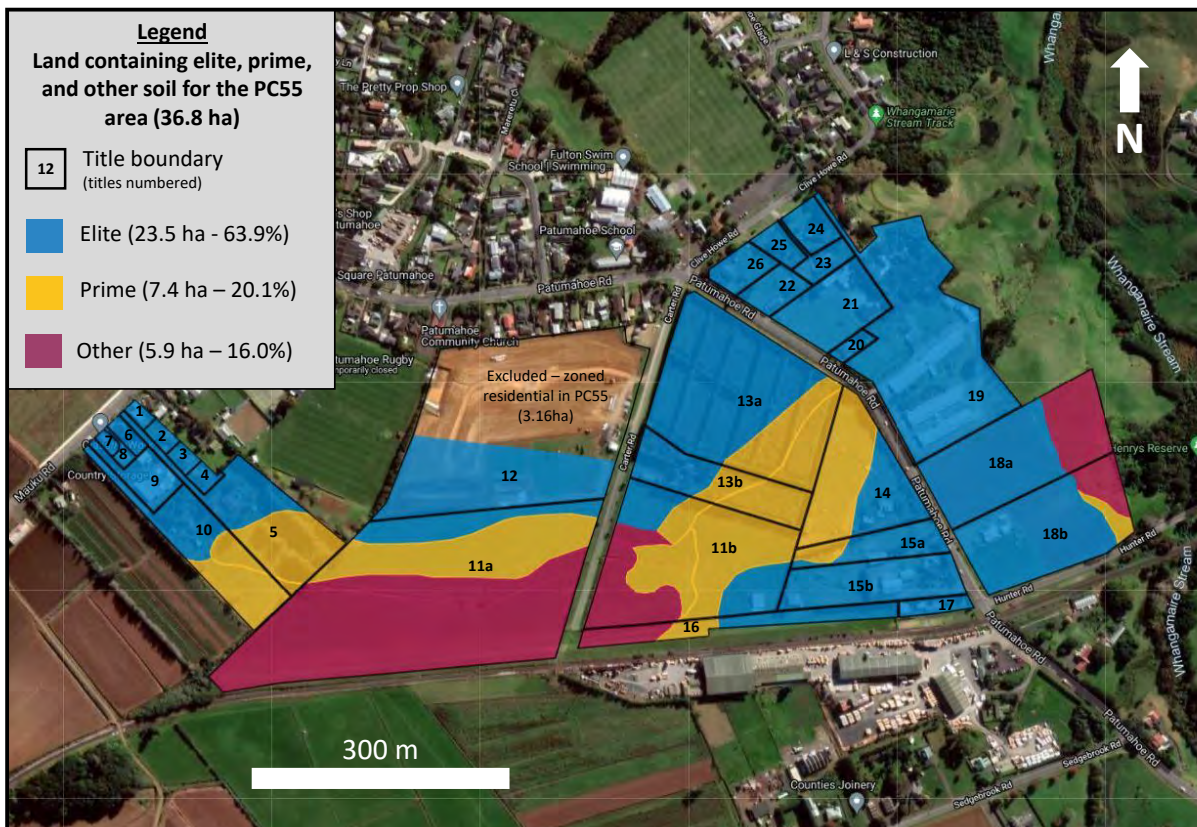


Figure 5. The distribution of land containing elite, prime, and other soil in the subject area.

The estimated areas of land containing elite, prime, and other soil by NZ primary parcel (title) are shown in **Table 4**.

Table 4. The estimated areas of land containing elite, prime, and other soil by NZ primary parcel (titles) for the subject area.

Number	Appellation	Titles	Area (ha)	Estimated land containing elite, prime or other soils (ha)		
				Elite (LUC 1w1)	Prime (LUC 2e1, 2w1, 2s3, 2w1+2s3)	Other (LUC 3e2, 3w1, 4e2)
1	Lot 1 DP 109862	NA62A/216	0.65	0.65	0.00	0.00
2	Lot 1 DP 398559	393720	0.85	0.85	0.00	0.00
3	Lot 1 DP 406383	422460	0.81	0.81	0.00	0.00
4	Lot 2 DP 406383	422461	0.85	0.85	0.00	0.00
5	Lot 3 DP 406383	422462	1.39	0.65	0.74	0.00
6	Part Allot 5 Sbrn Sec 1 PSH OF Puni	NA775/236	0.97	0.97	0.00	0.00
7	Lot 1 DP 183839	NA114D/600	0.48	0.48	0.00	0.00
8	Lot 2 DP 183839	NA114D/601	0.53	0.53	0.00	0.00
9	Lot 1 DP 136094	NA80A/996	0.35	0.35	0.00	0.00
10	Lot 2 DP 136094	NA80A/997	1.21	0.57	0.64	0.00
11a	Lot 1 DP 528517	854348	6.31	0.60	1.50	4.21
11b	Lot 2 DP 528517	854349	3.00	0.68	1.58	0.74
12	Lot 1 DP 169130 (part only)*	NA102A/185	1.84	1.84	0.00	0.00
13a	Lot 1 DP 98093	NA73C/1	3.29	2.38	0.91	0.00
13b	Lot 2 DP 125875	NA73C/1	1.00	0.47	0.53	0.00
14	Part Allot 48 Sbrn Sec 1 PSH OF	NA752/142	1.51	0.58	0.93	0.00
15a	Part Allot 48 Sbrn Sec 1 PSH OF	NA752/141	0.58	0.46	0.12	0.00
15b	Part Allot 47 Sbrn Sec 1 PSH OF	NA752/141	1.03	1.03	0.00	0.00
16	Lot 1 DP 451581	854349	0.70	0.36	0.34	0.00
17	Lot 1 DP 147416	NA87D/401	0.17	0.17	0.00	0.00
18a	Allot 50 Sbrn Sec 1 PSH OF Puni	NA754/70	2.09	1.43	0.00	0.66
18b	Part Allot 49 Sbrn Sec 1 PSH OF	NA754/70	1.92	1.53	0.12	0.27
19	Lot 2 DP 211908	NA139D/495	3.11	3.11	0.00	0.00
20	Part Allot 23 Sbrn Sec 1 PSH OF	NA2D/1016	0.10	0.10	0.00	0.00
21	Lot 1 DP 82415	NA39A/275	0.81	0.81	0.00	0.00
22	Lot 5 DP 209952	NA137C/788	0.28	0.28	0.00	0.00
23	Lot 3 DP 209951	NA137C/786	0.21	0.21	0.00	0.00
24	Lot 1 DP 209951	NA137C/784	0.27	0.27	0.00	0.00
25	Lot 2 DP 209951	NA137C/785	0.18	0.18	0.00	0.00
26	Lot 4 DP 209952	NA137C/787	0.28	0.28	0.00	0.00
Total (ha)			36.76	23.47	7.41	5.88
Total (%)			100.0%	63.9%	20.1%	16.0%

* Excluded (3.16 ha) area of zoned residential in PC55.

The total area of all titles in the subject area was 36.8 ha. Of this, an estimated 23.5 ha (63.9%) is land containing elite soil, 7.4 ha (20.1%) is land containing prime soil, and 5.9 ha (16.0%) is land containing other soil.

Land available for productive use

Not all the land in the subject area is likely to be available for productive use. Areas that comprise smaller land parcels, are dominated by infrastructure or planted with large trees would be impractical for arable or other primary productive uses, irrespective of whether the land contains elite or prime soils. Smaller land parcels adjoining larger titles have been included as potentially these adjoining areas could be leased out or amalgamated for productive use and contribute to the total contiguous land areas with potential for productive use.

The land practicably available for primary productive use and the proportion of elite, prime and other soil on these areas has been estimated. My estimate of the subject area land practicably available for productive use is 18.7 ha and is shown in **Figure 6**. This compares with an estimated usable area of 23.2 ha provided in PC55-appendix-9-land-productivity-

assessment. The difference in area is due to their inclusion of smaller titles which are primarily residential, which they also note in a separate column in Table 2 of their report.

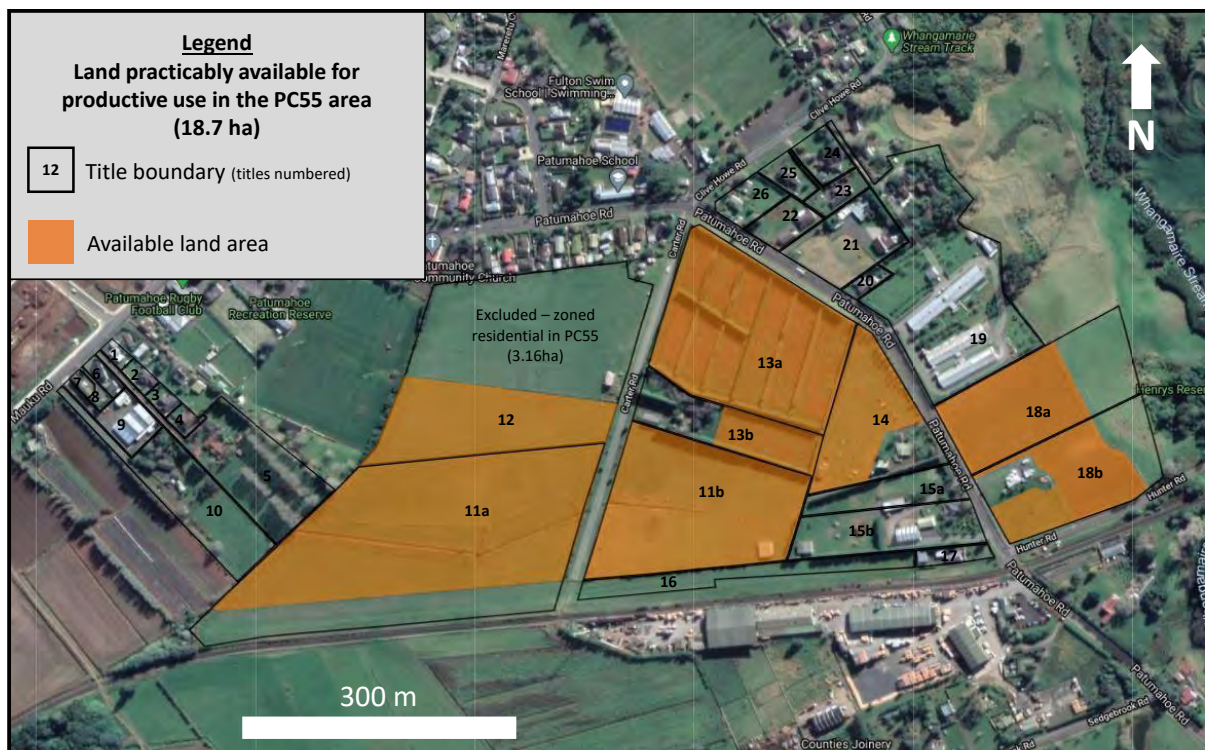


Figure 6. Estimated subject area land practicably available for productive use.

Based on the areas of land containing elite, prime, and other soil in the subject area (**Figure 5**) and applying the areas of land available for productive use (**Figure 6**), the areas containing elite, prime, and other soil on the available productive use areas can be estimated. **Figure 7** shows the distribution of land containing elite, prime, and other soil in the available productive use areas.

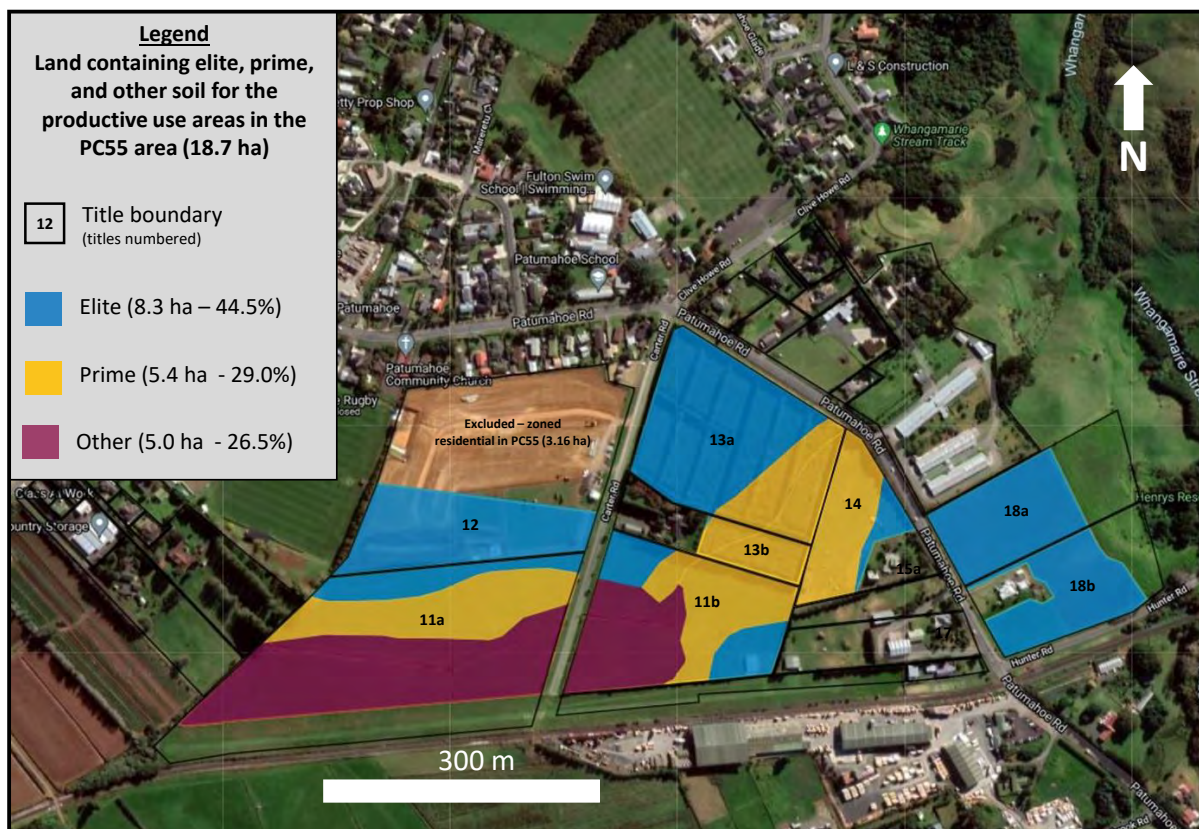


Figure 7. The distribution of land containing elite, prime, and other soil in the available productive use areas.

The estimated areas of land containing elite or prime soils for each title in the available productive use areas are shown in **Table 5**.

Table 5. The estimated areas of land containing elite or prime soils for each title in the available productive use areas.

Number	Appellation	Titles	Area (ha)	Estimated land containing elite, prime or other soils (ha)		
				Elite (LUC 1w1)	Prime (LUC 2e1, 2w1, 2s3, 2w1+2s3)	Other (LUC 3e2, 3w1, 4e2)
11a	Lot 1 DP 528517	854348	6.31	0.60	1.50	4.21
11b	Lot 2 DP 528517	854349	3.00	0.68	1.58	0.74
12	Lot 1 DP 169130 (part only)*	NA102A/185	1.84	1.84	0.00	0.00
13a	Lot 1 DP 98093	NA73C/1	3.29	2.38	0.91	0.00
13b	Lot 2 DP 125875	NA73C/1	0.51	0.00	0.51	0.00
14	Part Allot 48 Sbrn Sec 1 PSH OF	NA752/142	1.15	0.22	0.93	0.00
18a	Allot 50 Sbrn Sec 1 PSH OF Puni	NA754/70	1.38	1.38	0.00	0.00
18b	Part Allot 49 Sbrn Sec 1 PSH OF	NA754/70	1.23	1.23	0.00	0.00
Total (ha)			18.71	8.33	5.43	4.95
Total (%)			100.0%	44.5%	29.0%	26.5%

* Excluded (3.16 ha) area of zoned residential in PC55.

A broader desktop assessment of the soils under intensive cropping based on regional NZLRI soil map information¹⁸ and aerial photographic interpretation indicated that a large proportion of cropping in the broader area extending to Pukekohe was located on Patumahoe soils (**Figure 8**).

¹⁸ <https://iris.scinfo.org.nz/layer/48134-nzlri-north-island-edition-2-all-attributes/>

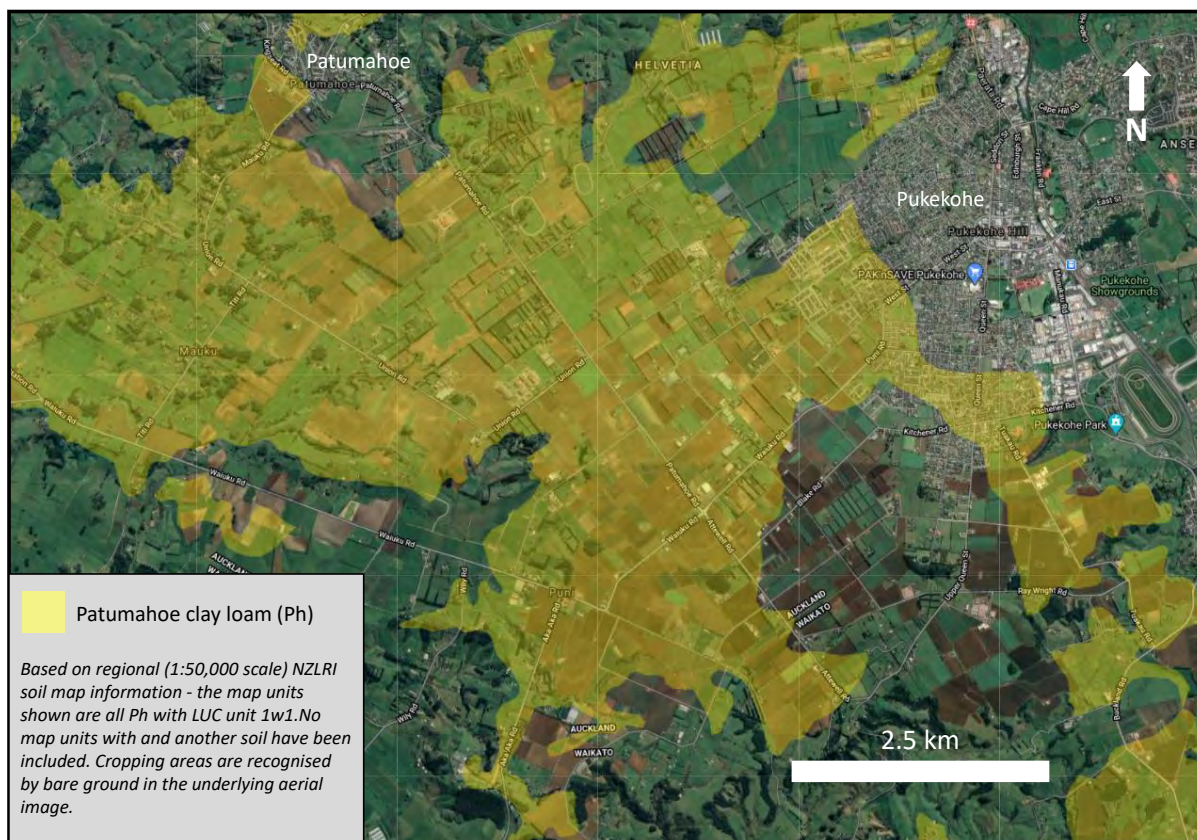


Figure 8. Distribution of Patumahoe clay loam soils relative to cropping land in the Patumahoe - Pukekohe area.

In my opinion, all 18.7 ha of land that I have identified as practicably available for productive use is capable of being used for food production irrespective of the various title sizes. This is based on:

1. The contiguous nature of the collective available areas,
2. the presence of elite soils on 8.3 ha which are the same soils used for continuous, year round, intensive vegetable production in the broader area extending to Pukekohe, and
3. the presence of 5.4 ha of prime soils that with some additional management area capable of at least seasonal food production.

Additionally, areas of land in the Auckland region of similar size have been in horticultural use for many decades. In a survey of outdoor vegetable growers in Pukekohe, the total effective vegetable growing area for those that responded to the survey ranged from as low as 12 ha to 170 ha, and a regional average of 35 ha was also referred to¹⁹. Furthermore, there is no way to predict the future viability of different sized land options, with the exception that the subdivision of these areas would almost certainly render them unavailable for any potential future productive uses.

Loss of land containing elite or prime soil

Table 6 summarises the area of land containing elite, prime, and other soil for all subject area titles, irrespective of current land use, and for titles with areas considered practicably available for productive use.

¹⁹ Curran-Cournane F, Cain T, Greenhalgh S, Samarasinghe O. 2016. Attitudes of a farming community towards urban growth and rural fragmentation- An Auckland case study. *Land Use Policy*. 58:241–250.

Table 6. The area of land containing elite, prime, and other land in the subject area (all areas rounded to 1dp).

Land containing elite, prime, and other soil	Estimated area (ha)	Estimated area (%)
Whole area	36.8	100
Elite	23.5	63.9
Prime	7.4	20.1
Other	5.9	16.0
Productive use area	18.7	100
Elite	8.3	44.5
Prime	5.4	29.0
Other	5.0	26.5

For the titles within the whole subject area, my assessment estimates 23.5 ha of land containing elite soils and 7.4 ha of land containing prime soils. Considering only the available productive use areas, I estimate 8.3 ha of land containing elite soils and 5.4 ha of land containing prime soils. The balance of the area (5.0 ha) is other soils that are productive soils but have moderate limitations of soil drainage or slope and are only suitable for pastoral land uses.

The subdivision as proposed will result in the loss of land containing both elite and prime soil totalling 30.9 ha (84%) across the whole subject area, and 13.7 ha (73.5%) on land I consider available for productive use. This loss of land from production will contribute to the ongoing loss of highly productive land in the Auckland region.

4.0 Applicant’s assessment

I have reviewed the applicant’s report *Soil and Resource Report for Patumahoe Rezoning Proposal* (PC55-Appendix 8 – Land use capability assessment) and note the following points.

Soil observations cover most areas within the subject area, with the exception of the smaller properties in the north of the subject area for which (based on the map of soil observations provided) there were only observations on the outside perimeter of this area.

In general the methods used for the soil assessment and LUC classification are sound and follow the accepted approach and guidelines used in New Zealand and soil information relevant to the subject area, namely Milne et al. (1995)²⁰, Lynn et al. (2009)²¹, and Orbell (1977). However, there was no reference to either the NZLRI LUC extended legend for the Waikato region or the FARM LUC.

The naming of soils differs for some of the soils compared with my assessment. On the whole, similar soil features are identified but a different soil name is given.

Soil names and areas that differed included:

Patumahoe clay loam identified on the lower lying areas

²⁰ Milne JDG, Clayden B, Singleton P.L, Wilson AD. 1995. Soil Description Handbook. Lincoln, New Zealand, Manaaki Whenua Press. 157p.

²¹ Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF. 2009. Land Use Capability survey handbook – a New Zealand handbook for the classification of land. AgResearch Hamilton; Manaaki Whenua Lincoln; GNS Science Lower Hutt, New Zealand.

I have named the area identified as Patumahoe clay loam on the lower lying areas as Helvetia clay loam as described in Orbell (1977), which I believe more closely fits with the soil descriptions I observed in the field; imperfect drainage. The LUC classification at class level is consistent. However, in my assessment I have classified Helvetia as LUC unit 2s3 and FARM LUC classes Helvetia clay loam as 1c. Given the imperfect drainage observed I believe LUC class 2 is appropriate for these soils on the lower areas (i.e. land containing prime soils).

Patumahoe strongly mottled clay loam

I have named the area identified as Patumahoe strongly mottled clay loam as Whangamaire clay loam as described in Orbell (1977), which I believe more closely fits with the soil descriptions I observed in the field; poor drainage, pale subsoil colours and the presence of humic silt and clay layers more typical of alluvial sediments and deposition. There is no soil name or description of Patumahoe strongly mottled clay loam provided in Orbell (1977). The LUC classification remains consistent (3w1) for the common area.

Ardmore peat

I did not identify the presence of Ardmore peat in my assessment. However much of the area in the applicants assessment was located in an area I did not have access to at the time of my assessment.

Patumahoe clay loam disturbed phase

I did not have access to this area to observe the soil and so cannot comment on the soil present and the degree of the soil disturbance.

In general, the soil boundaries shown on the applicant's soil map are similar to those in my assessment, noting the above mentioned differences in soil names. Where similar soil map units occur, some variation in the actual map unit boundary location is likely given soil boundaries are mostly gradational in nature and are difficult to define exactly even with a large number of observations.

The applicants LUC classification differed from my assessment. This is a fundamental difference in determining the presence of land containing elite and prime soils. **Figure 9** shows the LUC maps from both assessments.

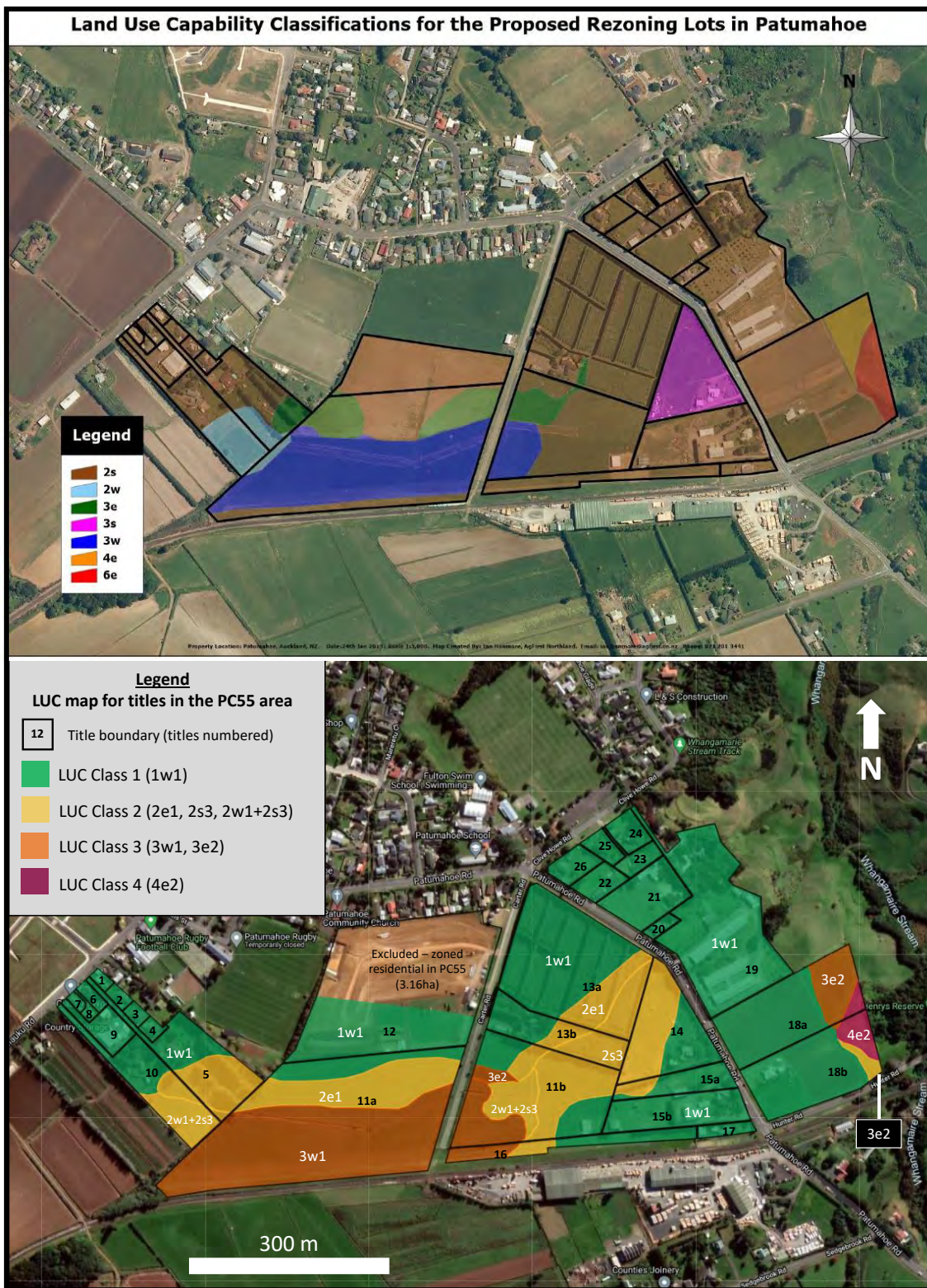


Figure 9. LUC maps from both assessments.

The main LUC classification differences are discussed.

The applicant has not identified any land containing elite soils. This is because the Patumahoe soils identified and mapped have been classified as LUC class 2s, with the greatest production limitation stated as “Soil characteristics due to clayey texture of the soil”.

The definitions for land containing elite and prime soils provided in the AUP do not refer to clayey soil texture. Land containing elite soils refers to well drained, friable and has well-

structured soils, flat or gently undulating slopes; and soils that are capable of continuous cultivation. In my assessment I have identified the areas of Patumahoe clay loam that have the required AUP definition characteristics and classified them accordingly as land containing elite soils rather than prime soil as in the applicant's assessment. The areas of Patumahoe clay loam I have identified include all of the following from the AUP definition for land containing elite soils:

- well drained (well drained and moderately well drained soils),
- friable and has well-structured soils,
- Flat or gently undulating, and
- capable of continuous cultivation,
- LUC1 land as mapped by the New Zealand Land Resource Inventory (NZLRI),
- other lands identified as LUC1 by more detailed site mapping;
- Land with other unique location or climatic features, and
- Patumahoe clay loam.

I believe the areas of Patumahoe clay loam rolling phase classified as 4e and possibly some of the area classified as 3e are incorrectly classified in the applicants assessment. My assessment of this approximate area measured slopes that place some of the area in the flat to gently undulating slope class, undulating slope class, and rolling slope class. Based on the slope and LUC criteria in Lynn et al. (2009)²² LUC class 4 has strongly rolling slopes, slope class D (16-20° slopes), rather than slope class C as stated in Table 2 of the applicant's assessment. This is further substantiated in the LUC extended legend for the Waikato region, which states that slope class D is required for LUC 4e2. This has some bearing on the resulting classification of land containing prime soils, meaning the area classified as 4e is correctly classified as LUC 3e (possibly also 1w1 and 2e depending on slope) and should be included in the area of land containing prime soils and some of the area land containing elite soils.

Overall, these differences would collectively result in the presence of land containing elite soils and more land containing prime soils in the subject area.

The applicant's assessment provides an indication of the land available for productive use (section 6.0 Potential Productivity). Their assessment identifies an area land with Patumahoe soil available for primary production within the rezoning area totals 11.17 ha and is classified as LUC class 2s. In comparison my assessment identifies 18.7 ha of land available for productive use. The differences in area are mainly due to my inclusion of soils other than Patumahoe clay loam and the applicant's exclusion of a 1.5 ha area (Title number 14) that they have classified as "Patumahoe clay loam disturbed phase".

I did not have access to Title 14 at the time of my assessment and cannot confirm if the soil in the area is disturbed. Generally, if a soil is disturbed it does not retain its soil name but is classified as an Anthropic Soil as defined by Hewitt (2010)²³. Hewitt (2010) describes the concept of Anthropic soils as follows:

"Anthropic Soils are soils that have been made by the direct action of people, including truncation of natural soils by earth-moving equipment, drastic

²² Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF. 2009. Land Use Capability survey handbook – a New Zealand handbook for the classification of land. AgResearch Hamilton; Manaaki Whenua Lincoln; GNS Science Lower Hutt, New Zealand.

²³ Hewitt, A.E. (2010). New Zealand Soil Classification. Landcare Research Science Series No.1, 3rd edition, Manaaki Whenua Press, Lincoln, New Zealand.

mixing of natural soils so that their original character is lost, or by deposition of thick layers of organic or inorganic material.”

Requirements for a soil to be classified as Anthropogenic are provided on pages 48-49 of Hewitt (2010). Generally, a disturbance depth of 30 cm either by removing the in-situ soil, deposition over in-situ soil, or mixing the in-situ soil is required for the soil to be anthropogenic.

If the soil does not meet the Anthropogenic soil criteria, the soil will have characteristics that are similar to that of an undisturbed in-situ profile and should be considered as such.

5.0 Comment on the use of the NZLRI

As mentioned, the applicant's assessment and LUC classification does not include consideration of the NZLRI LUC extended legend or the FARM LUC. Justification for this was provided by Mr Bob Cathcart of AgFirst in the letter Soils LUC Feedback 23 April 2020 - Letter to Auckland Council dated 23 April 2020. Mr Cathcart responded to a question by Dr Fiona Curran-Cournane enquiring why the Waikato Region: Extended Land Use Capability Legend had not been referred to. Mr Cathcart's response centred around the NZLRI LUC information was out of date and should not be relied upon, rather LUC classification should follow the criteria provided in Lynn et al. (2009) and the state of the land under current land use conditions. In response, I provide comment on the points stated.

I agree, the LUC classification in the Land Use Capability Survey Handbook (Lynn et al. 2009) provides the current criteria for defining LUC classes, sub-classes, and units. I am not entirely clear about the relevance of the statement:

“Not only is the Extended Legend out of date, but it also employed methodologies and approaches to productivity consistent with technology and practice of the time (1960's/70's), that have since been superseded”

My interpretation is the Mr Cathcart is referring to the inventory mapping itself, the productivity ratings provided for inventory units, or both. Modern technology has definitely enabled the production of more spatially correct mapping. However, this point would be irrelevant given the subject area is being informed by finer property scale assessment. I agree, productivity ratings provided for inventory units, which were based on production technologies of the time, and for most enterprises will be out of date. Again, I do not see the relevance for applying LUC classification to the subject area as definitions for LUC are based on defined criteria applied to the soils inherent characteristics, in turn identified by soil "type" and soil classification. Land management may temporarily alter the soil, but these are largely considered contemporary changes that change with changes in land management.

For the most part the LUC classification is still the same as that used for the mapping and development of the 1:50,000 scale inventory worksheets (map sheets) and associated extended legends. Although many of the worksheets have not been updated since the original mapping in the 1970s, the underlying classification criteria have remained the same as applied to land today. Lynn et al, (2009) clearly states (p98, paragraph 2) "It is important to note that farm LUC classifications are made using existing regional LUC units where possible or correlated with the regional equivalents to produce two levels of classification (a farm and regional classification). One of the objectives of the FARM LUC (Hicks and Vujcich, 2017)²⁴

²⁴ Hicks, D. L. and V. Vujcich (2017). Farm-scale land use capability classification for Auckland. Auckland Council Technical Report TR2017/016.

was to revise the LUC classification for the Auckland region and bridge the gap between the regional LUC units provided by multiple regional worksheets and extended legends. In doing so, they retained the eight LUC classes of the LUC classification system of Lynn et al. (2009) and correlating existing regional classifications where possible. This guidance is stated on page 104, Section 4.3.1 paragraph 2 of Lynn et al. (2009). The resulting FARM LUC remains interchangeable with the combinations of sub-class and unit in New Zealand Land Resource Inventory (NZLRI)²⁵.

A fundamental concept of the Land Use Capability classification is that it assesses land based on the capability of the land to support long term sustained production, with its productive capacity depending on the physical qualities of the land, soil, and the environment (Lynn et al. (2009). Physical qualities are largely inherent characteristics, rather than being defined by current land use, management, and productivity. This is an important point as it allows land with similar characteristics to be consistently assessed at local, regional, and national scales irrespective of how the land is being used at the time of assessment.

Irrespective of the imposed limitations resulting from current land use and land management practices, the Patumahoe clay loam soils in the subject area are the same soils used for commercial market gardening and vegetable production in the broader Patumahoe area.

6.0 Consideration of the AUP

The AUP recognises the value of Auckland's rural land which contains extensive productive areas beyond horticulture which are used for commercial farming, forestry, and recreation as well as the productive potential of land that does not contain elite or prime soil²⁶.

The purpose of sustainable management is to safeguard the life-supporting capacity of natural resources (including soil) now and in the future. This includes protecting the productive potential of the land to provide for present and future generations.

Any reference to LUC classes 1, 2 and 3 includes all-encompassing rural production activities (potential or actual) and recognises that 'no matter what type of rural production occurs, retaining land with high productive potential for primary production provides flexibility to improve economic performance, sustainably manage land resources and enable communities to pursue sustainable lifestyles'²⁷.

In my consideration of productive soil effects, I conclude that the areas identified as land containing elite or prime soil do require consideration with respect to their ability to produce food, as well as other uses (including commercial farming, forestry, and recreation) beyond horticulture alone. Consideration should also be given to the productive potential of the land to provide for present and future generations, irrespective of current land use and management.

7.0 Submissions

A number of submissions related to the productive soils theme noted the importance of retaining land containing elite and prime soils for food growing and production. I am in agreement with these submissions on the basis that the subject area does contain land for

²⁵ Hicks, DL and Vujcich V. (2017). Farm-scale land use capability classification for Auckland. Auckland Council Technical Report TR2017/016.

²⁶ AUP Rural Environment Chapter B Regional Policy Statement B9.1. Issues and B9.3.1.(3).

²⁷ AUP Rural Environment Chapter B Regional Policy Statement B9.5.

food growing and production. More specifically, I have identified that 18.7 ha of land in the subject area is practicably available for arable production and includes Patumahoe clay loam soils which are the most commonly soils used for vegetable production in the Auckland region, and are identified in the AUP as elite soil.

In addition to the above mentioned submissions I would like to specifically comment on two submissions.

1. Submission 23 Hickey

The submitter states that a property just opposite the proposed plan change area operates a thriving boutique horticulture business. They further note that even though the owners of the land covered in the subdivision proposal claim it is not economically viable that does not mean it will always be unviable however its productive ability will never be realised in the future if it has houses built on it. I agree with this, again current land use and production should not be used to determine the lands potential for production or its significance for food production. More so the inherent characteristics of the soil and land are the most objective means for this assessment. Contemporary land use and land management practices can result in “less than optimal” production on all soils, including elite and prime soils, but the potential production capacity remains for future generations. In contrast, the conversion of this land will inevitably result in the irreversible loss of this land from production for future generations.

2. Submission 17 Midnight Orchard

The submitter is the owner of the kiwifruit orchard at 21 Carter Road, within the subject area. The submission states that the bottom third of the orchard floods regularly (presumably each winter) and up to a month of pumping the water out is required to save the vines and 30 percent of the vines are dying from wet feet and Phytophthora. The submitter also states that the kiwifruit orchard barely makes a profit some years and losses other years. This is the main basis for the submitter supporting PC55.

The photo provided by the submitter shows extensive surface water in an area of the kiwifruit. Based on the submission I have the following comments.

The Helvetia clay loam mapped in the subject area (including the kiwifruit orchard (Title 13a) is closely associated with Patumahoe clay loam occupying lower lying areas and depressions (on the flat to gently undulating topography (0-3° slopes). Helvetia clay loam (as described in Table 3 of my report) are imperfectly drained soils and surface water such as shown in the photograph provided could occur. Although I did not have access to the area where the photograph was likely taken (Title 13a) my soil observations around the perimeter suggest that the 30% area estimate for these soils is similar to the area I have mapped for Title 13 (Figure 3), with the remainder of the area being Patumahoe clay loam. I do note that the FARM LUC classes Helvetia soils as 1c. However, based on soil drainage these soils in the subject area would not meet the “well drained” criteria in the AUP definition for land containing elite soils, and the LUC Class 2 classification (prime soils) as defined using the NZLRI extended legend for the Waikato region is more appropriate given the extent of the soils in the subject area.

From a soils perspective, the Patumahoe clay loam is known to have a slight wetness limitation (the reason for the “w” limitation noted in the NZLRI LUC classification). This is mainly due to the slow water movement in the soil because of the clay soil textures in the

subsoil. The Patumahoe soils are not suited to some intensive horticulture land uses that require well drained lighter textured soils for the reason stated by the submitter – that they do not like “wet feet”. This is especially so for kiwifruit and viticulture. However, this does not exclude these soils for other shallower rooted intensive food production uses, as is evidenced by the presence of intensive (and continuous) vegetable production on the Patumahoe clay loam soils in the broader surrounding area extending to Pukekohe.

A further comment is that soil compaction resulting from long term use of machinery could be exacerbating surface water ponding. Soil compaction is a commonly identified soil quality impact on Patumahoe clay loam soils under intensive vegetable cropping²⁸, and other soils under fixed row orchards and horticulture²⁹. Reduced soil quality can be reversed, with changes in land use management practices (e.g. use of cover crops to restore the carbon content of the soil, minimal tillage practices, minimising machinery passes).

For this reason, it is important to classify land and soils based on their inherent characteristics rather than current land use management and land use production. Dr Hicks eludes to this with respect to soil compaction in his Environment Court Rebuttal evidence (between Self and Auckland Council - ENV-2016-AKL-304-000199), noting compaction is an induced limitation which can be remediated.

8.0 Conclusions

A field assessment of the subject site undertaken on 1st November 2019, identified and mapped the soils and LUC units across the subject area.

In general, my assessment of the soils was similar to that provided by the applicant with the exception of soil names used, and minor soil map unit boundary differences.

Based on my assessment, the titles comprising the subject area contains an estimated 23.5 ha of land containing elite soil, 7.4 ha of land containing prime soil, and 5.9 ha of land containing other soil.

Based on my assessment, the available productive use areas in the subject area total 18.7 ha, with an estimated 8.3 ha of land containing elite soil, and 5.4 ha of land containing prime soil.

Based on the applicants assessment, no land containing elite soil was identified, and 31.7 ha of land containing prime soil was identified. They estimated 11.17 ha was considered available for productive use.

The main difference between the areas of land containing elite and prime soil are because of LUC classification differences of the areas of Patumahoe clay loam.

Irrespective of the LUC classification of the Patumahoe clay loam areas, the definition for land containing elite soils provided in the AUP specifically names Patumahoe clay loam as an elite soil.

²⁸ Curran-Cournane, F (2020). Differences in soil quality and trace elements across land uses in Auckland and changes in soil parameters from 1995-2017. Auckland Council technical report, TR2020/001; Taylor M, Cox N, Littler R, John Drewry J. (2017) Trends in soil quality monitoring data in the Waikato region 1995-2015. Waikato Regional Council Technical Report 2017/26. Waikato Regional Council, Hamilton.

²⁹ Oliver M. (2017) Soil Quality in the Marlborough Region in 2016. MDC Technical Report No: 17-003. Marlborough District Council, Blenheim.

In my opinion, the 18.7 ha of land I have identified in the available productive use areas is capable of being used for food production (irrespective of the various title sizes) based on:

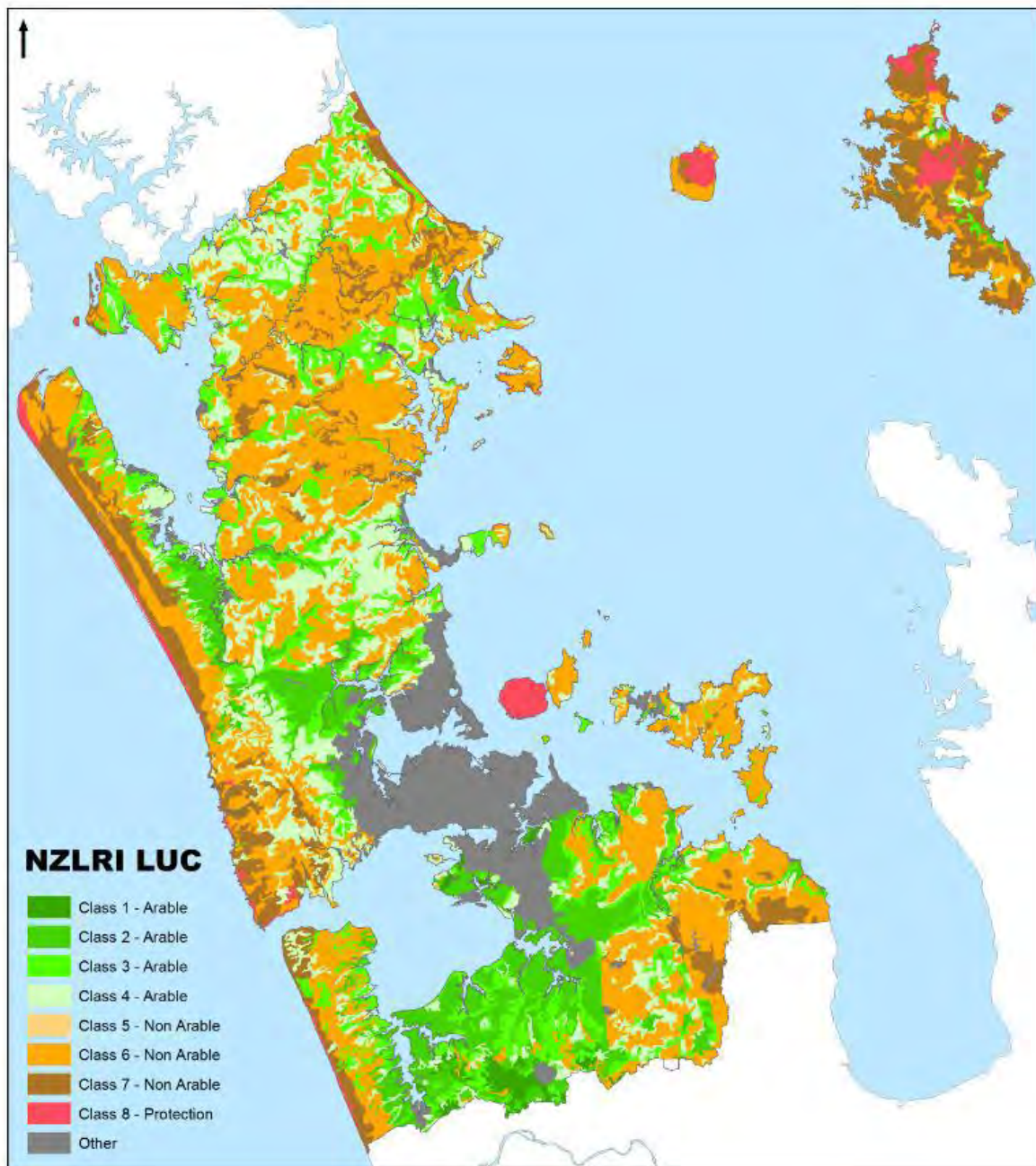
- The contiguous nature of the collective available productive use areas,
- the presence of 8.3 ha of land containing elite soil, which has the same soil used for continuous intensive vegetable production in the broader area extending to Pukekohe, and
- the presence of 5.4 ha of land containing prime soil, that with some additional management is capable of at least seasonal food production.

Irrespective of current land use management and productivity, the soils on this land are capable of commercial vegetable production, as is indicated by its presence on these soils across the broader Pukekohe-Patumahoe area.

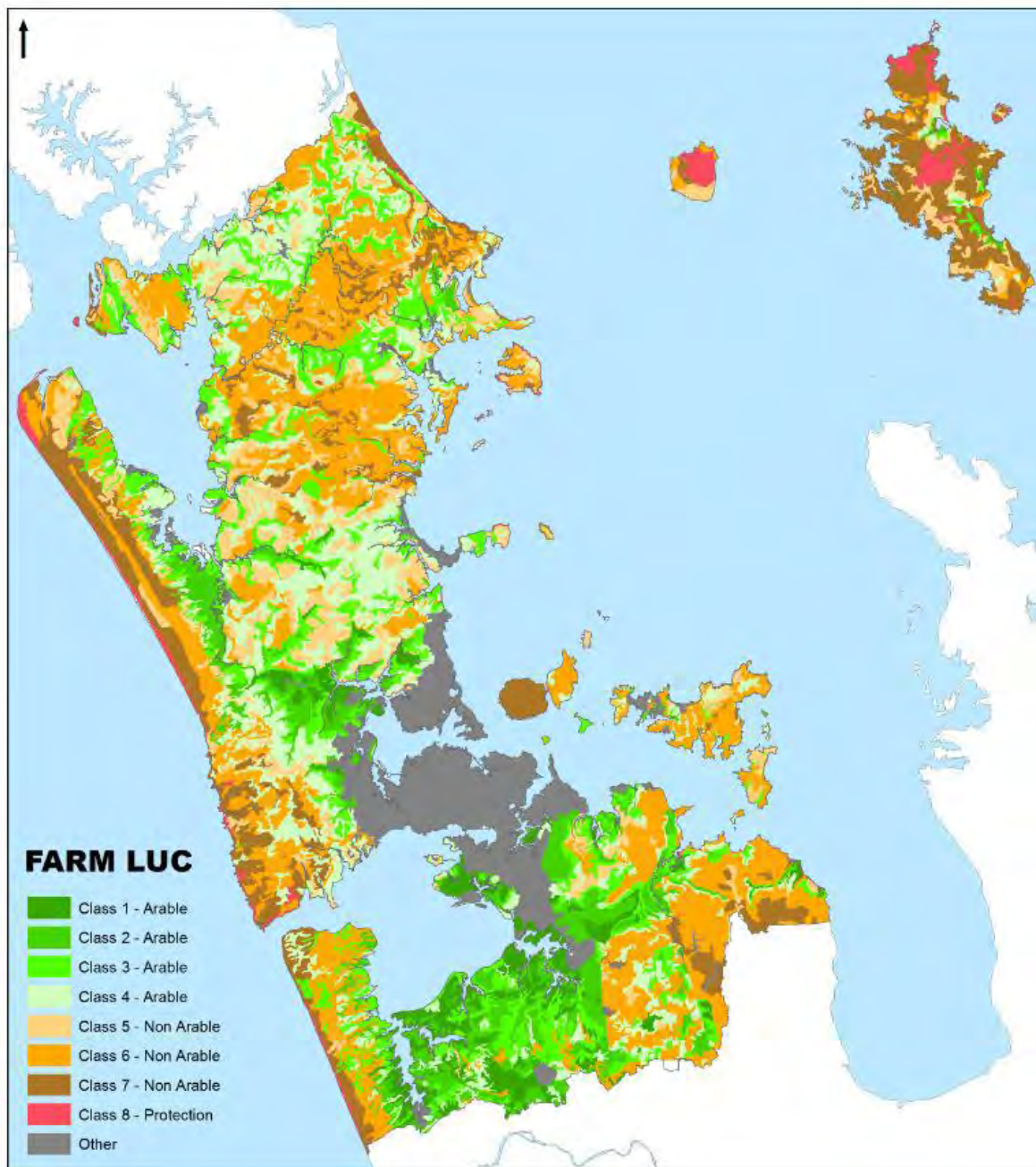
From a productive soil perspective, assessing the value of the subject area land containing elite and prime soils on its ability to support a viable horticultural enterprise alone, neglects to fully recognise the AUP, and the value of retaining land with high productive potential for primary production for present and future generations.

For this reason I do not support the current PC55 proposal from a productive soil perspective on the basis of that it will result in the loss of land containing elite and prime soils that have potential for food production.

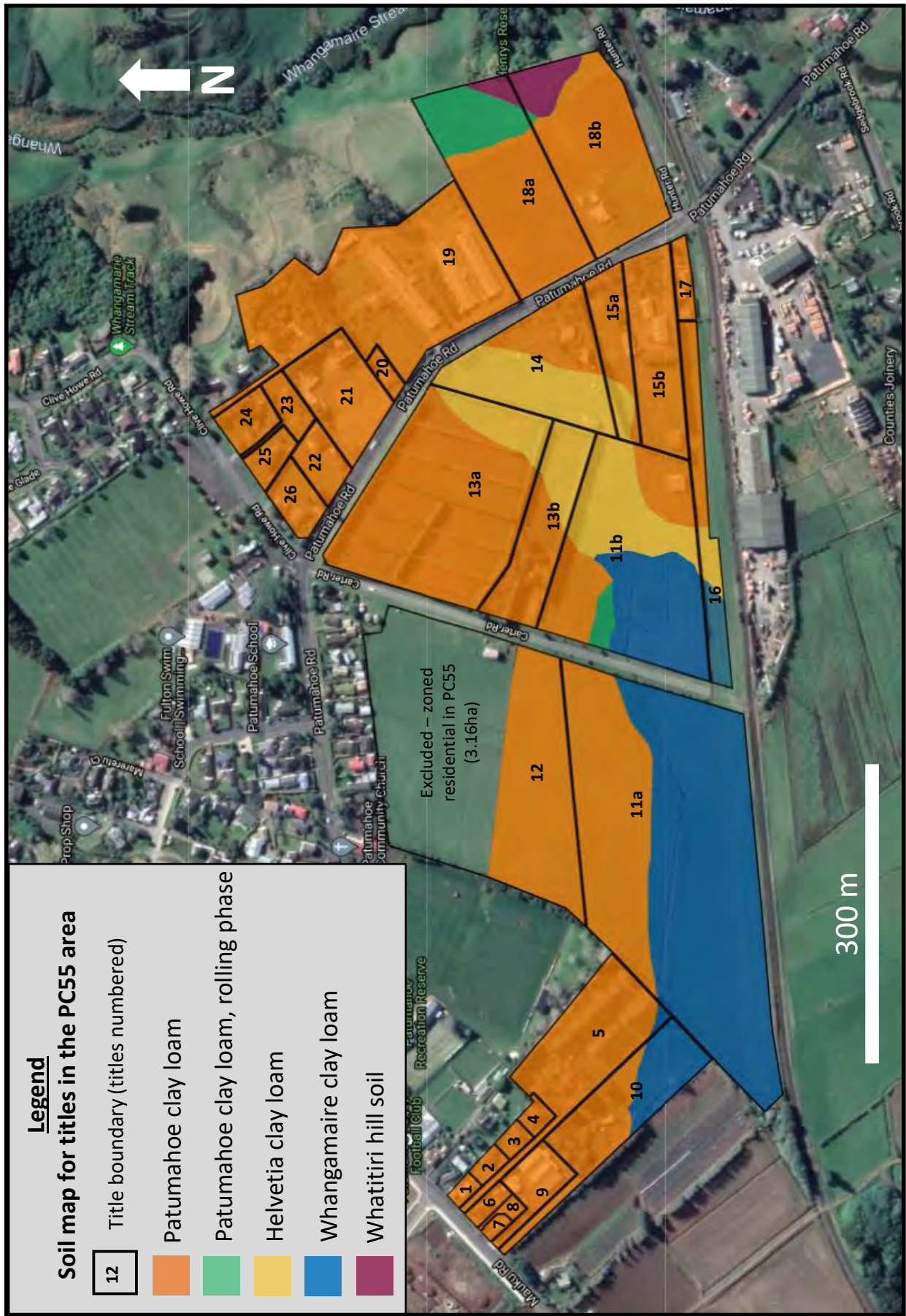
Appendix 1. Baseline NZLRI LUC classification according to the AUP boundary (from Figure 1A).



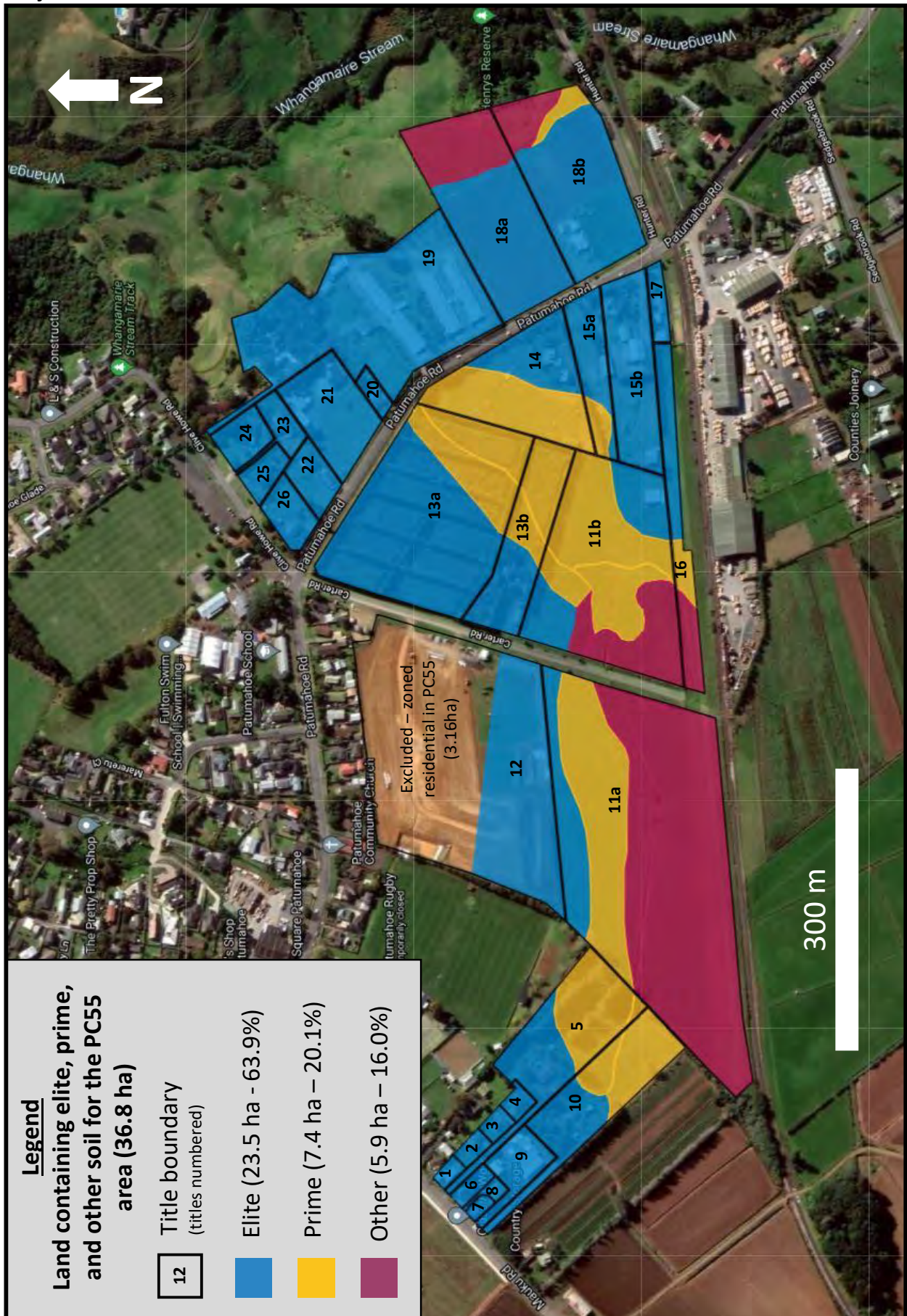
Appendix 2: Baseline FARM LUC classification according to the AUP boundary (from Figure 1B).



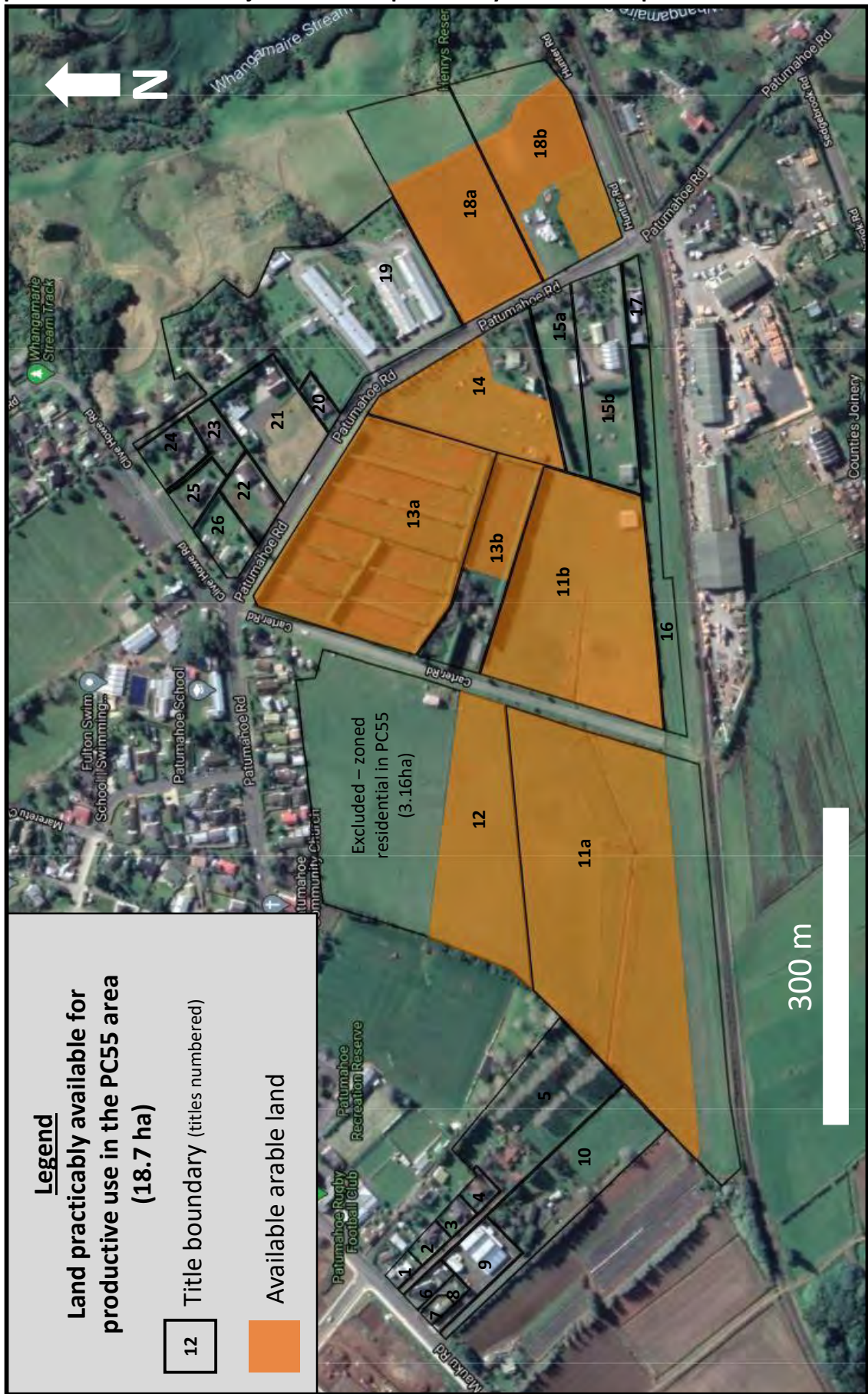
Appendix 3: Soil map of the PC55 subject area.



Appendix 5: The distribution of land containing elite, prime, and other soil for the PC55 subject area.



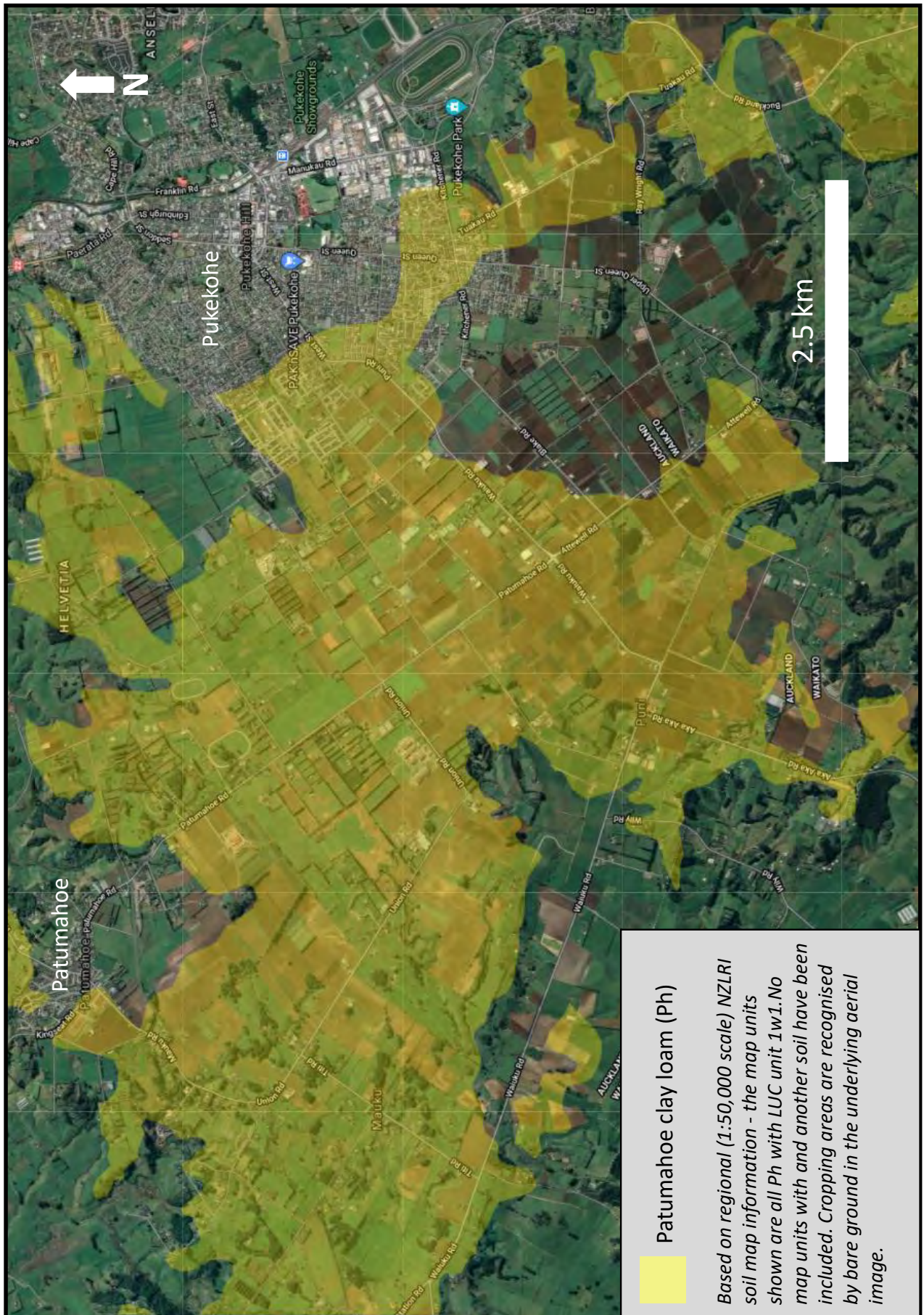
Appendix 6: Estimated subject area land practicably available for productive use.



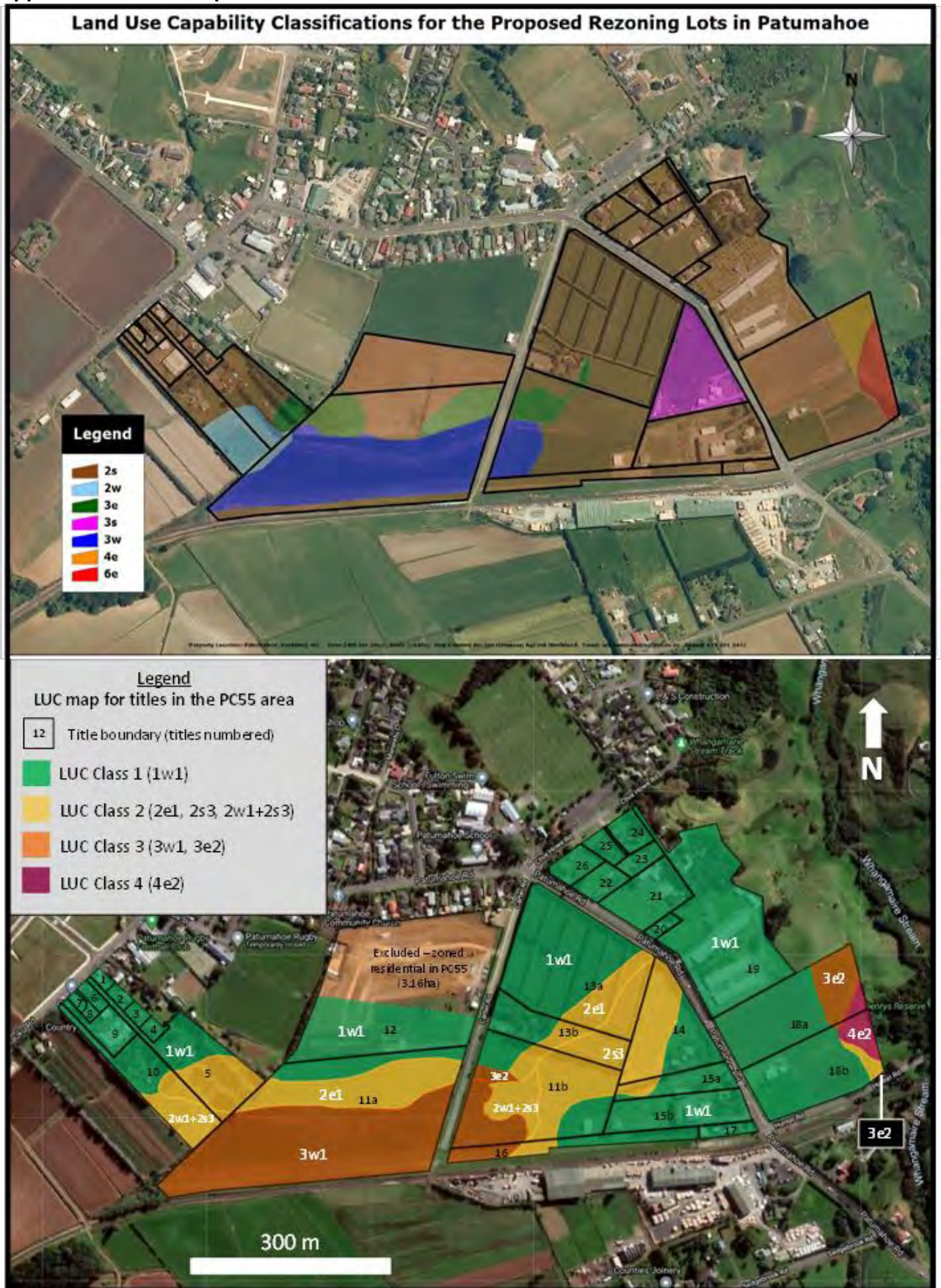
Appendix 7: The distribution of land containing elite, prime, and other soil in the practicability available productive use areas.



Appendix 8: Distribution of Patumahoe clay loam soils relative to cropping land in the Patumahoe - Pukekohe area.



Appendix 9: LUC maps from both assessments.



Landscape Effects Memorandum



Date: 25 June 2021

To: Chloe Trenouth, Consultant Planner, for Auckland Council

cc: Sanjay Bangs, Policy Planner, Auckland Council

From: Ainsley Verstraeten, Principal Landscape Architect, Auckland Council

Subject: Private Plan Change – PC55 Patumahoe South – Landscape Effects

Introduction

1. I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to the specific topic of landscape effects.
2. I have worked as a Landscape Architect for 13 years and have worked at Auckland Council since 2014. I am currently a Principal Landscape Architect in the Design Team, Urban Design Unit of the Plans and Places Department, Auckland Council. Further details of my qualifications and experience are set out in Appendix 1.
3. For the purpose of reviewing this application, I visited the site in November 2019, and again in March 2021, which included the surrounding area and locations of viewpoint photography.
4. When coming to a conclusion on the scale of effects I have utilised the same rating scale as included within the Landscape and Visual Effects Assessment (LVEA) by Bridget Gilbert Landscape Architecture.¹
5. Overall, it is considered that the application will result in a range of landscape effects from moderate to moderate – low.

Relevant application material reviewed

6. I have reviewed the following relevant application material:

Submitted with the original application

- *Assessment of Effects and Section 32 Report, prepared by Envivo, dated 01.10.2019,*
- *Landscape and Visual Effects Report (LVEA), prepared by Bridget Gilbert Landscape Architect, dated September 2019*
- *Urban Design Assessment, prepared by Ian Munro, dated June 2019*

Submitted as further information in response to Clause 23 request

- *Landscaping, Urban Design and planning feedback*

Notified documents

¹ Included in Appendix 2 of this memo

- *Assessment of Effects and Section 32 Report, prepared by Envivo, dated 26.06.2020,*
- *Landscape and Visual Effects Report (LVEA) Rev A, prepared by Bridget Gilbert Landscape Architect, dated June 2020*
- *Urban Design Assessment, prepared by Ian Munro, dated June 2019*
- *CIA reports from Ngati Te Atata (January 2019) and Ngati Tamahoho (not dated)*

Submissions

I have read all 45 submissions and the further submissions and will address issues raised within this memo.

Methodology / clarifications

7. I can confirm that while RFI points were responded to there remains some inconsistency between the LVEA and the proposed precinct standards. There are a number of design controls mentioned within the LVEA that are relied on in coming to a conclusion of the level of effects which have not been carried through into the precinct provisions. This is important as the LVEA relies heavily on landscape buffers and design controls as mitigation for effects and the ratings are (in some cases) based on fast growing exotic species yet the precinct standards do not include this. I do however have enough information to complete a review in terms of the proposals actual and potential landscape effects and consistency with the relevant objectives and policies of the Auckland Unitary Plan (Operative in Part) (“AUP(OP)”).
8. The following development controls are included within the LVEA and not the precinct:
 - a. Fast growing exotic species within the 5m wide landscape buffer.
 - b. Rural style streetscape typologies
 - c. A landscape framework strategy
 - d. Rural style fencing controls

Key Landscape and Visual Effects Issues

9. In my opinion, the key issues that relate to an assessment of landscape effects that arise from the proposed plan change relate to rural character and amenity values. Aside from the issue of whether residential development is appropriate on high quality soils, or whether urban development is appropriate in this location, my assessment focuses on whether the proposed plan change will be consistent with the local character of the town or village and surrounding area². I also focus on whether the proposal adversely affects rural character, amenity and landscape values and whether these have been mitigated³.

Landscape Character

10. I agree with the LVEA that the wider landscape is dominated by horticultural and agricultural land uses which reflects the high quality of soils. When considering landscape values, soil types are a key factor in this area’s biophysical values.
11. Other landscape features within the site that contribute to rural character are the tall shelterbelts, the areas of open landscapes between townships, open grass swales (as opposed

² AUP (OP) B2.6.1(1)(d)

³ AUP (OP) B92.2 (1)

to kerb and channel), undulating topography and dwellings being setback from the road by between 10m – 30m.

12. However, there are elements within the landscape that detract from the areas rural character which include, footpaths along the eastern side of Patumahoe Road and northern side of Mauku Road, the scale of the timber yard (and associated area of car parking) and the sites proximity to residential properties (and an approved subdivision) along the northern edge of the site.
13. The proposed plan change would extend the single house zone (SHZ) an additional 500m south-east along Patumahoe Road or a total of 810m (approx.) from the Neighbourhood centre. In comparison, the SHZ along Woodhouse Road is 400m from the neighbourhood centre. The extension of the SHZ along Mauku Road is similar to what is proposed along the opposite side of the road within the Patumahoe Hill subdivision.
14. New lots along Patumahoe Road will be the same size as the existing SHZ sites at 800m². This is also consistent with lots fronting Woodhouse Road (off Searle Drive) which are around 780m². I am of the opinion that this increase or stretch of SHZ along one of the main roads into Patumahoe will adversely affect rural character and values of the area. It will extend the gateway into the 'township' to the timber yard at 108 Patumahoe Road, rather than at the school (or just before). This results in the gateway to Patumahoe being light industrial activities, a relatively hard edge adjacent to a rural zone.
15. While I agree that the rail line provides a clear defensible edge to the township, Carter Road and Clive Howe Road could also be considered a defensible edge and would contain and be consistent with the spread of residential development throughout Patumahoe in north, north-west and south-west directions.
16. Landscape buffers are proposed as mitigation measures as a way of containing the site or filtering views towards the site as well as separation between the SHZ and light industrial uses. The 10m wide buffer proposed along the western edge at Mauku Road, is intended to act as a defensible edge to development. I am unconvinced with the location, width and purpose of this buffer for the following reasons:
 - a. The landscape buffer on the opposite side of the road is 20m. I understand this is due to the elevated nature of Patumahoe Hill and the need to reduce visibility from further south down Mauku Road. However, it is my view that a buffer that matched the opposite side would be more appropriate and act as a more defensible edge. Submissions from Horticulture New Zealand⁴ suggest that a buffer no less than 15m is required for reverse sensitivity issues.
 - b. The requirement of indigenous trees is likely to mean that these plants will be slow growing and take some time to form any kind of visual buffer.
 - c. There is no rationale for why the proposed edge to the precinct has been located here and not further west, although the current location does contain the spread of residential development further down Mauku Road.
17. The 5m wide landscape buffer along the southern boundary and in between the SHZ and light industrial zoning is supported from a residential amenity perspective. The proposed 3m wide strip along the southern boundary of the industrial zoned section is also supported for its inclusion of fast-growing exotic species which will assist in providing a backdrop to the industrial land and filter views when travelling in a northerly direction. This section of industrial land will be visible when crossing over the rail line so its inclusion will assist in providing a softer / more

⁴ Submission no. 31

rural 'gateway' character to the township. It is recommended this buffer is shown on precinct plan 3.

18. Should the level rail crossing be upgraded, and required this buffer to be reduced, I consider low level planting such as hedgerows (for vehicle sightlines) to be an appropriate treatment along a short portion of the southern boundary where it adjoins Patumahoe Road.
19. In terms of the future urban zoned (FUZ) land, the existing character is rural lifestyle closer towards the school⁵ and rural production with open pasture / horticulture and the chicken farm. A range of opinions for this area was provided within submissions, including that the site remains rural production or that it be live zoned residential – large lot.
20. In my opinion, once the western side of Patumahoe Road is rezoned residential, there is no defensible edge to ensure this character doesn't encroach to the other side of the road. To have a residential zone on one side of the road and rural on the other would detract from the rural character values and reduce the ability to defend the residential edges of the township.
21. Overall, I consider the extension of SHZ to result in moderate⁶ adverse effects on rural character. I consider urbanisation of the eastern side of the site (the FUZ area) to be inappropriate given the sensitivity of the escarpment and the interface between the bush reserves. The inclusion of light industrial zoning adjacent to the rail line and timber yard could result in adverse rural character effects due to its location at the gateway to the village however the proposed landscape buffer in this location will assist in mitigating effects to a moderate – low degree.
22. Should the proposed plan change be approved I recommend the removal of the FUZ as proposed. This is because further assessment is required in order to ensure the values of the escarpment landform is appropriately protected / treated. This is likely to include a setback from the edge, boundary to follow contours rather than cadastral lines, additional landscape buffers and building height controls.
23. The Urban Design memo by Ms Bitossi, assesses three possible alternative solutions for the location of a road connection to Mauku Road and the western boundary of the site. I agree that a wide landscape buffer at this location is a better solution for a defensible edge as opposed to a road only. This is because it would contain the residential land and limit the wider effects on rural character.

Visual effects

24. The site is relatively well contained with its main public viewpoints being from Patumahoe Road with only a small area being visible from Mauku Road (once the the proposed landscape buffer establishes). There will also be views from the Domain however there is already an expectation of residential development directly adjoining this area with the approved subdivision and the existing SHZ in this location.
25. The LVEA notes, that where visible, there will be a significant visual change however the development controls will read as an attractive, relatively low key and leafy rural village typology. However, in my opinion, the significant visual change on one of the main roads in and out of the village, will have an impact on how road users (visitors and residents) perceive this landscape. I do not consider the proposed development controls (or assessment criteria) to mitigate this visual change.
26. This change will adversely affect the amenity values of Patumahoe Village. Through submissions, residents' value the small scale and rural 'atmosphere' or 'aspect' of the village.

⁵ Existing lots range in size from 1012m² to 8094m² (the majority being between 1831m² and 2827m²).

⁶ See Appendix 2 for the effects rating scale

To remove a significant portion of rural land at the gateway to the village will adversely affect rural amenity values. As mentioned above, I do not consider the precinct provisions to be consistent with rural character or respond to the areas sense of place. They do not mitigate the significant visual change as there are no controls proposed that reflect the sites location in a small rural village.

27. The location of the light industrial land adjacent to the 'defensible edge' of the rail line will result in an abrupt threshold into the village. However, the proposed landscape buffer in this location will reduce this impact and the exotic species will ensure a buffer is produced within an acceptable timeframe.
28. I therefore disagree with the LVEA that the development (where visible) will result in an "attractive, relatively low key and leafy rural village typology". In part this is due to some of the development controls not being included within the precinct, but also that the controls do not go far enough in ensuring development responds (maintains or enhances) to the areas rural sense of place and character. I consider the precinct as proposed will result in a reduction in visual amenity values.
29. The LVEA notes the transient nature of road users as being less sensitive and while I agree they are less sensitive than residential audiences, this doesn't factor in these users are likely to be residents of the area who place a high level of amenity value from the rural qualities of the village or that Patumahoe Road is a main road between Pukekohe and Patumahoe.
30. Effects on views from rural and residential properties to the east are considered to be moderated by distance. However, in my view, the visual change is so significant that the change in character from rural to residential is so great that distance does little to moderate effects. The LVEA also notes the development controls (which are not proposed within the precinct) will ensure new development sits comfortably alongside the existing rural patterning. In my opinion effects are therefore likely to be moderate.
31. In order for new development to contribute to or enhance the sense of place of Patumahoe Village, I would have expected standards on building coverage and yards in order to appropriately maintain or enhance the existing "rural village character". These lots are located further away from the village centre than other residentially zoned land on main roads into and out of the village.
32. Should the plan change be approved, I consider new lots along Patumahoe Road need to respond to a more rural character than other single house zoned sites within Patumahoe i.e. Woodhouse Road which is a typical single house zone character. This will ensure development is more consistent with a 'rural village' character. This would include controls such as deeper front yard setbacks, with the requirement for at least one large specimen tree to contribute to a leafy character, reduced building coverage, rural fence typologies and others.

Rural Precinct Example

33. A useful precinct to draw comparisons from is Beachlands 1 which also has underlying SHZ and is adjacent to a rural zone. This location may be quite different in context, however the precinct includes an objective to *establish and maintain a low density, open spacious rural and coastal village character* and policies such as the ones listed below:

1403.3(5) Maintain the existing pattern of development and low-density character of the area.

1403.3(6) Require a development pattern characterised as one house per site

1403.3(10) Encourage the development of buildings that have a coastal appearance using materials, colours and features that complement the rural and coastal character of the original village.

1403.3(12) Retain a sense of openness between properties, and create a vegetated appearance through tree planting.

34. In my opinion this is a much clearer and direct approach in terms of identifying what the precinct is trying to achieve. Patumahoe precinct objective 1 seeks development that contributes to a sense of place which is quite subjective and doesn't discuss what that sense of place is. Below is a comparison table between the standards used in the Beachlands 1 precinct to achieve the low density, open spacious rural character, and a comparison with the SHZ.

Standard	Beachlands 1	Single House Zone
Front yards	6m	3m
Side yards	one side 2m the other side 3m	1m
Rear yards	8m	1m
Impervious area	40%	60%
Building coverage	30%	35%
Accessory building height	4m	N/A

35. In my opinion, the above standards are useful tools to assist in achieving a more 'rural' and spacious character. The Patumahoe precinct does not include these standards and instead relies on the underlying zoning (SHZ) and standards focused on colours of buildings, the height of retaining walls, paving materials and landscape buffers. While these all assist in reducing visual impact they do very little in achieving a rural character or sense of place that is inherently Patumahoe. I therefore recommend the above standards are considered for the new SHZ sites fronting on Patumahoe Road.

Submissions

36. I have reviewed all submissions made on the proposed private plan change, concentrating on those that raise landscape matters. I have grouped the relevant issues raised into sub-topics, as set out below. I have responded to issues a) and b) already in this memo and will discuss the remaining issues below.
- a. Change to the character of Patumahoe, loss of rural village atmosphere
 - b. Light industrial zone an unattractive entry to the area.
 - c. FUZ inappropriate for already urban land (suburban character with kerb and channel and other infrastructure). Should be live zoned as residential large lot.
 - d. Land east and west of the proposed boundaries to be included within the precinct.
 - e. Significance of landscape to mana whenua

Future Urban Zoned land

Land to the east of the proposed FUZ

37. Submitter #35⁷ also suggests that the land directly to the east of the proposed FUZ should be included within the plan change area. As mentioned previously, I consider the value of this landscape to be too high for future urbanisation, although I can see the benefit of formalising the connection between Henry's Scenic Reserve and Clive Howe Bush Reserve.

Land to the west of the proposed plan change boundary

38. Submission #42⁸ which is directly adjacent to the western boundary of the plan change area, queries why their property has not been included within the plan change as it has many of the qualities its neighbouring site has and is directly opposite sub-precinct B. I consider this submission raises some valid issues with regards to where the appropriate edge is for the precinct and that thorough analysis hasn't been provided in this regard.
39. They seek a variety of decisions should the plan change be approved, including the inclusion of their site within sub-precinct E, zoned as either FUZ, SHZ or LIZ or if their site is not included a landscape buffer included on all boundaries that abut the site.
40. In my opinion, it is important for the precinct to be as compact as possible. Therefore, it is appropriate to keep the site boundary where it is (or closer towards the village centre). The existing sites fronting onto Mauku Road are already zoned residential – single house so there is a logical reason for the location of the western edge in that regard. The proposed precinct plan 3 includes a 10m buffer along the submitters eastern and southern boundaries.

Significance of land to mana whenua

41. Submissions from Heritage NZ⁹ raises the issue of the precinct provisions not giving enough surety that the recommendations of Ngāti Te Ata and Ngāti Tamaoho will be incorporated into the future development within the precinct. I agree with their recommendation that Te Aranga design principles should be incorporated into the precinct provisions, especially around the stormwater areas.

Conclusions and Recommendations

42. Overall, I do not consider the proposed plan change (as notified) to be consistent with the intent of the RPS with regards to maintaining rural character and amenity values. It is my opinion that the proposed plan change would result in moderate adverse effects on rural character and amenity values.
43. However, should the plan change be approved the following are recommended:
- a. Specific standards for lots fronting onto Patumahoe Road. This would include standards such as deeper front yards (6m) and side yards (2m) to ensure there is an appropriate transition to the rural area, more space for a landscape buffer / specimen trees and development will be more consistent with the rural land opposite.
 - b. Rural fence controls such as post and rail, along Patumahoe Road to be more consistent with a rural typology
 - c. Building coverage to not exceed 30%.

⁷ Owners of 23 Clive Howe Road

⁸ Owners of 30 Mauku Road

⁹ Submission #44

- d. The western landscape buffer shall be increased to 20m to be consistent with the buffer on the other side as well as being appropriate for reverse sensitivity issues with the adjoining rural production zoned land and in achieving a 'defensible edge'.
44. In order to achieve the 'leafy' identity mentioned within the LVEA I recommend the inclusion of a landscape concept plan similar to what is included for sub precincts B, C and D. Alternatively, landscape framework plan' or 'comprehensive planting strategy' be submitted at the time of subdivision would suffice. The landscape framework would be an appropriate mechanism for including a Te Aranga Māori Design Matrix.
45. The precinct plan refers to a 3m landscape buffer along the southern edge of the Light Industrial Zoned land. As mentioned previously I support this buffer, however this is not shown on precinct plan 3. It is recommended that this be clearly shown in order to strengthen this requirement.

Kind Regards

Ainsley Verstraeten

Principal Landscape Architect, NZILA Registered
Auckland Council
021 807 410

Appendix 1: Qualifications and experience

Ainsley Verstraeten

Principal Landscape Architect

Design Review, Urban Design Unit.

Bachelor of Landscape Architecture (2005), Lincoln University, NZ

Registered Member of New Zealand Institute of Landscape Architects

I have been with Auckland Council in the design review team since July 2014. I have 13 years industry experience in NZ and the UK, in both the public and private sector. In my current role as Principal Landscape Architect, I specialise in design review and the assessment of landscape and visual effects for projects of various scales. I am responsible for reviewing applications for resource consent including major infrastructure projects, residential and mixed-use developments, subdivisions, public realm and projects within sensitive landscapes such as coastal environments and outstanding natural landscapes.

I have attended and provided evidence at council hearings over the last 4 years.

Appendix 2: BGLA Landscape Effects Rating Scale

Effect Rating	Use and Definition
Very High:	Total loss of key elements / features / characteristics, i.e. amounts to a very significant negative change in visual amenity and/or landscape values.
High:	Major modification or loss of most key elements / features / characteristics, i.e. little of the pre-development visual amenity and/or landscape values remains and amounts to a significant negative change in visual amenity and/or landscape values. <i>Concise Oxford English Dictionary Definition</i> <i>High: adjective - Great in amount, value, size, or intensity.</i>
Moderate - High:	Modifications of several key elements / features / characteristics, i.e. the pre-development visual amenity and/or landscape values remain evident but materially changed.
Moderate:	Partial loss of or modification to key elements / features / characteristics, i.e. the pre-development visual amenity and/or landscape values remain evident but are changed. <i>Concise Oxford English Dictionary Definition</i> <i>Moderate: adjective - average in amount, intensity, quality or degree</i>
Moderate - Low:	Minor loss of or modification to one or more key elements / features / characteristics, i.e. new elements are not uncharacteristic within landscape and do not disturb the pre development visual amenity and/or landscape values.
Low:	Very little material loss of or modification to key elements / features / characteristics. i.e. new elements integrate seamlessly into the pre-development visual environment and/or landscape values. <i>Concise Oxford English Dictionary Definition</i> <i>Low: adjective- 1. Below average in amount, extent, or intensity.</i>
Negligible:	Negligible loss of or modification to key elements/features/ characteristics of the baseline, i.e. influence of new elements is barely discernible with respect to visual amenity and/or landscape values.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

13 April 2021

To: Sanjay Bangs, Policy Planner, Auckland Council
From: Ezra Barwell, Senior Policy Advisor, Auckland Council

Subject: Open space assessment of Private Plan Change 55: Patumahoe South that aims to rezone approximately 34.5ha of land from primarily Rural Production to Residential - Single House, Business - Light Industry, Open Space - Informal Recreation and Future Urban zones; and apply I403 Patumahoe Precinct to the land, with amendments to I430 Patumahoe Precinct

1.0 Introduction

1.1 I have undertaken a review of Private Plan Change 55 on behalf of Auckland Council in relation to open space.

I have a Bachelor of Parks, Recreation and Tourism Management degree from Lincoln University and a Master of Science in Environmental Science from the University of Auckland.

I have worked in local government since 2002 in the areas of parks and open space management, strategy, planning and land acquisition.

My current role entails strategic planning for current and future open space networks and acquisition of land for open space purposes.

One of my open space planning functions is providing advice on the appropriate zoning of open space land.

1.2 I have reviewed the following documents when preparing this memo:

- PC 55 - Plan Change Request, AEE and Section 32 Report, including, specifically:
 - Appendix 1A: CIA - Ngāti Tamaoho
 - Appendix 1B: CIA - Ngāti Te Ata
 - Appendix 2: Urban Design Assessment
 - Appendix 3: Landscape and Visual Assessment
 - Appendix 11: Stormwater Management Plan
 - Appendix 12: Archaeological Assessment
 - Attachment 5: Proposed Amendment to AUP
- Clause 23 - Request for Further Information
- Clause 23 - Parks and Open Space Response
- Clause 23 - Stormwater & Flooding, Water & Wastewater Response.

2.0 Key Open Space Issues

From an open space perspective, the key issues that must be considered by the council are:

- How development within the plan change area will interface with existing recreational open space.
- Whether proposed recreational open space within the plan change area:

- is consistent with Auckland Council open space policy¹ (primary considerations being size, shape and location)
- is fit for purpose, including:
 - the topography of the land is suitable for the formation of a park
 - the land is not subject to flooding
 - soil contamination levels meet the NES for residential land
 - there are no cultural values associated with/historic heritage features on the land that would unduly constrain its use as recreational open space.

3.0 Applicant's assessment

The applicant's Urban Design Assessment and Neighbourhood Design Statement indicates (Attachment 6 – Concept master plan and Attachment 7 – Concept development plan) that future development of the plan change area includes a park edge road along the western boundary of the Patumahoe War Memorial Domain. Park-edge road is supported for its positive access and CPTED values and is consistent with council open space policy.

Having reviewed the applicant's Plan Change Request, AEE and Section 32 Report plus relevant appendices and attachments I am not satisfied that all relevant matters have been considered in relation to the proposed recreational open space area.

The size of the proposed recreational open space is not identified and there is no analysis of whether it is consistent with council open space policy.

Potential soil contamination of the proposed recreational open space area has not been addressed.

Potential flooding has not been addressed adequately.

This means that the suitability of the proposed recreational open space cannot be robustly assessed and therefore it cannot be determined whether it is fit for purpose.

No significant cultural values or historic heritage features have been identified on the land proposed for recreational open space but future earthworks (if the plan change is successful) may uncover features of significance. It is accepted that at this stage of the proposal it is unreasonable for archaeological investigations to have been undertaken.

4.0 Submissions

I have reviewed all of the submissions on the proposed plan change.

Two of the submissions include specific comment on open space-related matters:

- Submission 28: Auckland Council
- Submission 44: Heritage New Zealand / Pouhere Taonga.

My response to the open space-related aspects of the two submissions is provided below.

Submission 28: Auckland Council

I concur with the council submission that PC55 be amended to align the amount and location of open space to be provided with Council's Open Space Provision Policy 2016.

Submission 44: Heritage New Zealand / Pouhere Taonga

Not all the aspects covered by points 5 and 6 of Heritage New Zealand's submission fall within my purview of assessing and seeking to acquire recreational open space that meets council open space policy requirements.

¹ The Parks and Open Space Acquisition Policy (2013) and the Open Space Provision Policy (2016)

However, I would like to make it known that all confidential reports seeking political approval for open space acquisitions clearly state that mana whenua will be consulted regarding development of the land if it is acquired by the council.

Through post-acquisition consultation with mana whenua, any Māori cultural heritage values pertaining to the land are addressed and the open space named, developed and managed accordingly.

5.0 Assessment of open space-related matters and precinct provisions

Interface with existing open space

The applicant's Urban Design Assessment and Neighbourhood Design Statement indicates a park edge road along the western boundary of the Patumahoe War Memorial Domain. However, this is not included on *Patumahoe: Precinct plan 3 – Sub-precinct E* in the proposed amendments to the Patumahoe Precinct in the AUPOP.

Proposed new open space

The location of the proposed recreational open space is not specifically identified on *Patumahoe: Precinct plan 3 – Sub-precinct E* in the proposed amendments to the Patumahoe Precinct in the AUPOP. It is simply indicated as being somewhere within the proposed 'Stormwater Management Area & Recreation Reserve Area' so its exact location cannot be assessed for consistency with council open space policy.

An indicative location at the eastern extremity of the 'Stormwater Management Area & Recreation Reserve Area' is provided in the applicant's urban design assessment. In the Residential - Single House Zone the walking catchment for neighbourhood parks is 600m. Conformity to this catchment is tested using a 450m radial proxy. The indicated open space location would not service the entire plan change area within this catchment distance and it may be preferable to move it eastward – land suitability permitting.

As no size is indicated in any of the applicant's documents and no scaled plans have been provided I cannot comment on this aspect of its consistency with council open space policy (a 3000m² neighbourhood park would be appropriate and supportable for acquisition within the plan change area).

With regard to the land being fit for purpose I have two key concerns:

- The Catchments and Hydrology Layer of Auckland Council's GIS indicates that the majority of a 3000m² park in the location indicated in the applicant's urban design assessment would sit within a floodplain. The council does not acquire recreational open space land in floodplains – even at no capital cost. The applicant has not provided any information on how flooding would be addressed.
- As no information has been provided by the applicant, I have no understanding of soil contamination levels and whether they currently meet the NES for residential land (council's requirements for open space acquisitions). Additionally, no information has been provided what the applicant's intention is with regard to remediation of the proposed recreational open space land should it exceed levels acceptable to the council. Given that almost the entirety of the plan change area has been used for horticultural purposes it is likely that the proposed recreational open space land is contaminated – either by intentional application of agrichemicals or through overspray, run-off or leaching from adjoining land.

The proposed provisions of I430.6.10 (2) – *Prior to the occupation of any dwellings in Sub-precinct E that are located more than 400m from the Patumahoe Domain a neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 3 – are problematic for two reasons:*

- The proposed trigger distance of 400m is not consistent with any relevant provision metrics in the Open Space Provision Policy (2016) that guide the spatial location of open space.
- Stating that a neighbourhood park 'shall be established' is ultra vires and implies the proposed plan change has the ability to pre-empt the decision-making authority of the governing body of Auckland Council under the Local Government Act 2002 and require the council to acquire the land (assuming that it is intended that the council to acquire the land – but this is not clear).

The rezoning of the land proposed as 'Stormwater Management Area & Recreation Reserve Area' shown on the proposed *Patumahoe: Precinct plan 3 – Sub-precinct E* to the Recreation - Informal Recreation Zone prior to political approval for the council to acquire it being obtained (again, assuming that it is intended for the council to acquire the land) is also problematic.

There are four key reasons that applying open space zones through a private plan change that encompasses potential open space acquisitions is not recommended:

- even if consistent with Auckland Council open space policy it cannot be assumed that political approval to acquire the land for open space purposes will be obtained
- setting unsupportable expectations of land acquisition by the council amongst landowners/developers (potentially leading to litigation by the landowners/developers)
- forming an unsupportable basis for development configurations that compromise the maximisation of financial returns on development (potentially leading to litigation by the developers/landowners)
- necessitating further plan changes to accommodate changes of land use.

6.0 Conclusions and recommendations

The applicant has, in my view, appropriately indicated the provision of a park-edge road on the western boundary of the Patumahoe War Memorial Domain in their Urban Design Assessment and Neighbourhood Design Statement (Attachment 6 – Concept master plan and Attachment 7 – Concept development plan). I recommend that the proposed *Patumahoe: Precinct plan 3 – Sub-precinct E* is amended to include the park-edge road shown in the applicant's Urban Design Assessment and Neighbourhood Design Statement.

In my view the applicant has not provided adequate information on all relevant matters in relation to the proposed new recreational open space area:

- The size of the proposed recreational open space is not identified.
- There is no analysis of whether it is consistent with council open space policy.
- Potential soil contamination has not been addressed.
- Potential flooding has not been addressed adequately.

This means that the suitability of the proposed recreational open space of a size and in the location indicated on plans in the applicant's urban design assessment cannot be ascertained at this stage of the planning and development process.

With insufficient information to ascertain if a location within the 'Stormwater Management Area & Recreation Reserve Area' shown on the proposed *Patumahoe: Precinct plan 3 – Sub-precinct E* is appropriate for a recreational open space it is recommended that the label on the area is amended to remove reference to recreational open space as follows: Stormwater Management Area ~~& Recreation Reserve Area~~.

If the label of the 'Stormwater Management Area & Recreation Reserve Area' is amended as recommended above the potential rezoning of the area to Recreation – Informal Recreation Zone is moot.

However, if the label is not amended to exclude potential recreational open space I recommend that the entire area is not rezoned to Recreation – Informal Recreation Zone but is rezoned Residential - Single House Zone to allow flexibility through the resource consenting process. Any land acquired by the council for either stormwater management or recreational open space purposes can be rezoned post-acquisition by the council.

Based on the uncertainties regarding proposed recreational open space identified above I also recommend that the proposed provisions of I430.6.10 (2) are amended as follows:

~~(2) Prior to the occupation of any dwellings in Sub-precinct E that are located more than 400m from the Patumahoe Domain a neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 3.~~

(2) Public open space provision in Patumahoe Sub-precinct E will be of a size, shape and location consistent with Auckland Council open space policy.

Amendment of the 'Stormwater Management Area & Recreation Reserve Area' label on the proposed *Patumahoe: Precinct plan 3 – Sub-precinct E* and the wording of I430.6.10 (2) provide flexibility for the location of a suitable recreational open space that complies with council open space policy to be determined through the resource consenting process.

In conclusion, I support the proposed plan change with the inclusion of my recommended amendments.

Auckland Council
sanjay.bangs@aucklandcouncil.govt.nz

8 March 2021

Our Ref: 190501-A

Attention: Mr Sanjay Bangs

Dear Mr Bangs

GEOTECHNICAL ASSESSMENT PROPOSED PRIVATE PLAN CHANGE 55: PATUMAHOE SOUTH CARTER ROAD, PATUMAHOE

1.0 Introduction

Riley Consultants Ltd (RILEY) has been engaged by Auckland Council (Council) to review the geotechnical aspects of the proposed Private Plan Change 55 (PPC55) for the site at Carter Road, Patumahoe and provide technical advice to assist them to prepare their Section 42A Report.

2.0 Key Issues

The key geotechnical issues identified for the proposed PPC55 land are slope stability, and ground settlement potential.

3.0 Review

In preparing this geotechnical assessment, we have reviewed the following report:

- Preliminary Geotechnical Appraisal Report (PGAR), prepared by Lander Geotechnical Ltd (LGL), for Plan Change at Carter Road Development, Patumahoe, reference J01073 (Rev.1), dated 26 October 2018.

Following review of the LGL PGAR, we considered that slope instability and, ground settlement potential, had been suitably addressed for the majority of the site. However, we considered that slope stability of land in Zone 3 had not been suitably addressed.

Accordingly, we raised the following query:

There are no investigation locations or other information on the depth of the observed instabilities that would enable a consideration of the viability of the shear key, buttress fill and palisade wall measures within Zone 3 as identified in the Geotechnical Assessment prepared by Lander Geotechnical.

This is an important consideration as the suitability of these measures is significantly affected by the depth of instability. Counterfort drains may also be problematic as an engineering measure, as they will likely need to extend downslope beyond the zone boundary and into adjacent properties to suitably suppress the groundwater table. This leaves us with setback being the only other option. However, after applying a development set back, there might be no land within Zone 3 that can be developed.

The response from the Applicant is presented in the following Memorandum prepared by LGL:

- Memorandum – Council RFI, prepared by LGL, for Plan Change at Carter Road Development, Patumahoe, reference J01073, dated 24 July 2020.

4.0 Assessment

From additional consideration of the PGAR provided and the subsequent response by LGL to the query raised, we have reviewed our previous comments regarding the sufficiency of the current geotechnical investigations to support the application. From this, we now consider that the geotechnical investigations carried out to-date and recommendations presented by LGL in relation to the PPC55 proposal are sufficient.

In addressing our query, LGL has provided an example case study of a site with pre-existing instability features that was stabilised utilising a combination of inground palisade walls, and shear keys with subsoil drainage. These are the same options that have been proposed as measures to facilitate development at PPC55. In our opinion, Zone 3 is from a geotechnical perspective moderate to very challenging to develop, and we expect that much of the eastern slope will require some form of stability enhancement. While the scale of the stability enhancement measures is not known, at this stage we consider that LGL have shown that existing proven solutions are available to address the types of instability features identified here. With appropriate specific investigation, design and construction, we consider that these measures should be able to achieve the required factors of safety against instability such that the land in Zone 3 can be developable.

Specifically, we note that LGL recommend further geotechnical investigation, analysis and reporting to support future resource and building consent applications. We concur that further geotechnical input is required and would need to address all geotechnical hazards to future development.

5.0 Submissions

A total of 56 submissions have been received and reviewed. From our review of the submissions received, only one submission by Auckland Council has raised geotechnical issues or queries. See below:

- *The Plan Change request states there are two primary geotechnical constraints within the subject land. Those being slope stability along an escarpment in the eastern part of the plan change area, and compressible organic and/or cohesive soils through the middle of the plan change area.*
- *The analysis provided in the specialist Geotechnical report relies heavily on engineering solutions to overcome geotechnical risks, whereas these risks should be viewed as an indication that development is not appropriate in this location.*

Development on land requiring engineering solutions is not uncommon and most land in the Auckland area has at least some kind of geotechnical limitations on it. Based on our review of the LGL PGAR and their response to our query (see comments in Section 4.0 above), we consider that suitable engineering solutions are available to mitigate the geotechnical hazards and facilitate development of the subject land. While the measures required to ensure adequate factor of safety against instability and the softer ground are likely to be significant (see comments in Section 4.0 above), the measures have been adopted successfully for development on other sites in the Auckland area.

6.0 Recommendation

We consider that the geotechnical investigations, reporting carried out by LGL in support of PPC55, and their response to our query have demonstrated that the site can accommodate the proposal from a geotechnical perspective. There are geotechnical solutions available to address the identified geotechnical risks (specifically instability within Zone 3) and for building foundation design, that have previously been successfully implemented across the Auckland region. Accordingly, we do not see any obvious geotechnical evidence that indicates Zone 3 and the site cannot be developed with stability enhancement measures appropriately designed for the challenging ground conditions that are present.

Notwithstanding this, further geotechnical input will be required to support future resource and building consent applications to Council. This input will need to include specific geotechnical investigations, analyses, and reporting to address the identified geotechnical risks, facilitate detailed building foundation design, and to ensure that all relevant geotechnical issues are appropriately addressed in relation to future specific building proposals.

7.0 Limitation

This report has been prepared solely for the benefit of Auckland Council as our client with respect to the brief. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such parties' sole risk.

If you have any questions or require further information please do not hesitate to contact us.

Yours faithfully

RILEY CONSULTANTS LTD

Prepared by:



James Beaumont
Senior Geotechnical Engineer

Reviewed and approved for issue by:



Scott Vaughan
Project Director, CPEng

To Chloe Trenouth, Consultant for Auckland Council
From Wes Edwards, Consultant for Auckland Council
Date 17 June 2021
Ref 101080
Subject **Technical specialist report to contribute towards Council's section 42A hearing report
Private Plan Change – PC55 Patumahoe South – Transport**

1.0 Introduction

- 1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council, in relation to transport effects.
- 1.2 I am a Transportation Advisor and Director of Arrive Limited, a specialist traffic and transport consulting practice. I hold a New Zealand Certificate in Civil Engineering, and a bachelor's degree in Civil Engineering. I am a Chartered Professional Engineer and an International Professional (APEC) Engineer. I am a Chartered Member of Engineering New Zealand, and a Member of the Institute of Transportation Engineers. I have completed the Ministry for the Environment *Making Good Decisions* programme.
- 1.3 I have 35 years of engineering experience with 29 of those years as a specialist traffic engineer. I have experience in traffic matters associated with resource management, including resource consents, plan changes and notices of requirement; experience in the design of traffic infrastructure and facilities such as roads and intersections; and in road safety engineering, structure planning, subdivision design, street design, and traffic modelling.
- 1.4 In writing this memo, I have reviewed the following documents:
- Plan Change Request and Assessment of Effects, Envivo June 2020
 - Integrated Transportation Assessment Report, Stantec, June 2020 (Appendix 4 of AEE)
 - AT comments on Draft ITA, Stantec, January 2019 (Attachment 3 to AEE)
 - KiwiRail comments, KiwiRail email January 2019 ((Attachment 4 to AEE)
 - Proposed Amendment to the Auckland Unitary Plan (Attachment 5 of AEE)
 - Response to request for further information, Tripp Andrews, April 2020
 - First transport further information letter and drawings, Stantec, 26 June 2020
 - Second transport further information letter and drawings, Stantec, 23 July 2020
 - Submissions and Further Submissions relating to transport

2.0 Key transport issues

- 2.1 The effects of the proposed change can be considered at four geographic levels:
- a) How the change provides for the movement of people within the plan change area and at the connections to the road network
 - b) How the change may affect the local transport environment within Patumahoe
 - c) The effect on the roads that connect Patumahoe with the wider transport network
 - d) The effect on the wider transport environment within the southern Auckland region.

3.0 Applicant's assessment

The proposed change

- 3.1 The change proposes to rezone two areas. Area 1 west of Patumahoe Road is to have residential and business zones, and Area 2 east of Patumahoe is proposed to be zoned Future Urban.
- 3.2 The changes include Precinct Plan 3 that shows an indicative road network within Area 1 and seven figures showing the proposed road hierarchy and road cross-sections.
- 3.3 A proposed standard for staging (I430.6.13) is included, and it is proposed that subdivision proposals that comply with the standard would be Restricted Discretionary activities with assessment criteria referring to Figure 5 (Roading Hierarchy), and Figures 6-11 (Cross Sections). Subdivision proposals that do not comply with standard E430.6.13 are proposed to be Non-Complying.
- 3.4 The change proposes to extend the zones onto Carter Road, a public road controlled by Auckland Transport, and it is proposed that parts of this road be stopped in some form, with part closed to motor vehicles and the remainder ceasing to be road.

Staging

- 3.5 The information notes that the delivery of Intersection D on Mauku Road may be delayed resulting in Area 1 potentially being developed in two stages, with the first stage having access from Intersections A, B and C along Patumahoe Road.
- 3.6 The TIA analysis assumes that all of Area 1 except for properties close to Mauku Rd would be developed and accessed entirely from Patumahoe Road, and additional information noted:

The development can be constructed from the western side of the Plan Change area and access can only be provided from Mauku Road without the closure of Carter Road or the provision of access to Patumahoe Road for the first 50 dwellings (approximate number of houses on the western side of the Plan Change area), as long as the access road does not link to Carter Road. Once the 50 dwellings threshold is exceeded, the conversion of Carter Road to the shared path and a dedicated pedestrian/cyclist access is required to be provided to support the safety of all users within the development.

- 3.7 The proposed change includes standard I430.6.13 for staging. A subdivision proposal that is not in accordance with the proposed standard would be a Non-Complying activity.

I430.6.13. Staging in Sub-precinct E

- (1) *Before any S224(c) certificates or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130, the following works shall be constructed and completed to the Council's satisfaction:*

- (a) *A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of the indicative locations shown on Patumahoe: Precinct plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design);*
- (b) *a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed;*
- (c) *for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road: (i) formation of a new road access between Carter Road and Patumahoe Road;*
 - (ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and*
 - (iii) provision of vehicle access to the Watercare facility at 6 Carter Road – Lot 13 DP83912;*

The transport environment

- 3.8 The applicant's transport assessment is primarily contained in the Integrated Transportation Assessment [ITA] report published 19 June 2019 by Stantec and supplemented by additional information provided on 26 June 2020 and 23 July 2020.
- 3.9 The ITA describes the location of the change, and the existing transport environment near the location. This includes noting that bus route 396 serves a pair of bus stops on Mauku Road five times a day.
- 3.10 Traffic volumes recorded between 2013 and 2018 are provided for six locations in Patumahoe, and travel patterns recorded as part of the 2013 Census are summarised. The crash record from 2013-2018 for the area near the site is also presented. The crash record for the wider area including roads used to access Patumahoe is not included in the ITA.
- 3.11 Traffic volumes in the future are estimated by allowing for undeveloped zoned land and some additional growth. The information notes a software model of the future road network in the area¹ projected lower volumes than those present on the network now, so the model projections were discarded. The information describes a methodology used for estimating future traffic volumes within Patumahoe.
- 3.12 The intersection of Patumahoe Road/ Mauku Road/ Woodhouse Road is identified as a point where the operation of the intersection could be affected by growth, and the ITA recommends that the intersection is assessed at the time of subdivision.
- 3.13 The information provides some analysis of performance at two key intersections on Glenbrook Road.
- 3.14 The description of the existing (2018-19) transport environment within Patumahoe is reasonable. The description of the future transport environment within Patumahoe is limited by a scarcity of official traffic projections for the area and is reasonable in the circumstances. The description of the wider transport environment outside Patumahoe, both now and in the future, is poor.

Proposed network for the plan change area

- 3.15 Assessment of the plan change has been informed by a Master Plan showing one way in which the Area 1 land might be developed. This Master Plan has informed the ITA, other assessments, and the proposed changes.

¹ A model of the southern Auckland region developed using SATURN software for the Supporting Growth Alliance.

- 3.16 A key issue for this, or any, plan change is that it is feasible and practical to provide infrastructure to support development of the land in accordance with the proposed zoning and other provisions.
- 3.17 The ITA makes numerous references to the road network shown on the Master Plan, including four intersections that *“are proposed to link the development with the existing road network”*, references to proposed road cross-sections for roads within the plan change area, and *“indicative locations of proposed pedestrian and cyclist infrastructure”*.
- 3.18 The characteristics of the four proposed intersections are described in the ITA, and drawings showing how each intersection might be formed are provided in the further information.
- 3.19 Intersection A, northernmost on Patumahoe Road, is said to require the installation of a right turn bay until Intersection D is provided.
- 3.20 Intersection B on Patumahoe Road is expected to carry a moderate proportion of the traffic and is said to require a right turn bay. The provision of safe sight distances at this intersection is dependant on the speed limit on Patumahoe Road being lowered to 50km/h. The further information states the plan change area could be developed without Intersection B if needed.
- 3.21 Intersection C, southernmost on Patumahoe Road, is expected to carry the industrial traffic and require a right turn bay.
- 3.22 The drawings show how widening of Patumahoe Road could be undertaken to provide a flush median and right-turn bays at each intersection. A relatively narrow berm would remain on the opposite side of Patumahoe Road, just sufficient to provide for a footpath next to the carriageway, and insufficient to provide for separation between pedestrians and traffic or to provide cyclist facilities or the like.
- 3.23 Intersection D on Mauku Road is described as *“an important development link to the existing road network”* and that it *“will take a large proportion of development traffic heading towards Auckland”*. This intersection is said to not require a right turn bay, but one is recommended in the information to future proof against future demand.
- 3.24 The provided transport assessment relies on development of the plan change area being in accordance with the transport network contained in the master plan as reflected in the roading pattern and hierarchy shown in Precinct Plan 3 (with indicative road network) and Figure 5. In particular, the assessment relies on access points being in the locations shown, with multiple road connections to Patumahoe Road, a road connection to Mauku Road, a new road linking Patumahoe Road and Mauku Road, and a connection for pedestrians and cyclists along the Carter Road alignment.
- 3.25 The intersection of Patumahoe Road/ Carter Road/ Clive Howe Road is described as having limited visibility as it is located on the inside of a bend in Patumahoe Road, and the ITA states it is proposed to close the northern part of Carter Road to traffic for this reason. The further transport information states:

The main reason behind the closure of Carter Road to vehicular traffic is to encourage walking and cycling for shorter-distance trips between the Plan Change area and the existing urban development areas of Patumahoe.

The Carter Road Shared Path will connect the Plan Change area to Patumahoe School, Clive Howe Reserve and the Patumahoe village centre. The provision of safe walking and cycling infrastructure, separated from vehicular traffic, will encourage a higher proportion of active trips to be generated, and thereby reduce the traffic effects arising from the Plan Change on the surrounding roads.

It is also noted that a tee-intersection will provide a safer operating environment for both vehicles and active modes compared to what would otherwise be four-arm intersection, particularly as Carter Road currently does not achieve adequate or appropriate intersection visibility. The proposed outcome promoted through the Plan Change therefore achieves both efficiency and safety benefits over the current arrangements.

- 3.26 No assessment of potential alternative techniques for addressing the sight distance limitations at this intersection is provided. It is possible to provide safe and attractive walking and cycling facilities within a road reserve that also provides for vehicle movement. The closure of Carter Road is not sufficiently justified.
- 3.27 The southern part of Carter Road is proposed to be stopped (no longer legal road), and the northern part made available for pedestrians and cyclists only. The ITA recommends that a new zebra pedestrian crossing is installed west of this intersection to assist pedestrians crossing the road near the school.
- 3.28 The ITA states that a pedestrian connection is proposed through the Patumahoe Recreation Reserve to connect to John Street and Patumahoe Road, noting that this would require the agreement of Auckland Council’s Parks Department and this consultation is not considered a part of the plan change.

Trip generation and distribution

- 3.29 The ITA assessment estimates the trip generation of activities enabled by the proposed changes based on an estimated number of dwellings and an estimated scale of light industrial development based on an average utilisation of land area. An estimate of trip generation from Area 2 FUZ land is included.
- 3.30 The assessment does not attempt to estimate a proportion of trips that would be made between the residential and business activities within the Plan Change area, and states the assessment is conservative as a result. The number of internal trips is likely to be negligible.
- 3.31 The trip generation rates are discussed in more detail below. In summary the trip generation rates adopted for the assessment are reasonable.
- 3.32 The trip distribution is based on the 2013 Census Journey to Work data. As discussed below the 2018 Census data is now available but is unlikely to result in significant differences in the outcomes of the assessments included in the ITA. The FUZ trips are not assigned to the road network.
- 3.33 Appendix B of the ITA shows how the traffic movements were assigned to each intersection and are reasonable approximations for Area 1.
- 3.34 The ITA predicts external traffic volumes as summarised in the following table.

Table 1: External trip generation from proposed changes

Destination	AM Peak Hour			PM Peak Hour		
	Arrivals	Departures	Total	Arrivals	Departures	Total
North via Glenbrook Road, SH22	18	80	98	70	20	90
North via Kingsseat	11	7	18	6	12	18
South (Pukekohe)	90	55	145	48	101	149
West (Waiuku)	39	18	57	16	44	60
Total	158	160	318	140	177	317

- 3.35 The assessment makes no estimate of how much traffic may be attracted through the plan change area once a road connection between Patumahoe Road and Mauku Road is provided. The number of vehicles that would use this connection as a through route would depend on the number of vehicles

travelling between the two ends and delays along the existing route along Patumahoe Road and Mauku Road. Given the possibility of this occurring the provision of a right turn bay at Intersection D is prudent.

- 3.36 The traffic volumes and turning movements estimated to result from the proposed changes are reasonable for Area 1 (land to be live zoned). Area 2 (future urban land) is not assessed.

Effects on transport network

Local road network

- 3.37 When assessing the local road network in and around Patumahoe, the estimated future traffic volumes on local roads with and without the change have been compared. Based on that comparison the ITA concludes that *“intersections will operate without significant capacity issues.”*
- 3.38 The ITA recommends that the speed limit on some portions of road near the site be reduced to 50km/h, and as noted above Intersection B depends on this change.
- 3.39 The ITA discusses the potential impact on the level crossing of the Mission Bush Branch railway over Patumahoe Road. A few upgrades are expected to be required, and a concept design has been included to demonstrate that the upgrades could be implemented.
- 3.40 The information includes drawings showing how improvements to the Patumahoe Road/ Mauku Road/ Woodhouse Road intersection could be laid out, and these are considered further below.

Wider road network

- 3.41 The ITA assesses the impact on the wider network by referring to traffic models that include a list of expected infrastructure upgrades including widening of the Southern Motorway (Papakura – Drury), construction of a roundabout at the Glenbrook Road/ SH22 intersection, and other changes.
- 3.42 The assessment refers to traffic models for 2028 showing that Karaka Road (SH22) *“will be nearing capacity”* in 2028, but that traffic resulting from the proposed change *“represents less than 5% of the total volumes along SH22.”* The traffic volumes projected for Glenbrook Road and Waiuku Road are also examined and those roads are determined to have excess capacity.
- 3.43 Some analysis was provided in the further information responses and this included the identification of several routes that were available to carry traffic between Patumahoe and Auckland. Output from traffic models of the intersections of Glenbrook Road/ Ostrich Road and Glenbrook Road/ SH22 were provided for the AM peak hour.
- 3.44 At Ostrich Road the additional traffic results in the average delay turning right out of Ostrich Road increasing from 27 seconds (Level of Service D) to 39 seconds (Level of Service E). Level of Service [LOS] is a qualitative measure of intersection performance ranging from A (excellent) to F (over-capacity). LOS E is at capacity, and LOS D is commonly used as a design target during peak periods.
- 3.45 The ITA describes this as:
- The right turn from Ostrich Road is modelled to start reaching its capacity limit and average delays are expected to increase by around 10-20s as a result of the Plan Change development. Such operation is expected only during the peak hours and is considered acceptable*
- 3.46 The information considered the impact on traffic safety at the intersection, noting that right turns from Ostrich Road *“may become a more complex manoeuvre with increasing traffic volumes in the*

future” and recommended “that the road safety performance of this intersection be included in the matters for assessment in subsequent resource applications arising from the Plan Change”.

- 3.47 No assessment of potential measures that could address road safety issues at Ostrich Road are provided in the application material. The assessment of effects on safety is poor and is addressed further below.
- 3.48 The information includes model results from the Glenbrook Road /SH22 intersection as a Give Way (existing) and an indicative roundabout to represent a possible future situation.
- 3.49 Under Give Way control the Glenbrook Road approach is over-capacity with long delays in 2028 without the proposed rezoning, and the ITA acknowledges this and notes improvements are justified without the rezoning.
- 3.50 The ITA analysis of the roundabout for 2028 predicts the roundabout would operate well (LOS B) with and without the proposed rezoning; however, the model only includes 126 veh/h exiting Paerata Rise in the AM Peak (equivalent to less than 200 dwellings). The volume of traffic expected to be generated by Paerata Rise is expected to be much higher in future.
- 3.51 Modelling of the roundabout undertaken for the Paerata Rise plan variation indicated the roundabout may need enhancement (metering signals) to accommodate longer-term traffic flows, although the future implementation of the Pukekohe Expressway (currently expected beyond 2048) may result in changes to traffic patterns.
- 3.52 A recurring theme throughout the transport material is that the plan change represents a small increase (3 to 5%) over existing traffic volumes and would therefore have a minimal effect. That approach does not recognise that road networks near capacity can be overly sensitive to relatively small increases in traffic volume.
- 3.53 The road safety assessment does not consider the increase in crash risk that arises from an increase in travel on the road network, including several unlit relatively narrow rural roads that are less safe (per vehicle kilometre travelled) than urban streets or arterial roads.

Public transport

- 3.54 The ITA states vehicle trips “*will still heavily depend on private transport and this development does not warrant an additional public transport services.*” That is a correct assessment.

4.0 Assessment of transport effects and management methods

Existing transport environment

- 4.1 The crash record for Patumahoe and the wider area including roads used to connect Patumahoe to the arterial road network for the 2016-2020 period is shown in the following figures.

Figure 1: Crash record 2016-2020 for wider area.

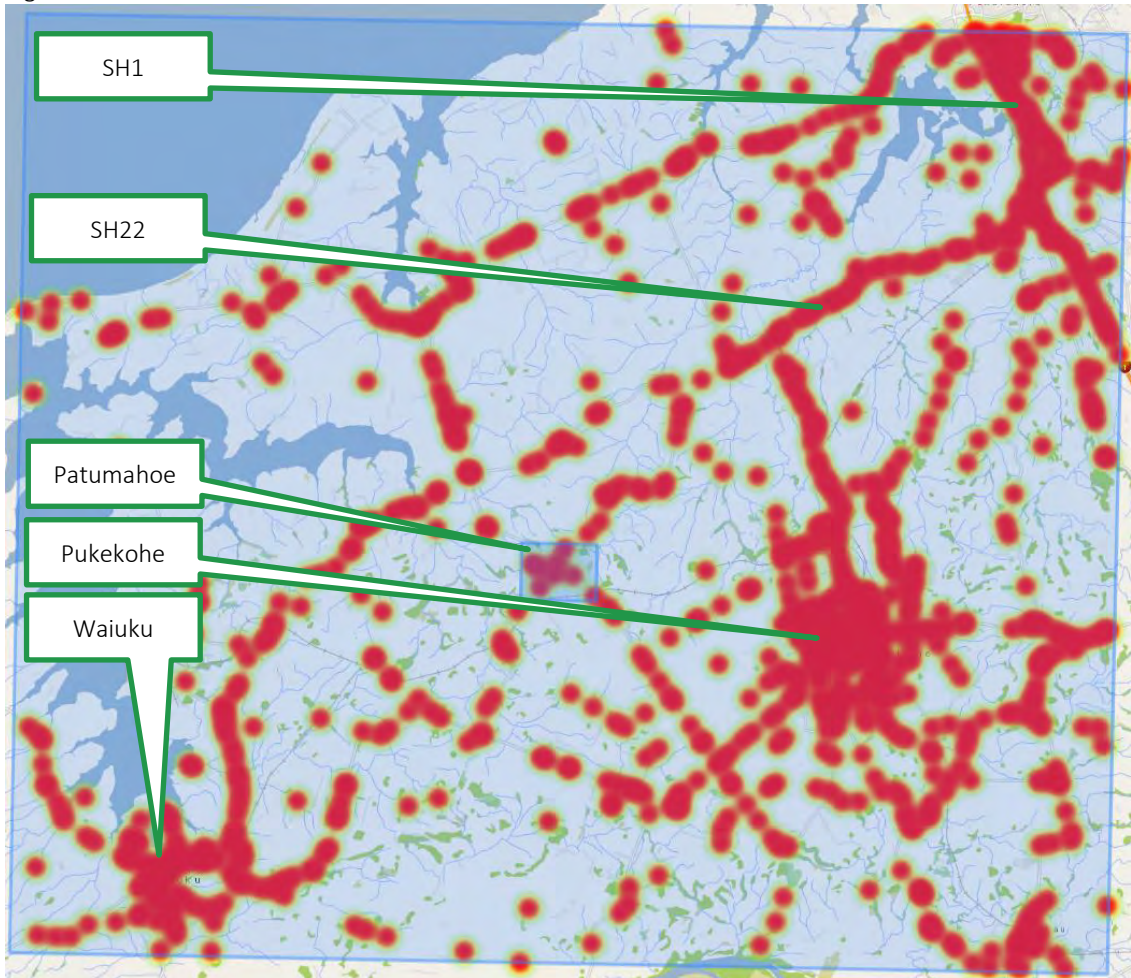
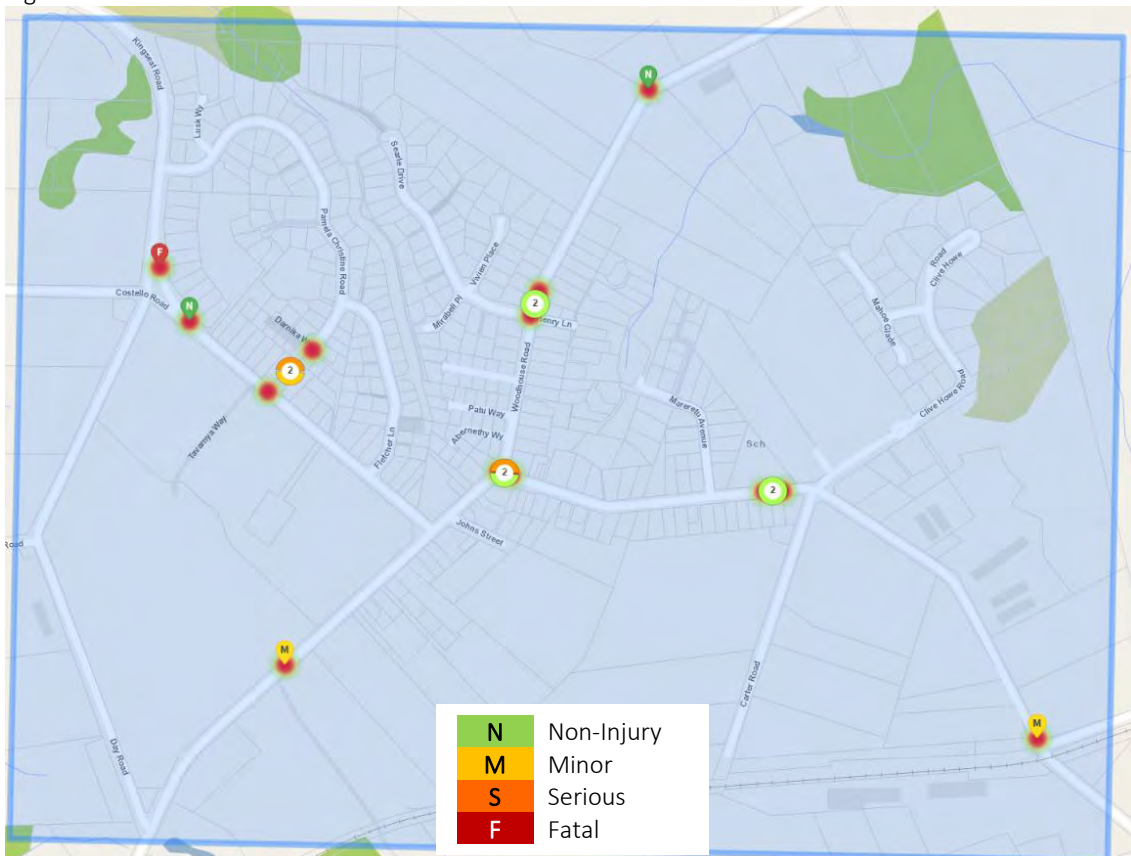


Figure 2: Crash record 2016-2020 for Patumahoe



4.2 The following maps show the road safety risk for roads in the area. The first map shows the “Collective” Risk where roads with more crashes are classified as higher risk. In this area the roads with the highest collective risk are Kingseat Road and Glenbrook Road. The southern part of Patumahoe Road is “Medium High” risk.

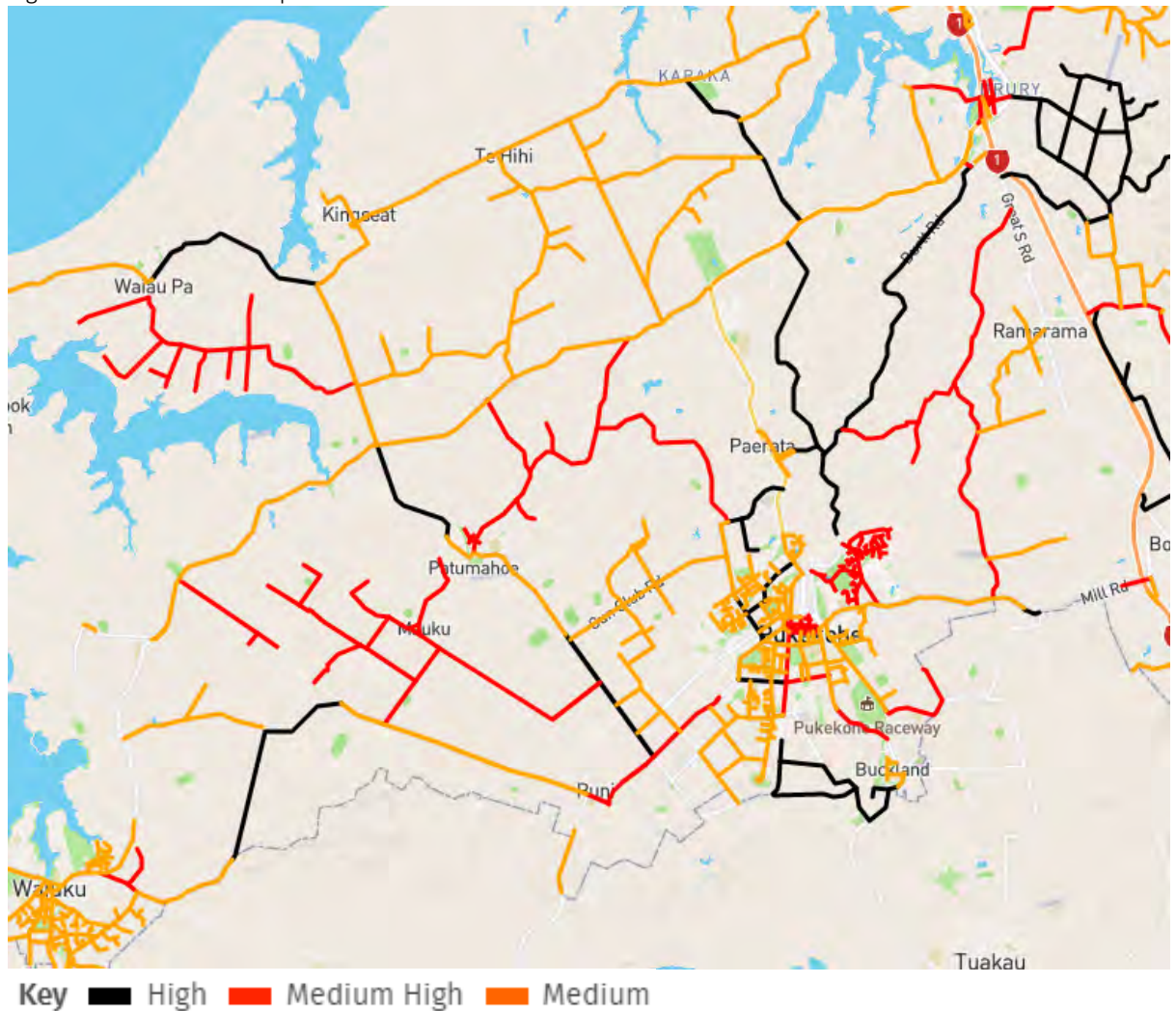
Figure 3: Collective Risk Map²



4.3 The second map shows “Personal” risk, which is the risk in relation to the amount of travel on the road. Roads with more crashes per vehicle-kilometre of travel are classified as higher risk. The roads with the highest personal risk include Kingseat Road, and the southern part of Patumahoe Road. Several roads around Patumahoe have a “Medium High” risk including Woodhouse Road, Ostrich Road, Cuff Road, Ostrich Farm Road, Day Road, Mauku Road, Union Road, Titi Road and others.

² From roadsafetyrisk.co.nz

Figure 4: Personal Risk Map



Proposed road network

- 4.4 The information provided demonstrates that access could be provided at four locations, although for Intersection B a lower speed limit (50km/h) is required to make the available sight distance adequate.
- 4.5 The ITA acknowledges that connections to both Patumahoe Road and Mauku Road are important, and I concur with that position, noting that it is desirable for all the plan change area to have access to both roads, but in a way that makes short-cutting through the residential area less attractive than a direct route.
- 4.6 The proposed staging provisions require a new road access from either Patumahoe Road or Mauku Road close to one of the identified locations for any development beyond 50 lots on Lot 1 DP169130. Subdivision that creates access from Carter Road requires a new road access between Carter Road and Patumahoe Road. There is no staging provision or threshold that requires access from both Patumahoe Road and Mauku Road.
- 4.7 As currently proposed the changes would allow the entirety of Area 1, except for some of the properties fronting Mauku Rd, to be developed without a new road connection to Mauku Road; or alternatively for much of Area 1 to be developed with only the Mauku Rd connection.
- 4.8 Depending on the number of intersections provided on Patumahoe Road, it is likely that there would be sufficient capacity at those intersections to accommodate development of all the land; however,

if the Mauku Road connection is not provided the traffic patterns in Patumahoe, including at the Woodhouse Rd intersection, would be different.

- 4.9 A through link between Patumahoe Road and Mauku Road is considered to be important to provide for walking and cycling connections through the area, including to bus services, and to provide for some flexibility and redundancy in vehicle routing through the village, including the ability for external traffic to avoid passing through the village centre if necessary.
- 4.10 Given the importance of a connection to both Patumahoe Road and Mauku Road it is recommended that these staging provisions be amended so that a smaller proportion of the land could be developed without all road connections.

Trip generation

Residential trip generation

- 4.11 The residential trip generation is based on trip generation rates from a 2002 New South Wales guideline³. Rates of 9.0 per dwelling per day and 0.85 per dwelling per peak hour are recommended by the guideline which notes:

The above rates are based on surveys conducted in areas where new residential subdivisions are being built. Public transport accessibility in such areas is often limited. ...

Note that not all trips are external trips. As a guide, about 25% of trips are internal to the subdivision, involving local shopping, schools and local social visits. When reviewing the impact of the traffic generated on sub-regional and regional roads, some adjustment is necessary, depending on the location of shops, schools and recreational facilities.

- 4.12 More detail on trip generation rates is appended.
- 4.13 The ITA assessment has residential trip rates consistent with suburban locations. In general terms, more remote locations are likely to produce fewer vehicle trips than suburban locations, and some trips to local destinations within Patumahoe are likely to produce more trips locally. Overall, the trip rates used in the analysis are reasonable for the assessment of effects.
- 4.14 There is a wide range in the data for business trip generation, particularly for sites surveyed in New Zealand, but the rates adopted in the ITA are reasonable.

Trip distribution

- 4.15 Residential trips are assumed to be 80% departures in the morning peak and 35% departures in the afternoon peak. The morning proportion is typical, but the afternoon proportion assumes less arriving traffic than typically assumed for similar assessments, and this could result in network performance in the afternoon peaks being slightly under-estimated at some intersections.
- 4.16 Business trips are assumed to be 17% departures in the morning peak and 79% departures in the afternoon peak, and these are reasonable assumptions.
- 4.17 Distribution of trips in various directions in the ITA is based on the 2013 Census journey to work information for the Patumahoe area. The area includes Patumahoe village and rural areas to the north, east and west.
- 4.18 The 2018 Census data is now available and is summarised in the following tables and figures.

³ Guide to Traffic Generating Developments, Version 2.2, October 2002, Roads and Traffic Authority of New South Wales, Sydney.

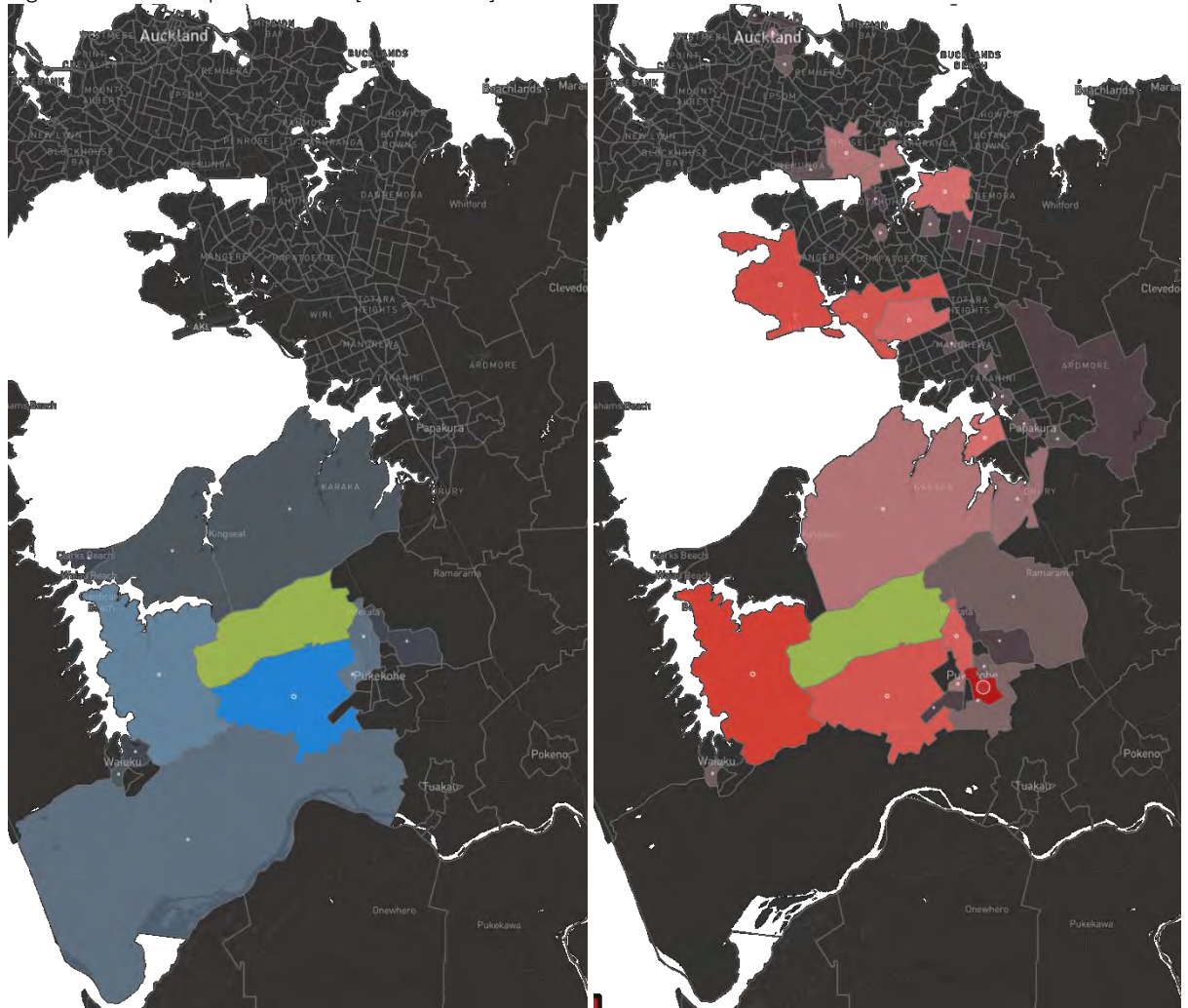
Table 2: Census trip modes

Mode	2018	
	Arrivals	Departures
Drive vehicle	34%	58%
Passenger in vehicle	27%	16%
School bus	2%	7%
Other bus		
Train		3%
Cycle		
Walk	8%	4%
Other, including work at home	28%	

Table 3: Census trip distribution

	2018	
	Arrivals	Departures
Internal – within Patumahoe	72.3%	32.9%
North East (Auckland, Manukau)	1.4%	34.0%
South East (Pukekohe)	15.8%	27.9%
West (Glenbrook, Waiuku)	10.5%	5.2%

Figure 5: Census trip distribution [Statistics NZ]



Patumahoe shown in green.

Arrivals into Patumahoe shown in blue, brighter blue = more arrivals.

Departures from Patumahoe shown in red, brighter red = more departures

- 4.19 Compared with 2013, the 2018 census showed few car drivers and more car passengers (indicating increased car occupancy), and an increase in working from home.

4.20 The distribution showed a small change away from travelling towards Auckland and an increase in travelling to destinations around Pukekohe. These changes are unlikely to result in significant differences in the analysis, and the distribution in the ITA is a reasonable estimate of likely traffic movements arising from the proposed changes.

Employment and dwellings

4.21 When considering travel demand the proximity of new employment to new dwellings is of relevance.

4.22 The proposal proposes an area of land zoned for business activity with a Light Industrial zoning, a zone recognised as providing employment opportunities. Residential zoning also provides some employment.

4.23 Structure planning of other areas undertaken by Council has estimated the employment likely to be provided by these zones. Using those rates, the number of jobs can be estimated, as summarised in the following table. Some of the land is already zoned Residential – Single House Zone, with subdivision consent for 30 lots, and those dwellings have been excluded from this calculation. The area proposed to be zoned Future Urban is also excluded as the zoning for that land is yet to be determined. These figures are broad estimates.

Table 4: Estimated employment for Patumahoe South

	B-LIZ	R-SHZ
Land area to be rezoned	2.34ha	23.45ha
Estimated development	2.34ha	177 dwellings
Employment rate	37 jobs per ha*	0.5 per dwelling*
Number of jobs	87	89

* Warkworth Structure Plan Integrated Transport Assessment, Supporting Growth Alliance, v1.2 July 2019

4.24 The proposed change is likely to result in around 176 new jobs and around 177 new dwellings, a ratio of 0.99 jobs per dwelling. Using an average dwelling occupancy of 2.7 people per dwelling (as typically used in Council structure planning), this number of dwellings is broadly equivalent to a population increase of 478 people, giving a ratio of 0.37 jobs per person.

4.25 The following table summarises the anticipated sub-regional population to employment ratios elsewhere in Auckland and compares this with the proposed change.

Table 5: Projected employment for Auckland⁴ and Patumahoe South

Area	Employment	Population	Jobs per Person
Warkworth	6800	22700	0.30
North	40800	181900	0.22
North West	22100	114100	0.19
South	88700	353100	0.25
Non-Growth Areas	855900	1796800	0.48
Patumahoe South*	176	478	0.37

* excludes Future Urban land and consented new dwellings within plan change area

4.26 This cursory analysis indicates the proposed zoning balances new employment opportunities with new population better than other growth areas within Auckland, although this does not mean that all people employed in the new business zone would reside in or near Patumahoe. There will be some increase in external travel to and from the business activities, and an increase in external travel from residents of Patumahoe to employment and education activities elsewhere, but there is also the opportunity to reduce the length of some trips for employees that would live in or near Patumahoe.

Effects on transport network

Local road network

- 4.27 The ITA assessment of the effect of the proposed changes on the safety and capacity of the existing local network are generally adequate. There are few reliable official projections of future traffic volumes in Patumahoe, and the methodology adopted in the ITA is adequate for the local road network.
- 4.28 The ITA identifies the Patumahoe Road/ Mauku Road/ Woodhouse Road intersection as a point where the proposed changes have the potential to produce a poorer road safety outcome, and this is accepted. A concept design for improving the intersection by adding new pedestrian refuge islands is included. While these islands may improve pedestrian safety, the design may not provide sufficient space for over-dimensional vehicles, including High Productivity Motor Vehicles [HPMV] (large truck and trailer vehicles displaying an “H”) which are relatively common in this area. As a result, the proposed design may not be capable of being implemented. If the increased risk at the intersection is not mitigated it would contribute adversely to the overall effects of the proposal.

Intersections along Glenbrook Road

- 4.29 The ITA assessment has analysed the Glenbrook Road/ Ostrich Road and Glenbrook Road/ Karaka Road (SH22)/ Paerata Road intersections.
- 4.30 With respect to the Glenbrook Road/ Ostrich Road intersection the ITA acknowledges that the right turn out of Ostrich Road would be at capacity by 2028. While the average delay to vehicles making that turn is not excessive in a congested urban context (where average delays are routinely double those predicted to occur here), there is an increased risk of crashes associated with the longer delays.
- 4.31 When facing longer delays some motorists turning right out of Ostrich Road are more likely to accept smaller gaps in the Glenbrook Road traffic streams. With the higher speeds present at this intersection the gaps can be more difficult to judge, and the severity of crashes would be increased. As a result, there is an adverse effect on the safety of this intersection.
- 4.32 Potential measures to mitigate this risk could include a lower speed limit along Glenbrook Road at this location, or the construction of a roundabout; however, the latter is likely to require additional land and would introduce delay to traffic on Glenbrook Road.
- 4.33 The ITA notes that alternate routes are available, and some motorists may use one or more of the alternate routes, particularly as delays at the Glenbrook Road/ Ostrich Road intersection increase. The redistribution of traffic is unlikely to make any significant difference to the outcome at the Ostrich Road intersection and would result in adverse effects elsewhere on the network.
- 4.34 At the Glenbrook Road/ Karaka Road (SH22)/ Paerata Road intersection the ITA acknowledges that this intersection operates beyond its capacity during peak periods, and that improvements to this intersection are warranted, even without this plan change.
- 4.35 The NZ Transport Agency has included the installation of a roundabout at this intersection on its list of projects for many years, but the project has not been prioritised for funding. At the time of writing, the most-recent copy of the Auckland Regional Land Transport Plan is the 2018-2028 edition, with the Draft RLTP 2021-31 expected to be approved in June 2021.
- 4.36 The 2018-28 RLTP contains the *SH22 Drury to Pukekohe Safe System Enhancement* project with Priority 2 (Funded, not Committed) with \$73.5 million allocated in the 2018-21 period. This project

does not include the roundabout. The 2021-31 Draft RLTP does not include the Glenbrook roundabout project.

- 4.37 The analysis of this intersection contained in the ITA has not made sufficient allowance for the development of the Franklin 2 Precinct (Paerata Rise). There is likely to be sufficient capacity to accommodate the plan change traffic at this intersection in the short to medium term, but beyond 2028 this roundabout, if installed, could be close to or at capacity during peak periods.
- 4.38 The amount of traffic added to the roundabout would be a relatively small proportion of the total flow, but when close to capacity the increase in delay from small changes to critical movements (such as the right turn from SH22 into Glenbrook Road) can be relatively significant.

Impact on other arterial roads

- 4.39 The ITA has not assessed the impact of the proposed changes on the operation of Karaka Road (SH22) or the Southern Motorway (SH1), presumably as the plan change traffic is a small proportion of the total flow along the road, but as noted above, when the road network is at capacity small amounts of additional flow can have a disproportionate effect.
- 4.40 Substantial growth is expected to occur in areas that are currently zoned (around Pukekohe, Paerata, and Drury), and several plan changes to rezone land around Drury are currently in progress. Those plan changes are generally consistent with the regional growth plans and strategies, although funding of the infrastructure required to service these planned growth areas is challenging the agencies tasked with infrastructure delivery, and only some of those projects are funded.
- 4.41 Conversely, while the proposed plan change is not included in the forward planning for infrastructure delivery, that does not mean that suitable infrastructure could not be provided, but that has not yet been demonstrated in the traffic assessments that have been provided.
- 4.42 Even with significant investment into transport infrastructure, the future road network, particularly SH1, is projected to be congested during peak periods. As a result, growth areas identified in the regional plans and strategies are serviced by higher-frequency public transport services. In the southern part of the region this is predominantly using rail services with new stations being planned (and funded) at Drury and Paerata.
- 4.43 While Patumahoe is adjacent to a railway, the Mission Bush Branch is a goods-only line apart from occasional excursion trains to and from the Glenbrook Vintage Railway. There is no station at Patumahoe, and the scale of the proposed plan change would not justify the establishment of a station, or passenger rail services. The proposed plan change may provide some support for increasing the frequency of bus services, but the scale of the change would not justify frequent services. As a result, any growth at Patumahoe would be almost entirely dependant on private car travel.

Impact on other non-arterial roads

- 4.44 Growth areas located closer to higher-standard roads, high-frequency public transport services, and greater accessibility of goods and services have historically generated more vehicle trips per dwelling, but that is expected to reduce over time as public transport is used for a greater proportion of trips.
- 4.45 The key differences arising from the location are the length of each vehicle trip, and the road environment those trips occur on.
- 4.46 Patumahoe lies some distance from arterial roads such as Glenbrook Road and Paerata Road. It is accessed via lower-order rural roads, typically with a higher speed limit on relatively narrow carriageways which are not lit at night. These roads are commonly used by slower-moving

agricultural vehicles and some provide few passing opportunities. Many of these roads have a “High” or “Medium-High” Personal Risk classification.

- 4.47 Some objective analysis of crash risk is appended, using Ostrich Road and the Glenbrook Road / Ostrich Road intersection as examples. With no changes to the road environment, the number of crashes increases in direct correlation with traffic volume. Ostrich Road is expected to experience a 41% increase in traffic volume because of the plan change and this is predicted to result in a 41% increase in injury crashes along the road. Crashes at the Glenbrook Road / Ostrich Road intersection are predicted to increase by 21%.
- 4.48 While injury crashes are still relatively rare events, this level of increase in crashes is significant. This effect has not been assessed in the ITA, and no mitigation for this increased risk is provided. Suitable mitigation in mid-block sections may include measures such as providing wider sealed shoulders, realignment of bends, and improvements to signs and road markings.
- 4.49 There are significant lengths of road identified as potential travel routes in the ITA, resulting in an extensive road upgrade programme being required to mitigate or avoid the adverse road safety effects of the plan change.
- 4.50 When coupled with the poorer response time of emergency services in rural areas, there is a significant increased risk of poor safety outcomes arising from the proposed change.

Summary

- 4.51 Access to the land to be zoned for development (Area 1) is proposed to be provided at four locations, three on Patumahoe Road and one on Mauku Road. The middle intersection on Patumahoe Road (Intersection B) is dependant on the speed limit being reduced to 50km/h, but the other two intersections could provide sufficient capacity in the short term. A road connection through the site to a connection on Mauku Road is important.
- 4.52 The estimates of traffic volume generated by the proposal are reasonable, and the projected distribution of trips is also reasonable.
- 4.53 The ITA identifies the Patumahoe Road/ Mauku Road / Woodhouse Road intersection as a point requiring some sort of improvement yet to be determined. A pedestrian crossing near the school is also proposed. With those changes in place the local road network within Patumahoe can accommodate the proposed changes.
- 4.54 The proposal would produce adverse road safety outcomes on roads connecting Patumahoe with the arterial road network, and no mitigation of these increased risks has been proposed.
- 4.55 The wider road network experiences significant traffic congestion and delay during peak times and this is projected to worsen because of growth already enabled in other areas. The proposed change would contribute to that congestion, and no mitigation is proposed.
- 4.56 Growth is expected in other areas identified in strategic planning instruments. While some infrastructure projects are planned to address this growth, funding is not yet available for all projects required to support that growth. In addition, the provision of transport infrastructure for these areas includes provision of substantially improved access to public transport, with high-capacity rail services forming the backbone of those services.
- 4.57 The plan change area has poor access to public transport, and is located remote from other areas providing employment, education, and other services, increasing reliance on private vehicle travel which is at odds with the planning for growth in the region.

4.58 While the planned infrastructure projects may provide sufficient residual capacity to accommodate the proposed changes, no evidence of that has been provided, and the effects on the wider network have largely been discounted on the basis they would form a small proportion of the volume on the network.

National policy statements

- 4.59 The National Policy Statement on Urban Development 2020 [NPS-UD] obliges Council to take several matters into account when deciding to zone land. Council is required to provide sufficient development capacity for housing and business land, and that development capacity must be “infrastructure ready”.
- 4.60 The NPS has requirements for short term (3 years), medium term (3 to 10 years), and long term (10 to 30 years). With respect to the short term, development capacity is infrastructure-ready if there is adequate existing development infrastructure. For medium-term capacity, existing infrastructure must be adequate or funding for adequate infrastructure is to be identified in a long-term plan. For long-term capacity, adequate infrastructure must be identified in Council’s infrastructure strategy.
- 4.61 Council must also be satisfied that additional infrastructure (not controlled by Council) to service the development capacity is likely to be available. With respect to transport this could include the provision of state highway or rail infrastructure.
- 4.62 With respect to the short term, the existing transport infrastructure is not adequate. While the roads within Patumahoe may be generally adequate, the wider transport network experiences significant traffic congestion during peak periods.
- 4.63 When considering the medium term, some additional transport infrastructure is identified in a long-term plan, but it is not all funded. The widening of the Southern Motorway is funded, as are some safety improvements (but not capacity improvements) along the SH22 corridor. At the time of writing the Glenbrook Road/ Karaka Road/ Paerata Road roundabout construction is not funded or identified in the RLTP.
- 4.64 With respect to the long term, some infrastructure projects are identified, and this includes projects such as the Pukekohe Expressway, but no additional infrastructure that might be required to support development of the land.
- 4.65 None of the planned infrastructure has been specifically designed to support the development capacity proposed through this plan change. The infrastructure may have residual capacity to accommodate this development, but that has not yet been demonstrated.
- 4.66 Other infrastructure changes and improvements are considered necessary to mitigate the adverse effects of the plan change, including:
- a) Improvements at the Patumahoe Road/ Mauku Road/ Woodhouse Road intersection
 - b) Safety improvements along roads used to access Patumahoe including Woodhouse Road, Ostrich Road, and potentially others
 - c) Safety improvements at rural intersections including Glenbrook Road/ Ostrich Road, and potentially others.
- 4.67 None of the additional infrastructure required to address the effects of developing the plan change land is publicly funded, so the land would not meet the requirements of the NPS-UD unless private funding was provided.

Auckland Council Regional Policy Statement

- 4.68 The Auckland Council Regional Policy Statement [ACRPS] Transport chapter sets out several policies and methods.
- 4.69 Method 4.4.2.1(i)(a) seeks to integrate land use and transport planning by plan provisions that enable development to be serviced efficiently by public transport, walking, and cycling. The plan change area has reasonable walking and cycling connectivity internally, but external walking and cycling connections are poor due to the relative isolation of the area. As noted in the applicant's ITA the area is poorly serviced by public transport.

5.0 Submissions

- 5.1 Many of the submissions raise transport-related issues, with several of the submissions raising similar or related issues, so these are addressed on an issue-by-issue basis. Submission points requesting specific changes to the proposed precinct provisions are then addressed.
- 5.2 Submissions relating to vibration and noise generated by use of the transport network are outside the scope of this assessment.

Traffic volumes, congestion, and crashes

General transport concerns

- 5.3 Several submissions (3, 18, 20, 26) oppose the proposed change citing relatively general transport concerns. These include concerns around worsening of traffic congestion in Patumahoe, increases in traffic volumes, or insufficient infrastructure, although no specific data or locations are identified, so it is not clear if some of the submissions are referring to locations within Patumahoe, or elsewhere. A similar submission point (45) seeks that the long-term transport requirements of Patumahoe are recognised.
- 5.4 With respect to traffic volumes and congestion within Patumahoe, the roads are generally capable of accommodating the current and expected future traffic volumes without significant congestion and delays, although some delay may be experienced at some locations at times. When compared with congestion and delay experienced elsewhere in the region the congestion in Patumahoe is minor. On that basis Submission 3 is not supported, and the other submissions are not supported with respect to the road network within Patumahoe.
- 5.5 With respect to traffic volumes and congestion outside Patumahoe, arterial roads and intersections in the wider area currently experience significant congestion and delay during peak periods. This is expected to worsen in future because of growth already enabled by the Unitary Plan, and by growth expected to be enabled by the Unitary Plan in accordance with regional strategies and plans. While transport infrastructure is planned to address that growth, and some is funded, the planned infrastructure has not taken development in this area into account. That does not necessarily mean there would be insufficient capacity to accommodate this area, but sufficient capacity has not been demonstrated in the evidence provided to date. Submissions 18, 20 and 26 are supported to the extent they are concerned about traffic congestion and safety on the wider road network.

Impact on roads providing access to Patumahoe and wider road network

- 5.6 Submissions 12 and 25 are concerned that the proposal would increase volumes on local roads that are not built to cope with the additional volume, resulting in an increase in accidents. Submission 12 also notes that slow rural vehicles cause delays, and the TIA does not consider several roads

(“Kingseat Rd, Woodhouse Rd, Cuff Rd, Ostrich Rd, Glenbrook Rd, Hunter Rd, Gun Club Rd, Mauku Rd, Patumahoe Rd, Day Rd, etc, etc.”), that connect Patumahoe to the arterial road network.

- 5.7 As noted earlier, the proposal would increase the traffic volume on these access roads, in some cases by a significant proportion, with a corresponding increase in the risk of crashes, and this has not been assessed in the ITA and no mitigation for this increased risk is proposed. These submission points are supported.
- 5.8 Submission point 28.11 opposes the proposal on the basis that the cumulative effects on the wider transport network including SH1 and SH22 are not addressed. This point is supported.
- 5.9 Submission point 33.5 is seeking a wider network assessment of effects. This is supported.

Trip Generation

- 5.10 Submission point 33.4 states the trip rates used for the assessment are too low for a rural area with little mode choice and requests revised analysis with revised trip generation rates. As set out above, residential trip generation rates in more remote area are typically lower than in suburban areas due to increased trip chaining, and the trip generation rates used in the assessment are reasonable. This submission point is not supported.

Travel demand, location of growth, access to public transport

- 5.11 Submissions 19 and 21 raise similar concerns around employment and growth in a remote location. Submission 19 states:

“There are not enough jobs in the area to sustain such growth, so many people living here already work in the city, commuting on our ever busy rural roads. Current developments much closer to the motorways and city for commuters that are massive - Paerata and Drury - are much more suited to this growth”.
- 5.12 Submission point 28.5 makes a related point noting:

This plan change would create a low-density development in a greenfield area outside a remote rural village that is not located on a frequent transport network.
- 5.13 Submission 32 is concerned the poor access to public transport will increase the demand for travel, resulting in adverse effects from carbon emissions.
- 5.14 Submission point 33.2 supports the provision of the B-LIZ land to provide employment and reduce travel demand.
- 5.15 The concern that the plan change would provide insufficient new employment for the new population to avoid an increase in travel demand on rural roads is partly supported, but the analysis indicates the provision of employment would be better than other growth areas.
- 5.16 Compared with other growth areas, Patumahoe will have poorer access to public transport due to the small population generating relatively low demand for public transport services that are more costly to provide due to the long route length and low population density. The proposed change is therefore less able to reduce demand for private car travel than other growth areas.
- 5.17 The concern that the proposed change would not be well served by public transport and would therefore lead to an increase in private vehicle travel, particularly when compared with other growth areas, is supported.
- 5.18 Submissions 2 and 33.46 request that additional bus stops and services are provided. When new roads are constructed Auckland Transport typically requires developers to provide bus stops on new

roads where bus services are expected to operate, but that is unlikely to include any new roads within the plan change area. While more frequent public transport would be of benefit and assist in offsetting an increase in travel demand from the plan change the provision of public transport is the responsibility of Auckland Transport, and for that reason the submissions seeking additional services are not supported. The installation of additional bus stops requires a separate approvals process involving consultation, and for that reason requiring bus stops to be provided is not considered appropriate for inclusion in the Unitary Plan provisions.

Extent of zoning

- 5.19 Three submissions (4.2, 8.2, 35) seek that land outside the plan change extents is also rezoned, or that land proposed to be zoned Future Urban is live-zoned for urban development. To date no analysis supporting these requests has been provided, and on that basis these submissions are not supported.
- 5.20 Submission 33.1 opposes the rezoning of the land proposed to be zoned Future Urban as the land has not been considered in strategic planning.
- 5.21 The ITA included the FUZ land in the estimate of trip generation, based on the land providing 61 dwellings, but the trip distribution and assignment of trips to the road network excluded the trips generated from the FUZ land. As a result, those trips were not included in the assessment of effects on the transport network. Those trips would typically be assessed when the land is rezoned for development.
- 5.22 The land proposed to be FUZ in the notified plan change does not appear to have any significant reason why it could not support some form of urban development, subject to the development of appropriate development controls and standards, and subject to the provision of adequate transport infrastructure; however, this land is subject to the same constraints and issues as the land proposed to be live-zoned with respect to matters such as increasing the demand for travel on the rural road network.
- 5.23 Any FUZ land would be long-term with respect to the NPS-UD, for which “infrastructure ready” means that appropriate infrastructure is identified in strategic planning documents, and this land would fail that test. For that reason, submission point 33.1 is supported.

Access and connections

Access to Area 2 (Future Urban Zone)

- 5.24 Submission point 33.1 also opposes the zoning of Area 2 as Future Urban as the applicant has not adequately addressed the transport effects of connections with this land.
- 5.25 The ITA provides no description of how this land could be accessed. It is reasonable to assume that the FUZ land might be accessed from Clive Howe Road, Hunter Road, or Patumahoe Road, and at this point there appears to be no fundamental transport reason why some form of urban activity could not have sufficient access provided from one or more of these roads. This aspect of the submission point is not supported.

Access to Mauku Road

- 5.26 Submissions 9, 11, 14, 15, 24, and 34 oppose the proposed road connection to Mauku Road across or close to properties at 22, 24A, 24B, 26A, 26B and 28 Mauku Road. These submissions are opposed by Further Submissions FS2 on the basis the road connection is necessary, and FS9 on the basis that appropriate road access to 30 Mauku Road is desired as that submitter (42) is seeking that property be zoned as Future Urban, Residential-Single House, or Business-Light Industry.

5.27 The following figure identifies the relevant properties and the indicative road network.

Figure 6: Indicative road connection to Mauku Road (from Precinct Plan 3) shown as dashed lines with property addresses shown (indicative road width not to scale)



- 5.28 The ITA assessment has been undertaken on the basis that the proposed road connection to Mauku Road via new Intersection D is a required component of the change. The transport assessment material assessed the ability of the development to be serviced without a road at Intersection B in the event a reduction in the speed limit is delayed or does not occur, but has not assessed the impact on the performance of the local road network without Intersection D.
- 5.29 The submissions opposing the road connection to Mauku Road do not contain information about the performance of the local road network in the event there was no connection to Mauku Road.
- 5.30 Road connections from the plan change area to both Patumahoe Road and Mauku Road are desirable for a few reasons. It is desirable for development areas to have more than one access route available to provide redundancy of access in the event of a road being closed for maintenance or in the event of an emergency, and access to two widely separated different roads is superior in that respect to two closely spaced connections to the same road.
- 5.31 The proposed connection to Mauku Road provides a reasonably direct connection between the western parts of the plan change area and transport options on Mauku Road, including the bus stops located near the northern end of Mauku Road. While a pedestrian connection through the reserve

may be one option, a road connection can be superior for several reasons, chiefly with respect to personal safety.

- 5.32 A recently constructed road providing access to the Patumahoe Heights subdivision is located opposite 18 Mauku Road. The need to maintain adequate separation (30m) between the two intersections would generally preclude a new road being provided to the north of the driveway providing access to 24, 24A, 24B and 24C. As a result, the position of the road connection shown on Precinct Plan 3 is close to the northern-most practical location for a new road.
- 5.33 Locations further to the south would appear to not be precluded by physical transport considerations, such as sight distance, although the desire to provide short walking distances to and from bus stops and local services on Mauku Road would favour a connection relatively close to the location shown on the Precinct Plan. A location broadly through the centre of this part of the plan change area would provide the most efficient development of the land.
- 5.34 At the time of writing there is no transport assessment to support the inclusion of 30 Mauku Road in the plan change, and therefore no support for locating the indicative road connection on that property.
- 5.35 That would suggest, should the plan change be approved, that a road connection could be located somewhere along the road frontage indicated in the following figure (the road frontages of 24 to 28 Mauku Road). The road would be around one quarter of that width, so would need to cross between two and four of those properties.

Figure 7: Locations along Mauku Road where access may be feasible.



- 5.1 A road located on 22, 24A, 24B and 24C Mauku Road would be too close to the new road opposite 18 Mauku Road, and for that reason Submission points 11.1, 15.2, and 24.1 are supported. For clarity, a road located at least partly on 24 Mauku Road, which is used to access 24A, 24B and 24C would be located a sufficient distance from the new road.
- 5.2 As noted above, submission 42 is not supported, and as a result FS9 is not supported.
- 5.3 Submission points 9.1 and 14.1 opposing use of 26A and 26B Mauku Road for access are not supported to the extent that a road connection to Mauku Road is required, although an alternative location that avoided these properties may also be feasible.
- 5.4 Submission point 34.2 opposing the use of 28 Mauku Road for access is not supported as a road connection to Mauku Road is required and all feasible locations must cross at least part of this property.
- 5.5 Further submission FS2 is supported to the extent that a road connection to Mauku Road is required, although there may be some flexibility in the exact location of that road.

Carter Road

- 5.6 Submission 41 supports the installation of a zebra crossing near Patumahoe School and supports the partial closure of Carter Road to provide students with a safe pedestrian link into the proposed plan change area and to address the limited visibility at the intersection.
- 5.7 The installation of a pedestrian crossing on Patumahoe Road west of Carter Road is supported. It is recommended that the form of the crossing be determined at the time of subdivision in consultation with Auckland Transport. Suitable forms of crossing would include a permanent zebra crossing incorporating a raised platform, and a part-time school-patrol (Kea) crossing that could potentially be installed without a raised platform providing advantages with respect to noise etc.
- 5.8 The partial closure of Carter Road to vehicles is not required to provide a safe environment for pedestrians. Safe pedestrian and cycling facilities can be provided alongside vehicle movements, and there are alternate methods available for addressing the poor sight distance at the Patumahoe Road/Carter Road intersection. The primary benefit of closing the northern end of Carter Road to vehicles is simplifying the intersection from a crossroads to a T-intersection. There is evidence to support the assertion that crossroad intersections on busy roads are less safe than T-intersections unless an alternate form of control such as traffic signals or a roundabout is installed. There has been no assessment of alternate methods to address the issues at this intersection.
- 5.9 The submission point is supported to the extent that closure of Carter Road would simplify the intersection and make it safer, but no evidence to suggest that closure is the only viable option or the most appropriate option.
- 5.10 Submission point 33.21 requests clarification of access to Lot 12 DP83912 (57 Patumahoe Road) on the south western corner of Patumahoe Road and Carter Road which has one access on each road. A Watercare property located at 6 Carter Road also has vehicular access provided from Carter Road as noted in point 33.20.
- 5.11 As noted in some submissions, the partial closure of Carter Road is subject to separate processes under the Local Government Act⁵. These processes require appropriate justification to be provided and consultation with affected parties, and the provision of appropriate access, or some form of remedy, would be a part of that process. If parts of the road are to be stopped (no longer legal road) there is a process with respect to sale of the former road reserve.

⁵ Local Government Act 1974, Sections 336, 342.

- 5.12 Irrespective of the additional processes involved with the proposed changes to Carter Road, the proposed closure would appear to impose an adverse effect on at least two adjacent landowners, and it would be beneficial to understand how this might be addressed. The submission points are supported.

Figure 8: Properties with access from Carter Rd



Staging and infrastructure requirements

- 5.13 Submission point 33.3 is concerned that insufficient information has been provided about the impact of the development on the wider transport network, including if infrastructure improvements are not realised or are delayed. The submission seeks that appropriate methods are incorporated, such as staging triggers for infrastructure upgrades.
- 5.14 As discussed earlier, the wider transport network is currently congested, as acknowledged in the information provided. There is no evidence to demonstrate that sufficient capacity is available from planned infrastructure, and no evidence to show that the provision of additional capacity would be practicable to provide.
- 5.15 While the provision of adequate infrastructure is the responsibility of infrastructure providers such as Auckland Transport rather than developers, linking the timing of development to the provision of infrastructure is a method commonly employed throughout the Unitary Plan. Although this method has some weaknesses, in the absence of a superior alternative the submission is supported.

Changes to precinct provisions

- 5.16 Several submission points seek transport-related changes to the proposed provisions. Submission points that support the retention of a particular provision (including 33.8, 33.30, 36.12, 36.14) are not addressed except in the context of another submission that seeks to amend that provision.

Changes to Objectives

- 5.17 Submission point 33.6 seeks amendment of Objective 3a due to it being confusing what upgrades are being referred to and who is responsible for delivering the upgrades.

'(3) Development and/or subdivision within the precinct facilitates a transport network that:

(a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network;'

- 5.18 The submission point is supported.

Changes to Standards

- 5.19 Several submission points request changes to the wording of proposed standards or seek that a standard is expanded to include additional items.

- 5.20 Point 33.12 seeks that Standard I430.6.3 be amended to clarify the standard does not apply to roads to be vested in Auckland Council. This existing standard specifies paving materials to be used on roads and excludes asphaltic concrete or chip seal. The point is supported.

- 5.21 Proposed standard I430.6.13 "Staging in Sub-precinct E" lists pre-requisites for the issuing of titles or building consents for dwellings.

- 5.22 Point 33.15 requests amending Standard I430.6.13(1)(a) to remove redundant wording, and as standards for sight distance at intersections would be set by Auckland Transport at time of development. The point is supported.

(a) A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of/from the indicative locations shown on Patumahoe: Precinct Plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design);

- 5.23 Point 33.16 seeks to reword Standard I430.6.13(1)(b) on the basis it is unnecessarily detailed.

a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed; the width of the road from the property boundary of the proposed site to the kerb on the opposite side of the road.

- 5.24 The detailed nature of any road upgrading is best determined at the time of subdivision in accordance with the engineering standards in place at that time and the provisions of the Resource Management Act. While the submission point is seeking a less detailed description it still seeks to impose requirements that are best determined as a condition on a resource consent for subdivision. This point is supported to the extent the description is simplified, but the sought wording is not supported.

- 5.25 Points 33.17 and 33.18 are concerned that Standard I430.6.13(1)(c) is not clear and should specify which road is being referred to. These points are supported.

- 5.26 Point 33.19 notes that Auckland Transport now prefers separated pedestrian and cyclist paths over shared paths and seeks changes to Standard I430.6.13(1)(c)(ii).

formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road; and' the northern portion of Carter Road, which is identified as 'pedestrian / cycle lane' on Precinct Plan 3 is to be closed to vehicle traffic and formed with pedestrian access and separated cycle facilities'

- 5.27 The future preferences of Auckland Transport with respect to the desired implementation of pedestrian and cyclist facilities at the time of development is unknown, and Auckland Transport have the power to determine how paths in roads are set out and used. The identification of a pedestrian path and a cycling facility as infrastructure required to be provided in Carter Road is supported but detailing the form of those facilities is not necessary and is not supported.
- 5.28 This point requires that the northern portion of Carter Road be closed to vehicular traffic which is subject to separate processes and approvals. The closure of Carter Road to vehicular traffic is not essential to providing safe pedestrian and cyclist passage along the road and making such closure a requirement for development of the land is not supported.
- 5.29 In addition to those changes, the submission is seeking this standard be modified to clarify how access is to be provided to the Watercare facility at 6 Carter Road and the property at 57 Patumahoe Road. While it is important to understand how those properties are to be accessed, that is a matter than can be addressed through the separate road stopping processes.
- 5.30 It is recommended that the standard require pedestrian and cyclist facilities to be provided along the northern part of Carter Road (which could be implemented regardless of road closure). It is also recommended that the standard provide for upgrading the Patumahoe Road/ Carter Road intersection as an alternative to closing Carter Road to vehicles, allowing the road stopping processes to determine the most appropriate form of Carter Road.
- 5.31 Point 33.22 is seeking the addition of a requirement to vest the land adjacent to Patumahoe Road (as identified on Precinct Plan 3) as road to allow the provision of an appropriate road cross-section. This point is supported in relation to development of each lot that has frontage.
- 5.32 Point 33.23 seeks the addition of a requirement to upgrade the Patumahoe Road frontage of the plan change area to include walking and cycling facilities. This point is supported.

Matters for discretion and assessment criteria

- 5.33 Point 33.27 seeks the removal of matter of discretion (f) under I430.8(2) and the insertion of a new matter of discretion.

(f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (roading Hierarchy) and Figures 6-11 (Cross Sections) below;

'(x) The adequacy of the transport infrastructure and services to provide for the subdivision'

- 5.34 That point is related to point 33.31 that seeks to remove Figures 5 to 11 in the precinct provisions that show a roading hierarchy and transport infrastructure cross-sections. These changes are sought as any subdivision must be in accordance with the roads shown on Precinct Plan 3, the proposed cross-sections are different to current Auckland Transport standards.
- 5.35 The proposed changes are like content already included in the Patumahoe Precinct provisions for other sub-precincts in Patumahoe; however, Figure 5 is unnecessarily prescriptive and is not essential for appropriate development of the land. Appropriate cross-sections can, and commonly are, determined at the time of subdivision with reference to what ever standards might apply at that time. The removal of Figures 5 to 11 is supported.
- 5.36 Point 33.28 requests relatively minor changes to the matter of discretion at I430.8(2)(h) as follows:
- (h) establishment of ~~suitable~~ safe and efficient road access from Patumahoe Road to Sub-precinct E and the internal roading network including, footpaths and cycleways within the Sub-precinct;*
- 5.37 This point is supported, albeit with the more generic "cycle facilities" substituted for "cycleways".

5.38 Point 33.29 seeks to amend the matter of discretion at I430.8(2)(i) as follows:

need for and provision of road safety improvements to ~~those sections of Patumahoe and/or Mauku Roads,~~ including at the intersection with Woodhouse Road, adjacent to to mitigate the transport effects of development in Sub-precinct E;

5.39 This point is supported, noting that other roads may also require safety improvements to mitigate the effects of development.

5.40 Point 33.33 seeks that the transport infrastructure requirement is added to assessment criterion I430.8.1(1) for development as follows:

(b) For Sub-precinct E, ~~the extent to which an activity a development~~ complies with the Patumahoe: Precinct Plan 3 and implements the identified transport infrastructure.

5.41 As there is some transport infrastructure not shown on Precinct Plan 3, this point is supported.

5.42 Point 33.37 is seeking the insertion of a new assessment criterion for I430.8.1(2) for subdivision (as opposed to other forms of development), and this is supported, noting that some transport infrastructure is not shown on Precinct Plan 3 and should be included in the matter.

(x) For Sub-precinct E, the extent to which the subdivision implements the transport infrastructure identified on Precinct Plan 3

5.43 Points 33.39, 33.40, and 33.41 are seeking amendments to the three sub-parts of assessment criterion I430.8.1(4)(b) that provides additional roading criteria for subdivision in sub-precinct E. Submission point 26.14 is seeking these provisions remain as notified.

(i) ~~Whether the subdivision will implement any works are~~ required within Patumahoe or Mauku Roads, and existing intersections with those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and

'(ii) ~~Whether the subdivision will implement any safety improvements required to the local road network are facilitated by subdivision in order to safely accommodate the additional activity~~ address any transport effects associated with development in Sub-precinct E.

Amend assessment criterion I430.8.1(4)(b)(iii) as follows:

'(iii) ~~Whether the subdivision provides for any safety improvements are~~ required to maintain the safe operation of the railway level crossing on Patumahoe Road, and

5.44 These points requesting amendments are supported, and 36.14 is not.

5.45 Point 33.44 seeks to insert two new criteria for I430.8.1(4)(c) which applies if development is staged.

(x) Whether the staging of development is aligned with the delivery of transport infrastructure needed to service the development

(x) Whether the establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure in existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.

5.46 These points are supported.

Changes to Precinct Plan 3

5.47 Submission point 33.32 requests that Precinct Plan 3 be amended to “*clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council*” on the basis that roads to be vested need to comply with Auckland Transport’s standards. Any roads that are to be vested are

subject to subdivision resource consent approval and engineering plan approval by Council, and Auckland Transport is involved in those processes. This is a matter that can be dealt with at the time of subdivision, so this point is not supported.

5.48 Point 33.46 seeks to “delete the section of ‘indicative road layout’ located adjacent to the south-west boundary of the Patumahoe Recreation Reserve” because servicing of these lots may be better achieved by a jointly owned access lot rather than a public road. This is a decision that can appropriately be made at time of subdivision, so deletion of the indicative road is not supported for that reason, but as this indicates that a few different forms of development may be appropriate it indicates that this road is not crucial for development of the land and therefore should not be shown on the Precinct Plan.

5.49 Point 33.46 also requests that Precinct Plan 3 be amended to “include other transport works required to support the proposal including:”

- *Pedestrian crossings on Patumahoe Road*
- *Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road*
- *Pedestrian and potential cycling connection through Patumahoe Recreation Reserve*
- *Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection*
- *Additional bus stops on Patumahoe Road*
- *Identification of roads for speed reduction measures.*

Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.

5.50 It may not be appropriate to include all these infrastructure requirements on Precinct Plan 3, particularly if any items are not included within the extents of the Precinct. It is recommended that provisions linking development to required transport infrastructure be dealt with by a list in the text of the provisions, rather than on the precinct plan, unless a spatial representation on the Precinct Plan is required to understand the requirement.

5.51 The identification of roads for speed reduction measures is not supported as an item of required transport infrastructure to allow development.

5.52 Submission point 33.47 seeks to remove either Intersection A or Intersection B on Patumahoe Road on the basis that three intersections on Patumahoe Road would produce safety concerns in relation to proposed cycle facilities along Patumahoe Road, and the view that two intersections on Patumahoe Road are sufficient.

5.53 This point is supported to the extent that the plan provisions identify either intersection as appropriate locations for a new road, and that both need not be provided.

5.54 Point 33.48 seeks to:

Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.

5.55 The submission notes “In addition, Auckland Transport sees value in maintaining the road connection to the rail line as future proofing for future rail/transport requirements.” As noted earlier, separate

processes would be required to stop or partially stop Carter Road, but the desire to note this on the Precinct Plan is not supported.

5.56 From the information available to date, developing the land in accordance with the proposed zoning does not require that Carter Road be stopped, and it is possible that some form of development could occur in the event the separate processes did not result in changes to Carter Road. As a result, it is recommended that closure of Carter Road is not shown on Precinct Plan 3 or included elsewhere as a necessary item of infrastructure. If vehicular use of the northern section of Carter Road is retained, then some form of upgrade to the intersection with Patumahoe Road may be desirable. As these matters can be dealt with at time of subdivision or development, and after any road stopping process has been completed, the requested changes are not supported to the extent the requirement to stop Carter Road is retained.

5.57 Point 33.49 requests the following change:

Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.

5.58 The provision of a new road at Intersection B on Patumahoe would require the lowering of the speed limit on Patumahoe Road; however, as noted in the transport information, and in Auckland Transport's submission, the land could be developed without requiring that intersection to be formed. There may be other reasons why the speed limit on Patumahoe Road may need to be reduced to assist in providing for the development or to mitigate adverse effects; however, that is most appropriately determined at the time of development or subdivision and does not need to be included in the precinct provisions as a prerequisite for development. This point is not supported.

5.59 The speed limit to be applied to new roads is typically determined at the time of subdivision and need not be stipulated in these precinct provisions.

5.60 Point 33.51 requests the following change if a separated walking and cycling connection cannot be provided along the western side of Patumahoe Road to the Woodhouse Road intersection:

Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.

5.61 While a connection through the reserve is desirable, the essential component with respect to developing the land is that a connection to the reserve is provided. The form of the connection through the reserve is subject to approval from Auckland Council Parks Department, and to an agreement on funding. The need for the connection is also seen to be dependent upon the provision of other infrastructure. This indicates the connection is not a necessary component of developing the land and therefore should not be included on Precinct Plan 3. The point is supported only to the point where a pedestrian and cycling connection to the reserve boundary is included on the Precinct Plan.

5.62 The submission points by Auckland Transport (33.46, 33.50) requests that additional bus stops on Patumahoe Road be shown on Precinct Plan 3 and that the Unitary Plan requires two pairs of bus stops be provided in conjunction with development.

5.63 The provision of bus stops would normally be required at the time of subdivision. The installation of bus stops is subject to a separate third-party regulatory process (Auckland Transport traffic controls resolution) including consultation with neighbours and others, as-is the provision of any bus shelter (Local Government Act), which also includes consultation with neighbours. As a subdivision proposal not in accordance with the Precinct Plan would be a Non-Complying activity, features shown on the

Precinct Plan should be confined to those essential to provide for development to occur and would ideally not require additional third-party approval. While it is important that the new development area be supported by public transport, showing bus stops in Patumahoe Road on the Precinct Plan is not appropriate and is not supported.

- 5.64 A table summarising the recommended response to each transport-related submission point is appended.

6.0 Conclusions and recommendations

- 6.1 The change proposes to rezone land as Residential-Single House, Business-Light Industrial and Future Urban. The change proposes to extend the zones onto Carter Road, a public road controlled by Auckland Transport, and it is proposed that parts of this road be stopped in some form, with part closed to motor vehicles and the remainder ceasing to be road.
- 6.2 The relevant transport environment consists of a few roads within Patumahoe that have relatively low traffic volume and minimal infrastructure for pedestrians or cyclists, a network of low to moderate volume rural roads in the area surrounding Patumahoe, and the wider sub-regional road network which experiences congestion and delay during peak periods.
- 6.3 The transport assessment included in the plan change notified material describes the transport characteristics of the local area near the site and the proposed change. In general, the assessment of effects on the local transport environment for the land proposed to be (live) zoned for development is adequate.
- 6.4 The assessment of effects on the rural road network surrounding Patumahoe is inadequate, particularly with respect to the impact of development on road safety and infrastructure that may be required to address those effects.
- 6.5 The assessment of effects on the wider road network in the southern Auckland region is superficial, being predicated on the proposal representing a small proportion of growth rather than demonstrating that sufficient residual capacity in the planned road network is available to accommodate the proposal.
- 6.6 The wider road network experiences significant traffic congestion and delay during peak times and this is projected to worsen because of growth already enabled in other areas. The proposed change would contribute to that congestion, and no mitigation is proposed.
- 6.7 Growth is expected in other areas identified in strategic planning instruments. While some infrastructure projects are planned to address this growth, funding is not yet available for all projects required to support that growth. In addition, the provision of transport infrastructure for these areas includes provision of substantially improved access to public transport, with high-capacity rail services forming the backbone of those services.
- 6.8 The plan change area has poor access to public transport, and is located remote from other areas providing employment, education, and other services, increasing reliance on private vehicle travel which is at odds with the planning for growth in the region.
- 6.9 While the planned infrastructure projects may provide sufficient residual capacity to accommodate the proposed changes, no evidence of that has been provided, and the effects on the wider network have largely been discounted on the basis they would form a small proportion of the volume on the network.

- 6.10 The proposed rezoning does not meet the medium-term NPS-UD definition of “infrastructure ready” as infrastructure required for the proposed live zoning is not funded.
- 6.11 The proposed rezoning is inconsistent with the RPS as the provisions do not enable development to be serviced efficiently by public transport.
- 6.12 Several transport-related issues were raised in submissions, ranging from concern about additional development being located in Patumahoe which has reduced access compared with other areas, requests for additional land to be rezoned, issues about specific and discrete details of the proposal, and several submissions seeking detailed changes to the planning provisions. A summary of recommended responses to the transport-related submission points is appended.
- 6.13 To conclude, Patumahoe is a location serviced by several lower-quality high-risk rural roads and a low-frequency public transport service.
- 6.14 Several infrastructure projects, such as the provision of paths, crossings, and intersection works, to provide for development of the land have been identified within Patumahoe, and these appear to be feasible, subject to being funded by developers.
- 6.15 Infrastructure projects, or other mitigation, to address the effects of development on the rural road network have not been identified and the funding of such projects is not addressed.
- 6.16 There is insufficient evidence to demonstrate that the sub-regional transport infrastructure is, or would be, sufficient to accommodate development of the land. If any additional infrastructure is required, the funding has not been addressed.
- 6.17 Compared with other locations, development in Patumahoe appears to have poorer access to public transport, and increased reliance on private vehicle transport, including on lower-quality rural roads. This is contrary to transport strategy and plans for growth in Auckland.
- 6.18 To conclude, it is recommended the proposed rezoning is not supported.
- 6.19 Should the proposed rezoning be supported, the following recommendations are made:
 - a) The Precinct Plan should contain only the essential infrastructure and requirements that need to be spatially defined. With respect to transport, this should include the land to be vested as road to provide for widening of Patumahoe Road;
 - b) The proposed cross-sections and road hierarchy diagrams should be removed.
 - c) A precinct standard should require the following transport infrastructure to be provided:
 - i. A road connection to Mauku Road, with a threshold of around half of the residential development triggering the provision of that connection, including a through connection between Patumahoe Road and Mauku Road. This connection should provide a good standard of provision for cyclists to link the existing shared path on Mauku Road with the proposed facility on Patumahoe Road.
 - ii. A road abutting the domain.
 - iii. A pedestrian crossing on Patumahoe Road near the school
 - iv. A cyclist facility along Patumahoe Road

- d) When considering an application to develop the land Council should be provided with discretion to consider the impact on the road network, and what mitigation is proposed, specifically:
- i. Impacts on safety and efficiency at the intersection of Patumahoe Road, Mauku Road and Woodhouse Road
 - ii. Impacts on safety of the rural road network surrounding Patumahoe;
 - iii. Impacts on safety and efficiency of the arterial road network linking Patumahoe to the wider Auckland Region, including effects on Glenbrook Road and Karaka Road.

Appendix A. Trip Generation Rates

- A.1 This appendix provides some additional data on trip generation rates for residential dwellings outside larger suburban areas, and some data on the trip generation of business activities likely to establish in the B-LIZ.
- A.2 Updated NSW surveys and guidelines were published in 2013 based on surveys in 2010. The surveys separated low density dwellings in urban and other areas from high-density urban dwellings. The average trip rates for the low-density housing are summarised in the following table, together with data from the NZ Trips Database Bureau.

Table 6: Low density residential trip generation rates in NSW and NZ. Range and (average)

Location		Daily	Peak Hour
Inner Suburban	NSW	5.23 – 10.30 (8.4)	0.59, 1.22 (0.91)
	NZ	2.63 – 11.16 (4.3)	0.38 – 1.46 (0.67)
Outer Suburban	NSW	5.16 – 10.33 (8.0)	0.61 – 1.39 (1.00)
	NZ	0.69 – 1.04 (7.1)	0.52 – 1.04 (0.77)
Inner Rural	NSW	6.36 – 7.12 (6.6)	0.75 (0.75)

- A.3 The three Inner Suburban sites contained between 676 and 1495 dwellings, a range of other activities such as childcare centres and shops, and good access to public transport. The four Outer Suburban sites contained between 669 and 1335 dwellings and activities such as childcare centres, medical centres, and local shops, and varying access to public transport. The four Inner Rural sites contained between 509 and 697 dwellings, few other activities, and poor access to public transport.
- A.4 The NSW data indicates that locations further from city centres generated fewer vehicle movements per dwelling despite poorer access to public transport. This characteristic has also been noted in New Zealand⁶. A likely reason for this “increased trip linking” is that people living further from employment are more likely to make trips for shopping as part of their trip home from work, rather than making a separate trip from home. As a result, a more remote location is likely to have fewer trips and longer trip lengths.
- A.5 The older guidelines note that around 25% of trips are to local destinations such as shops, schools, and social visits, recommending that some adjustment should be made for roads further from the site.
- A.6 The updated NSW guideline is clearer, warning the rates do not include trips made internal to the subdivision (for example to childcare or local shops) which “*may add up to an additional 25%.*”
- A.7 It is also useful to note that assessments of future growth areas by the Supporting Growth Alliance [SGA] assume that residential trip generation in suburban areas will decline over time due to factors including increased working from home and decreasing average household size.

Business trip generation

- A.8 The Auckland Unitary Plan [AUP] Business - Light Industry Zone [B-LIZ] provides for a range of activities, including industrial and storage activities, smaller dairies and food outlies, service stations and trade suppliers.
- A.9 Trip generation for the Light Industrial zone is assumed to be 5.0 veh/h per 100m² of gross floor area (GFA) per day and 1.0 veh/h during peak hours, with an assumption that buildings would occupy 65% of the land area. These trip generation rates match the recommendations in the 2002 RTA guide for

⁶ Trips and parking related to land use. Research Report 453. NZ Transport Agency, November 2011.

“Factories.” When calculated per 100m² of site area, the ITE rates are 3.25 trips/day and 0.65 trips/hr.

- A.10 The NSW 2013 update provides recommendations based on surveys of industrial estates in 2012 in a variety of areas. Industrial estates typically contain manufacturing, warehousing and distribution activities. Trip rates are summarised in the following table.

Table 7: Industrial trip generation rates in NSW and NZ. Range (**Average**)

Location		100m ² Floor Area		100m ² Site Area	
		Daily	Peak Hour	Daily	Peak Hour
Outer Suburban	NSW	1.89, 2.31 (2.1)	0.15-0.20 (0.18)	0.40, 0.82 (0.6)	0.03-0.07 (0.05)
	NZ	2.32-38.94 (18.7)	0.24-6.02 (1.42)	0.48-18.52 (3.4)	0.03-3.06 (0.49)
Inner Rural	NSW	3.78	0.32-0.39 (0.36)	1.27	0.11-0.13 (0.12)
	NZ	8.31	1.33		

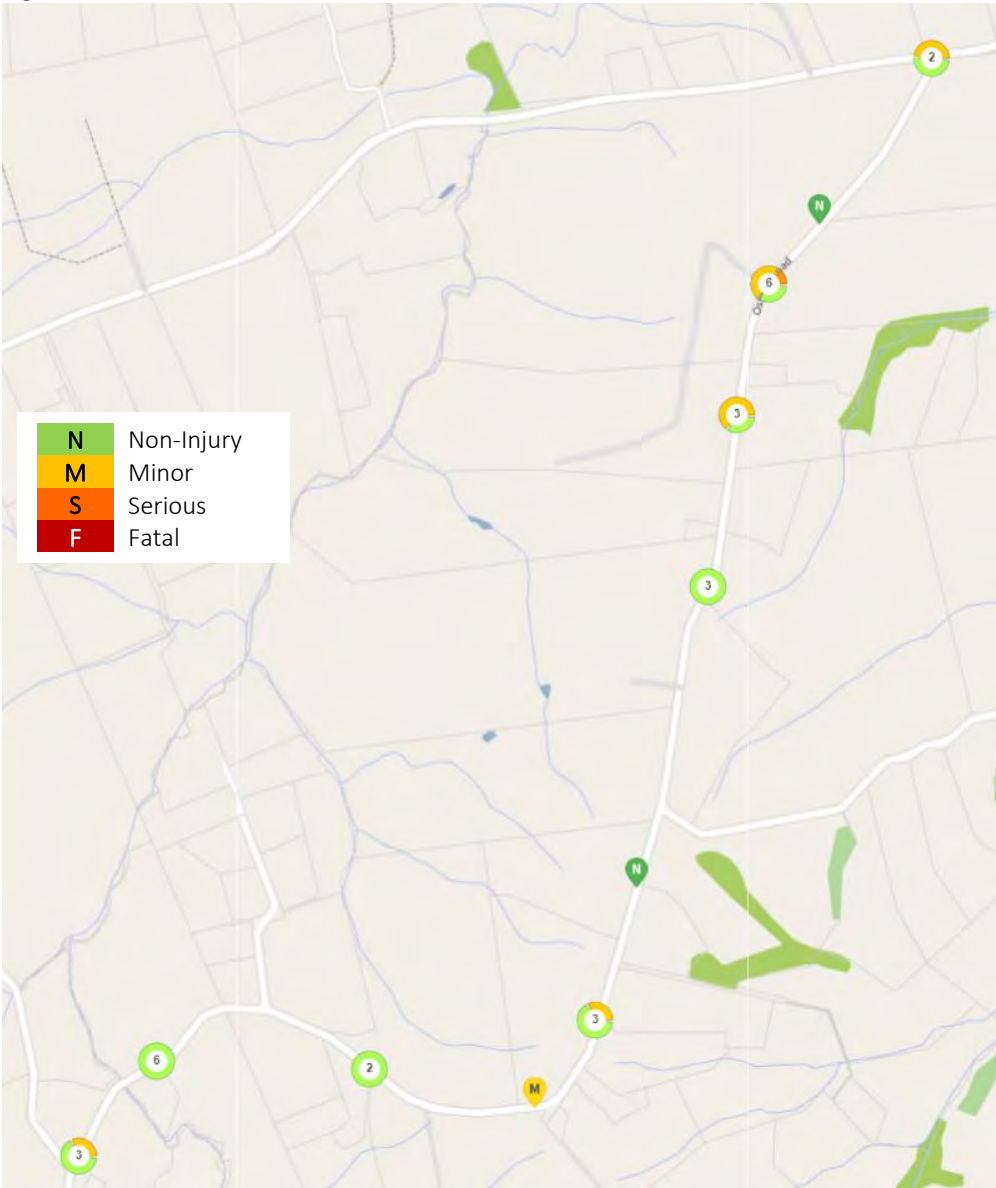
Appendix B. Crash Rate Analysis

- B.1 This appendix provides some objective analysis of road safety risk using the data and methodology from the NZ Transport Agency Crash Estimation Compendium. The data and equations in the compendium are derived from extensive research into typical crash rates on New Zealand Roads.
- B.2 In this case, Ostrich Road is used as an example; however similar results could be expected for other minor rural roads in the area.

Crash History

- B.3 The crash history for Ostrich Road over the past ten years (2011-2020) is shown in the following diagram.

Figure 9: Crashes on Ostrich Road, 2011-20



- B.4 If the crashes at the intersections at each end are excluded, there were:
 - a) 30 crashes
 - b) 1 serious injury crash
 - c) 9 minor injury crashes

- B.5 Ostrich Road is 4.1km long, and currently carries around 1900 vehicles per day. The historical crash rate is 10 injury crashes over 10 years, a rate of 1.0 per year, over the 4.1km. There was an average of 0.1 deaths and serious injuries (DSI) per year.
- B.6 The proposed change is expected to generate in the order of 782 veh/d on Ostrich Road, increasing the volume from around 1900 veh/d to around 2,682 veh/d, an increase of 41%.

Typical Crash Rate – Ostrich Road Midblock

- B.7 From the compendium the typical crash rate (reported injury crashes per year) for a rural road ($\geq 80\text{km/h}$) at mid-block locations (excluding intersections) is given by the following equation, with values taken from the compendium for road characteristics matching Ostrich Road.

$$A_T = b_0 \cdot (L \cdot \text{AADT} \cdot 365 / 10^8) \cdot \sum \text{CMFs}$$

Parameter		Without Proposal	With Proposal
b_0	crash factor	29	29
L	length in km	4.1	4.1
AADT	annual average daily traffic (veh/day)	1900	2682
CMF	3.25m lane width and 0.25m shoulders	1.21	1.21
A_T	Total injury crashes per year	0.998	1.408
A_{DSI}	Total deaths and serious injuries per year	0.259	0.366

- B.8 The equation predicts a good match for the historical number of injury crashes. The equation suggests the additional traffic generated by the plan change would result in a 41% increase in the number of injury crashes on Ostrich Road, in direct correlation with the increase in traffic volume.

Typical Crash Rate – Ostrich Road / Glenbrook Road Intersection

- B.9 The crash rate at rural high-speed priority-controlled T-intersections is given by the following equation, with the parameters and results summarised in the table. The equation does not directly account for congestion, but it is accounted for indirectly as other intersection with similar volumes are expected to have similar levels of congestion unless daily traffic patterns are unusual.

$$A_T = b_0 \cdot Q_{\text{major}}^{b_1} \cdot Q_{\text{minor}}^{b_2}$$

Parameter		Without Proposal	With Proposal
b_0	crash factor	3.52×10^{-4}	3.52×10^{-4}
b_1	crash factor	0.18	0.18
b_2	crash factor	0.57	0.57
Q_{major}	AADT on Glenbrook Road (veh/day)	9550	9550
Q_{minor}	AADT on Ostrich Road (veh/day)	1900	2682
A_T	Total injury crashes per year	0.136	0.165
A_{DSI}	Total deaths and serious injuries per year	0.043	0.053

- B.10 The number of injury crashes at the intersection is predicted to increase by 21% because of the plan change.

Appendix C. Recommended response to transport related submission points

Point	Summary	Recommended Response
2.2	Amend the plan change to include a new AT bus stop with a shelter on Patumahoe Road up by the school, and a shelter for the existing Mauku Road bus stop. Also seeks a better bus service for Patumahoe.	Not supported
3.1	Patumahoe Rd has become extremely busy with township becoming congested	Not supported
4.2	Rezone 75 Patumahoe Road to a live submission [zoning] instead of future urban.	Not supported
8.2	Include the eastern sector in the Proposed Plan Change from Rural - Rural Production Zone to Residential - Single House Zone	Not supported
9.1	It affects the submitter's property (24A Mauku Road).	Partially supported
11.1	Opposes using 24A Mauku Rd for access	Supported
12.1	Will severely impact on traffic volumes on local roads. Roads not built to cope with extra traffic volume, increase in accidents. ITA does not consider Kingseat, Woodhouse, Cuff, Ostrich, Glenbrook, Hunter, Gun Club, Mauku, Patumahoe, Day. Slow rural vehicles produce delays	Supported
14.1	Major disruption to submitter's residential property (26A Mauku Road).	Partially supported
15.2	Amend the plan change so that the new road placement (Intersection D) is reconsidered. Opposes using 24B Mauku Rd for access.	Supported
18.1	Too much traffic and congestion already	Partially supported
19.1	Remote from employment increases travel demand	Partially supported
20.1	Insufficient infrastructure	Partially supported
21.1	Remote from employment increases travel demand	Partially supported
24.1	Opposes using 22 Mauku Rd for access	Supported
25.1	Will severely impact on traffic volumes on local roads. Roads not built to cope with extra traffic volume, increase in accidents.	Supported
26.1	Traffic volumes on network, Existing congestion	Partially supported
28.5	Decline the plan change in relation to the NPS-UD. Remote from employment increases travel demand, not on FTN	Partially supported
28.11	Decline the plan change [in relation to transport]. PC does not address cumulative effects on wider transport network including SH1 and SH22. Remote location increases travel demand, this growth not allowed for in planning of road network so no evidence to say effects on wider network are able to be addressed.	Supported
32.1	Emissions from increased travel, lack of public transport.	Partially supported
33.1	Decline the proposed rezoning of 9 hectare on the eastern side of Patumahoe Road from Rural Production to Future Urban zone. Land not in FULLS so not considered in strategic planning. Applicant not adequately addressed transport effects of connections with FUZ.	Partially supported
33.2	Retain the proposed rezoning of 2.5 hectares at the southern end of the development from Rural Production and Strategic Transport Corridor to Light Industrial. Supports LIZ to provide employment, reduce travel demand	Supported
33.3	Require more information about the impact of the development on the wider transport network, including if the infrastructure improvements identified as providing a contribution to the traffic impact associated with the Plan Change are not realised or not realised by the timeframes identified. If these infrastructure requirements are necessary to support the development to be enabled by this Plan Change in any way, then identify appropriate methods to address them, such as appropriate staging triggers.	Supported
33.4	Trip rates too low for rural area with little mode choice. Require analysis with revised trip generation rates based on development level/quantum proposed and any additional mitigation required.	Not supported
33.5	Require wider network assessment of the effects of this development given that the strategic network assessment did not include the effects of this development and much of the strategic capacity is utilised by others.	Supported
33.6	Amend Objective 3(a) ...	Supported
33.8	Retain Policy 5.	Supported

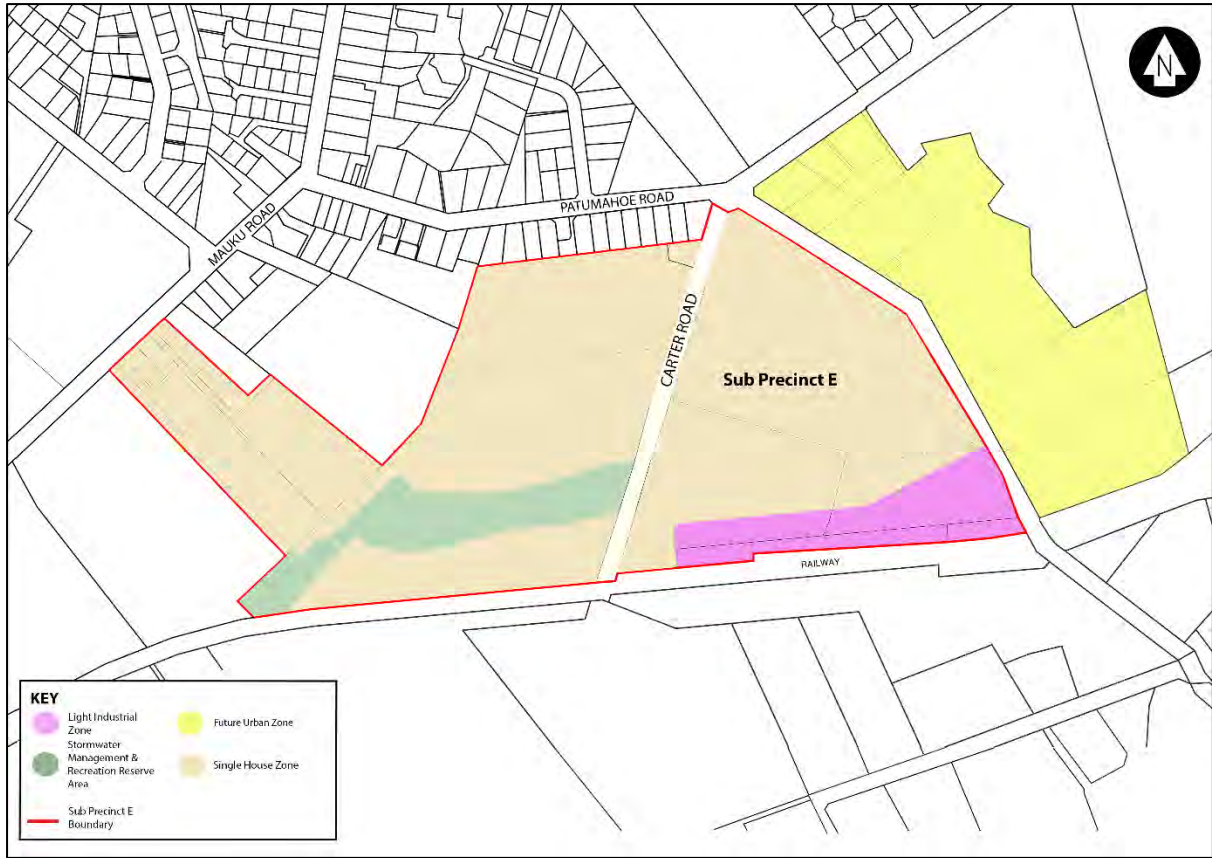
Point	Summary	Recommended Response
33.12	Amend Standard I430.6.3 to clarify the standard does not apply to roads to be vested in Auckland Council.	Supported
33.15	Sight distance requirements will be set by AT. Amend Standard I430.6.13(1)(a) ...	Supported
33.16	Reword Standard I430.6.13(1)(b) ...	Not supported
33.17	Reword Standard I430.6.13(1)(c) ...	Supported
33.18	Reword Standard I430.6.13(1)(c)(i) to clarify what road needs to be formed.	Supported
33.19	In general AT no longer accepts shared paths. Reword Standard I430.6.13(1)(c)(ii) ...	Partially supported
33.20	Reword I430.6.13(1)(c)(iii) to clarify how vehicle access is to be provided to the Watercare facility at 6 Carter Road.	Supported
33.21	Request clarification on the loss of access for Lot 12 DP83912 and ongoing provision of such if required.	Supported
33.22	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant, to require the vesting of land as road adjacent to Patumahoe Road as identified on Precinct Plan 3.	Supported
33.23	Amend Standard I430.6.13, and other parts of the precinct provisions as relevant including identification on Precinct Plan 3, to require the upgrade of Patumahoe Road frontage in conjunction with subdivision and development. This includes separated walking and cycling facilities to be provided along the western side of Patumahoe Road extending to Woodhouse Road and vesting of land to accommodate this infrastructure.	Partly supported
33.27	Remove the matter of discretion at I430.8(2)(f) ...	Supported
33.28	Amend the matter of discretion at I430.8(2)(h) ...	Partially supported
33.29	Amend the matter of discretion at I430.8(2)(i) ...	Supported
33.30	Retain the matter of discretion at I430.8(2)(j)	Supported
33.31	Remove Figures 5 – 11 in the Precinct Plan, showing the roading hierarchy and cross sections of roads and a shared path. Replace the cross-sections with an approach that identifies the minimum road reserve widths, functional requirements, and particular components such as separated cycle facilities.	Supported
33.32	Amend the Precinct Plan to clearly identify which roads in Sub-precinct E are intended to be public roads vested to Auckland Council.	Not supported
33.33	Amend assessment criterion I430.8.1(1)(b) ...	Supported
33.37	Insert new assessment criterion for I430.8.1(2) ...	Supported
33.39	Amend assessment criterion I430.8.1(4)(b)(i) ...	Supported
33.40	Amend assessment criterion I430.8.1(4)(b)(ii) ...	Supported
33.41	Amend assessment criterion I430.8.1(4)(b)(iii) ...	Supported
33.44	Insert two new criteria for I430.8.1(4)(c) ...	Supported
33.46	Amend Precinct Plan 3 to delete the section of 'indicative road layout' located adjacent to the south-west boundary of the Patumahoe Recreation Reserve. Amend Precinct Plan 3 to include other transport works required to support the proposal including: <ul style="list-style-type: none"> • Pedestrian crossings on Patumahoe Road • Upgrade and widening of Patumahoe Road frontage to accommodate a separated walking and cycling facility extending to Woodhouse Road • Pedestrian and potential cycling connection through Patumahoe Recreation Reserve • Safety improvements at the Patumahoe / Mauku / Woodhouse Roads intersection • Additional bus stops on Patumahoe Road • Identification of roads for speed reduction measures. Make consequential amendments to precinct provisions, including rules such as staging triggers and assessment criteria, to require these works in conjunction with subdivision and development.	Partially supported
33.47	Amend Precinct Plan 3 to remove one of the proposed intersections onto Patumahoe Road but retain the intersection adjacent to the industrial zone.	Partially supported

Point	Summary	Recommended Response
33.48	Amend the Precinct Plan to include reference to the road stopping process which would be required to realign the southern part of Carter Road in the manner proposed. The Precinct Plan should acknowledge through advice notes and special information requirements that development which relies on the road realignment cannot proceed until road stopping is completed and there is an unconditional agreement in place to acquire the stopped road.	Not supported
33.49	Amend the Precinct Plan to add provisions, including rules, identifying where speed limits on Patumahoe Road need to be lowered to support safety for the proposed development and that this process will be funded by the applicant.	Not supported
33.50	Amend the Precinct Plan to require two pairs of bus stops meeting Auckland Transport standards to be provided along Patumahoe Road in conjunction with subdivision and development of Sub-precinct E. The indicative location of the bus stops should be identified on Precinct Plan 3.	Not supported
33.51	Amend the precinct plan to incorporate provisions, including rules, relating to the provision of a pedestrian and, potential cycling connection through the Patumahoe Recreation Reserve, subject to the approval of the relevant group within Auckland Council.	Partially supported
34.2	Seeks the removal of the Indicative Road through 28 Mauku Road from Precinct Plan 3.	Partially supported
35.3	Seeks that the subject site at 23 Clive Howe Road is included within the private plan change area and the Patumahoe Precinct;	Not supported
35.4	Seeks that the subject site at 23 Clive Howe Road and the adjoining site at 75 Patumahoe Road are rezoned Residential Large Lot and are subject to a subdivision standard which requires all new lots to have a minimum size of 2000m ² and an average size of 4000m ² .	Not supported
35.5	Seeks that the sites at 24, 25, 26 and 28 Clive Howe Road and 59, 61 and 71 Patumahoe Road are rezoned to Residential Single House.	Not supported
36.12	Retain I430.8. Assessment – restricted discretionary activities (2) clause (j) as notified	Supported
36.14	Retain I430.8.1(4)(b)(iii) and (iv) as notified	Partially supported
41.2	No specific decision requested but supports the proposed safety improvements to mitigate traffic effects on pedestrian safety.	Supported
41.3	No specific decision requested, but supports the partial closure of Carter Road to be converted into a walking and cycling pathway	Not supported
41.4	No specific decision requested but supports the proposed speed reduction to 30km/hr in the wider Proposed Plan Change area.	Not supported
42.2	Include 30 Mauku Rd with Future Urban, Residential and/ or Light Industrial zoning	Not supported
45.1	Seeks that the proposal recognises the long-term transport requirements of Patumahoe Village.	Supported

APPENDIX EIGHT
AMENDMENTS TO I430 PATUMAHOE
PRECINCT

Plan Change 55 – Patumahoe South

Zone map



I430. Patumahoe Precinct

(N.B. Includes PC4 Modifications to AUP:OIP)

I430.1. Precinct Description

Patumahoe Sub-precinct A consists of approximately 25 hectares of land located northwest of the existing Patumahoe settlement. The precinct is bounded to the east by Woodhouse Road and to the west by an existing residential area fronting Kingseat Road. To the south of the precinct is the Patumahoe town centre/commercial area, while to the north are horticultural and pastoral activities. The sub-precinct is bisected by an open watercourse that drains into the headwaters of the Taihiki River. A second, less significant watercourse is located in the western aspect of the precinct which includes the western wetland.

Sub-precincts B, C and D comprise approximately 9.93 hectares and are located on a weathered volcanic cone to the west of the Patumahoe town. The three sub-precincts are bounded by Mauku Road to the south east, Kingseat Road to the north east and Day Road to the north west. Land to the west and south of the precinct remain in rural/horticultural use.

The zoning of land within this precinct is Residential - Single House Zone and Open Space – Informal Recreation.

Sub-precinct E comprises approximately 33.5ha of land adjoining the southern edge of the existing settlement. The sub-precinct extends from the western side of Patumahoe Road across Carter Road to Patumahoe Domain and through to Mauku Road (opposite sub-precinct B). The ~~Paerata-Waiuku-Mission Bush~~ Branch railway line forms the southern boundary of the precinct, with land to the south of the railway (outside of the precinct) remaining in rural land use.

The zoning of land within this precinct is Residential - Single House, ~~and Business – Light Industrial and Open Space – Informal Recreation.~~

I430.2. Objectives

- (1) Development provides a high standard of amenity, safety and convenience and contributes to a positive sense of place and identity for the Patumahoe area.
- (2) Efficient infrastructure is provided to service the needs of the precinct area.
- (3) Development and/or subdivision within the precinct facilitates a transport network that:
 - (a) integrates with, and avoids adverse effects on the safety and efficiency of, the transport network of the surrounding area, including any upgrades to the surrounding network;
 - (b) facilitates transport choices by providing for pedestrians, cyclists, public transport facilities, and vehicles;

(c) is designed and constructed in a manner that is consistent with the requirements of Auckland Transport and any relevant code of practice or engineering standards.

(4) Subdivision and development minimise the potential for reverse sensitivity conflicts with adjoining rural activities and land uses.

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

I430.3. Policies

(1) Require dwellings developed within the precinct, to make efficient use of land and infrastructure while achieving an overall pattern and intensity of development compatible with the rural character of Patumahoe.

(2) Enable a range of site sizes while maintaining a compact, centre focused urban form that is compatible with the current scale and development pattern of Patumahoe.

(3) Require subdivision and design of residential, open space, and infrastructure to enhance landscape amenity and recreational values associated with the principal watercourse including the bush gully and waterfall area at the north-western corner of the Sub-precinct A.

(4) Provide quality public open spaces which generally abut streets rather than residential sections and thus provide opportunities for passive surveillance and public amenity.

(5) Require subdivision and/or development within the precinct to provide for a transport network that:

(a) as a minimum, is in accordance with the transport network elements shown on Patumahoe: Precinct plans 1 *and* 3;

(b) supports safe and efficient movement of pedestrians, cyclists, public transport and vehicles;

(c) is designed and constructed in accordance with the requirements of Auckland Transport and any relevant code of practice or engineering standards.

(6) Require all lots within sub-precincts B, C, D and DE to be connected efficiently and cost effectively to the existing public sewerage and water supply networks in Patumahoe, and recognise that the council may enter into such arrangements as are appropriate with any developer to ensure this happens in a timely manner.

(7) Require the use of water harvesting within sub-precincts B, C, D and DE (i.e. roof water collection tanks) for non-potable uses for individual dwellings as a means of

achieving stormwater management objectives and to promote water conservation and efficiency.

- (8) Require low impact stormwater management techniques to be integrated into the design of the stormwater network in the area and stormwater management to occur in accordance with the Patumahoe Integrated Catchment Management Plan and associated Stormwater Network Discharge Consent

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

I430.4. Activity table

The provisions in any relevant overlays, zone and the Auckland-wide provisions apply in this precinct unless otherwise specified below.

Table I430.4.1 Activity table specifies the activity status of activities in the Patumahoe sub-precincts B, C and D pursuant to sections 9(3) and 11 of the Resource Management Act 1991. A blank table cell with no activity status specified means that the zone, Auckland-wide and overlay provisions apply.

Table I430.4.1 Activity table

Activity		Activity status
Development		
(A1)	Building	
<i>(A2)</i>	<i>Activities in the Business Light Industrial Zone</i>	
Subdivision		
(A2)	Subdivision which complies with the subdivision standards I430.6.4 Vehicle parking and access in sub-precincts B, C and D, I430.6.7 Minimum net site area, I430.6.8. Maximum number of lots in sub-precincts B, C and D, I430.6.9 Landscape buffer in sub-precincts B, C, and D, I430.6.10 Public open space in sub-precincts B, C and D, I430.6.11 Staging in sub-precincts B, C and D and I430.6.12 Stormwater management in sub-precincts B, C and D;	
(A3)	Subdivision which does not comply with the subdivision standards I430.6.4 Vehicle parking and access, I430.6.7 Minimum net site area, I430.6.8. Maximum number of lots in sub-precincts B, C and D, I430.6.9 Landscape buffer, I430.6.10 Public open space, I430.6.11 Staging and I430.6.12 Stormwater management.	NC

Table I430.4.2 Activity table specifies the activity status of activities in Patumahoe sub-precinct E pursuant to sections 9(3) and 11 of the Resource Management Act 1991. A blank table cell with no activity status specified means that the zone, Auckland-wide and overlay provisions apply.

Table I430.4.2 Activity table

<u>Activity</u>		<u>Activity status</u>
<u>Development</u>		
<u>(A4)</u>	<u>Building</u>	<u>P</u>
<u>(A5)</u>	<u>Building which does not comply with the applicable building and development standards in I430.6.</u>	<u>RD</u>
<u>Subdivision</u>		
<u>(A6)</u>	<u>Subdivision which complies with the subdivision standards I430.6.7 Minimum net site area, I430.6.9 Landscape buffer in sub-precincts B, C, and D and E, I430.6.10 Public open space in sub-precincts B, C and D and E, I430.6.13. Staging in Sub-precinct E; I430.6.14. Stormwater management in Sub-precinct E; I430.6.15. Reverse Sensitivity in Sub-precinct E.</u>	<u>RD</u>
<u>(A7)</u>	<u>Subdivision which does not comply with the subdivision standards listed in (A6) above.</u>	<u>NC</u>

I430.5. Notification

- (1) Any application for resource consent for an activity listed in Tables I430.4.1 and I430.4.2 Activity table above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

I430.6. Standards

The overlay, zone and Auckland-wide standards apply in this precinct in addition to the following standards, unless otherwise specified below. All activities listed in Table I408.4.1 Activity table must comply with the following standards.

I430.6.1. Building design in sub-precincts B, C, D and DE

- (1) The finishing of external walls of buildings shall have a light reflectivity value of no more than 70%.
- (2) The finishing of roofs shall have a light reflectivity value of no more than 40% and the roof finishing shall be darker than the external walls of the building.
- (3) Buildings fronting Patumahoe Road between the railway line and Carter Road must have a minimum front yard setback of 7 metres.

I430.6.2. Retaining walls in sub-precincts B, C, D and DE

- (1) The height of a single retaining wall shall not exceed 1.2m.
- (2) The use of more than one 1.2 metre retaining wall is permitted, provided this can be done by terracing a second wall behind the first. The space in between the two walls cannot be less than 0.75 metres and this intervening area must be landscaped in accordance with Figure 4 Retaining detail below.
- (3) At the base of each retaining wall landscape plantings shall be established in accordance with the Figure 4 Retaining detail below, to visually break up the appearance of the face of the retaining wall.
- (4) Retaining walls must be constructed of natural stone, or timber or designed with materials that match materials used on the exterior of a dwelling on the same lot. Crib or keystone are not permitted.

I430.6.3. Paving materials in sub-precincts B, C, D and DE

- (1) Paving materials must comprise either exposed aggregate concrete, concrete with charcoal oxide (6.0kg/m³), natural stone, natural timber, or be undertaken with dark or earth toned pavers. This standard shall not apply to public roads.

I430.6.4. Vehicle parking and access in sub-precincts B, C and D

- (1) No vehicle access to private lots is permitted from Kingseat Road. Vehicle access for properties with frontage onto Kingseat Road shall be from public roads or private lanes at the rear of properties.

I430.6.5. On-site stormwater mitigation in sub-precincts B, C, D and DE

- (1) All stormwater from impervious areas shall be mitigated to achieve flow attenuation, such that 5m³/100m² of roof area and 3m³/100m² of other impervious areas are attenuation by one (or a combination) of the following methods:
 - (a) Stormwater soakage pits where geotechnical conditions allow.
 - (b) Stormwater rain tanks where geotechnical conditions do not allow for effective soakage, or to provide generally for rainwater harvesting.

I430.6.6. Interface with Kingseat Road – all sites fronting Kingseat Road in sub-precincts B, C and D

- (1) That part of Standard H3.6.8 Yards specifying front yards does not apply.
- (2) Front yards: a front yard of not less than 4.0 metres, and not more than 5.0 metres must be provided.
- (3) That part of the front façade of a dwelling within 10m of the front boundary must contain glazing to a habitable room or habitable rooms that is cumulatively at least 10 per cent of the area of that part of the front façade.
- (4) Any retaining wall adjacent to the Kingseat Road boundary shall be a maximum of 1.2 metres high, as illustrated in Figure 3 Kingseat Road below,

Landscaping shall be planted to the front of any such retaining wall facing Kingseat Road for its entire length.

I430.6.7. Minimum net site area

- (1) Standards E38.8.2.3 Vacant sites subdivisions involving parent sites of less than 1 hectare and E38.8.3.1 Vacant sites subdivision involving parent sites of 1 hectare or greater, do not apply.
- (2) Site sizes for proposed residential sites must comply with the minimum net site areas specified in Table I430.6.7.1 Minimum net site area.
- (3) Standard E38.8.2.4 Subdivision of sites in the Subdivision Variation Control does not apply to Sub-precinct E.

Table I430.6.7.1 Minimum net site area

Sub-precinct	Minimum net site area
A	800m ²
B	950m ²
C	600m ²
D	700m ²
<u>E</u>	<u>600m² for lots either wholly or partially located within 400m of the SE corner of the intersection of Patumahoe Road and Mauku Road;</u> <u>1500m² for lots adjoining the Paerata-Waiuku railway;</u> <u>800m² for all other lots</u>

I430.6.8. Maximum number of lots in sub-precincts B, C and D

- (1) The total number of residential lots within sub-precincts B, C and D, including those containing the two existing dwellings shall not exceed 73.

I430.6.9. Landscape buffers in sub-precincts B, C, and D and E

- (1) A landscape buffer area with an average width of no less than 20m, shall be established by way of reserve to vest in the council or restrictive covenant/s (or similar) along the south western boundary of Sub-precinct B in accordance with Patumahoe: Precinct plan 1.
 - (a) The landscape buffer area must be planted with a mixture of indigenous trees, shrubs or ground cover plants (including grass) along the full extent of the landscape strip.
 - (b) A recreation trail must be established within the landscape buffer area and have a minimum width of 2 metres.
- (2) A landscape buffer area with an average width of no less than 10m, shall be established by way restrictive covenant/s (or similar) along the western

~~boundaries of Sub-precinct E adjoining rural zoned land in accordance with Patumahoe: Precinct plan 3.~~

~~A landscape buffer of 20m width, may include a road, shall be established along the southwestern boundary of Sub-precinct E adjoining rural zoned land in accordance with Precinct Plan 3.~~

~~(a) The landscape buffer area must be planted with a mixture of indigenous trees and shrubs along the full extent of the landscape strip. The landscape buffer area must include a hedge of fast-growing indigenous shelterbelt species along the southwestern boundary of Sub-precinct E adjoining rural zoned land; and~~

~~(b) Where a road is included as part of the landscape buffer the width of planting may be reduced to 10m.~~

(3) A landscape buffer area with an average width of no less than 5m, shall be established by way of restrictive covenant/s (or similar legal mechanisms) on Single House zoned lots along the southern boundaries of Sub-precinct E and between the Light Industrial and Single House zone land mid-way along the south boundary, in accordance with Patumahoe: Precinct plan 3.

(a) The landscape buffer area must be planted with a mix of fast-growing exotic shelterbelt species and indigenous trees and shrubs along the full extent of the landscape strip.

(4) A landscape buffer area with an average width of no less than 3m, shall be established by way restrictive covenant/s (or similar) along the southern boundaries of the Single House and Light Industrial zone of Sub-precinct E adjoining the railway in accordance with Patumahoe: Precinct plan 3.

(a) The landscape buffer area must be planted with a mixture of fast-growing exotic shelterbelt species and/or indigenous specimen trees and shrubs along the full extent of the landscape strip.

1430.6.10. Public open space in sub-precincts B, C, and D and E

(1) A neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 1.

~~(2) Prior to the occupation of any dwellings in Sub-precinct E that are located more than 400m from the Patumahoe Domain a neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 3.~~

~~(2) A neighbourhood park shall be established in the general location identified in Patumahoe: Precinct plan 3 and shall be of a size, shape and location consistent with Auckland Council open space policy.~~

1430.6.11. Staging in Sub-precincts B, C and D

(1) Before any S224(c) certificates of building consents are granted for any stage of development, the following works shall be constructed and completed to the council's satisfaction:

(a) the central spine road – major as shown on Patumahoe: Precinct plan 1;

- (b) a shared footpath, appropriate kerb and channel, berm and street trees; and
- (c) a services corridor along the frontages of Day Road, Mauku Road and Kingseat Road, where they are adjacent to the portion of land being developed.

I430.6.12. Stormwater management in Sub-precincts B, C and D

- (1) Before S224(c) certificates or building consents are granted for development within Stage 2, either:
 - (i) a stormwater management pond shall be constructed and completed to Council's satisfaction within Sub-precinct D at the corner of Kingseat and Day roads; or
 - (ii) any upgrades necessary to the Western Pond within Sub-precinct A shall be constructed and completed to the council's satisfaction.
 - (iii) The works outlined above shall be undertaken in accordance with the Patumahoe stormwater network discharge consent.

I430.6.13. Staging in Sub-precinct E

- (1) Before any S224(c) certificates for subdivision or building consents for new dwellings are issued for any stage of development within Sub-precinct E, excluding the subdivision of up to 50 lots on Lot 1 DP169130, the following works shall be constructed and completed to the Council's satisfaction:
 - (a) A new road access either from Patumahoe Road or from Mauku Road into the precinct within 50m of one of the from the indicative locations shown on Patumahoe: Precinct plan 3 (and meeting the Sight Distances specified in the Austroads Guide to Road Design);
 - (b) a footpath, appropriate kerb and channel, berm and street trees; and a services corridor along the road frontage(s) adjacent to the portion of land being developed; width of the road from the property boundary of the proposed site to the kerb on the opposite side of the road.
 - (c) for subdivision of existing land parcels (as at 30 June 2020) resulting in the formation of access from Carter Road:
 - (i) formation of a new road access between Carter Road and Patumahoe Road;
 - (ii) formation of a Shared Path for pedestrians and cyclists over the northern section of Carter Road onto Patumahoe Road pedestrian and cyclist facilities along the northern portion of Carter Road, identified as 'pedestrian / cycle lane' on Precinct Plan 3; and
 - (iii) provision of vehicle access to the Watercare facility at 6 Carter Road – Lot 13 DP83912;
 - (iv) upgrade the Patumahoe Road / Carter Road intersection as an alternative to closing Carter Road to vehicles

- (d) an extension of the public wastewater network and water supply networks with sufficient capacity to service the proposed allotments and any future subdivision stages. This shall include provision of a new third water reservoir and land on which it can be sited, adjacent to the existing Watercare facility.
- (2) Subdivision or development exceeding a threshold of 100 sites / dwellings within Sub-precinct E, triggers the following works that shall be constructed and completed to the Council's satisfaction:
 - (a) Provide a road connection to Mauku Road, including a through connection between Patumahoe Road and Mauku Road. This connection should also provide a good standard of provision for cyclists to link the existing shared path on Mauku Road with the proposed facility on Patumahoe Road;
 - (b) Provide a road abutting the Domain when land adjacent to the Domain is subdivided;
 - (c) Provide a (zebra) pedestrian crossing on Patumahoe Road near the school;
 - (d) Provide a cyclist facility along Patumahoe Road, from the railway line level

I430.6.14. Stormwater management in Sub-precinct E

- (1) Before S224(c) certificates or building consents for new dwellings are issued for development within Sub-precinct E:
 - (i) a stormwater management pond suitably sized for the relevant stage(s) shall be constructed and completed to Council's satisfaction within Sub-precinct E to the southeast of the Patumahoe Domain as shown on Precinct Plan 3.
 - (ii) The stormwater management system shall be designed and implemented in accordance with the applicable stormwater network discharge consent.

I430.6.15. Reverse Sensitivity in Sub-precinct E

- (1) Before any subdivision of land in Sub-precinct E enabling dwellings to be located within 200m of the poultry sheds located at 75 Patumahoe Road (Lot 2 DP 2119808) either:
 - (a) Use of the poultry sheds shall be discontinued; or
 - (b) Reverse sensitivity measures shall be implemented to Council's satisfaction, for example the registration of a "no complaints" covenant on the respective sites restricting the owners and occupiers of such land from complaining about any offensive and objectionable odours or dust within the buffer area generated by the poultry sheds.
- (2) Before any subdivision of land in Sub-precinct E enabling dwellings to be located between 200m and 400m away from the poultry sheds located at 75 Patumahoe Road (Lot 2 DP 2119808) reverse sensitivity measures shall be

implemented to Council's satisfaction by requiring the registration of a "no complaints" covenant on the respective sites restricting the owners and occupiers of such land from complaining about any offensive and objectionable odours or dust within the buffer area generated by the poultry sheds.

I430.6.16. Fencing in Sub-precinct E

- (1) Fences within the front yard must not exceed a height of 1.4m (measured from ground level at the boundary) and must be a minimum 50% visually open as viewed perpendicular to the front boundary.
- (2) Side/Rear fences adjoining an Open Space zone must not exceed a height of 1.8m (measured from ground level at the boundary) and if more than 1.4m in height must be a minimum 50% visually open as viewed perpendicular to the boundary.
- (3) Any front fences in Sub Precinct E, fronting Patumahoe Road, shall be a post and rail rural type fence, and may be supplemented by hedges.

I430.6.17. Protection from Railway Noise and Vibration in Sub-precinct E

- ~~(1) Any new building or alteration to an existing building located within 100 metres of the railway network (located within the Strategic Transport corridor zone) that contains an activity sensitive to noise shall be designed, constructed and maintained to achieve indoor design noise levels not exceeding the maximum values in the following table:~~

Building type	Occupancy/activity	Maximum railway noise level LAeq(1h)
Residential	Sleeping spaces	35 dB
	All other habitable rooms	40 dB

~~**N.B.**~~

- ~~a) Railway noise is assumed to be 70 LAeq at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres~~
- ~~b) Compliance may be achieved by adopting the construction schedule specified by Kiwirail (refer to Schedule XX Construction schedule for indoor noise control, page 5, KiwiRail Plan Provisions October 2018).~~

- ~~(2) Any new building or alteration to an existing building located within 60 metres of the railway network shall be designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s (Vw,95).~~

I430.6.18. Dairy and Food and Beverage Retail in Light Industry Area

- (1) No more than one dairy and one other food and beverage retail business shall be located within the Sub-precinct E Light Industry zone.

I430.7. Assessment – controlled activities

I430.7.1. Matters of control

There are no controlled activities in this precinct.

I430.7.2. Assessment criteria

There are no controlled activities in this precinct.

I430.8. Assessment – restricted discretionary activities

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

(1) Development and infringements of development standards:

- (a) for sub-precincts A, B, C and D consistency with Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
- (b) for sub-precinct E consistency with the Patumahoe: Precinct plan 3.
- (c) the location of any buildings and earthworks;
- (d) protection and planting of vegetation.

(2) Subdivision and infringements of subdivision standards:

- (a) for sub-precincts A, B, C and D consistency with Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
- (b) for sub-precinct E consistency with the Patumahoe: Precinct plan 3.
- (c) Compliance with minimum site size requirements;
- (d) the location of any building envelopes shown on the plan of subdivision;
- (e) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on the Patumahoe: Precinct plan 1 and on Figures 1 – 4 below;
- (f) the layout and design of any roads, vehicle access ways or pedestrian walkways shown on Figure 5 (Roading Hierarchy) and Figures 6 – 11 (Cross Sections) below; The adequacy of the transport infrastructure and services to provide for the subdivision

<u>Sub-precinct E Road Typology, Widths and Functions</u>		
<u>Road typology</u>	<u>Road reserve width</u>	<u>Functions</u>
<u>Patumahoe Road</u>	<u>20m</u>	<u>Berm planting, sidewalk, cycle facility, street trees, dual carriageway, median, sidewalk, berm planting</u>
<u>Through road from Mauku Rd to Patumahoe Rd</u>	<u>20m along rural boundary, remainder 18m</u>	<u>Buffer hedge along rural boundary, avenue street trees and sidewalks both sides of dual carriageway</u>
<u>Light Industry Road</u>	<u>19m</u>	<u>Planted berms, sidewalks and street trees both sides of dual carriageway</u>
<u>Other local roads</u>	<u>16m</u>	<u>Planted berms, sidewalks and street trees both sides of dual carriageway</u>

- (g) protection and planting of vegetation;
- (h) establishment of ~~suitable~~ safe and efficient road access from Patumahoe Road to sub-precinct E and the internal roading network including, footpaths and cycleways facilities within the sub-precinct;
- (i) need for and provision of road safety improvements to those sections of Patumahoe and/or Mauku Roads, including at the intersection with Woodhouse Road adjacent to mitigate the transport effects of development in sub-precinct E;
- (j) need for and provision of safety improvements to the railway level crossing on Patumahoe Road,
- (k) provision of public water supply and wastewater networks in sub-precinct E;
- (l) establishment of stormwater management and reticulation in sub-precinct E;
- (m) **Compliance with fencing standards in sub-precinct E;**
- (n) **Compliance with Railway Noise and Vibration Standards in Sub-precinct E.**

- (o) *Te Aranga design principles in subdivision design and development*

Figure 1: Minor roads

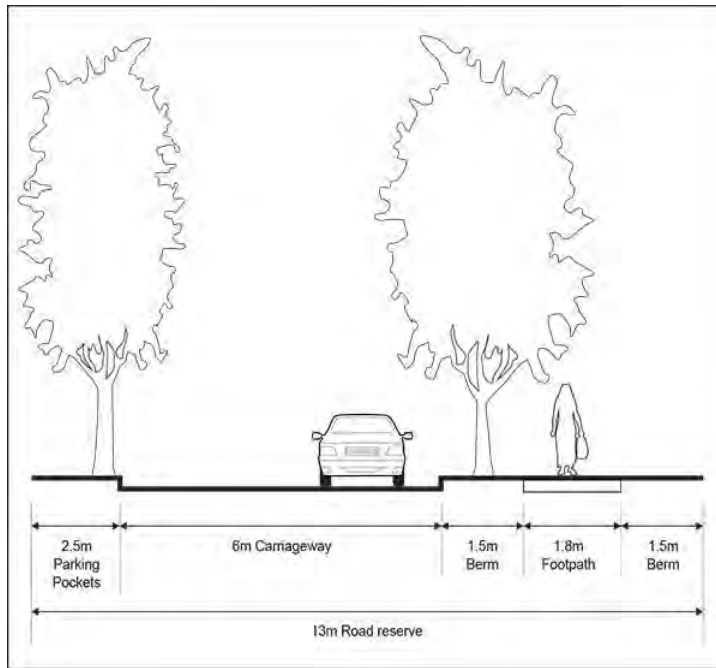
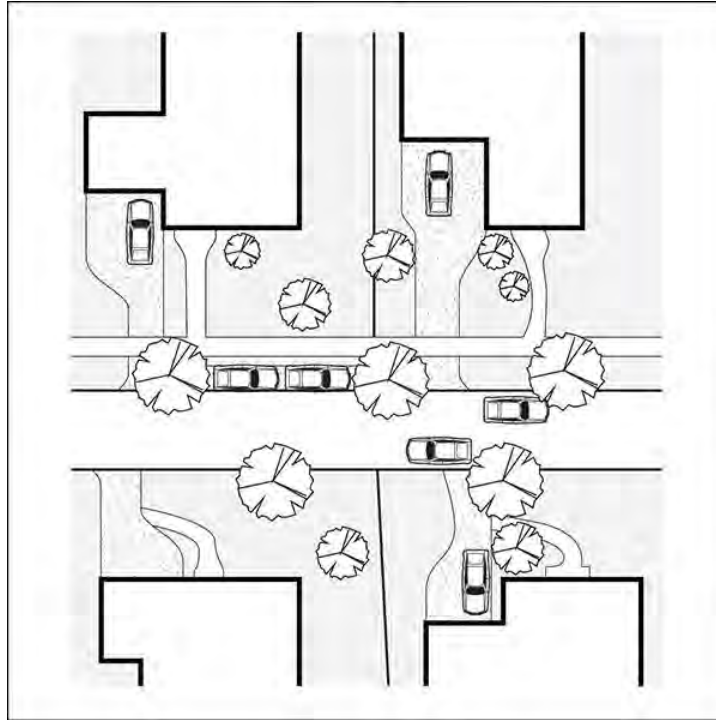


Figure 2: Major roads

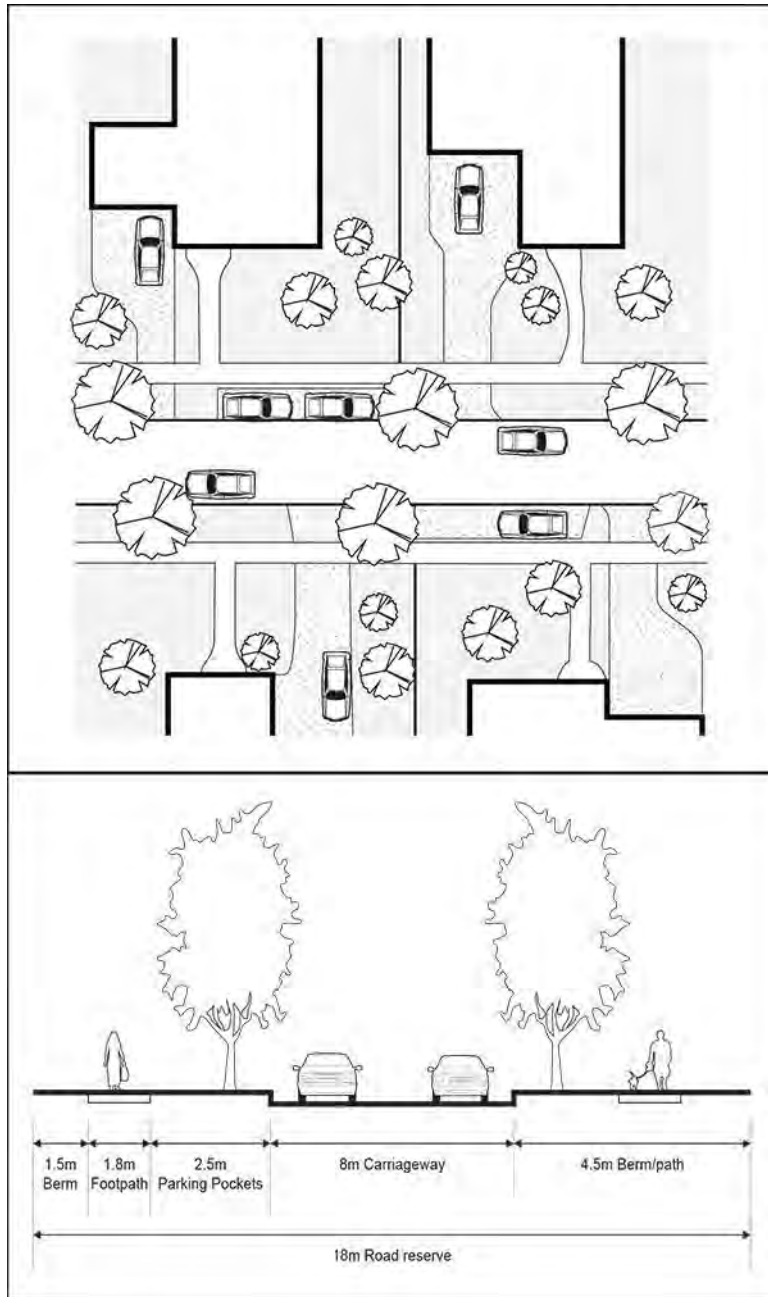


Figure 3: Kingseat Road

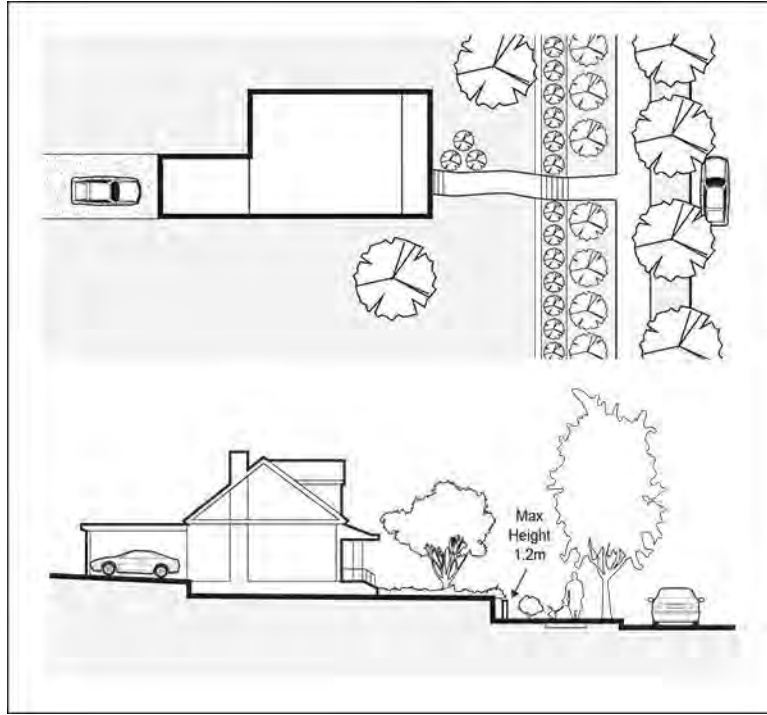


Figure 4: Retaining detail

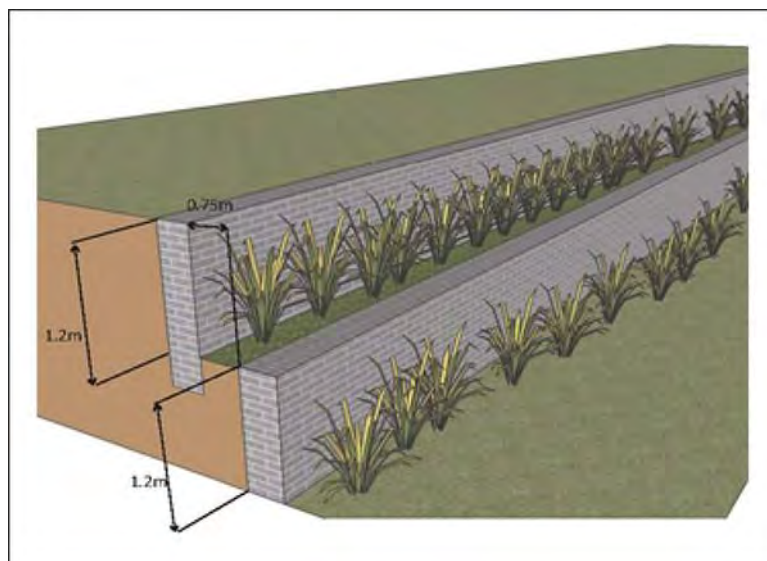


Figure 5: Roading Hierarchy – Sub-precinct E



Figure 6: Patumahoe Road – Cross Section

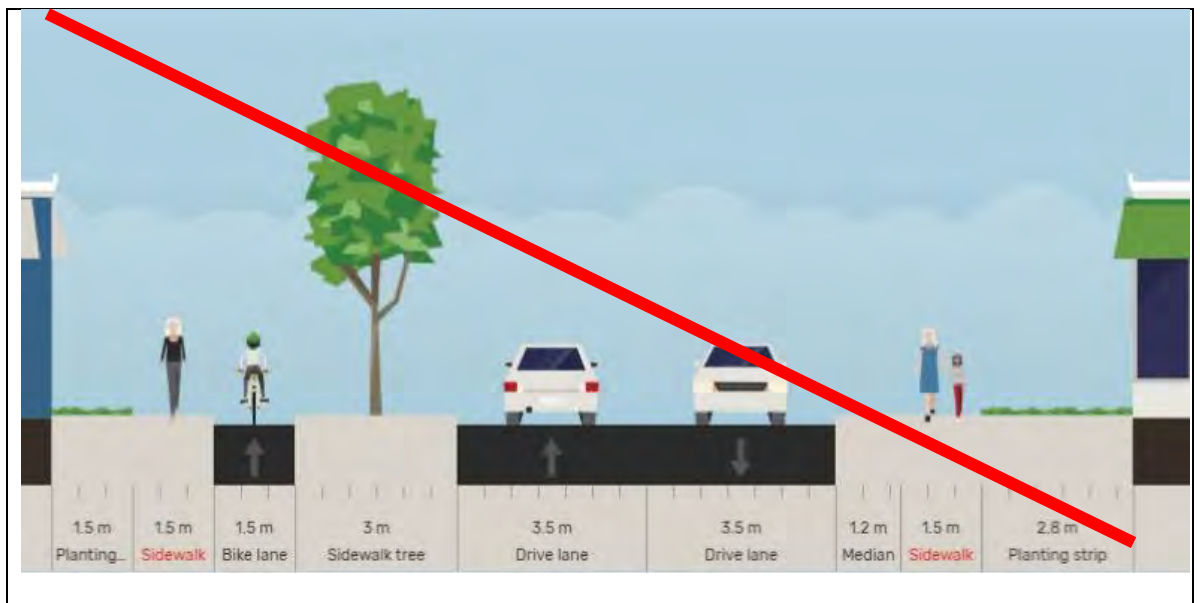


Figure 7: Greenway – Cross Section

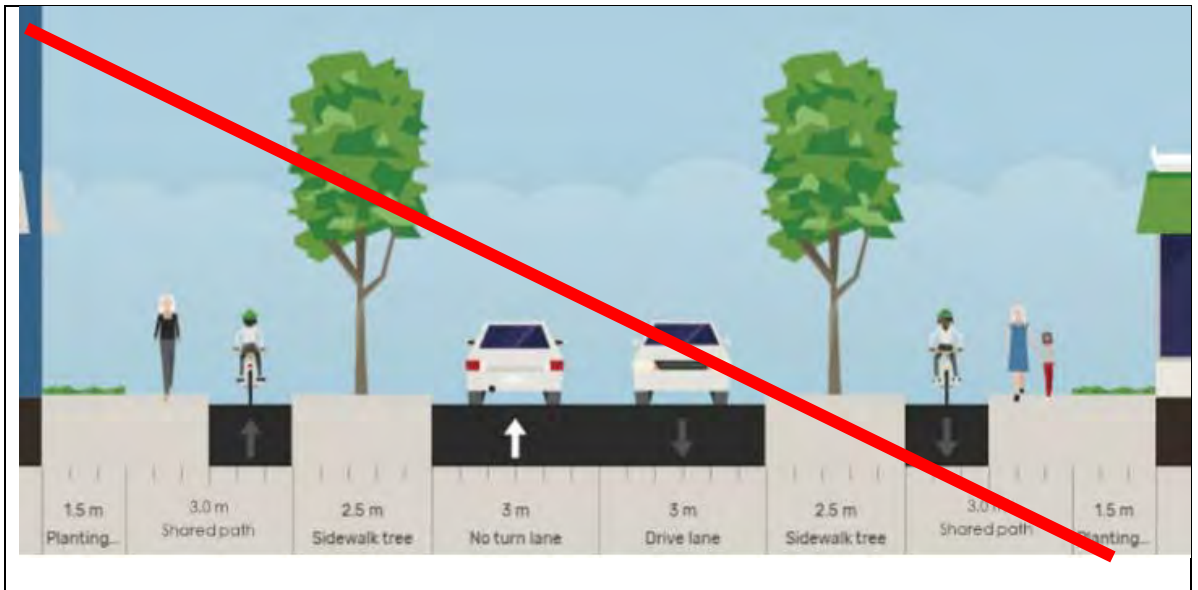


Figure 8 – Minor Road Cross Section

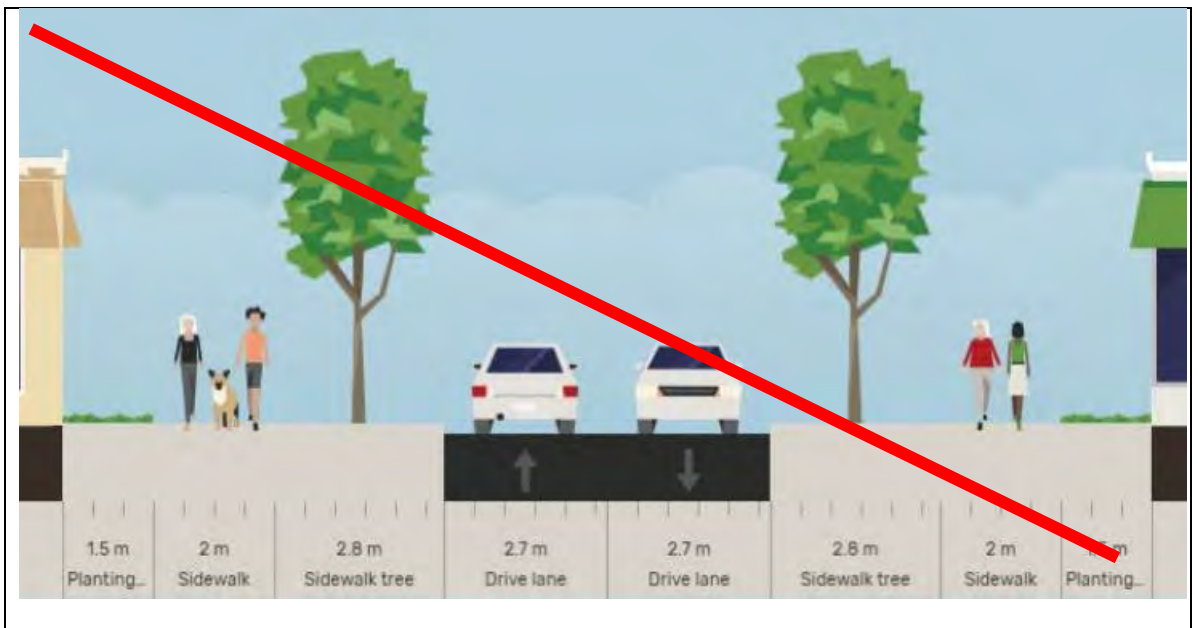


Figure 9 – Local Road Cross Section

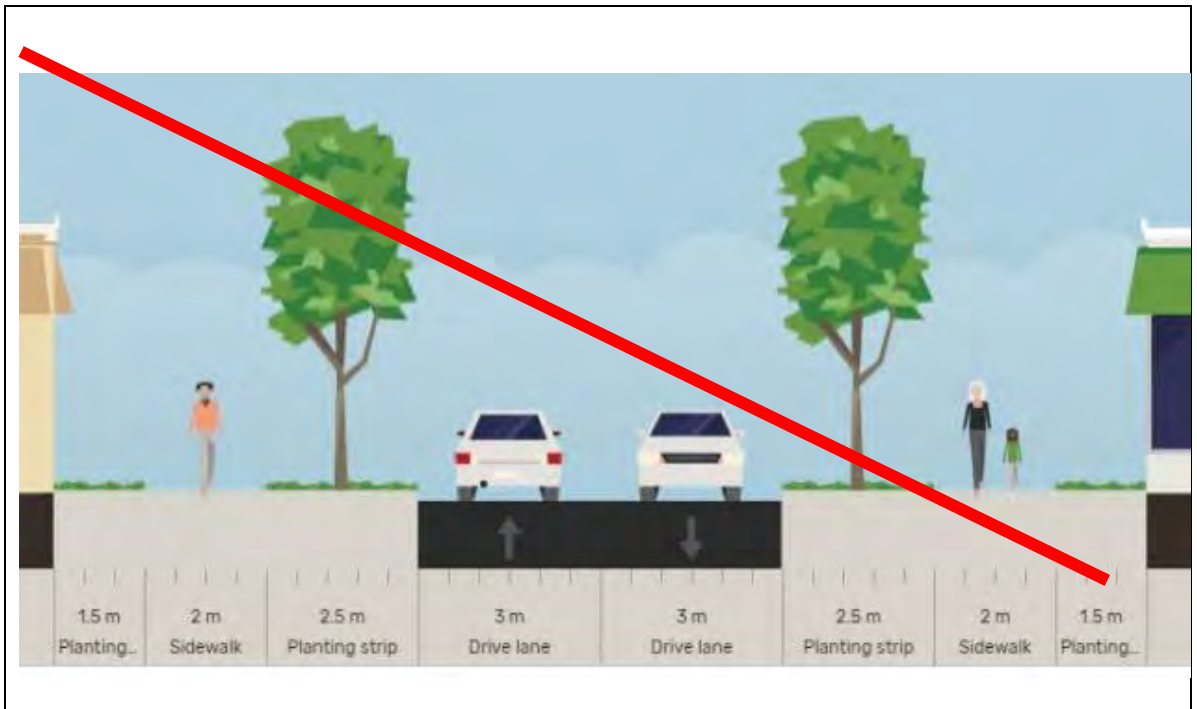


Figure 10 – Light Industrial Road Cross Section

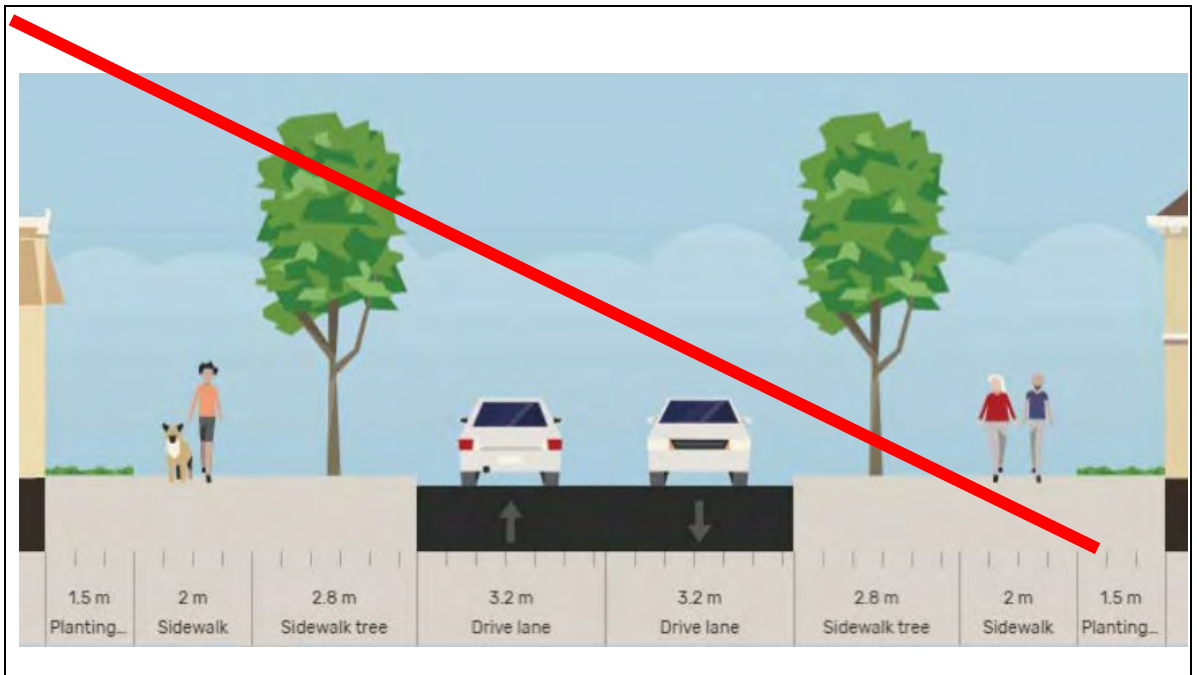
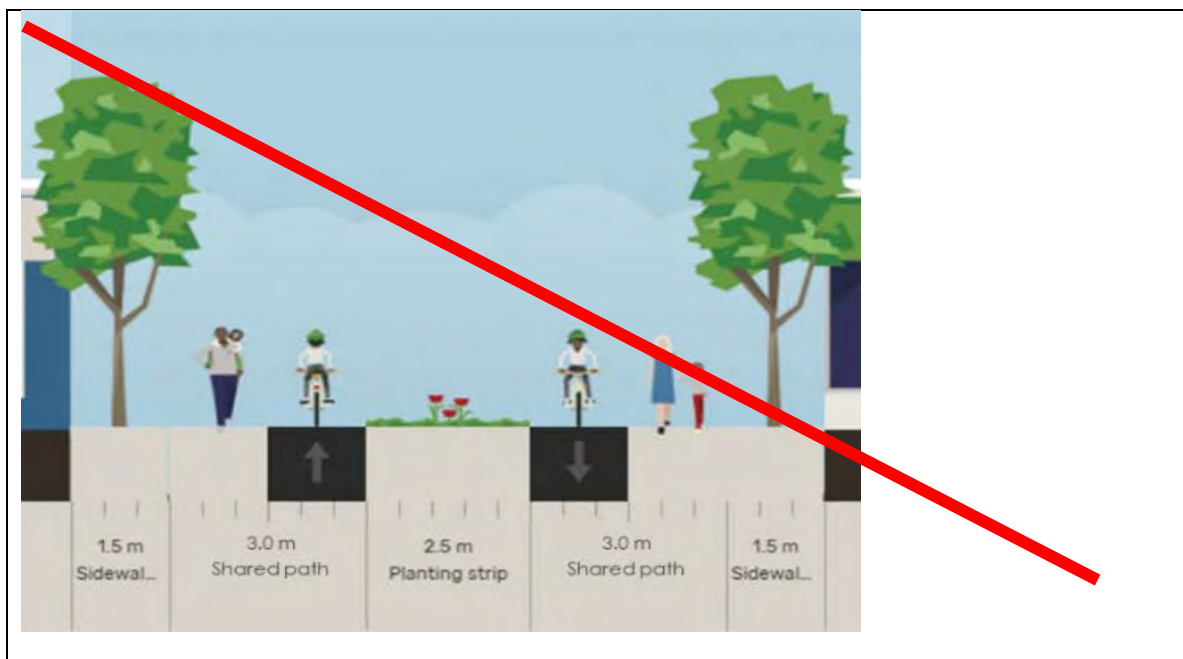


Figure 11 – Shared Path Cross Section



I430.8.1. Assessment criteria

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

- (1) Development and infringement of development standards.
 - (a) For sub-precincts A, B, C and D the extent to which an activity complies with the Patumahoe: Precinct plan 1 and Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan;
 - (b) For sub-precinct E the extent to which *an activity a development complies with the Patumahoe: Precinct plan 3 and implements the identified transport infrastructure.*
 - (c) For sub-precincts A, B, C, and D and E whether the design of any roads, vehicle access ways or pedestrian walkways is consistent with the relevant precinct plan and relevant Figures 1- 4 or 5-9 above.
 - (d) The extent to which existing vegetation will be removed and what mitigation planting is proposed to increase the overall vegetated area.
 - (e) How the landscape character and amenity of the area will be enhanced.
 - (f) Where it can be demonstrated it is not possible or practicable to meet other assessment criteria with respect to vegetation, whether provision

is made for replacement planting that will enhance the landscape character and amenity of the area.

- (g) The extent to which buildings and works are not visually prominent or do not create any scars on the landscape that would be visually prominent.
- (h) The extent to which the height and the scale, massing and form of the building is compatible with the low density and natural character of the landscape.
- (i) The extent to which development in sub-precincts B, C and D maintains the natural landform of the Patumahoe Hill.
- (j) Whether the presence and scale of retaining walls in sub-precincts B, C and D is minimised to avoid modification of the natural gradient of the Patumahoe Hill.

(2) Subdivision and infringement of subdivision standards

- (a) For sub-precincts A, B, C, D and E the extent to which the design of the subdivision, the layout of any roads, vehicle access ways or pedestrian walkways and the location of any building envelopes shown on the plan of subdivision is consistent with the relevant precinct plan and relevant Figures 1- 4 and 5-11 above.
- (b) ~~Whether site sizes meet the minimum requirements in Standard 1430.6.7 above.~~ For sub-precinct E consistency with the Patumahoe: Precinct Plan 3.
- (c) The extent to which the subdivision is designed to protect existing indigenous vegetation and provide for the planting of new vegetation to mitigate the effects of removing any existing significant vegetation.
- (d) Whether the subdivision is in accordance with the Patumahoe Stormwater Network Discharge Consent.
- (e) For Sub Precinct E, the extent to which subdivision implements the transport infrastructure identified on Precinct Plan 3

(3) Additional assessment criteria for subdivision and infringement of subdivision standards in sub-precincts B, C and D

- (a) Stormwater
 - (i) Whether stormwater from sub-catchments “East” and “West 1” as identified in Patumahoe: Precinct plan 2 – Staging and stormwater sub catchment plan is directed to the Main Stormwater Treatment/Detention Pond in Sub-precinct A
 - (ii) Whether stormwater flows from the western sub-catchments “West 2” and “West 3” as identified in Patumahoe: Precinct plan 2 –

Staging and stormwater sub-catchment plan are maintained at pre-development levels.

- (iii) Whether a pond should be established on the northern corner of Sub-precinct D, primarily as a flood management system and landscape amenity feature but also as a stormwater quality improvement device if a pond in that location is required for the purpose of maintaining stormwater flows at a pre-development level.
 - (iv) If a pond is established on Sub-precinct D, whether it is treated as an amenity feature and landscaped accordingly.
 - (v) Whether on-site stormwater detention is also required (such as soakage pits) except where it can be demonstrated that geotechnical conditions within sub-precincts B, C and D do not allow for on-site soakage.
 - (vi) Whether the development uses water sensitive design techniques, including swales, grey water rainwater harvesting for outdoor use, rain gardens, and/or permeable paving etc.
- (i) In the event development of the sub-precincts B, C and D is staged:
 - (i) Whether sub-catchments “East” and “West 1” comprising stage 1 should be developed first and drain to the main pond on Sub-precinct A.
 - (ii) Whether sub-catchments “West 2” and “West 3” comprising stage 2 should drain to the western pond in Sub-precinct A.
 - (ii) The extent to which the subdivision in sub-precincts B, C and D maintains the natural landform of the Patumahoe Hill by ensuring that the grading of individual lots does not occur as part of the subdivision engineering works; rather, the formation of building platforms occurs at the time individual sites are developed and the modification of the natural gradient of the Patumahoe Hill is thereby minimised.
 - (iii) The extent to which lighting design for streets recognises the visually prominent hillside location of sub-precincts B, C and D by minimising all light pollution.
 - (iv) Whether design of lighting standards includes bollard style standards for street lighting which can be mixed with pedestrian scaled light standards.
 - (v) The extent to which landscaping consists of ecologically sourced native plants (i.e. those that naturally occur in the Manukau Ecological District) which are appropriate to the site. (Examples of such species are set out in the typical plant palettes in Figures 512 and Tables 1–7 below).

- (vi) Whether plantings and other landscape features will result in a maintenance free mature landscape, insomuch as is practical.

Figure 12: Landscape concept plan and typical plant palettes sub-precincts B, C and D



(4) Additional assessment criteria for subdivision in sub-precinct E

(a) Stormwater

- (i) Whether stormwater is directed to the Main Stormwater Treatment/Detention Pond;
- (ii) Whether stormwater flows from the Main Stormwater Treatment/Detention Pond are maintained at pre-development levels.
- (iii) Whether on-site stormwater detention is also required (such as soakage pits) except where it can be demonstrated that geotechnical conditions within sub-precinct E do not allow for on-site soakage.
- (iv) Whether the development uses water sensitive design techniques, including swales, grey water rainwater harvesting for outdoor use, rain gardens, and/or permeable paving etc.

(b) Roading

- (i) Whether **the subdivision will implement** any works **are** required within Patumahoe or Mauku Roads, and existing intersections with

those roads, to ensure traffic and pedestrian safety is maintained at, or enhanced from, pre-development levels; and

- (ii) Whether ~~the subdivision will implement any~~ safety improvements required to the ~~local~~ road network ~~are facilitated by subdivision in order to safely accommodate the additional activity~~ address any transport effects associated with development in sub-precinct E.
- (iii) Whether ~~the subdivision provides for~~ any safety improvements ~~are~~ required to maintain the safe operation of the railway level crossing on Patumahoe Road, and
- (iv) Whether subdivision and development in sub-precinct E contributes proportionately to any required safety improvements to the level crossing.
- (c) In the event development of sub-precincts E is staged:
 - (i) Whether the establishment of roading, footpaths, cycleways and landscaping in each stage is consistent with Patumahoe: Precinct plan 3, Auckland Council Codes of Practice and the Auckland Design Manual.
 - (ii) Whether public water supply and wastewater networks can be extended to each stage in sub-precinct E;
 - (iii) Whether each stage of development can drain to the main Stormwater Treatment/Detention pond within the Sub-precinct.
 - (iv) Whether the staging of development is aligned with the delivery of transport infrastructure needed to service the development
 - (v) Whether the establishment of any transport infrastructure in each stage is consistent with Precinct Plan 3 and whether any transport infrastructure is existing roads or to be vested in Auckland Council is consistent with the Auckland Transport's design standards.
- (d) (i) The extent to which landscaping consists of ecologically sourced native plants (i.e. those that naturally occur in the Manukau Ecological District) which are appropriate to the site. (Examples of such species are set out in the typical plant palettes in Tables 1–7 below).

(ii) The extent to which a high proportion of large scale street trees (such as Puriri – Vitex Lucens) are provided within and around Sub Precinct E.
- (e) Whether plantings and other landscape features will result in a maintenance free mature landscape, inasmuch as is practical.

- (f) The extent to which subdivision design and associated provisions ensure that the specific Standards 1430.8(1)(b-d) and 1430.8(2)(b, c, f-l) applicable to Sub-precinct E achieve their respective purpose(s).
- (g) The extent to which Te Aranga design principles have been included in subdivision and land development design

Table 1 Native Restoration Planting Schedule (all species to be ecosourced)

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING
Native Restoration: Nurse Species			
<i>Carex</i> sp	Native grasses	PB2	500mm
<i>Coprosma repens</i>	Taupata	PB2	1.0m
<i>Coprosma robusta</i>	Karamu	PB2	1.0m
<i>Cordyline australis</i>	Cabbage tree	PB2	1.0m
<i>Geniostoma rupestre</i>	Hangehange	PB2	1.0m
<i>Hebe stricta</i>	Koromiko	PB2	1.0m
<i>Kunzea ericoides</i>	Kanuka	PB2	1.0m
<i>Leptospermum scoparium</i>	Manuka	PB2	1.0m
<i>Libertia</i> sp	NZ Iris	PB2	0.5m
<i>Melicytus ramiflorus</i>	Mahoe	PB2	1.0m
<i>Myrsine australis</i>	Mapou	PB2	1.0m
<i>Phormium</i> sp (dwarf)	Dwarf flax	PB2	0.5m
<i>Phormium tenax</i>	Flax	PB2	1.5m
Native Restoration Enrichment Species			
<i>Cordyline australis</i>	Cabbage tree	PB5	2.0m
<i>Cyathea medullaris</i>	Tree fern	PB5	4.0m
<i>Knightia excelsa</i>	Rewarewa	PB5	4.0m
<i>Meryta sinclairii</i>	Puka	PB5	4.0m
<i>Podocarpus totara</i>	Totara	PB5	5.0m
<i>Vitex lucens</i>	Puriri	PB5	5.0m

Table 2: Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING [approximate]
Large Scale Street Trees			
<i>Vitex lucens</i>	Puriri	P8150	20.0m
Residential Scale Street Trees			
<i>Alectryon excelsa</i>	Titoki	P8150	10.0m

Table 3: Native Garden Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Native Garden Specimen Trees			
<i>Alectryon excelsa</i>	Titoki	PB95	4.0m
<i>Cordyline australis</i>	Cabbage tree	PB95	2.0m
<i>Hoheria populnea</i>	Lacebark	PB95	3.0m
<i>Meryta sinclairii</i>	Puke	PB95	3.0m
<i>Plagianthus regius</i>	Ribbonwood	PB95	3.0m
<i>Sophora microphylla</i>	Kowhai	PB95	4.0m
<i>Vitex lucens</i>	Puriri	PB95	5.0m

Table 4: Garden Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Garden Specimen Trees			
<i>Alectryon excelsa</i>	Titoki	PB95	4.0m
<i>Cordyline australis</i>	Cabbage tree	PB95	2.0m
<i>Fraxinus sp</i>	Asc	PB95	4.0m
<i>Ginkgo sp</i>	Maidenhair	PB95	5.0m
<i>Liquidambar styracifluo</i>	America sweet gum	PB95	5.0m
<i>Liriodendron tulipifera</i>	Tulip tree	PB95	5.0m
<i>Magnolia sp</i>	Magnolia	PB95	6.0m
<i>Meryta sinclairii</i>	Puke	PB95	3.0m
<i>Quercus palustris</i>	Pin Oak	PB95	5.0m
<i>Vitex lucens</i>	Puriri	PB95	5.0m

Table 5 Gateway Specimen Tree Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Gateway Specimen Trees			
<i>Cordyline australis</i>	Cabbage tree	PB150	2.0m
<i>Meryta sinclairii</i>	Puke	PB150	3.0m
<i>Vitex lucens</i>	Puriri	PB150	5.0m

Table 6: Evergreen Hedging Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
<i>Camellia sp</i>	Camellia	PB8	1.0m
<i>Griselinia sp</i>		PB8	1.0m
<i>Pittosporum sp</i>		PB8	1.0m

Table 7: Retaining Wall Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
Shrubs and Hedging species			
<i>Camellia sp</i>	Camellia	PB5	1.0m
<i>Griselinia sp</i>		PB5	1.0m
<i>Phormium sp (dwarf)</i>	Dwarf flax	PB5	0.5m
<i>Pittosporum sp</i>		PBS	1.0m
Groundcovers			
<i>Dietes grandiflora</i>		PBS	0.5m
<i>Lomandra sp</i>		PB5	0.5m
Climbers			
<i>Ficus pumila</i>	Creeping fig	PB5	0.5m

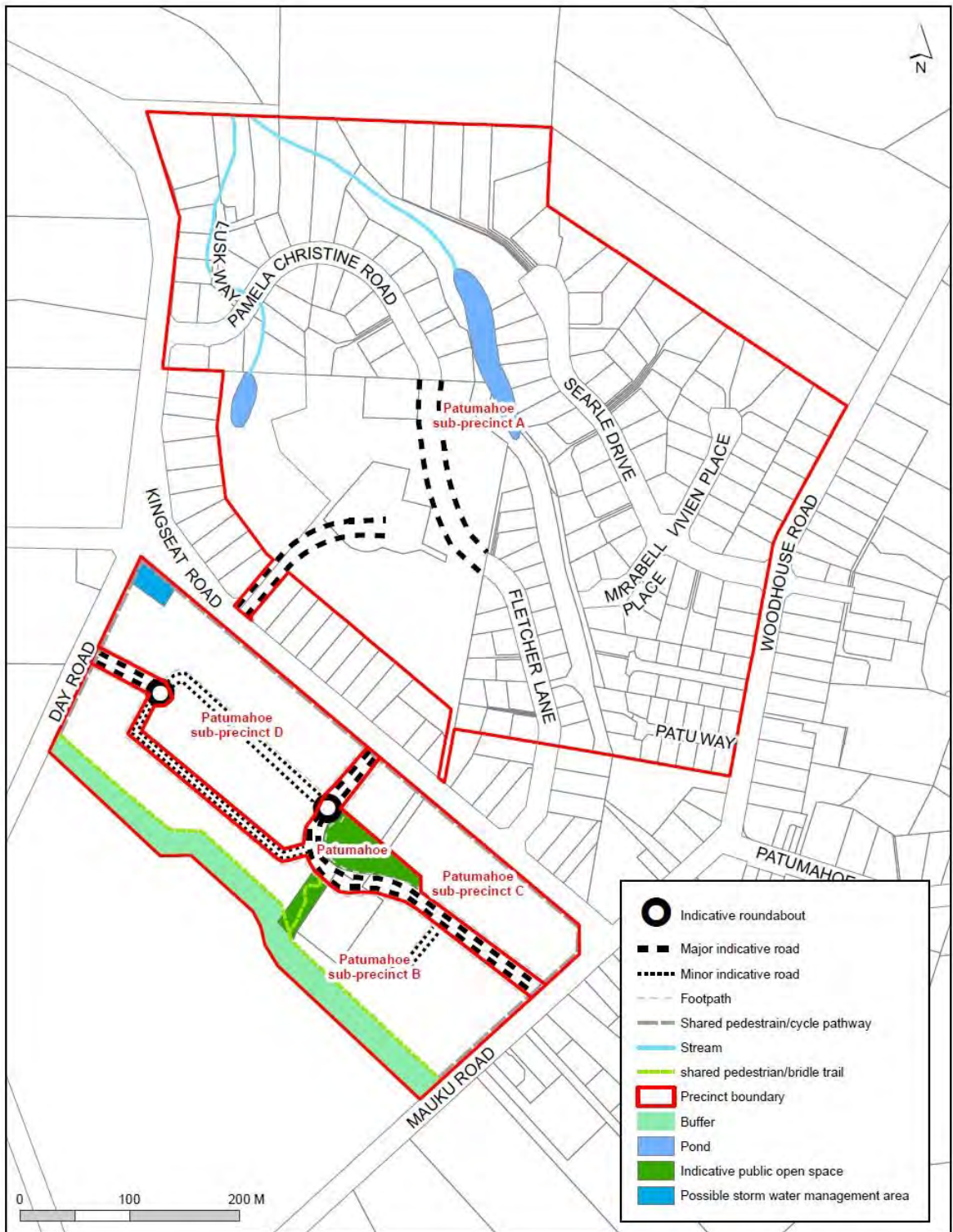
Table 8: Exotic Shelterbelt Planting Schedule

SPECIES	COMMON NAME	MINIMUM SIZE	SPACING (approximate)
<i>Alnus jorullensis</i>	Mexican alder	PB8	2.0m

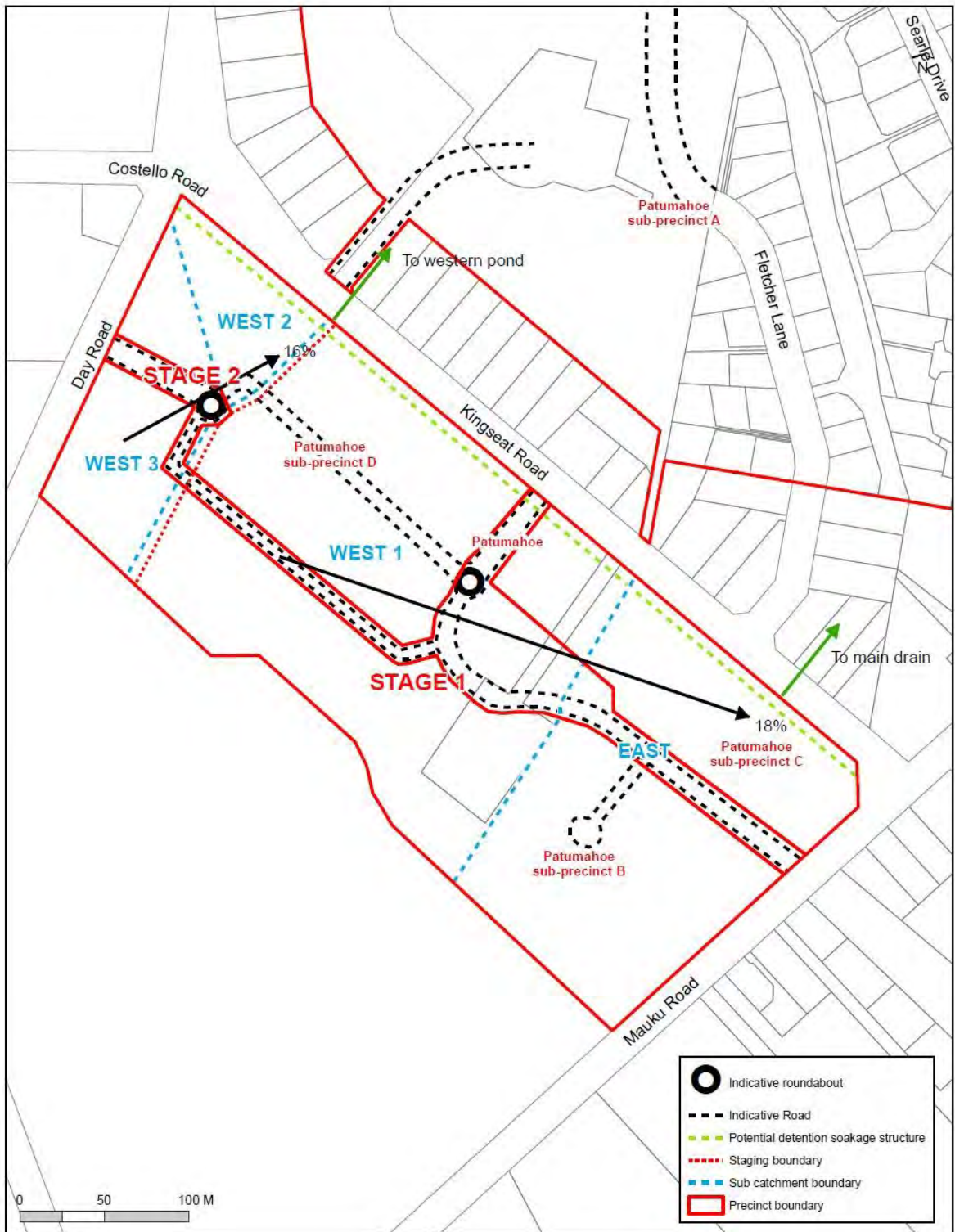
1430.9. Special information requirements

There are no special information requirements in this precinct.

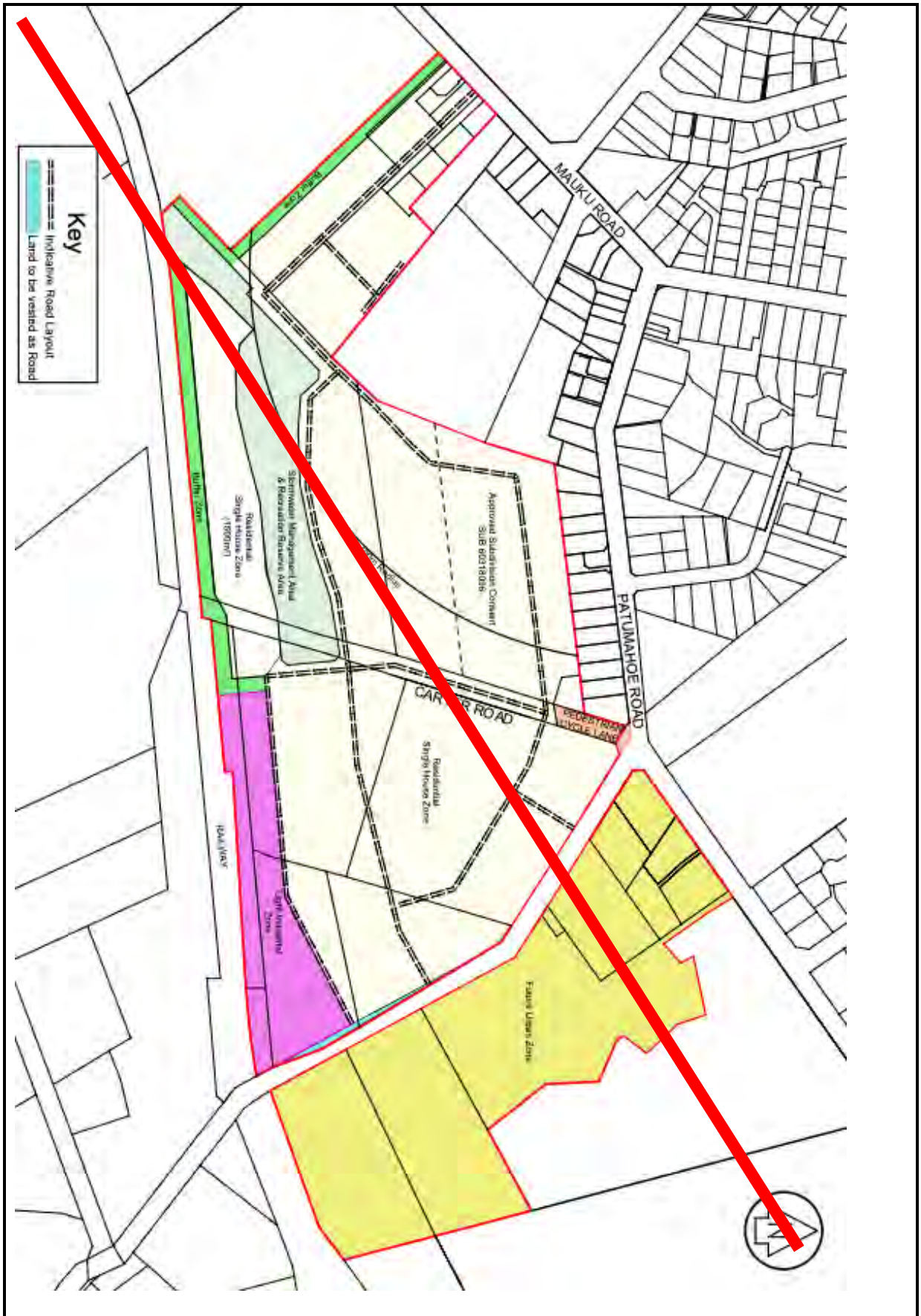
I430.10. Precinct plans I430.10.1 Patumahoe: Precinct plan 1



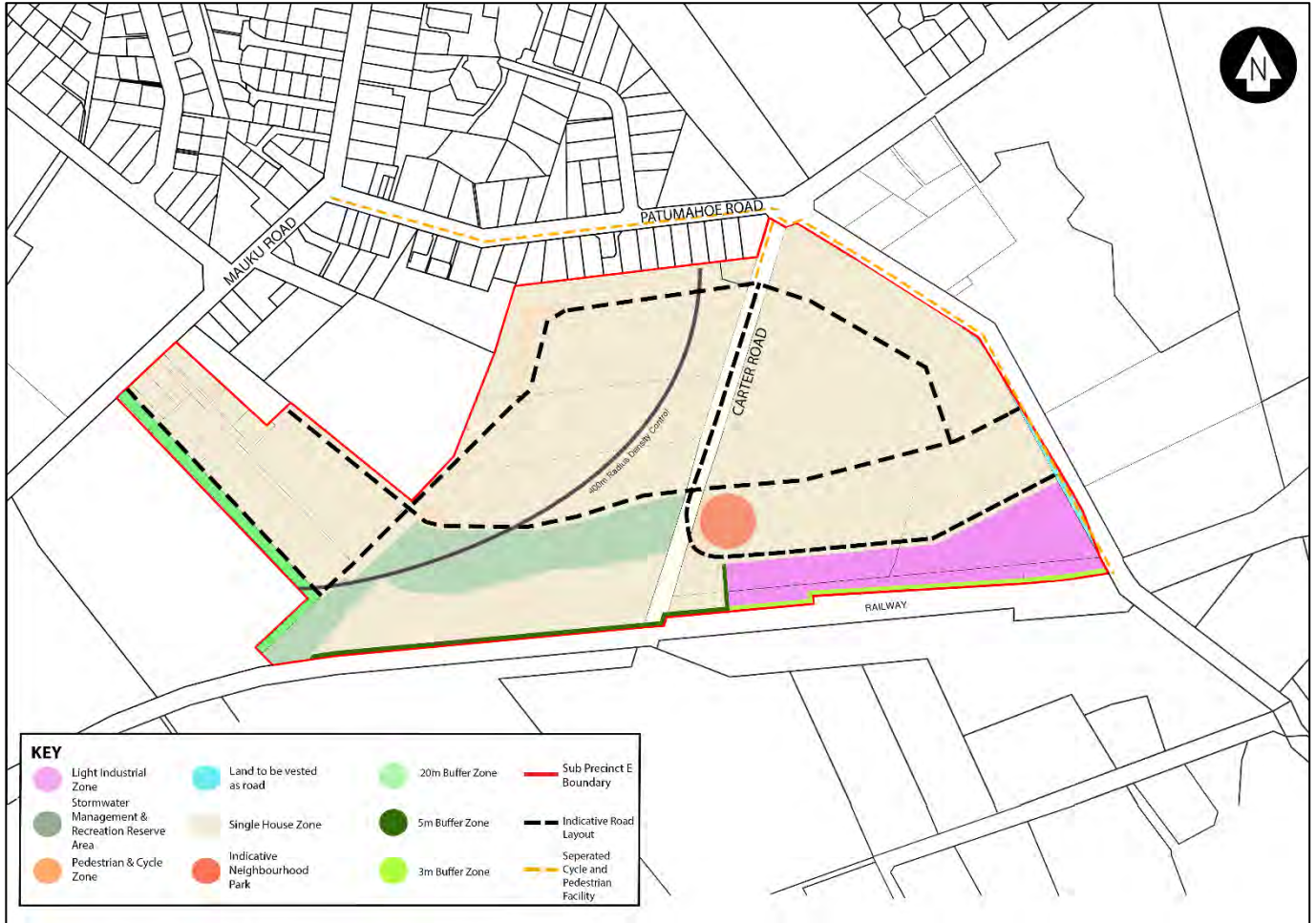
1430.10.2 Patumahoe: Precinct plan 2 – Staging and stormwater sub-catchment plan



1430.10.2 Patumahoe: Precinct plan 3 – Sub-precinct E



Proposed amendments to Precinct Plan 3



APPENDIX NINE
QUALIFICATIONS AND EXPERIENCE

Chloe Trenouth

BPlan (Hons), MNZPI



Director

Chloe is a Director with Hill Young Cooper Ltd, a strategic resource management and environmental policy and planning consultancy. Chloe has over 20 years planning experience with a wide ranging planning background in resource management policy development and implementation, with significant government experience throughout Auckland and New Zealand specialising in district planning policy, growth management, stormwater and sustainability. She holds qualifications in planning from the University of Auckland.



Experienced in strategy development, preparation and processing district plan changes and designations, as well as the preparation and processing of resource consents. Chloe approaches projects with a view of the big picture and is focused on achieving deliverables effectively and on time. Specific skills include policy analysis and development; research; project management; assessments of effects; section 32 reports for plan changes; and being an expert witness.

Specialist Capabilities

- Regional growth
- Policy analysis
- District planning
- Resource consents

Chloe assisted Auckland Council with the development of the Auckland Unitary Plan across a range of topics including Urban Growth, Mana Whenua, and various precincts. She was the lead planner for the Urban Growth chapter of the Regional Policy Statement establishing provisions for the rural urban boundary, as well as Mana Whenua chapters at both the Regional Policy Statement and District Plan level. Chloe's involvement in precincts across the Unitary Plan included preparing provisions to manage stormwater within Special Housing Areas, and to address cultural landscape issues. Chloe also prepared expert planning evidence on behalf of Auckland Council at council hearings as well as the Environment Court.

Professional Experience

- Director, Hill Young Cooper : 2016 - present
- Senior Consultant, Hill Young Cooper: 2012 - 2016
- Principal Strategic Planner, Auckland Council: 2010 - 2012
- Strategic Policy Analyst, Auckland Regional Council: 2009 - 2010
- Senior Consultant, Hill Young Cooper Ltd: 2004 - 2009
- Resource Planner, Waitakere City Council: 2002 - 2004
- Development Control Planner, London Borough of Haringey (UK): 2001 - 2002
- Policy Planner, London Borough of Hounslow (UK): 2001
- Policy Analyst, Ministry for the Environment: 1998 - 2000

Prior to rejoining Hill Young Cooper, Chloe worked at the Auckland Council as a Principal Strategic Planner on the development of the first Auckland Plan. She was also recently involved in the Auckland Plan Refresh assisting Auckland Council on its Development Strategy.

Chloe has extensive experience in greenfield plan changes throughout Auckland, providing planning advice on provisions for a range of clients including Auckland Council – Healthy Waters and Auckland Transport. Currently Chloe is assisting Auckland Council on the development of growth scenarios for the Auckland Growth Model.

Chloe has recently completed the Making Good Decisions training course and is an accredited independent commissioner.

