Proposed Plan Change Request

Heights Road Plan Change Planning Report

9, 33 and 49 Heights Road, Pukekohe

GBar Properties Limited
18/10/2024
Clause 24 Revision - Final

Document Control

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1. Executive Summary

GBar Properties Ltd ('**applicant**') requests a private plan change ('**PPC**') to the Auckland Unitary Plan (Operative in Part) ('**AUP:OP**') in relation to 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe ('**PPC land**'). The PPC request has been prepared in accordance with Section 32 and Schedule 1 of the Resource Management Act ('**RMA**'). The report also includes an assessment against the relevant planning documents including policy statements, which is a relevant consideration under Sections 74 and 75 of the RMA.

The PPC land has a long history of light industrial use. A substantial portion of the PPC land is currently utilised for existing consented rural business activities including the Tractor Centre, machinery hire, building businesses, and storage facilities which support the local rural sector. Other historic uses include the Cavalier meat works and the King coleslaw factory.

The purpose and objective of the PPC is to enable the ongoing operation, intensification and expansion of light industrial activities on the PPC land to meet current and future demand for industrial growth, consistent with the Pukekohe-Paerata Structure Plan 2019 ('**Structure Plan**'), whilst avoiding, remedying or mitigating adverse effects on the environment.

It is proposed to rezone the PPC land from Future Urban Zone ('**FUZ**') to Business – Light Industry ('**BLIZ**') and apply the Stormwater Management Area – Flow 1 ('**SMAF – 1**') Control to the entirety of the land. In summary, the PPC seeks to apply the following to the PPC land:

- Rezone 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe from FUZ to BLIZ;
- Apply the Stormwater Management Area – Flow 1 Control;
- Retain the existing Macroinvertebrate Community Index - Rural control;
- Retain the existing Aquifer overlays; and
- Retain the existing 6705, State Highway 22: Karaka to Pukekohe - Road widening, Designations, New Zealand Transport Agency designation.

It is proposed to apply the existing AUP:OP provisions to the PPC land, specifically the BLIZ and Auckland-wide provisions, to manage the way in which the site is used and developed. It is not proposed to establish a site-specific precinct as the Section 32 Options analysis has determined that the existing AUP:OP provisions are the most efficient and effective to achieve the objective of the PPC.

The PPC has been prepared in accordance with the Structure Plan. An Indicative Masterplan has been developed to support the PPC request and provides a proposed build out of the PPC land including existing and proposed buildings, hardstand, parking and access, and stormwater management devices (ponds).

The PPC is consistent with the strategic policy framework and the objectives and policies of the Council's planning documents. This report confirms that the PPC gives effect to the higher order national policy framework, specifically the National Policy Statement for Urban Development ('**NPS-UD**') in achieving a well-functioning urban environment. At the regional level, the PPC aligns with the policy framework and timing set out in the Structure Plan and Future Urban Land Supply Strategy ('**FULSS**'), which was in force when the PPC was lodged, with intended development of the area, including the PPC land, proposed to come online from 2023.

More recently, the Future Development Strategy ('**FDS**') was released in 2023 in response to the directives of the NPS-UD. The FDS has amended the development timeframes for the Auckland

South area through to 2040 and introduced infrastructure prerequisites to determine land and infrastructure sequencing. The NPS-UD directs Councils to be responsive to plan change requests that are not in sequence with planned development. In this case, this report, in conjunction with the suite of expert reporting appended to this PPC request, has demonstrated that the PPC land can readily accommodate the proposed rezoning and subsequent development at an earlier timeframe than that anticipated by the FDS. This can be facilitated by a combination of onsite infrastructure solutions and utilisation of the existing network without adversely impacting the function and capacity of public infrastructure. Importantly, the PPC provides an opportunity to deliver development ready business land (both existing and proposed) to meet local and regional demand for industrial land capacity, and contribute to local employment opportunities on well-located urban land within the Rural Urban Boundary ('**RUB**'), adjacent to the state highway network, and near to Pukekohe logistics operations to facilitate freight movement. The PPC will also provide local employment within the Pukekohe catchment thereby creating choice for local people to work close to home without commuting out of the area.

A robust Section 32 analysis has been prepared at section 11 of this report to support the PPC request. Alongside specialist assessments, this report concludes that the proposal to apply the BLIZ, SMAF-1 control and the existing provisions of the AUP:OP to the PPC land is the most efficient and effective option to achieve the objectives of the PPC and relevant statutory documents. Further, this option is the most appropriate to achieve the purpose of the RMA and address social, cultural, environmental, and economic benefits and costs, and the potential effects on the environment.

An effects assessment commensurate with the scale and significance of the request is set out at section 10 of this report in accordance with Clause 22(2). Based on the reporting and assessment undertaken by technical specialists, the PPC represents an appropriate use of the PPC land and will result in environmental outcomes that can reasonably be anticipated and accommodated on the PPC land. Any adverse effects can be appropriately avoided, remedied or mitigated by the proposed provisions. There will also be significant positive effects from the urbanisation of the PPC land, including better enabling existing business activities and increasing the provision of industrial land and local employment opportunities in Pukekohe, whilst reducing demand for travel outside of the Pukekohe district. Overall, the proposal is appropriate and any actual and potential adverse effects on the environment of granting the PPC request can be avoided, remedied or mitigated.

In summary, the PPC request is considered an appropriate and acceptable planning outcome for the PPC land. The PPC is consistent with the Structure Plan, gives effect to the applicable national and regional policy statements, is consistent with the regional and district planning framework, and any potential adverse environmental effects can be avoided, remedied or mitigated. Further, positive effects are anticipated through the supply of business land to assist in meeting demand, better enabling existing rural business activities, promoting local employment opportunities, and improvements to stormwater management. The proposed BLIZ zoning, SMAF-1 control and application of the existing AUP:OP provisions is the most efficient and effective option to achieve the PPC objectives and the purpose of the RMA.

2. Applicant and Property Details

The details relating to the applicant and subject property are as follows:

Item	Detail
Applicant	GBar Properties Limited
Site address	9, 33 and 49 Heights Road, Pukekohe, Auckland 2676
Legal description	Lot 1 DP 73273 (9 Heights Road)
	Lot 2 DP 109824 (33 Heights Road)
	Lot 1 DP 109824 (49 Heights Road)
AUP:OP zoning	Future Urban Zone
Plan Change 78 zoning	Future Urban Zone
Precinct	n/a
Overlays	Natural Resources: Quality Sensitive Aquifer Management Areas Overlay [rp] – Franklin Volcanic Aquifer Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Central Aquifer Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Kaawa Aquifer
Controls	Macroinvertebrate Community Index – Rural Arterial Road (State Highway 22 / Paerata Road)
Designations	Designations - 6705, State Highway 22: Karaka to Pukekohe - Road widening, Designations, New Zealand Transport Agency
Other site features	1% Annual Exceedance Probability Flood Plain Overland Flow Path

3. Existing Environment

3.1. Site Description and Context

3.1.1. Context

The PPC land is shown in **Figure 1 and 2** below. It comprises 5.35ha of land held across three titles (**Appendix 16**), located in north Pukekohe. The PPC land is situated approximately 3km north of the Pukekohe town centre, and is located adjacent to State Highway 22 ('**SH22**') to the east and the Heights Park Cemetery to the west and south. To the north of the PPC land is the RUB, which follows the alignment of Heights Road, with General Rural zoned land beyond.

Figure 1: Site Context (Source: Auckland Council AUP:OP)

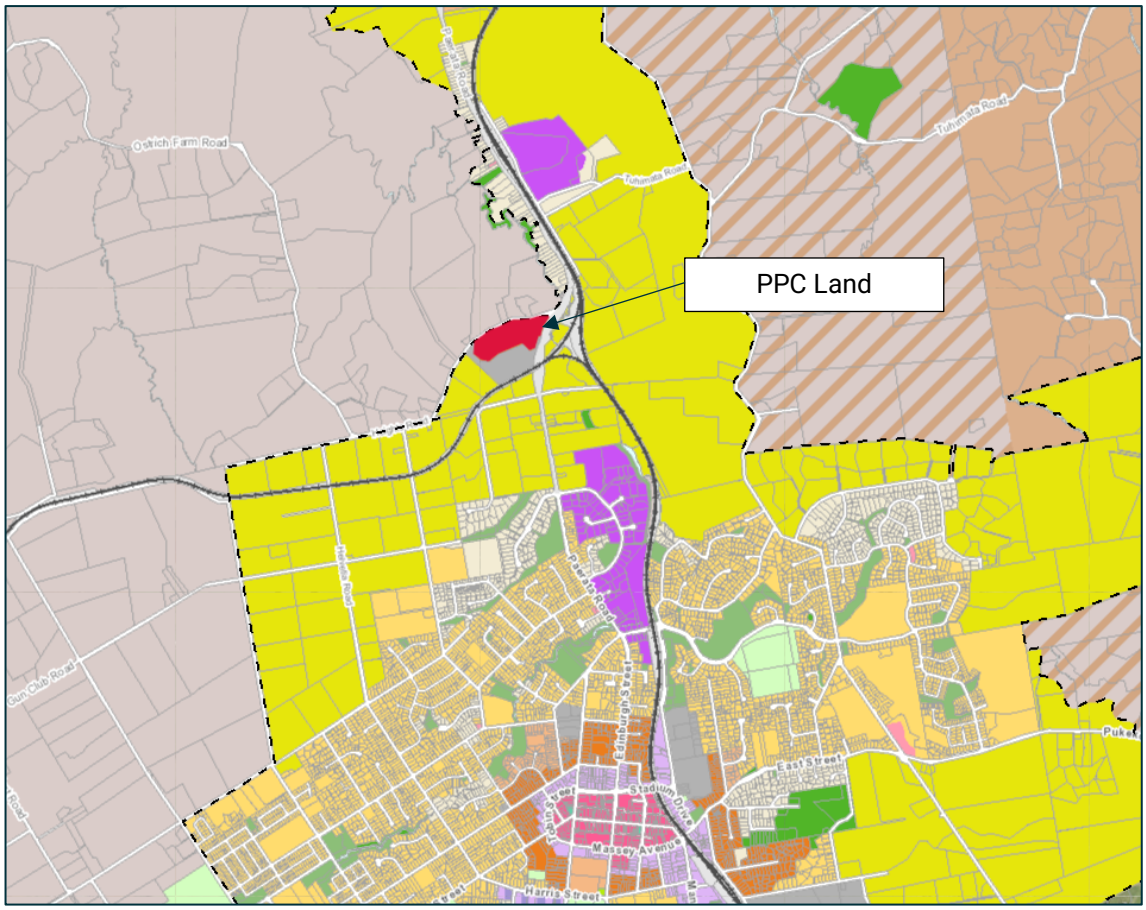


Figure 2: Location of PPC Land Extent over Aerial Photo (Source: Grip Map)

3.1.2. 9 and 33 Heights Road

These two titles form the majority of the PPC land, comprising 3.90ha in area, and are bounded by Heights Road to the north, the Paerata Road section of SH22 to the east and the Heights Park Cemetery to the south.

The land slopes down moderately from the north, west and south and forms a natural basin, sitting at a lower elevation to the surrounding land.

These sites have a long history of light industrial use. Historic uses include the Cavalier meat works and the largest coleslaw factory in Australasia.

The sites are currently used for a range of existing small-scale rural business and light industrial activities that support the rural sector, including The Tractor Centre, and ancillary tractor hire, servicing and parts businesses.

Figure 3: Photo of the Tractor Centre located on the southeast part of 9 Heights Road

Figure 4: Photo of the temporary storage sheds located west of the Tractor Centre building

A two-storey building is sited at the southeast of the site, accommodating the showroom and offices of the tractor business (**Figure 3**). West of this building are three large shelter sheds providing for the storage of rural agriculture machinery (**Figure 4**).

Towards the north of the site is a recently established shed and associated landscaping and stormwater infrastructure (**Figures 5 & 6**) authorised under resource consent LUC60134266. The shed is aligned towards Heights Road, sitting below the elevation of the street, and is finished in recessive colours. The building is used for storage of light industrial equipment. Stormwater mitigation is provided via detention tanks (**Figure 7**) collecting roof runoff, and a bioretention raingarden device (**Figure 8**) above the retaining wall providing both quality and hydrological

Figure 5: BMC Building located on the north part of 9 & 33 Heights Road. Photo taken from the Heights Park Cemetery.

Figure 6: Photo of the BMC Building looking east

Figure 7: Stormwater tanks for the BMC Building

Figure 8: New raingarden associated with BMC Building

treatment before discharging to the stormwater network on the site. The land is retained to the south by timber retaining walls measuring up to approximately 5m in height. The front yard at this part of the site adjacent to Heights Road has been planted with native flaxes and shrubs.

Compacted metal and sealed hardstand areas provide for vehicle parking and access, and outdoor storage of equipment accessory to the activities on the site. These areas have been added to and expanded over the years and some parts of the site have various consents and/or existing use rights. A handful of mature trees are located centrally on the site within an elevated ridge of the driveway approaches. It is noted that a small part of the hardstand and tractor display areas occupy part of the Paerata Road road reserve. We understand that this has historically arose part of a civil arrangement with the former Franklin Local Board.

3.1.3. 49 Heights Road

This title comprises 1.45ha in area, and contains a single-storey residential dwelling (**Figure 9**) located at the northwest, with the balance of the site held in cleared pasture (**Figure 10**). The land is bounded to the north by Heights Road, and west and south by the Heights Park Cemetery, and is defined by a gentle slope from north to south.

Figure 9: Existing dwelling on 49 Heights Road, photo taken from Heights Road

Figure 10: 49 Heights Road, photo taken from Heights Rd, looking south to Heights Park Cemetery

3.2. Ecology

The PPC request is supported by an Ecology Report (**Appendix 9**), which finds that the PPC land is of low to nil ecological value as it lacks the habitat features to support indigenous species. There are no streams or wetlands on the PPC land, and whilst the Structure Plan identifies a watercourse extending east-west over part of the land, this no longer exists on the PPC land, having been piped in 2002 (refer to consenting history in Section 3.8 below and **Appendix 15**). Whilst the rear of 49 Heights Road supports an overland flow path, this does not exhibit characteristics consistent with the AUP:OP definition of a stream.

In terms of vegetation, the PPC land supports 15 retained native trees comprising 13 totara and two kahikatea which are located centrally on 9 Heights Road within a ridge between the driveway accessways through the PPC land. Other than these trees, there is no native vegetation on the PPC land and no habitat value for lizards, birds and bats. A bat survey has been undertaken which has confirmed that there were no bats present on the PPC land which was anticipated given that the remaining trees are separated from bush edges, watercourses and other viable roosting habitats, and have been subject to uncontrolled pest activity for a long time.

3.3. Contaminated Land

A Preliminary Site Investigation (PSI) (**Appendix 7**) has been conducted by ENGEO Ltd, which concluded that contaminants may be present within the shallow soils, therefore, these excavated soils may require testing/approval from Auckland Council prior to disposal or reuse. ENGEO Ltd

recommends a Detailed Site Investigation (DSI) be undertaken to assess the contaminated land provisions of the AUP:OP in accordance with the requirements of the National Environmental Standard.

3.4. Transport

A full description of the transport environment is contained within the Integrated Transport Assessment (**ITA**) at **Appendix 4**. The sites at 9 and 33 Heights Road are primarily accessed from Heights Road by a vehicle crossing located towards the northeast extent of the site, approximately 35m from the intersection with Paerata Road. A secondary access exists further west on Heights Road. Internal parking, access and circulation is provided primarily through internal private compacted metal accessways, with sealed parking area towards the eastern access point. The site at 49 Heights Road is served by a separate access and crossing on Heights Road.

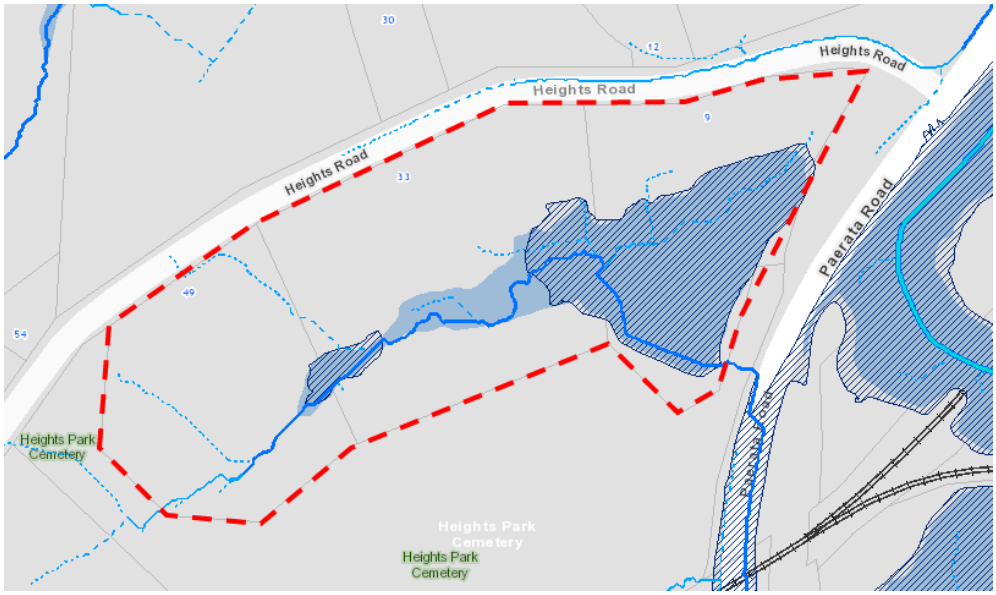
Heights Road is a rural road that provides one lane in each direction, with limited shoulders, and has a posted speed limit of 80km/h that has recently been reduced from 100km/h. It is not classified as an arterial road. Paerata Road is identified as an Arterial Road in the Unitary Plan and is also classified as a Limited Access Road (SH22) by Waka Kotahi NZ Transport Agency ('**Waka Kotahi**'). It also has a posted speed limit of 60km/h adjacent to the PPC land. An NZTA road widening designation applies to the site frontage with SH22, and a relatively large berm separates the PPC land boundary from the road carriageway.

3.5. Flooding

As depicted in **Figure 11** below, Auckland Council's GIS indicates that the PPC land is bisected by a major overland flow path (more than 4,000m^2), several minor overland flows, and a 1% Annual Exceedance Probability (**AEP**) flood plain. A flood prone area is also identified over the southeast portion of the PPC land. There are no streams or watercourses on the PPC land.

The SMP (**Appendix 8**) prepared to support this PPC has identified that the location of these overland flow paths on the GIS are inaccurate as they haven't taken into consideration the existing culvert under SH22. Section 2.6 of the SMP provides a summary of the flood plain and overland flow paths that apply to the PPC land.

Figure 11: Existing floodplain, overland flows and flood prone areas (Source: Auckland Council GIS)



3.6. Infrastructure

3.6.1. Stormwater

The PPC land is currently serviced by a private stormwater network located at the eastern portion of the PPC land. A piped private network collects runoff from impervious surfaces on the PPC land including buildings and hardstand areas, and discharges to the upper catchments of the Whangapouri Stream via a 600mm culvert beneath Paerata Road / SH22. The ultimate receiving environment is the Manukau Harbour, a considerable distance north of the PPC land.

Stormwater from the roof of the northern shed and associated hardstand area is treated by a recently established bio-retention raingarden device prior to discharge to the stormwater network. Stormwater flows from the roof are also mitigated through aboveground detention tanks located to the east of the building.

3.6.2. Wastewater

The PPC land is not serviced by the public wastewater network, with the nearest public reticulation rising mains on Paerata Road. However, as set out in the Civil Infrastructure Report (**Appendix 5**) the PPC land is currently served by a private wastewater pump station and a rising main that discharges to a public gravity system adjacent Possum Borne Reserve. The capacity of this pump station is relatively large given the PPC land's historical use as a meat works and is therefore sufficient to cater for the proposed light industrial land use.

3.6.3. Water Supply

There is a 300mm diameter public network installed at the Paerata Road / SH22 frontage of the PPC land, and a 100mm connection to the PPC land from this line. The existing business activities are currently serviced by private supply in the form of a consented groundwater take and use (Permit 41851) working in conjunction with storage tanks.

3.7. Culture and Heritage

The PPC land is not identified as being subject to any sites of significance to mana whenua or historic heritage places or extents of places under the AUP:OP. In addition, no cultural heritage items are identified on the PPC land on the Cultural Heritage Inventory, with the nearest being the Heights Park Cemetery (ID: 19278).

The wider Pukekohe area is identified by Ngāti Tamaoho as an area with historically fertile soil, important pā and strategic maunga which all contributed to the settlement of the area. Prominent settlements, including Pukekohekohe housed prominent tupuna from Ngāti Tamaoho history.

3.8. Consenting History

The PPC land has a long history of light industrial use. Historic uses include the Cavalier meat works and the King coleslaw factory.

Whilst the majority of the activities are formalised and/or legalised, staged development in accordance with the BLIZ zoning sought in this PPC request provides an opportunity to formalise the existing operations and achieve improvements to environmental outcomes. The recent consented development of the sheds and stormwater improvements (i.e. recent raingarden and rain tanks) on the northern part of the PPC land is a good example of these opportunities. The following key permits / consents have been granted on the PPC land.

- BCO30270245 (Tractor Centre) – Decision for establishment of Agricultural Machinery Sales/Service Centre granted on 8 October 2001. BCO10133144 – Approved plans dated 2 April 2002 for the above BC number.
- LUC60134266 (BMC Engineering Building) – Land use resource consent approved on 28 April 2017 for the construction of the northern building at 9 and 33 Heights Road including use for storage activities, and to undertake enabling earthworks, including retaining walls up to 5m in height. Includes stormwater retention tanks and raingarden.
- DIS60264238 for Permit No. 26269 (Piped stream consent) – Regional consent approved on 23 May 2002 to extend a 600mm diameter piped section of a watercourse through the site for approximately 25m in length.
- Water Right 740798 to discharge stormwater from a commercial building and pipe 400 feet of watercourse. Works included a 24 inch diameter pipe with cesspit and manhole discharging through outfall structure to Blackridge Creek. Approved 11 January 1991.
- Water Take 41851 (Take & Use Groundwater Permit) – Permit granted on 3 October 2014 to take groundwater to use from the Pukekohe Frankline Kaawa Aquifer for the Tractor Centre and wider site use. Consented to take 50m3 water take per day / 11,500m3 per annum. Expires on 31 May 2027.
- Stormwater from the PPC land currently discharges to the upper catchment of the Whangapouri Stream via a 600mm culvert located under SH22. This asset is owned by Waka Kotahi and consented via Permit 26269 in 2002 (expiry date 2036).

Additional consenting applies to the PPC land for various existing activities that are operating on the PPC land. A consent history summary table is included at **Appendix 15**, along with copies of the relevant consent documents.

3.9. Surrounding Environment

The PPC land is bounded to the north by the RUB which follows the alignment of Heights Road, and beyond that rural land used as pasture and paddocks. To the north of Heights Road is a moderately sloped bank that provides a visual buffer / barrier limiting views between the PPC land and rural land to the north.

There are two rural properties with dwellings on the northern side of Heights Road immediately opposite the PPC land with their dwellings sited approximately 70-80m from the PPC land boundary. Due to the lie of the topography, these dwellings are sited on the knoll or north facing slopes of their titles with their outlook orientated to the north. A third dwelling is located opposite the Heights Park Cemetery driveway entrance. This dwelling sits on the ridge above the road (approximately 10m from the road reserve). This dwelling is located approximately 45m from the PPC land's western boundary, with their outlook focused to the north, away from the PPC land.

The south and west boundaries of the PPC land adjoin land held by Auckland Council, approximately half of which comprises the Heights Park Cemetery, a small rural cemetery. The accessway to the Cemetery adjoins the PPC land's western boundary, and is defined by extensive mature tree planting, which extends along the west and part of the southern boundary of the PPC land. The accessway opens out to the cemetery at the southwest of the PPC land, containing headstones, parking and landscaped areas. To the east of the cemetery is vacant paddocks held

by Council, and zoned in the AUP:OP for cemetery purposes. To the south of the cemetery is the North Island Main Trunk ('**NIMT**') railway corridor.

The wider surrounding area is defined by rural and peri-urban activities, including pasture, horticulture, light industrial servicing and manufacturing, and ribbon residential development orientated along on Paerata Road. Approximately 3.5km to the north is Paerata Rise, an emerging greenfield residential subdivision, and adjacent to that Wesley College, a secondary school. Approximately 3km to the south is the township of Pukekohe, a satellite town with a resident population of 23,904 at the 2018 New Zealand census. The PPC land and surrounds are connected to urban Auckland via State Highways 1 and 22.

In time, it is anticipated that the land to the south, east and west of the PPC land will urbanise in accordance with the Structure Plan and FUZ zoning (**Figure 1**), and will include a mix of business land to the south and east, with suburban residential to the west. The RUB aligns with Heights Road, and it can reasonably be expected that the land to the north of Heights Road will retain its rural function. Refer to **Figure 12** for the immediate surrounding context.

Figure 12: PPC Land with wider surrounding area context (Source: Grip Map)

4. Plan Change Request

By way of summary, the PPC request seeks to apply the BLIZ to the PPC land consistent with the Pukekohe-Paerata Structure Plan to provide for the ongoing operation of existing rural businesses and facilitate new light industrial land use activities to establish on the PPC land.

There is no need to establish a site-specific precinct because the objectives, policies and rules of the BLIZ (without amendment) will adequately enable (and manage the effects) of the intended form of light industrial development. Further, the wider AUP:OP provisions such as the Auckland Wide provisions will manage the way in which the PPC land is used and developed. The details of the PPC are set out in the proceeding sections of this report.

4.1. Purpose of the Proposed Plan Change

In accordance with Clause 22(1) of Schedule 1 of the RMA, the purpose of the PPC is to enable the ongoing operation and expansion of light industrial activities at 9, 33 and 49 Heights Road, Pukekohe to meet current and future demand for industrial growth, consistent with the Structure Plan, whilst avoiding, remedying and mitigating adverse effects on the environment.

Specifically, the client owns the entire PPC area landholding and wishes to consolidate existing industrial operations towards the eastern portion of the PPC land and enable the balance land to be developed for light industrial activities to support the local rural sector. The PPC land has a long history of light industrial activities.

The PPC is consistent with the strategic policy framework and the objectives and policies of the Council's planning documents. A Section 32 analysis has been prepared at section 11 of this report to support the PPC. Further, an effects assessment commensurate with the scale and significance of the request is set out at section 9 of this report in accordance with Clause 22(2).

4.2. Details of the Proposed Plan Change

The PPC seeks to apply the following to the PPC land extent:

- Rezone 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe from Future Urban Zone to Business – Light Industry Zone ('**BLIZ**');
- Apply the Stormwater Management Area – Flow 1 Control;
- Retain the existing Macroinvertebrate Community Index - Rural control;
- Retain the existing Aquifer overlays; and
- Retain the existing 6705, State Highway 22: Karaka to Pukekohe - Road widening, Designations, New Zealand Transport Agency designation.

The proposed amendments are set out in **Appendix 1** to this request and are depicted in **Figures 13 and 14** below.

Figure 13: Proposed Zoning Map

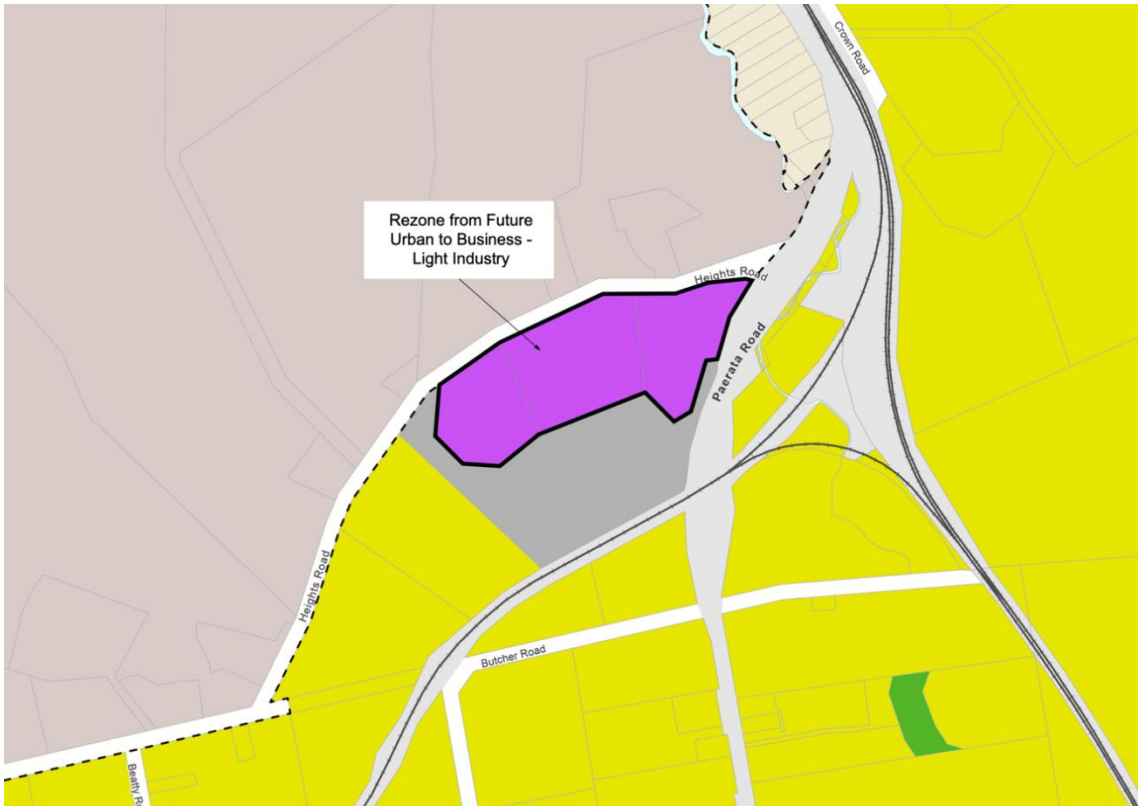
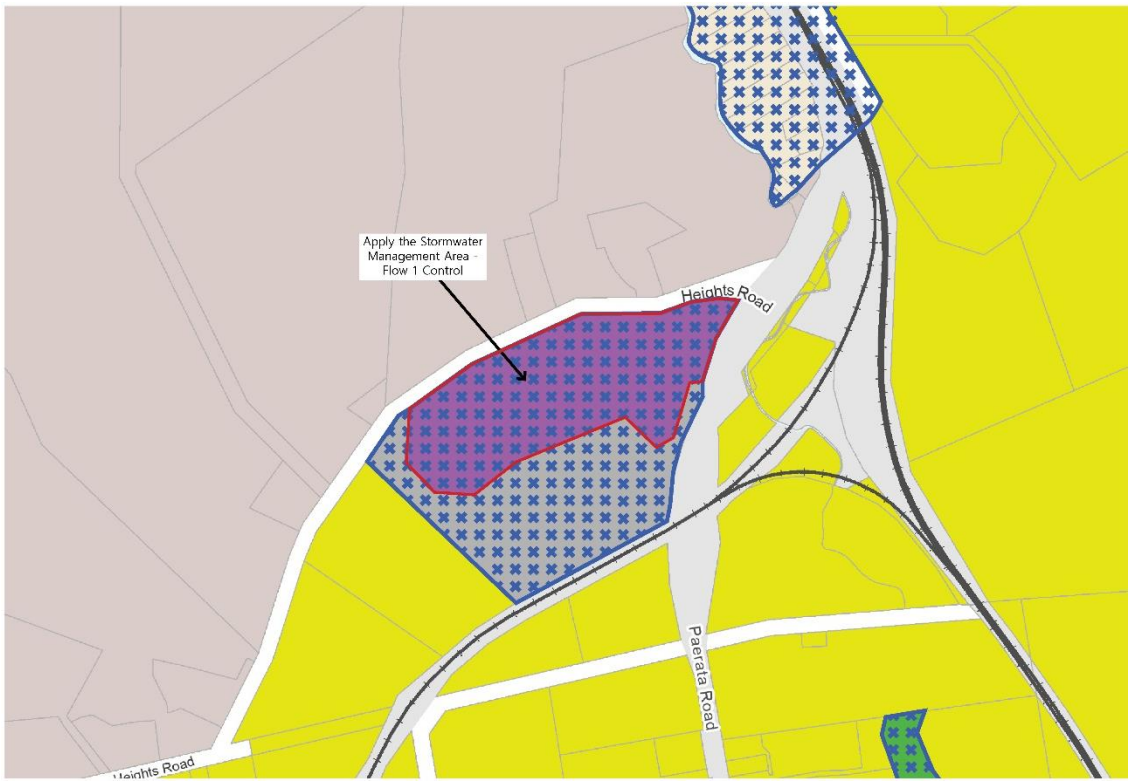


Figure 14: Proposed application of SMAF - 1 Control



4.2.1. Light Industry Zone

It is proposed to apply the BLIZ zoning to the PPC land. The BLIZ will provide a suitable planning framework for the existing established activities to continue operating from the PPC land, and/or

provide flexibility to establish new activities if desired on both the developed and undeveloped parts of the PPC land. The BLIZ is described in Chapter H17 of the AUP:OP. A summary of the key provisions of the BLIZ is set out as follows:

H17.1. Zone Description

The BLIZ anticipates industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. The anticipated level of amenity is lower than the centres zones, Business – General Business Zone and Business – Mixed Use Zone. Due to the industrial nature of the zone, activities sensitive to air discharges are generally not provided for.

The BLIZ provides for a range of industrial activities set out in the nesting tables under Chapter J1 Definitions of the AUP:OP, including warehousing and storage, light manufacturing and servicing, repair and maintenance services , waste management facilities, storage and lock-up facilities and wholesalers. The BLIZ also makes limited provision for non-industrial activities, including trade suppliers, specific retail such as garden centres and motor vehicle sales, dairies and small-scale food and beverage, retail and offices accessory to industrial activities, and workers accommodation.

With respect to development, the relevant standards contained in H17.6 are summarised in **Table 1** below:

Table 1: Summary of BLIZ development standards

Standard	Description
H17.6.1 Building height	Maximum building height of 20m, unless specified by way of a Height Variation Control on the planning maps
H17.6.2 Height in relation to boundary	Buildings must not project beyond a 35 degree recession plane measured from a point 6m vertically above ground level along the boundary of the residential zones, open space zones, Special Purpose – Māori Purpose Zone or the Special Purpose – School Zone.
H17.6.3. Maximum impervious area within the riparian yard	Maximum impervious area of 10 per cent within a riparian yard.
H17.6.4 Yards	Minimum yard setbacks of: ▪ Front yard: 2m ▪ Rear and side yard: 5m, where the yard adjoins a residential zone, an open space zone, the Special Purpose – Māori Purpose Zone or the Special Purpose – School Zone ▪ Riparian yard: 10m ▪ Lakeside yard: 30m ▪ Coastal Yard: 25m, or as specified in Appendix 9 to the AUP:OP Planting requirements within yards:

Standard	Description
	▪ Front yards (excluding access points) must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard. ▪ Side and rear yards must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard to provide a densely planted visual buffer for a depth of at least 3m and must be appropriately maintained thereafter.
H17.6.5 Storage and screening	Any outdoor storage or rubbish collection areas that directly face and are visible from a residential zone, rural zone, open space zone, Special Purpose – School Zone or Special Purpose – Māori Purpose Zone adjoining a boundary with, or on the opposite side of the road from, an industrial zone, must be screened from those areas by landscaping, a solid wall or fence at least 1.8m high.

4.2.2. Stormwater Management Area – Flow 1 Control

It is proposed to apply the Stormwater Management Area – Flow 1 ('**SMAF-1**") control overlay to the PPC land extent. This approach is supported by the Stormwater Management Plan ('**SMP**') (**Appendix 8**) as an appropriate mechanism to achieve suitable stormwater mitigation measures for the PPC. SMAF-1 applies to catchments which discharge to sensitive or high value streams that have relatively low levels of existing impervious area. In this case, it is noted that SMAF-1 applies to existing areas of land in the Whangapouri Creek catchment, including the neighbouring Heights Park Cemetery. Therefore, it is proposed to extend the SMAF-1 overlay across the entire PPC land extent to manage stormwater discharge from the PPC area.

The SMAF-1 Control seeks to manage the effects of stormwater disposal from new and redeveloped impervious surfaces on downstream freshwater systems, and is described in Chapter E10 Background of the AUP:OP as follows.

> *Auckland has numerous small and narrow urban rivers and streams. Despite their small size, these rivers and streams are home to much of our freshwater aquatic biodiversity and have amenity values. These values are threatened by the effects of ongoing urban development.*
>
> *The creation of impervious surfaces in a catchment undergoing development increases the flow rate and volume of stormwater runoff. This change in hydrology, unless managed, can have a significant adverse effect on streams within the catchment, including accelerating river and stream erosion and bank instability, particularly in steeper upper catchment areas, and creating hydrological conditions that do not support healthy aquatic ecosystems. In developed urban catchments with large areas of impervious surface, increased runoff is one of the primary causes of degraded river and stream health, and also causes loss of land (including the undermining buildings) and amenity values.*
>
> *However, in areas that are yet to be developed, or where development is at low levels, development can be enabled while also protecting and enhancing in-stream biodiversity and other river and stream values by reducing and managing stormwater runoff, and other measures*

such as enhancing riparian margins. Redevelopment also offers an opportunity to reduce existing adverse effects and enhance river and stream values.

The SMAF Flow 1 and Flow 2 identifies rivers and streams (and their contributing catchments) that are particularly susceptible to the effects of development or have relatively high values.

Under Chapter E10, the development of new or redevelopment of existing impervious areas greater than 50m^2 within the SMAF-1 Control is required to provide retention and detention of stormwater to the following standards[1]:

- Retention of at least 5mm runoff depth for the impervious area for which hydrology mitigation is required; and
- Detention and a drain down period of 24 hours for the difference between the pre-development and post-development runoff volumes from the 95th percentile, 24 hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required.

The SMP recommends a Flood Storage option for the PPC land to ensure there are no flooding effects on SH22, or other properties upstream or downstream of the development. Further, a matrix of proprietary devices considered suitable for the PPC land and which meets GD01 water quality treatment requirements is included in the SMP.

In addition to the requirements of SMAF and E10, the AUP:OP Auckland-Wide provisions and supporting standards and codes of practice ensure that a robust stormwater management regime will be achieved for future development of the PPC land. Section 3.1 of the SMP sets out the regulatory and design requirements that would apply to future development of the site beyond that required by E10 SMAF provisions. There is a comprehensive set of regulations that apply to all manner of stormwater discharge, diversion, water quality, hydrology and detailed design proposals to provide certainty that stormwater management of the site will be appropriately considered in the future.

4.2.3. NZTA Designation

It is noted that an NZTA designation applies along the SH22 frontage of the PPC land - *Designations - 6705, State Highway 22: Karaka to Pukekohe - Road widening, Designations, New Zealand Transport Agency*. This designation will be retained to enable future road widening options for NZTA if required in the future.

4.2.4. High Use and Quality Sensitive Aquifer Overlays

Three aquifers currently reside under the PPC land. It is proposed to retain these overlays on the PPC land:

- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Kaawa Aquifer
- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Central Volcanic
- Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay [rp] - Franklin Volcanic Aquifer

[1] Set out at Table E10.6.3.1.1

4.3. Accepting the Proposed Plan Change

Council has the discretion to accept or reject a PPC request in accordance with Clause 25 of Schedule 1 of the RMA and decide under which process the PPC shall be dealt with. The Council may either adopt the request as its own (Clause 25(2)); consider the application as a resource consent (Clause 25(3)); or consider the application in accordance with the matters set out in Clause 25(4)(a)-(e). The relevant considerations are listed below:

a) Whether the PPC request is frivolous or vexatious (Clause 25(4)(a));

b) Whether in the last 2 years the PPC request has been considered and given effect to, or rejected by, the local authority or Environment Court (Clause 25(4)(b));

c) Whether the request is not in accordance with sound resource management practice (Clause 25(4)(c));

d) Whether the request would make the Plan inconsistent with Part 5 – Standards, Policy Statements and Plans (Clause 25(4)(d)); and

e) Whether the AUP:OP has been operative for less than 2 years.

In relation to the above Clause 25 considerations, the following comments are made with respect to the PPC request:

a) The PPC relates to the rezoning of FUZ land that is intended for light industrial development in accordance with an adopted Structure Plan. A full and complete PPC request application has been prepared with a suite of expert reports to support the proposal. Therefore, the PPC is not frivolous or vexatious;

b) The PPC has not been previously considered, given effect to, or rejected by any local authority or Environment Court process;

c) The PPC achieves sound resource management practice for the following key reasons:

- The PPC land is zoned FUZ and is intended for future business use as shown on the Structure Plan. It is proposed to apply the BLIZ to the PPC land and the PPC is in general accordance with the Structure Plan;
- Infrastructure provision for the PPC land can be met by a combination of existing and proposed onsite devices and civil upgrades;
- Consultation has occurred with mana whenua through the process;
- Any adverse effects can be adequately avoided, remedied or mitigated as set out in the effects assessment within this report and supported by the expert reports commissioned in support of this PPC request;
- The PPC is consistent with the overarching policy framework that applies to the PPC land. In particular, the PPC is considered to give effect to the NPS-UD. Infrastructure provision has been addressed, business land will be made available for development, local employment opportunities will be created, and effects have been addressed;
- All statutory requirements have been met, including an evaluation in accordance with Section 32 of the RMA; effects assessment; and policy framework analysis with supporting evidence; and

- The PPC is considered to be consistent with the sustainable management purpose and principles of the RMA;

d) As per the above, it has been demonstrated that the request is in accordance with sound resource management practice. The entirety of the land is currently zoned FUZ and is intended for future business use in accordance with the Structure Plan. The PPC will adopt the operative BLIZ zoning and apply the standard provisions of the AUP:OP to the PPC land. The SMAF 1 overlay will be extended to apply to the PPC land to manage stormwater discharge. Overall, the PPC will be consistent with the AUP:OP and Part 5 of the RMA; and

e) The AUP:OP has been operative for longer than a 2 year period.

Given the above, there are no reasons to reject the PPC request and Council can accept the request for consideration.

5. Structure Plan & Master Planning Process

Policy B2.2.2(3) of the Regional Policy Statement ('**RPS**') enables the rezoning of FUZ land for urbanisation where in accordance with the Appendix 1 Structure Plan Guidelines of the AUP:OP. In this case, the PPC request has been prepared in accordance with the Council adopted Pukekohe – Paerata Structure Plan 2019 ('**Structure Plan'**).

5.1. Pukekohe-Paerata Structure Plan 2019

The Structure Plan (**Figure 15**) sets out Auckland Council's strategic direction for growth in the Pukekohe-Paerata area. The Structure Plan applies to some 1,262ha of land, located on the periphery of the Pukekohe township and the SH22 and NIMT corridors. The Structure Plan identifies the location of future land uses and infrastructure networks, whilst identifying areas of cultural, heritage, ecological and landscape value to be protected.

The Structure Plan was developed over a 2-year timeframe and adopted by Council in August 2019. The Structure Plan forms the basis for future plan changes in the Pukekohe Paerata FUZ zones and provides for 30 years of urban growth in the Pukekohe and Paerata area in accordance with the FULSS. The vision for the Structure Plan is:

> *"New growth areas will enhance Pukekohe as a focal point and place to further support the surrounding rural economy. These areas will offer a range of housing choice and employment opportunities for people at all stages of life. It will be well connected to the wider Auckland and Waikato regions, while protecting and enhancing the natural, physical and cultural values that contribute to Pukekohe's unique character and identity".*[2]

The key outcomes sought by the Structure Plan include places for people, shared stories, sustainable communities, natural environment values, rural Pukekohe and servicing. The area is anticipated to double in population size, and a two-staged development approach has been recommended, with Paerata FUZ zoned land in the first tranche (2018 – 2022), and Pukekohe FUZ zoned land (including the PPC land) in the second tranche (2023-2027) of planned development.

One of these key outcomes of the Structure Plan relevant to this PPC is: *3.2.5 Rural Pukekohe (c) Enable rural industries to continue to support businesses and provide a diverse range of jobs, goods and services.*

[2] Pukekohe-Paerata Structure Plan 2019

A mix of land uses are proposed to support the growth objectives which includes approximately 12,517 new dwellings and 5018 jobs to support a population target of 33,809. A mix of housing typologies and densities are anticipated, with higher density housing provided for in centres and around transport nodes. Business land is provided for in pockets of BLIZ and Local Centre Zoned land throughout the Structure Plan area. A network of parks and riparian buffer zones is also anticipated on the Structure Plan, along with protected landscape values associated with the volcanic tuff ring features throughout the area. Of relevance to this PPC, issues addressed included availability of business land supply, stormwater management and flooding hazards, and infrastructure and transport integration. Land use, transport linkages and key features are shown on a series of Maps within the Structure Plan and discussed in the sections below.

Figure 13: Pukekohe Paerata Structure Plan Map 2019 (Source: Auckland Council)

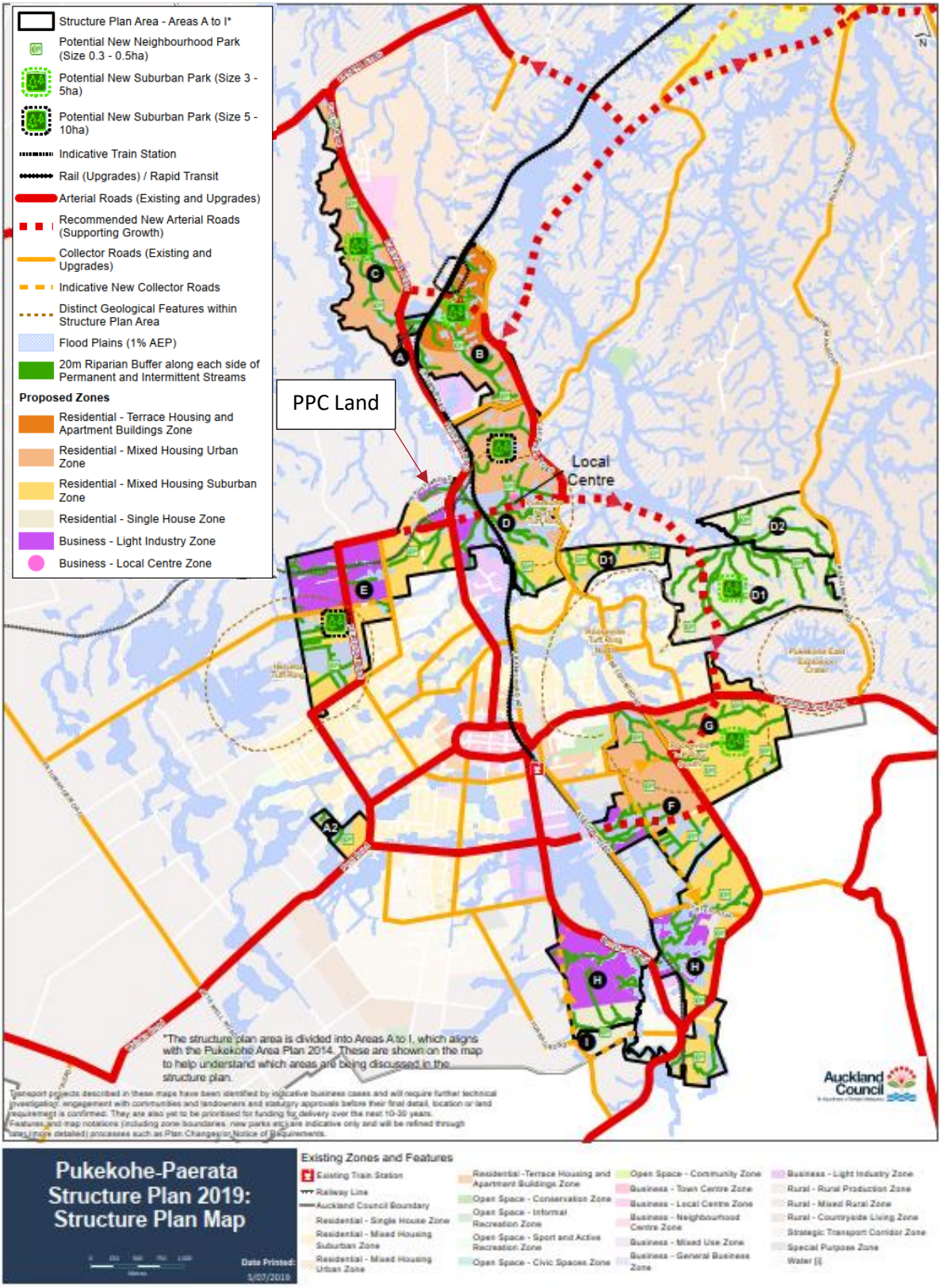
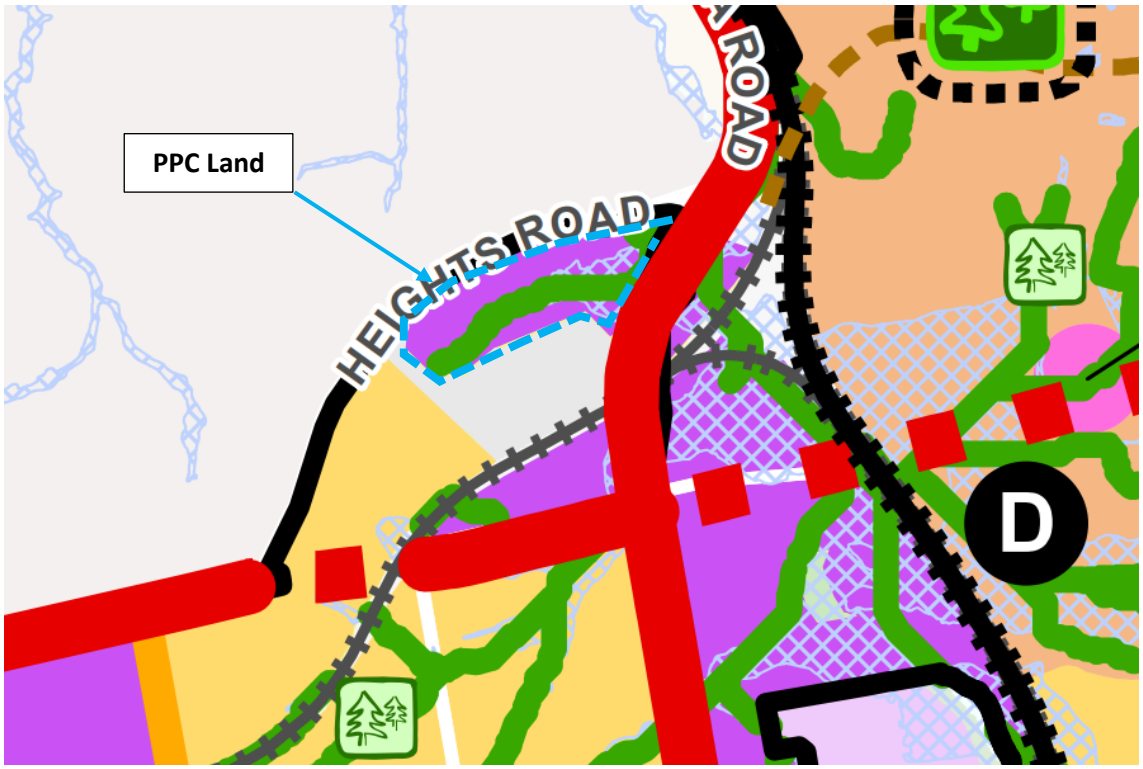


Figure 14: Inset of Structure Plan showing PPC Land (Source: Auckland Council)



5.2. Applicants Engagement in Structure Plan Process

Robust consultation was undertaken with the community and stakeholders in the development of the Structure Plan. The key areas of concern related to timing and staging of infrastructure, effects on productive soils, riparian buffers for streams, protection of volcanic tuff rings, transport connectivity, environmental hazards, and the rural/urban interface. The applicant engaged in the Structure Plan process with Council and supported the light industrial zoning on the PPC land.

5.3. Alignment with the PPC & Structure Plan

Key features of the Structure Plan relating to the PPC land (**Figure 16**) include:

- The PPC land is identified as being BLIZ on Map 1 and 3 of the Structure Plan;
- Map 2 confirms the location of the PPC land within the Structure Plan;
- Map 4 shows a 20m wide riparian buffer alongside the low point of the land which is in a flood plain (stream is now underground);
- Map 5 identifies SH22 as an Arterial Road and a connector / local indicative public transport route (**Figure 18**);
- Map 6 indicates that Heights Road and SH22 will be serviced by future water, electricity, and gas infrastructure;
- Map 7 shows the PPC land in the West Franklin Business catchment;
- Map 8 shows the proposed Water Supply Main route along SH22 adjacent to the property;
- Map 9 shows a future Proposed Wastewater Gravity Main along Heights Road; and

- Map 10 shows the PPC land within Area E Pukekohe north-west (Sub Area boundary) (**Figure 17**).

A discussion on these land uses, features and services is provided below.

5.3.1. Business Land Use

One of the main objectives of the Structure Plan is to provide for enough business land to meet the employment and population growth projections for the area. Feedback from the Council's Structure Plan consultation process sought to provide local employment to reduce the need to commute outside the area.

The Structure Plan (Section 3.3.2) estimates that approximately 80 – 100ha of new, net developable industrial land is required in Pukekohe-Paerata to meet future demand employment. In response, the structure plan identifies approximately 95ha of future light industrial land to meet this demand, which is expected to provide for 2,370 new jobs. The BLIZ provides for a range of activities that support rural industries and allows for activities that would not otherwise be suitable in the town centre. Several areas of BLIZ have been identified across the Structure Plan area, including the PPC land. These areas have been identified as BLIZ for the following reasons:

- Good access to the road network, including freight routes (limiting traffic through the town centre);
- Suitable topography;
- Proximity to existing areas of BLIZ land allowing co-location of similar activities and reducing reverse sensitivity effects;
- Proximity to less sensitive activities; and
- Reflection of existing land uses suited to the BLIZ zone. Specific reference made to the PPC land which is identified as machinery sales and maintenance activities.

The PPC seeks to apply the BLIZ, consistent with the aspirations of the Structure Plan.

- The PPC land has good access to the road network, being adjacent to SH22;
- As demonstrated on the indicative Masterplan (see section 5.4 below), the PPC land can be developed on the areas of suitable topography;
- Areas to the north will remain rural, the site to the west and south is occupied by the cemetery land, and the land to the east is occupied by SH22 and the NIMT. The PPC land is therefore well located in terms of proximity to similar activities and less sensitive activities with respect to potential interface issues between rural and urban land uses; and
- The PPC land is already partially utilised for rural industry activities which is referenced within the Structure Plan.

The Structure Plan notes that some areas of BLIZ contain flood plains, streams and riparian margins and that these should be appropriately addressed through future plan changes. These matters are addressed in the sections 5.3.3 and 5.3.4 below.

5.3.2. Area E Pukekohe North-West

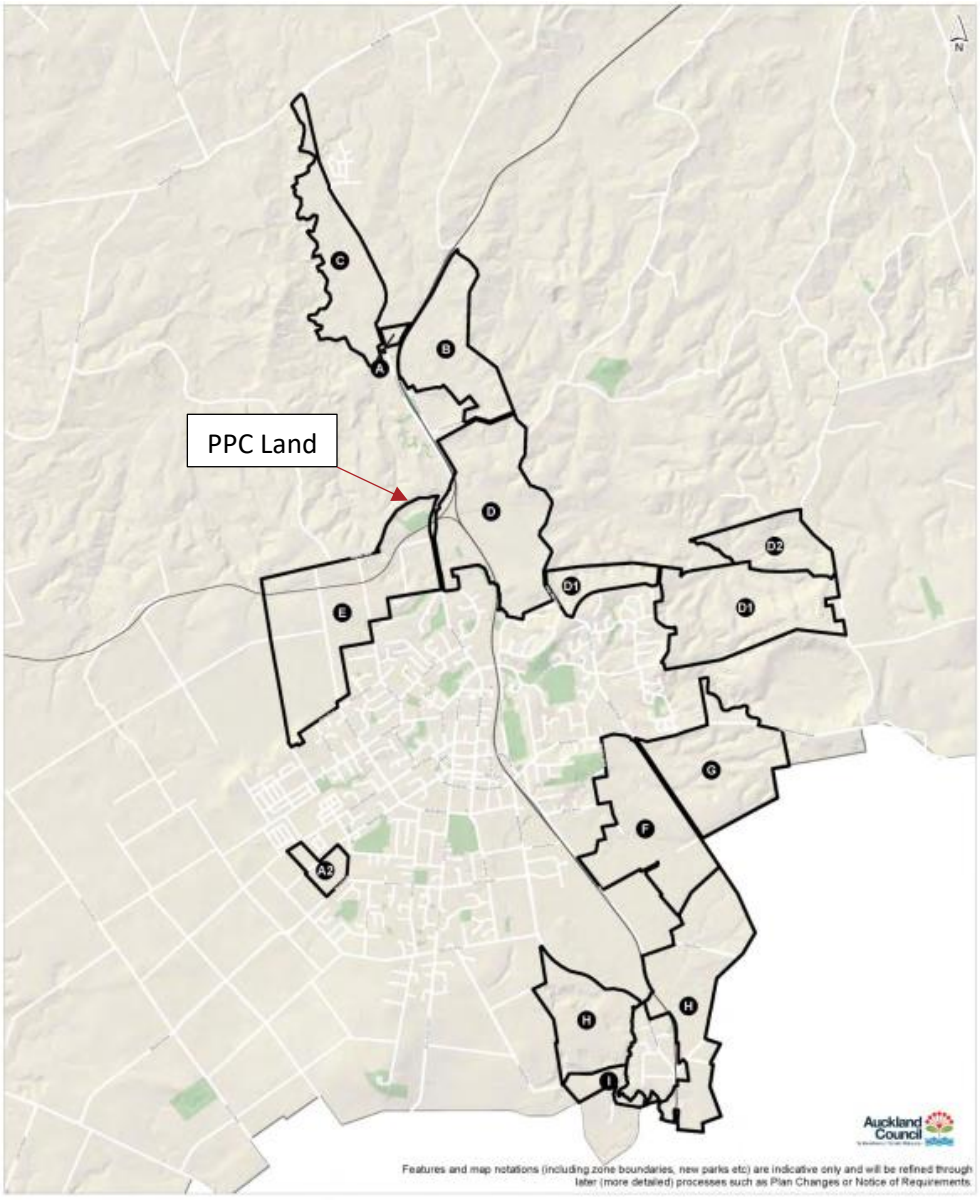
The PPC land is located in Area E Pukekohe North-West of the Structure Plan (**Figure 17**). Section 4.4.8 of the Structure Plan outlines the zoning rationale for this area. The zoning reflects the

existing rural business operations in the area (including the existing business uses on the PPC land), proximity to road routes, and recognises that there are areas with geotechnical and flooding constraints.

The geotechnical review supporting the Structure Plan identifies the PPC land as being an area of 'medium development premium'. As set out in section 10.3 of this report, the PPC request is supported by a Geotechnical Investigation Report (**Appendix 6**) which finds that the PPC land is generally suitable for light industrial activities, and that the AUP:OP contains appropriate provisions to enable geotechnical effects to be assessed at the time of development.

As outlined in the Section 32 evaluation at section 11 of this report, an assessment of the benefits and costs of alternative zonings has considered different industrial and commercial zonings, and concludes that the BLIZ is the most efficient and effective way to give effect to the objectives of the PPC.

Figure 17: Pukekohe Paerata Structure Plan Sub Boundaries Area E (Source: Auckland Council)



5.3.3. Streams and Riparian Margins

Map 1 (**Figures 15 and 16**) and 4 of the Structure Plan identifies a stream on the PPC land, and a requirement for the provision of an esplanade reserve measuring 20m either side of the watercourse. As discussed in section 3.8 of this report, this watercourse was piped in the 1980s and extended early 2000s and no longer exists. There are existing buildings (The Tractor Centre) and hard stand areas in this area. Therefore, the esplanade reserve shown on the Structure Plan is not applicable.

It is noted that there are no areas of indigenous vegetation or ecological areas, outstanding natural landscapes or features, parks or paths identified on the PPC land within the Structure Plan maps.

5.3.4. Flood Plain

Map 4 shows an area of flood plain on the low-lying area of land towards the southeast portion of the PPC land. The location of the flood plain has been comprehensively assessed by the PPC request and supported by expert reporting, including a SMP (**Appendix 8**).

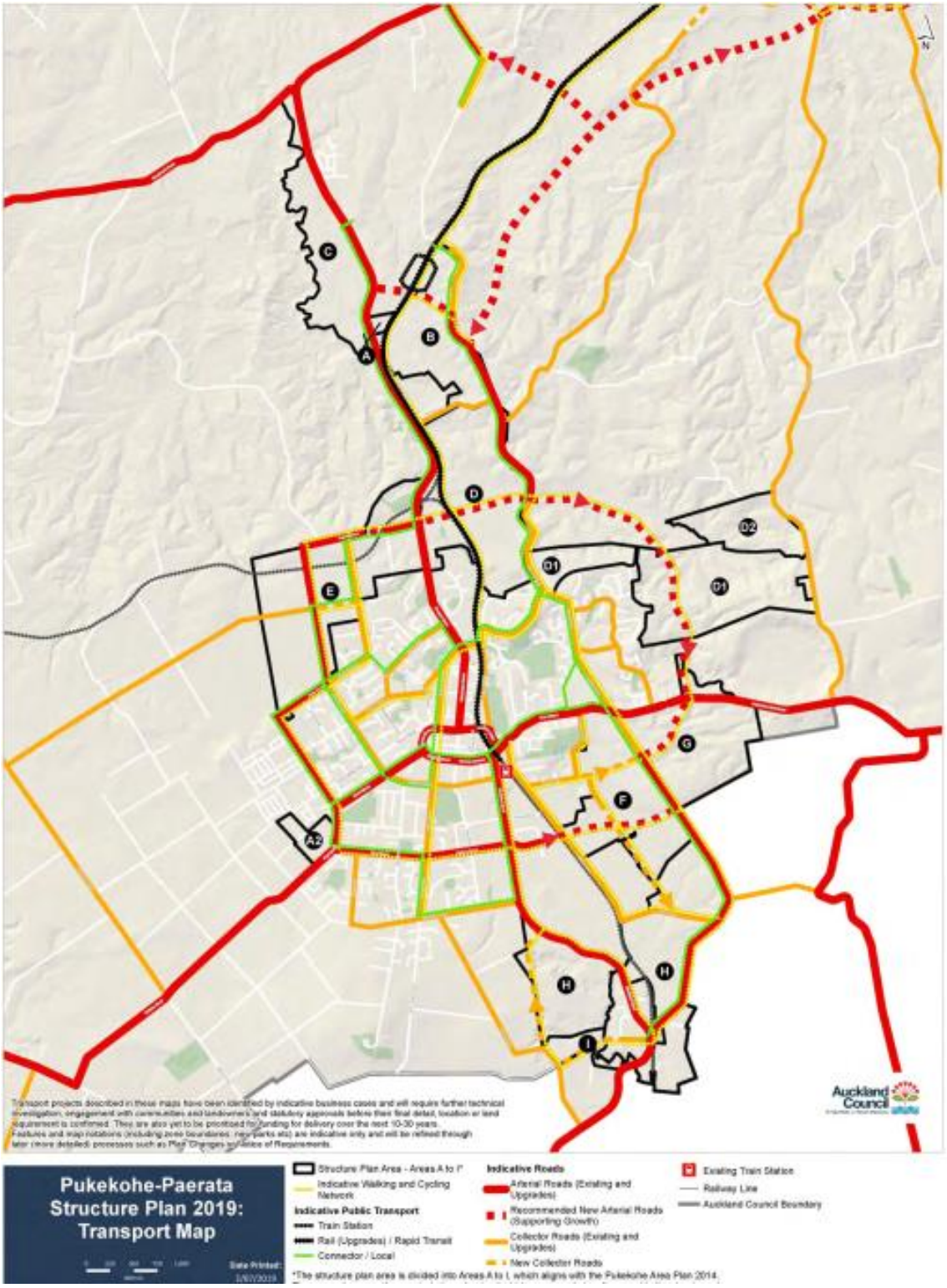
The PPC request seeks to apply the SMAF-1 control to the PPC land and any future development will be undertaken in accordance with the existing Auckland Wide provisions of the AUP:OP which deal with redevelopment / development of impervious surfaces, discharge and water quality. The SMAF-1 controls will require future development to address future rainfall events, and the SMP has modelled attenuation ponds that can be utilised to reduce flooding. An Indicative Masterplan (**Appendix 3** and section 5.4 below) has been prepared to show how BLIZ development could occur on the PPC land in accordance with the AUP:OP provisions (including SMAF-1) and suitably address the existing flooding constraint. Overall, the SMP confirms that flooding will not be exacerbated by the proposed PPC request.

5.3.5. Transport Network

Map 5 (**Figure 18**) identifies the indicative future transport network for the Structure Plan area, which shows SH22 / Paerata Road as an Arterial Road (Existing and Upgrades), with a connector or local public transport service operating on the part of this corridor adjacent to the PPC land. This is discussed in further detail in section 10.1 of this report.

It is noted that there is a generously sized berm between the PPC land and Paerata Road which provides a corridor width of 50m adjacent to the PPC land, and a road widening designation (6705) over the PPC land enabling an additional 5m width to be used if necessary. As such, development of the PPC land will not preclude the delivery of future improvements to SH22 / Paerata Road. An Integrated Transport Assessment ('**ITA**') (**Appendix 4**) has been prepared to support the PPC request.

Figure 18: Pukekohe Paerata Structure Plan Transport Map (Source: Auckland Council)



5.3.6. Infrastructure

Maps 6, 8 and 9 address the existing and proposed infrastructure provision for the PPC land and surrounding area. The Structure Plan demonstrates that there is satisfactory water, wastewater and utility infrastructure either in place or proposed within proximity to the PPC land. Therefore, the PPC request will not impact the provision of infrastructure in accordance with the Structure Plan timing and capacity.

Notwithstanding the Structure Plan timing and capacity, it is important to consider the recent FDS and the infrastructure prerequisite changes which are discussed further in section 10.2 of this report. While the FDS timeframes have expanded and additional infrastructure is required to service the wider / large scale transition of Pukekohe-Paerata to live urban zoning, the timing of that infrastructure is not a constraint to the live zoning and development of the PPC land. The expert reporting has confirmed that there either existing site-specific private infrastructure solutions already in place, or there is sufficient capacity in the network to accommodate the scale of the proposed PPC development, particularly given that a large portion of the land is already utilised for rural business activity uses.

5.3.7. Summary

Overall, the PPC request is broadly in accordance with the Structure Plan. The PPC applies the same BLIZ zoning determined for the PPC land to deliver a small but important contribution to the industrial land capacity of the Pukekohe area. The timing and delivery of the PPC aligns with that envisaged by the Structure Plan. Key issues, opportunities and constraints have been considered through the supporting expert reporting, development of an Indicative Masterplan (section 5.4 below) to demonstrate how future BLIZ could be facilitated on the PPC land, and by way of the Section 32 options analysis at section 11 of this report.

Whilst the PPC does not deliver the riparian margin identified on the Structure Plan maps, this is no longer relevant given that the former watercourse has been piped and the area is now occupied by existing buildings and hardstand, including the long standing The Tractor Centre business. Flood management will instead be provided via onsite ponds which will contribute to the amenity values of the PPC land.

5.4. Indicative Masterplan

An Indicative Masterplan and perspectives have been prepared to support the PPC request as an example of the type of development that could occur on the land in line with the PPC request. This includes the potential build-out of the PPC land applying the BLIZ utilising the existing AUP:OP provisions. Supporting the Masterplan are isometric perspectives intended to assist with visualising a potential BLIZ build-out of the PPC land. This is attached as **Appendix 3** to this PPC request and depicted in **Figure 19** below.

Figure 19: Indicative Masterplan demonstrating example potential build-out of the PPC land

The key spatial features of the indicative masterplan are:

- **Existing Buildings:** Existing site elements to be retained, including the consented Tractor Centre building (southeast), and the consented BMC Building (north) which are both shown in dark blue;
- **New Buildings:** Approximately 12,860m^2 of new light industrial floor area contained within nine new buildings. The buildings have been configured and orientated to run east-west with the site topography, to minimise the extent of earthworks and retaining required and address stormwater. Buildings will face away from the southern and western neighbour boundaries;
- **Land Modification:** As mentioned above, building configuration reflects the topography of the PPC land, the Geotech considerations, and has sought to reduce the amount of land modification required. Building platforms will follow the contour of the land;
- **Access:** Access from the existing location at the eastern extent of Heights Road, and a secondary access point further west along Heights Road. Internal circulation will be provided through a private road or jointly-owned access lot. Access is not provided directly onto SH22 to address safety and the existing designation;
- **Parking:** 341 car parks to service the development;
- **Stormwater Management:** Two stormwater ponds collectively measuring approximately 2,000m^2 in area providing mitigation of stormwater quality and hydrology and on-site flood detention (approximately 4,000m^3), and bounded by landscaped batters;

- **Flooding:** Part of the PPC land is subject to a flood plain. The overland flow path that previously traversed the southern part of the PPC land has been piped (consented) and is now underground; and
- **Landscaping:** Amenity landscaping is proposed throughout the PPC land, including along the western boundary where the PPC land abuts the neighbouring cemetery driveway and on the ponds batter. There are no significant stands of native vegetation, wetlands or streams that necessitate inclusion in the Masterplan.

In summary, the Masterplan provides just one example of an indicative layout for future BLIZ development of the PPC land taking into account the land constraints and opportunities raised through the Structure Plan process and expert reporting completed for the PPC request. In particular, the indicative layout shows that development bulk and location can occur in accordance with the AUP:OP provisions, vehicle access can be obtained via Heights Road, land modification can be achieved in line with civil and geotechnical recommendations, and stormwater management and flooding constraints can be adequately addressed.

6. Stakeholder Consultation on the PPC

6.1. Mana Whenua

As set out at **Appendix 12** to this report, the following iwi groups who are identified as having an interest in the area have been consulted by circulating a memo describing the PPC and Indicative Masterplan, and setting out the potential effects of the proposal, and offering a site meeting:

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

Ngāti Tamaoho sought further engagement with the project, and a site meeting was held on 14 April 2023 with a representative of Ngāti Tamaoho. In addition, the draft SMP and Flooding Assessment were circulated to Ngāti Tamaoho for review. Based on this information, Ngāti Tamaoho has since prepared a memo which is attached as **Appendix 13** to this report, setting out that they do not oppose the application, subject to recommendations being adopted which are set out and addressed in **Table 2** below:

Table 2: Ngāti Tamaoho recommendations and responses

Ngāti Tamaoho Recommendation	Comment
Water tanks for the reuse of rainwater from roofs to ease the water shortage in Auckland and mitigate flooding	It is proposed to apply the SMAF-1 overlay to the PPC extent. The SMP sets out requirements for roof areas to meet SMAF1 hydrology mitigation requirements, including a minimum re-use volume to meet retention requirements.

Ngāti Tamaoho Recommendation	Comment
Accidental discovery protocols be applied for any artefacts, features or koiwi that may be found in the area	Accidental discovery protocols will apply to any future earthworks on the site under Standard E12.6.1.
Appropriate sediment and silt controls for this project	Future earthworks will be subject to the controls in Chapter E12 of the AUP:OP, and appropriate sediment controls will be required to be demonstrated through assessment against the rules and standards in Chapter E12.
A planting palette that reflects the original flora and fauna	Landscape planting within front yards will be required under Standard H17.6.4, and palette/species will be determined once detailed design is undertaken.

As part of the Council Clause 23 RFI process, some aspects of the SMP have been updated to reflect further consultation with Healthy Waters. Ngāti Tamaoho was provided with an update on the changes by way of phone call and email on 18 July 2024. A copy of the revised SMP was provided for comment on 29 July 2024 and we are awaiting further feedback on the proposal. Overall, it is our view that the consultation undertaken with Ngāti Tamaoho has been beneficial and helpful to the development of the PPC.

6.2. Waka Kotahi NZ Transport Agency Ltd

A meeting was held with Waka Kotahi given the adjacent location of SH22 to the east. The key concerns raised by Waka Kotahi are addressed in **Appendix 14** to this report and summarised below:

- The ITA has been updated to address Waka Kotahi's concerns regarding the location of the eastern access point, sight distances and proximity to SH22;
- In relation to concerns of increased flooding risk over SH22, the SMP supporting the application (**Appendix 8**) finds that no flooding risks are anticipated on SH22 under the proposed flood detention option; and
- Points raised with regard to sequencing are discussed in sections 8 and 11 of this report and the ITA (**Appendix 4**), particularly around the Te Tupuna Ngātahi Supporting Growth Alliance (**SGA**) road infrastructure improvements. The ITA concludes that vehicle movements from the PPC land can be accommodated on the existing road network.

6.3. Auckland Transport

A meeting was held with Auckland Transport ('**AT**') on 15 March 2023. AT did not signal any fundamental concerns with the PPC request, with the key matters discussed set out in **Appendix 14** to this report and summarised below:

- Based on advice shared by SGA, AT advised that the Pukekohe Ring Road will not utilise Heights Road, but rather would be aligned through Butchers Road to the south (since confirmed by the notification of Pukekohe North West Arterial NOR7 in late

2023). The PPC and upgrade to Heights Road will not conflict with the design and delivery of the Pukekohe Ring Road.

- AT raised what mechanism would be used to upgrade Heights Road and Paerata Road frontages to an urban standard in the future. While future land development and industrial activities could conceivably occur under the proposed AUP:OP provisions without requiring the Heights Road frontage to be urbanised, this is unlikely given AT has the ability to input into any future resource consent proposals to address any adverse effects on the road network. In any case, the applicant has agreed to work with AT to develop a private agreement and land use covenant requiring the progressive upgrade of the Heights Road frontage to, at a minimum, kerb/channel, and sufficient road reserve to accommodate footpath, berms and lighting.

Following lodgement of the PPC documentation in July 2023, we have received several Clause 23 RFIs from AT's consultant. Through that process we have provided a formal response to the RFIs and refined the ITA (**Appendix 4**) to provide additional traffic modelling and trip generation, crash history, forecast transport upgrades assessment, intensive development scenarios, heavy vehicle usage, sight distances, and access considerations to inform and support the PPC request.

6.4. Auckland Council

6.4.1. Plans & Places

A meeting was held with Council's Plans & Places Department. No significant concerns were raised by Plans & Places, with the key topics of discussion being transport, particularly the upgrade of the Heights Road frontage, the implementation of stormwater mitigation, landscape and visual effects, and the alignment with Auckland Council's plans and strategies.

6.4.2. Cemetery Services

A meeting was held with Council's Cemetery Services in respect of the interface between the PPC land and the Heights Park Cemetery to the west. Cemetery Services sole concern was potential noise and vibration from future industrial activities on the PPC land. In response to these concerns, the following is noted:

- Future industrial activities are anticipated to be warehousing and servicing of agricultural machinery, rather than heavy manufacturing or similar activities that may generate significant noise and vibration. This is in line with the BLIZ purpose and permitted activities; and
- Any future buildings that establish on or near the boundary with Heights Park Cemetery are likely to face away from the cemetery, with noise directed across the PPC land rather than the cemetery site.

The PPC is in line with the Structure Plan which anticipates BLIZ for the land. The Indicative Masterplan also demonstrates a form of development that that concerns raised by the Cemetery Services will be adequately addressed.

6.4.3. Healthy Waters ('**HW**')

Consultation with HW has been ongoing throughout the development of the PPC. A meeting was held on 11 December 2020, at which HW advised that the PPC land must be treated as a greenfield

site under the NDC and therefore must meet Schedule 4 of the NDC. Healthy Waters recommended that the applicant use HW's flood model as a basis for future modelling.

A second meeting was held on 17 May 2023 to receive feedback on the PPC and draft SMP. Following this meeting, HW advised that the discharge of stormwater from existing private assets (culvert underneath SH22 held by Waka Kotahi) are not authorised under the Regionwide NDC because as set out Advice Note 1(f) of the NDC: "Private network discharges and any associated stormwater infrastructure that directly connect to a stormwater network that is not owned and operated by the Auckland Council, and/or are not subsequently vested to the Auckland Council" are not authorised under the NDC. As such, HW have advised that future discharges from the existing outfall cannot be authorised under the NDC, and that a private discharge consent under Chapter E8 of the AUP:OP will be required at the time of development.

In addition, HW sought greater detail on the selection of proprietary devices and confirmation of groundwater infiltration rates to inform retention of stormwater to ground. In response, the SMP was updated to specify performance criteria for future devices. Further geotechnical investigations have also been undertaken to confirm ground infiltration rates, attached as **Appendix 6A** to this request.

The PPC documentation was lodged with Council in July 2023 and we have engaged in an interactive process of clause 23 RFIs , responses and meetings from the HW team. This included the provision of a revised SMP to address the matters raised by HW, which included an updated approach to stormwater management of existing and new impervious areas, and additional information to confirm flow rates for the underground pipe, effects on the upstream and downstream catchment, and hydrograph to show exit at the NZTA culvert.

A further revised SMP was sent to HW for review with final feedback received in October 2024. This included discussion on reversing the position on the applicability of the NDC, reinstating the wetland and storage pond management devices, addressing flood displacement, and confirming that a number of the matters were details that could be resolved as part of future resource consent processes once detailed design was known. Woods have since updated the SMP to its final version (18 October 2024) attached as **Appendix 8** to this PPC request.

6.5. Watercare Services Limited ('**WSL**')

A meeting was held with representatives of WSL in December 2022 in respect of wastewater and water supply servicing of the PPC land. WSL did not express any concerns with the approach to wastewater and water servicing of the PPC land. In April 2023, WSL provided an update of the progress on key network improvements relevant to the PPC including proposed resilience improvements to water supply and the Isabella Drive wastewater pump station.

WSL advised in 2022 and 2023 that whilst the existing watermain extending along SH22 can cater for future development, a resilience option would be required to service the PPC land. This resilience improvement to watermains is planned for late 2025 / early 2026. At the time, WSL did not express any fundamental concerns with relying on the private bore currently servicing the PPC land as an interim solution.

In relation to wastewater, WSL advised that the current public network is at capacity until the Isabella Pump Station is completed. An existing onsite wastewater pump solution which has capacity will be used in the interim until which point Isabella PS comes online. In July 2024, Council advised that the Isabella Pump Station timing would be delayed from 2025 until 2028. The applicant has had further discussions and correspondence with WSL since receiving that advice, the outcome of which is that in terms of utilising the existing onsite pump station until the Isabella

Pump Station came online, WSL confirmed it had no objections to this in principle, assuming there is no increased discharge into the network as to what is currently happening.

The applicant has also discussed WSL's policy position that it generally does not support out of sequence development that impacts WSL's ability to deliver its planned infrastructure programme. As outlined throughout this report and in supporting expert reports, the PPC will not impact WSL's ability to deliver their planned infrastructure programme.

6.6. Franklin Local Board

The Franklin Local Board was briefed on the PPC at a meeting on 28 March 2023. The Franklin Local Board did not express any fundamental concerns with the PPC, with the key matters raised relating to stormwater management and water quality, flooding, access and traffic. An assessment of the PPC against the Franklin Local Board Plan is provided in section 8.12 of this report.

7. Statutory Framework

7.1. RMA

The relevant provisions of the RMA that require consideration for a PPC request are set out in the sections below.

7.1.1. Part 2

An assessment of the PPC against Part 2 is provided at Section 11 of this report in relation to an evaluation of the PPC objectives under Section 32(1)(a).

- Section 5 of the RMA sets out the purpose of the Act, which is to promote the sustainable management of natural and physical resources.
- Section 6 of the RMA sets out matters of national importance that decision-makers must recognise and provide for.
- Section 7 of the RMA sets out other matters that decision-makers must have particular regard to.
- Section 8 of the RMA requires decision-makers to take into account the principles of the Treaty of Waitangi (Te Tiritiri o Waitangi).

7.1.2. Section 32

Section 32 of the RMA sets out the requirements for preparing and publishing evaluation reports under the Act. An evaluation of the PPC against Section 32 of the RMA is presented at section 11 of this report.

7.1.3. Part 5

Part 5 of the RMA sets out the framework and hierarchy of standards, policy statements and plans under the Act. The relevant considerations for this PPC are as follows:

- Section 72 sets out the purpose of district plans, which is to assist territorial authorities to carry out their functions in order to achieve the purpose of the Act, which is outlined under Section 31 of the RMA.

- Section 73 relates to the preparation and change of district plans. Section 74(1) sets out that a district plan can be changed in the manner set out in the relevant part of Schedule 1 (refer to section 7.1.4 below).
- Section 74 sets out the matters to be considered in the preparation and change of district plans. Section 74(1) outlines that changes to district plans must be undertaken in accordance with the provisions of Part 2, the obligation to prepare evaluation reports under Section 32, and any national policy statement, New Zealand coastal policy statement and national planning standards. An assessment against the relevant national policy framework is provided at section 8 of this report and a Section 32 analysis is provided at section 11 of this report.
- Section 75 sets out the contents of district plans. Of relevance to this PPC request, Section 75(3) establishes that a district plan must give effect to:
    - any national policy statement;
    - any New Zealand coastal policy statement;
    - a national planning standard; and
    - any regional policy statement.
- Section 75(4) states that a district plan must not be inconsistent with a water conservation order, a regional plan or any matter specified in Section 30(1).

7.1.4. Schedule 1

Part 2 of Schedule 1 to the RMA sets out the relevant requirements for plan change requests:

- Clause 21(1) of Schedule 1 to the RMA sets out that any person may request a change to a district plan or a regional plan (including a regional coastal plan).
- Clause 22(1) establishes that any plan change request must be in writing, and must explain the purpose of, and reasons for, the proposed plan or change to a policy statement or plan and contain an evaluation report prepared in accordance with Section 32 for the proposed plan or change. A Section 32 evaluation is provided at section 11 of this report.
- Clause 22(2) requires that, where adverse effects are anticipated, the request must describe those effects, taking into account Clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan. An assessment of environmental effects is provided at section 10 of this report.
- Clause 23 sets out that a local authority may request further information to enable better understanding of the PPC request and Clause 24 enables the PPC request to be modified. In this case, several Clause 23 requests have been received by the applicant principally in relation to ecology, transportation and stormwater management matters. These have been responded to in detail over the course of several months. The package of information included with this revised PPC request includes the requested information in the updated reporting supporting the PPC request in line with Clause 24.

- Clause 25 sets out the directives for a local authority to consider a request and whether to accept or adopt the PPC the request. A full consideration of this Clause is set out in section 4.3 of this report.

8. Policy Context

8.1. National Policy Statement on Urban Development 2020 ('**NPS-UD**')

The NPS-UD came into effect on 20 August 2020 and was updated in May 2022. It sets an overarching purpose of providing for well-functioning urban environments. Auckland Council is classified as a Tier 1 urban environment which is the highest order urban environment with the greatest capacity for growth. The NPS-UD directs Councils to provide sufficient capacity for housing and business land, be responsive to proposals that are not in sequence with planned land release, and consider infrastructure readiness in the short, medium and long term.

8.1.1. Well-Functioning Urban Environment

Policy 1 of the NPS-UD sets out the overarching purpose of achieving a well-functioning urban environment as follows:

a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

e) support reductions in greenhouse gas emissions; and

f) are resilient to the likely current and future effects of climate change.

Given this framework, it is considered that the PPC will positively contribute to a well-functioning environment for the following key reasons:

- The PPC will provide for light industrial land use on a site that has in part long been used for rural service activities and in an area that is anticipated for light industrial land use by the Structure Plan. Located within Area E of the Structure Plan, the land has been identified for BLIZ zoning due to the existing rural business operations in the area, proximity to rail and road routes, and consideration of natural hazards;
- With a 5.35ha site size, the PPC land provides for small and medium scale industrial activities, contributing to a variety of sites suitable for different business sectors in the Pukekohe district. The PPC land is currently occupied by a tractor machinery sales business and warehousing to service the rural community. The Masterplan anticipates a similar offer on the remainder of the undeveloped PPC land;
- The proposed rezoning from FUZ to BLIZ enables more businesses in an area with high demand for light industrial activities. This is set out further in section 10.8 of this report, which describes the current and anticipated future demand for light industrial

activities within Southern Auckland. This PPC also addresses Objective 3 of the NPS-UD which addresses high demand for business land;

- The location of BLIZ close to a main transport route (SH22) and logistics services at Pukekohe provides good accessibility for movement of freight which is an essential consideration for business zoned land;
- Whilst the PPC land is located on the outskirts of Pukekohe and not currently well-serviced by public transport stops within a viable walking distance of the site, improvements are planned proximate to the PPC land including the Paerata Train Station, and a strategic walking and cycling corridor along SH22 is adjacent to the PPC land boundary. As the wider area builds out, it is anticipated that public transport options and services will improve. Discussion on these matters is set out further in section 10.1 of this report;
- Providing additional BLIZ in the Pukekohe – Paerata community will create more locally based jobs for the local population. This will assist in providing more employment opportunities close to home rather than requiring people to commute out of the area for work. Overtime it is anticipated that the future road upgrades, public transport infrastructure and strategic active mode links will provide additional modal choice to the PPC land. Together, these will contribute to a reduction in greenhouse gas emissions; and
- The PPC land is identified as BLIZ in the Structure Plan which has been subject to a comprehensive and integrated planning process to determine suitability for urbanisation. Whilst there are natural hazards identified on the PPC land (flood plain), the development can be accommodated on the PPC land without exacerbating flood risk and effects within the PPC land and beyond the PPC land boundaries. The SMP has considered climate change in the modelling undertaken and developed resilience into the PPC request utilising a 3.8^{o}C climate change factor. This PPC also addresses Objective 8 of the NPS-UD which addresses greenhouse gas emissions and climate change.

Overall, it is considered that the PPC will contribute to a well-functioning urban environment. The development supports the anticipated land use for the PPC land, gives effect to the comprehensively developed Structure Plan, provides for development capacity of business land, addresses accessibility, supports reductions to greenhouse gas emissions, and builds in climate change resilience.

8.1.2. Development Capacity

With respect to business and employment, the NPS-UD contains objectives, policies and further provisions relevant to the PPC request:

Policy 2: *Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

3.3 Sufficient development capacity for business land

Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet the expected demand for business land:

(a) from different business sectors; and

(b) in the short term, medium term, and long term.

(c) In order to be sufficient to meet expected demand for business land, the development capacity provided must be:

i. plan-enabled (see clause 3.4(1)); and

ii. infrastructure-ready (see clause 3.4(3)); and

iii. suitable (as described in clause 3.29(2)) to meet the demands of different business sectors (as described in clause 3.28(3)); and

iv. for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22)

With respect to Policy 2 and Clause 3.3, the proposal provides additional development capacity to meet business land supply demands. The PPC land is infrastructure-ready as it has existing development infrastructure in place to support proposed BLIZ landuse. It can be serviced by the existing transport network as outlined in section 10.1 of this report, and is serviced by existing and planned water and wastewater infrastructure, as set out in section 10.2 of this report. The PPC land is also suitable in terms of the Clause 3.29(2) of the NPS-UD which defers definition of suitability to local authorities, but requires consideration of location and site size. The PPC land is ideally located for industrial activity, being located adjacent to existing and planned strategic transport networks and future business land activities as indicated on the Structure Plan. The site size is suitable to support small to medium-scale industrial tenancies providing business land choice and in a market where business land demand is high, including those activities already operating within the PPC land.

8.1.3. Plan Responsiveness

One of the key changes brought about by the NPS-UD has been the requirement for decision makers to be responsive to plan change requests (Objective 6), even where these may be ahead of planned land release. In this case, the land is zoned FUZ and is intended to come online for development in 2023 as anticipated by the Structure Plan. The FDS recognises Pukekohe as the southern rural node for Auckland and growth in anticipated within this node, but has expanded the timeframe for development through to 2040 for Pukekohe North West which includes the PPC land. The following key objectives and policies are of particular importance to the consideration of this PPC (emphasis added).

Objective 6 seeks to ensure that when assessing applications on a case-by-case basis that the big picture is taken into account. Proposals should be considered on their merits with respect to integration with infrastructure planning, the relevant strategic planning framework, and whether they would contribute to significant development capacity.

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

(c) responsive, particularly in relation to proposals that would supply significant development capacity.

Policy 6 asks that particular regard is had to several key matters. In this case, decision making on the merits of the PPC should have regard to the FDS, the actual and potential effects on amenity values, whether a well-functioning urban environment will be achieved, whether the BLIZ will contribute to development capacity, and lastly have regard to climate change.

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and

(ii) are not, of themselves, an adverse effect

(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity

(e) the likely current and future effects of climate change.

Policy 8 asks that Councils consider the merits of plan changes that add significantly to development capacity and contribute to well-functioning urban environments despite not being anticipated by the existing planning framework or the timing of delivery is out of sequence.

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:*

(a) unanticipated by RMA planning documents; or

(b) out-of-sequence with planned land release.

Turning now to the PPC request and the merits of the proposal given the policy framework outlined above. Whilst in sync with the planned infrastructure and sequencing of the Structure Plan, the recently adopted FDS (August 2023) has amended the timing of the Pukekohe North West area delivery through to 2040. Both the NPS-UD and FDS recognise that land can be brought online sooner than planned, provided a well-functioning urban environment and infrastructure capacity can be achieved.

As demonstrated in section 8.1.1 above, the PPC will contribute to a well-functioning environment. The economic reporting confirms that there is a shortfall in business land supply in the area, and the delivery of BLIZ land will contribute to supply in the district creating local employment opportunities and reducing travel distances. The PPC will ensure that the necessary infrastructure solutions are in place to service wastewater, water and stormwater and expert reporting confirms that the transportation network has capacity to service the development. Therefore, the PPC will positively contribute to the Pukekohe North West area without impacting the infrastructure capacity and funding models of the wider area.

Turning now to the matter of significant capacity as the PPC relates to a relatively small land holding (5.39ha). In this context, it is considered that while the PPC will make a small land contribution to capacity, it will provide an important supply offer in the form of light industrial land (rather than large business land holdings), particularly to provide for smaller business tenancy options to support the local rural sector. Objective 6 calls for Council to be responsive to urban development, particularly in relation to proposals that would supply significant development capacity. However, it is noted that the NPS-UD does not preclude smaller proposals from being

considered on their merits. In this case, the PPC land could support a number of smaller businesses contributing to the rural service sector.

8.1.4. Treaty of Waitangi

Objective 5 requires planning decisions relating to urban environments take into account the principles of the Treaty of Waitangi and Te Tiriti o Waitangi. In this case, engagement with iwi has been sought with respect to the PPC, with local iwi Ngāti Tamaoho indicating an interest and providing input into the development of the PPC. As noted in 3.7 of this report, the PPC land is not identified as being subject to any sites of significance to mana whenua.

8.1.5. Summary

Overall, the PPC request is considered to give effect to the objectives and policies of the NPS-UD. The PPC request is considered to give effect to the policy directives set out by the NPS-UD.

8.2. National Policy Statement on Freshwater Management 2020 ('**NPSFM**')

The NPS-FM came into effect on 3 September 2020 and was updated in February 2023. It relies on the fundamental concept of Te Mana o te Wai, which refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment.

The NPS-FM has the overarching objective of managing natural physical resources in a way that prioritises firstly, the health and well-being of water bodies and freshwater ecosystems, secondly the health and needs of people (such as drinking water), and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

The PPC request is considered to give effect to the NPS-FM policy framework. The PPC provides for a whole of catchment approach to stormwater treatment in order mitigate adverse effects on the hydrology and quality of freshwater (Policy 3). This is outlined in section 10.5 of this report. The stormwater approach relies on flood modelling based on the entire catchment, and takes into account the best available data with respect to climate change, including adopting a precautionary warming scenario of 3.8°C (Policy 3 & 4). A suite of stormwater quality and hydrology and flooding mitigations are proposed in order to manage the effects of increased impervious coverage on the surrounding area.

The SMP also recognises the importance of High-Use aquifers present underneath the PPC land and proposed retention function via infiltration to ensure there are no adverse effects caused by the increase in impervious surfaces proposed by the PPC.

As set out in section 6.1 of this report, iwi groups recognised as having mana whenua in this area were consulted on the PPC, and engagement with Ngāti Tamaoho has been ongoing during the preparation of the PPC (Policy 2). In particular, Ngāti Tamaoho have reviewed the SMP supporting the application and have not raised any fundamental concerns, noting their support for rainwater re-use from roofs, which is proposed to be implemented where there is sufficient water demand.

With respect to Policies 6 – 10, there are no wetlands, rivers or streams identified on the PPC land, as set out in section 10.6 of this report, and therefore the PPC request will not result in the loss of the extent of these waterbodies. The stormwater network from the PPC land diverts to a culvert under SH22 which discharges into an upper catchment of the Whangapouri Stream. As such, water quality treatment will be employed to improve the quality of stormwater discharging from the PPC land.

Overall, the PPC request is considered to give effect to the NPS-FM.

8.3. New Zealand Coastal Policy Statement 2010 ('**NPCPS**')

The NZCPS sets out the high-level policy framework for protection, management and consideration of the coastal environment from activities and land use. While the PPC land is not within close proximity to the direct coastal environment, the effects of land use on water quality and sediment discharge are relevant matters under the NZCPS and discharges from the PPC land will flow into the upper reaches of the Whangapouri Stream which the continues on into the Manukau Harbour.

As discussed in the SMP, best practice stormwater management will be adopted for the PPC land. Water quality for existing roof areas will be re-used, and any new or redeveloped roofs will be constructed with inert roofing. A stormwater basin will be used to meet hydrology mitigation and provide further water quality enhancement. The SMAF 1 overlay is also proposed for the land for stream hydrology purposes. Together, these measures will ensure that any potential effects on the coastal receiving environment are avoided or mitigated.

8.4. National Policy Statement for Highly Productive Land 2022 ('**NPS-HPL**')

The NPS-HPL does not apply to existing urban areas and land that Councils have identified as future urban zones in district plans.

8.5. National Policy Statement for Indigenous Biodiversity 2023 ('**NPS-IB**')

The NPS-IB directs the protection, maintenance and restoration of indigenous biodiversity of land in New Zealand with the overarching objective to ensure there is no further net loss of biodiversity into the future.

In this case, the PPC land is small in area (5.39ha) and located within an existing rural context. The eastern portion of the PPC land is currently utilised by rural business activities, with the western position occupied by a residential dwelling and recently cleared pasture. The land has been assessed for ecological value by RMA Ecology who determined that the PPC land has very low / nil value to indigenous habitat and ecology. The PPC land does not support native vegetation, bats or lizards, with the exception of a few trees located centrally on site and surrounded by hardstand. Further, the Structure Plan and AUP:OP have not noted any particular ecological value associated with the PPC land.

Overall, the PPC will not trigger the thresholds for adverse effects on non-SNA habitat for indigenous biodiversity and no action is required to minimise, remedy, offset or compensate for any potential indigenous biodiversity that may use the PPC land.

8.6. Regional Policy Statement ('**RPS**') & Regional Plans

Section 75(3) requires a district plan to give effect to any regional policy statement. Section 75(4) states that a district plan must not be inconsistent with a regional plan for any matters specified in Section 30(1). The AUP:OP is a combined document which contains the RPS, Regional Coastal Plan, Regional Plan and District Plan.

The RPS sets out the issues of regional significance for the Auckland Region and the overarching policy direction to address these issues. A comprehensive assessment of the PPC against the key objectives and policies of the RPS is provided at **Appendix 2** to this report.

By way of summary, the PPC gives effect to the RPS with key conclusions as follows:

- **B2 Urban growth and form:** The PPC land is within the RUB, is zoned FUZ, and subject to a Structure Plan that identifies the future use of the site for light industrial land use. Rezoning the PPC land to BLIZ will contribute to light industrial land supply in an area where there is existing and future demand. The PPC request supports a quality compact urban form by enabling industrial activities to establish and operate within the RUB, in a location integrated with current and future urban activities, planned public and active transport, and existing and planned infrastructure. The proposal manages conflicts between incompatible activities, as the PPC land is well separated from existing and future residential activities sensitive to the effects of light industrial activities
- **B3 Infrastructure:** The adverse effects of infrastructure will be avoided, remedied or mitigated, as the site can be serviced by existing and/or proposed transport, water, wastewater and stormwater infrastructure. The existing NZTA road widening designation which applies to the SH22 boundary will be retained. The location of the adjacent SH22 corridor will contribute positively to the business uses proposed by readily facilitating freight movement to and from the PPC land.
- **B6 Mana whenua:** Mana whenua identified has having an interest in this area have been provided an opportunity to engage in the PPC preparation process. Ngāti Tamaoho have provided recommendations to the PPC, largely relating to addressing water quality and hydrology. Their feedback has been adapted into the PPC.
- **B7 Natural resources:** The PPC land has very low indigenous biodiversity value. Water from the site discharges to the upper catchment of the Whangapouri Stream. It is proposed to apply the SMAF-1 overlay control to the PPC extent and a SMP has been developed to demonstrate how stormwater management and flood risk can be addressed. It is proposed to address stormwater quality through the use of proprietary devices (e.g. wetland) and flows through flood storage options. This will ensure that streams are protected through storm events and that water quality departing the site through the discharge point at Paerata Road has been treated.
- **B10 Natural hazards and climate change:** The SMP supporting the PPC request demonstrates that the adverse stormwater and flood risk effects of future development will be avoided, remedied and mitigated with no flooding occurring downstream or upstream as a result of the PPC request. Climate change resilience has been built into the flood modelling.

It is proposed to adopt the Regional Plan rules as part of the PPC request. Of particular relevance to the PPC are those rules relating to E8 Stormwater discharge and diversion, E9 High contaminant generating carparks and high use roads, E10 Stormwater management area – Flow 1 and Flow 2, and E36 Natural hazards and flooding. The SMP (**Appendix 8**) has addressed the application of these provisions at a broad level. Any future development enabled by the proposed BLIZ zoning will be subject to the SMAF-1 overlay and will require assessment against the regional rules. Therefore, the PPC is not inconsistent with the Regional Plan.

9. Strategic Documents

Section 74(2)(b)(i) requires that Council, when changing a District Plan, to have regard to any management plans and strategies prepared under other Acts. An assessment of various documents is provided in the following sections.

9.1. Auckland Plan 2050

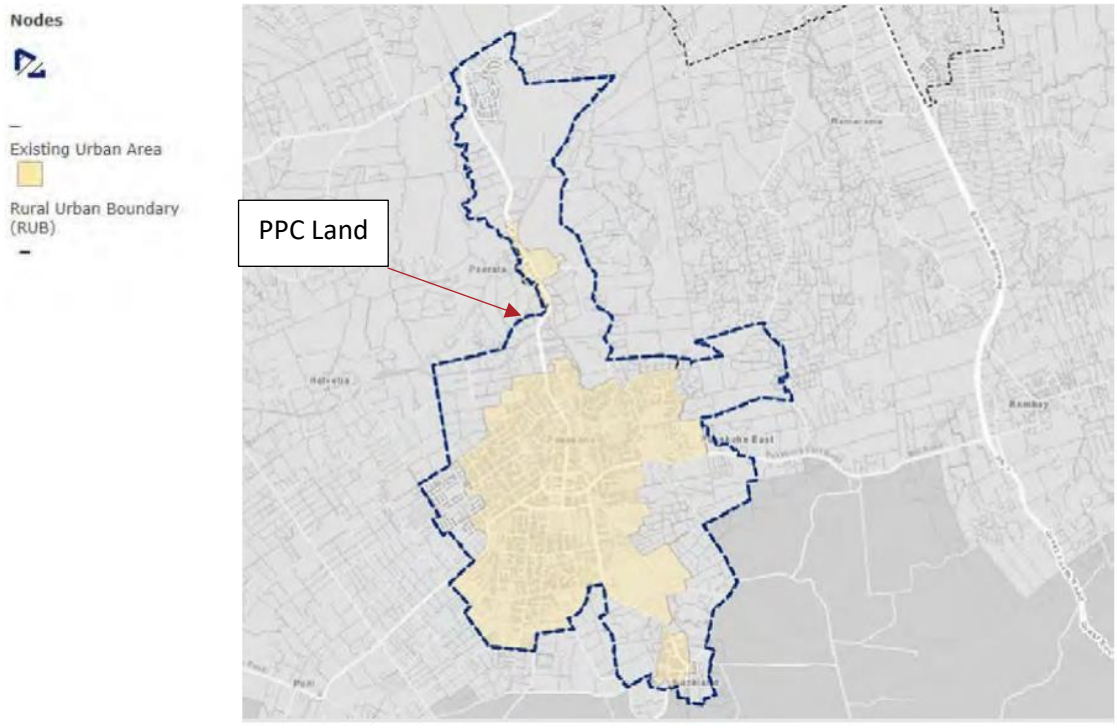
The Auckland Plan 2050 is the long-term spatial plan for Auckland and sets an overarching direction for the region for future growth and development. By way of background, at the time of lodging this PPC with Council in July 2023, the Auckland Plan was the relevant document for consideration and informed the development of this PPC. The Auckland Plan identified the PPC land as an Indicative Future Business Area. The proposed development timing, including infrastructure, for this area in the Auckland Plan indicated Decade One 2023 -2027 for the Pukekohe area. This document has now been superseded by the FDS.

9.2. Auckland Future Development Strategy 2023-2053 ('FDS')

The NPS-UD requires that Council have regard to the FDS when changing the AUP:OP. The purpose of FDS is to promote integrated, long-term strategic planning to help the Council set the high-level vision for accommodating urban growth over the long term and identify strategic priorities to inform other development-related decisions in Auckland. It aims to achieve well-functioning urban environments, ensure there is sufficient development capacity, and integrate planning and infrastructure planning and funding.

Pukekohe is an established rural node (**Figure 20**) identified in the FDS and is a key growth node for the south. Upgrades to bulk infrastructure will be required to facilitate the anticipated growth in this area. Major transport infrastructure improvements will underpin this development.

Figure 20: FDS Pukekohe Rural Node (Source: Auckland Council)



The PPC has given regard to the FDS for the following key reasons:

- Provides for business land to meet current and future demands within Pukekohe and within existing Future Urban Areas ('**FUA**') identified as key areas for housing and business growth. Pukekohe is identified as an important rural growth centre. The PPC land is located within the Rural Node of Pukekohe, within the RUB and is subject to a Structure Plan;
- The PPC land also has a number of existing consented rural business activities operating on the site and a rezoning would support the continued use and operations of these activities which support the local rural sector;
- The underlying zoning of the PPC area is FUZ. Pursuant to the NPS-HPL this land cannot be assessed as highly productive land. Further, part of the PPC land is already in use as business/industrial activities;
- Mana whenua have been considered through early consultation and ongoing engagement;
- Supports local employment through the provision of additional business land within the Pukekohe area creating employment closer to where people live and make living close to work a long-term endeavour. This will aid in reducing vehicle trips north to Auckland / out of the district and associated greenhouse gas emissions;
- Contributes to the mix of land uses in the Pukekohe area supporting more equitable, and sustainable living;
- The PPC land is on the northern outskirts of Pukekohe Town Centre. Whilst public and active travel networks are located some distance from the PPC land, there are services within proximity. The Paerata Train Station is approximately 1km north of the PPC land, and the 394 bus route on Paerata Road has bus stops approximately 1km from the PPC land. It is expected that public transport options will become more readily accessible and available via the future growth of Pukekohe in time. This includes a future strategic walking and cycling corridor along SH22 and future public transport upgrades including Papakura to Pukekohe rail electrification and Paerata Rail Station in Decade 1;
- The PPC land can be developed without creating or worsening flooding effects upstream or downstream of the PPC land. The SMP supporting the PPC has taken into account a precautionary climate change warming scenario thereby protecting people and property from harm; and
- A FUZ zoning applies to the land. Consideration has been given to the capacity of infrastructure and stormwater management as part of this underlying AUP:OP zoning and Structure Plan process.

Infrastructure Prerequisites

The PPC broadly aligns with future urban (bulk) infrastructure prerequisites identified in Appendix 6 of the FDS for Pukekohe North-West. Provision of infrastructure prerequisites contributes to well-functioning urban environments. In the case of Pukekohe North-West, the planned infrastructure pre-requisites are addressed in the following points:

- **Pukekohe North-West Arterial**: The ITA (**Appendix 4**) confirms that traffic generation arising from the PPC can be accommodated on the existing road network whilst maintaining safe and efficient operation. A Notice of Requirement for the Pukekohe-North-West upgrade ('**NoR7'**) was notified on the 13 October 2023 as part of the Supporting Growth Alliance ('**SGA'**) work around route protection in the area. The NoR7 upgrade is located to the south of the PPC land (a new transport corridor between Helvetia Road and SH22) and it requests an extended lapse period of 20 years for implementation of the proposed designation. The designation will provide resilience for the wider Pukekohe network and will assist in directing traffic away from the town centre to the south and provides an alternative connection for all modes. Whilst the timing of the PPC will be ahead of the provision of the completed road infrastructure in the surrounding Pukekohe area, it is important to note that the arterial upgrades project is intended to service the full build out of the Pukekohe-Paerata area. The PPC is a discrete parcel of business land on the outskirts of Pukekohe and part of the land is already utilised for longstanding rural business activities. Whilst the PPC request is "ahead" of timing (notwithstanding the existing consented business operations), the ITA confirms that the Heights Road / Paerata Road intersection will continue to operate safely and efficiently, and it is appropriate for the PPC to proceed ahead of the delivery of the Pukekohe North West Arterials. The ITA has also undertaken modelling scenarios of forecast volumes with and without the Pukekohe arterial network in place in 2048 at Section 5.4.1 of that report. No additional transport infrastructure provision is required to service the PPC.
- **Isabella Drive Pump Station**: Watercare Services (WSL) have advised that the Isabella Drive Pump Station is due for completion in 2028. It is anticipated that the PPC will be operative by late 2025, with future site preparation, earthworks and construction will occur from 2026 onwards. This will broadly align with the timing of the Isabella pump station. In any case, the CIR (**Appendix 5**) confirms there is a sufficient and adequate private wastewater system available on the PPC land to service future development until reticulation becomes available.
- **New Reservoir Adams Road South**: The PPC request relates to a small site located to the far northeast of the new reservoir at Adams Road South. WSL have advised that the existing watermain extending along SH22 can cater for future development, however the resilience option relating to the planned improvements to the watermains in late 2025/26 will provide improved service. The CIR (**Appendix 5**) has confirmed that the existing private water supply (water permit) will be used in the interim if the PPC timing is earlier.

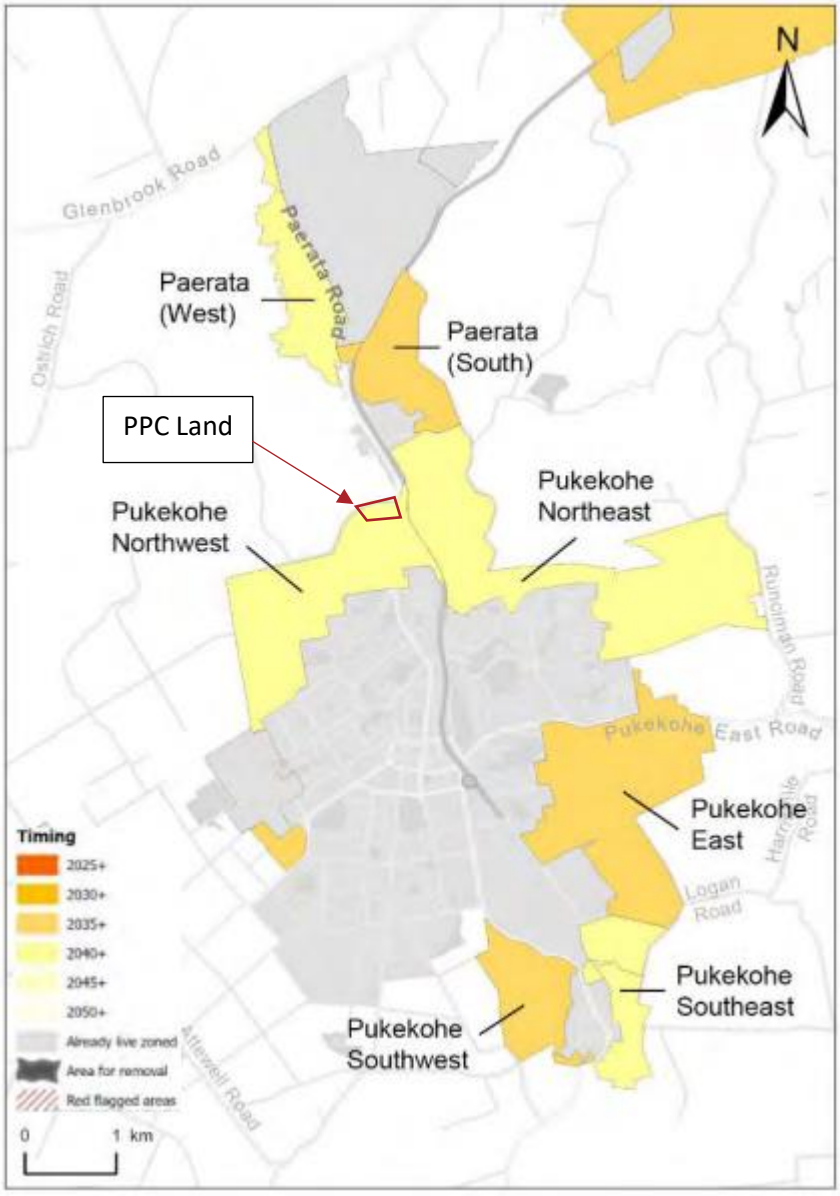
Appendix 6 to the FDS notes that responsive planning is a key principle of the NPS-UD, and Council must respond to plan change requests that add to development capacity and contribute to well-functioning urban environments, even if out of sequence with the planned release set out in the FDS. The FDS is a matter that Council is required to have regard to and the introduction of infrastructure prerequisites identified for FDAs provides direction for private developers to fund and finance infrastructure to bring the development of FUZ areas forward. Although described as infrastructure "pre-requisites" their context within the FDS and NPS-UD means that they do not constrain development and the FDS specifically addresses private plan change requests in Appendix 6 noting that alternate or new infrastructure funding tools can be identified and accepted by Council. Essentially, flexibility is enabled.

Whilst Appendix 7 of the FDS identifies a proposed timeframe of 2040+ for the Pukekohe North-West area (**Figure 21**), this timing relates to infrastructure required to support the full build-out of the future urban area. This PPC request relates to a discrete, relatively small site, part of which is already utilised for rural business activities, rather than promoting a full or substantial build-out of the Pukekohe North-West growth area. The expert reporting provided with the PPC documentation confirms that the PPC land can be adequately serviced by private infrastructure and/or timing of the PPC development will coincide with the development of planned public infrastructure in the locale (i.e. Isabella Pump Station planned for development in 2028).

Summary

Overall, the PPC land is located within the RUB, the Pukekohe rural node and FDA, is zoned FUZ and subject to a Structure Plan, and will provide an appropriate form of development for the land with respect to the growth objectives and timing of infrastructure provision in Auckland. Therefore, the PPC will be consistent with the provisions of the FDS.

Figure 21: FDS Staging and Timing for Pukekohe & Paerata FUA Cluster (Source: Auckland Council)



9.3. Future Urban Land Supply Strategy 2017 ('**FULSS**')

Prior to the adoption of the FDS, the FULSS was responsible for the sequencing of future urban land for development within Auckland. The initial PPC lodgement in July 2023 provided an assessment of the proposal against the FULSS, however, since the original lodgement date, the August 2023 FDS has replaced the FULSS.

By way of background, the PPC was considered consistent with the principles and directives of the FULSS. The PPC land was within the Pukekohe growth area, which was proposed to be development-ready by Decade One, 2nd half 2023 – 2027 with supporting infrastructure in place. Pukekohe has been identified for short to medium term grown for many years and as such, the PPC request was consistent with the sequencing set out in the FULSS.

9.4. Regional Land Transport Plan 2024 - 2034 ('**RLTP**')

The RLTP (prepared under the Land Transport Management Act 2003) sets out and prioritises the projects and services that AT, Waka Kotahi and KiwiRail propose to be funded from the National Land Transport Fund. The key policy outcomes seek to improve public transport, improve regional economic productivity, address transport safety and greenhouse gas emissions. Projects local to the PPC included in the RLTP include:

- the 4-track additional tracking of the NIMT from Westfield to Pukekohe to support capacity projections for freight and passenger service trains;
- Papakura to Pukekohe rail electrification; and
- Construction of the new train station at Paerata, including bus interchange, park and ride and connecting roads.

In addition, the RLTP proposes funding renewal and maintenance work on roads, rail and state highways to future proof these assets. Further, public transport projects are recommended for priority funding.

Together, these infrastructure upgrades will support the integrated planning of future growth in the Pukekohe Paerata area, including the Structure Plan area and PPC land. Public transport projects will offer modal choice to the area, and road (including state highway) upgrades will address safety and efficiency outcomes.

9.5. Franklin Local Board Plan 2023 ('**FLBP**')

The FLBP is a three-year strategic plan prepared under the Local Government (Auckland Council) Act 2009 which sets the aspirations and priorities for the local Franklin area through engagement with the local community. Key initiatives include climate action and the environment, positive Māori outcomes, community and people, provision of community services and facilities, and economic growth.

The objectives of relevance to the PPC include enabling and accelerating modal shift within town centres and villages, improved water quality and waterway function through intentional intervention, and the facilitation of local economic development opportunities. Transport in particular is a key consideration given the large area of the Franklin District, reliance on rural roads and the state highway network, and accessibility between centres. The FLBP seeks to advocate for the following key projects that support growth as part of its transport priority mandate:

- Pukekohe arterials and increased safety at rural intersections;

- Drury to Pukekohe link (an alternative route to SH22); and
- Drury West and Paerata arterials (access to new train stations, and improving access to surrounding areas).

Overall, the PPC supports the relevant directives of the FLBP. The PPC will ensure integration with the transport network, a SMP has been developed to consider stormwater management and quality, and the land is located in an identified area of future BLIZ in the Structure Plan. Pipeline projects relating to transport improvements will support the success of the future BLIZ on the PPC land.

10. Assessment of Effects on the Environment

In accordance with Clause 22(2) of Schedule 1 to the RMA 1991, the potential adverse effects associated with the PPC request are identified and discussed below.

10.1. Transport Effects

The PPC request is supported by an Integrated Transport Assessment ('**ITA'**) prepared by Commute Limited dated 2 August 2024, attached as **Appendix 4** to this application. The ITA has been updated to incorporate the further information requests that have arisen through the Clause 23 process (discussed in sections 6.2 and 6.3 above). The key findings of the ITA are described in the below sections and should be read in conjunction with the ITA.

10.1.1. Existing Environment

The ITA reports that existing traffic volumes on Paerata Road between Adams Drive and the SH22 end comprise an average annual daily traffic of 13,653 vehicles per day in May 2022. Based on traffic counts taken in May 2022, at the intersection of Heights Road and Paerata Road, the AM Peak comprises 1,148 vph and PM peak of 1,188 vph. It is noted that these figures were taken during the Covid 19 Protection Framework, and based on the long term data, a 3% increase over five years would have been expected (13,179vpd – 15,345vpd).

Vehicle movement surveys were undertaken at the site in October 2023. During the AM peak, 80% of trips travelled to the site from the east (SH22) and 86% departed to the east, and in the PM peak, 100% of trips originated from the east and 63% departed to the east.

An assessment of the surrounding area's safety record has been undertaken using the Crash Analysis System database for the five year period from 2017 – 2021. This assessment records 14 crashes (two serious, five minor and seven non-injury crashes), as detailed in Section 2.3 of the ITA. However, it is noted that the majority of crashes occurred before the posted speed limit reductions on both Heights Road and Paerata Road in 2020.

The PPC land currently has limited access to walkable public transport stops. Whilst the 394 bus operates along Paerata Road from Wesley College to Pukekohe Train Station, the existing nearest stop is 1km from the PPC land with no footpaths or pedestrian facilities available at this current time. It is anticipated that over time as the wider area builds out and more public services come online between Pukekohe and Paerata, that alternative transport choices will become more available and attractive for use.

10.1.2. Future Environment

The future transport network for Pukekohe and Paerata was initially set out in SGA's Indicative Strategic Transport Network for the southern area, published in 2019. Of particular relevance to the PPC land are the following:

- A new Paerata Train Station, and the upgrade and electrification of the rail line between Papakura and Pukekohe. These improvements have been funded by the NZ Upgrade Programme in 2021, and are expected to be delivered by 2024 (electrification) and 2025 (Paerata Train Station);
- The Pukekohe Arterials, which comprise four two-lane arterials forming a ring road around the Pukekohe township, connecting with SH22. The recently notified NOR7 for Pukekohe North West Arterial shows that the designation will be located further to the south of the PPC land, connecting Butcher Road and Helvetia Road rather than utilising Heights Road; and
- A new strategic walking and cycling corridor along Paerata Road / SH22.

The implementation timeframe for the Pukekohe Arterials network is unknown, with the FDS suggesting it could be in 2040+.

10.1.3. Traffic Generation Effects

To demonstrate the potential traffic generation associated with a possible BLIZ build out of the PPC land, the ITA has undertaken traffic modelling using the Indicative Masterplan as an example of a future development. The ITA estimates a total of 177-185 trips during peak hour. In terms of routing, the trips are anticipated to comprise 80% inbound and 20% outbound trips, with trip routes balanced between those from the north on Paerata Road, and those from the south/west on Heights Road.

Heavy vehicle movements have been considered by the ITA. Using the nearby industrial area of Adams Drive as an indicator, it is estimated that there will be some 12-13 heavy vehicle movements generated by the site during the peak periods.

A SIDRA intersection model has been undertaken for the Paerata Road / Heights Road intersection in both the AM and PM peak hours. A number of modelling scenarios have been considered by the ITA, including existing infrastructure with 10 years of growth, and forecast through to 2048 both with and without the Pukekohe Arterials completion. This modelling finds that the network will continue to operate well-below capacity following the complete build-out of the PPC land under the PPC provisions, with only a small delay in right-turns from Heights Road to Paerata Road occurring. With an alternative option (travel west via Heights Road) and the reduction in speed to 60km/hr, the existing intersection form is considered appropriate. As such, the extent of development enabled by the PPC request is expected to have minimal impact on the operation and efficiency of the existing intersection.

However, discrete improvements to Heights Road have been identified as being necessary to support the urbanisation of the land, as detailed in section 10.1.5 below.

10.1.4. Access and Internal Network

For the purposes of the PPC, the ITA has identified the most appropriate access points as being the existing access to Heights Road proximate to the Paerata Road intersection, and a new access to Heights Road approximately 35m from the western site boundary. Both access points would provide for two-way vehicle movement to and from Heights Road. An example of how this could

be achieved is shown on the Indicative Masterplan with the ultimate access locations to be determined at the time of development.

A new access could consolidate and replace the existing driveways currently serving 33 and 49 Heights Road. The indicative location has been selected to work with the topography of the land in order to achieve complying vehicle access and platform gradients, and to achieve sufficient sightlines for vehicle safety. A new western access point would achieve sufficient site distances for visibility to/from the road environment, and comply with NZTA's Guidelines for visibility at driveways (RTS 06), both as a local road or collector road. Whilst the existing eastern access point does not meet the RTS 06 requirements, this driveway is existing, and vehicles approaching from the east (Paerata Road) are travelling at much lower speeds, enabling vehicles to exit the site safely.

It is also noted that Paerata Road is identified by Waka Kotahi as a Limited Access Highway, and is subject to the Arterial Road control under the AUP:OP. A Waka Kotahi road widening designation also applies to the frontage of the PPC land. In the unlikely event that an access point is proposed to be established to Paerata Road, the provisions of Chapter E27 of the AUP:OP would apply, and approval from Waka Kotahi would be required.

The internal transport network is anticipated to comprise private roads and/or JOALs given the PPC land is not of a scale that supports a public network. Were subdivision to occur, internal access would require assessment as part of a future subdivision consent. The ITA has considered the AUP:OP parking and loading requirements and confirms that these can be readily met by the PPC.

10.1.5. Improvements

The ITA recommends that the following improvements to Heights Road are required to mitigate the effects of the PPC:

- Sequenced upgrading to the frontage of Heights Road (southern side) for the length of the PPC land to an urban standard, including kerb and channel, with sufficient space to accommodate a future footpath (noting no footpath is initially considered necessary as there is no destination available); and
- Shoulder widening on the northern side opposite the access points to enable through vehicles to safely pass a vehicle waiting to turn right into the PPC land.

Chapter E38 Subdivision – Urban of the AUP:OP provides a framework requiring these improvements to be delivered upon subdivision of the PPC land, with objectives and policies relating to the timely and coordinate provision of infrastructure[3] and provision of road reserves with urban frontage elements[4]. However, it is acknowledged that under a land-use led approach the AUP:OP thresholds for network improvements are limited to those under Chapter E27 Transport for high trip-generating activities[5]. These thresholds may not be reached in any single land use consent proposal given the smaller scale of industrial tenancies anticipated.

In order to provide greater certainty that an urban frontage and shoulder widening will be constructed at the time of land use development, the applicant intends to work with AT to develop a private agreement and land use covenant requiring an urban frontage to be constructed. The

[3] Objective E38.2(4)
[4] Under Policy E38.3(17)
[5] 20,000m^2 GFA for warehousing and storage, and 10,000m^2 GFA for all other industrial activities, as per Table E27.6.1.1(T9) and (T10).

urban frontage elements would at a minimum comprise kerb and channelling, sufficient berm space set aside for a footpath, berms, and street lighting to be constructed once land further along Heights Road is developed. The timing of the delivery of these improvements would be sequenced to occur as the PPC land develops, with the delivery of an urban frontage likely tied to cumulative traffic movements associated with existing and proposed industrial activities. AT have indicated that they are amenable to this mechanism being used, which is discussed further at section 6.3 of this report.

The ITA provides a comprehensive and robust assessment of the transportation related effects arising from the proposal. Overall, the adverse transport effects are avoided, remedied and mitigated.

10.2. Infrastructure Effects

The PPC request is supported by a Civil Infrastructure Report ('**CIR**') prepared by Woods dated 31 July 2024, attached as **Appendix 5** to this application. This section should be read in conjunction with the CIR.

Presently, there is no existing public wastewater network that can service the PPC land. The CIR notes that the site is serviced by a private wastewater pump station and rising main that discharges at a public gravity system adjacent to Possum Borne Reserve. Discussions with WSL have been undertaken confirming that a new pump station at Isabella Drive will be completed by 2028, which will be available to service the PPC land. In the interim, the CIR recommends that the existing private system is utilised, and notes that its lifespan can be prolonged through on-site treatment of wastewater flows, repair/rehabilitation of the existing rising main, and on-site treatment and disposal.

With respect to water supply, there is a 300mm diameter PE public network installed at the SH22 frontage of the PPC land which is currently at capacity. However, discussions held with WSL have indicated that supply issues at Pukekohe are being resolved and the public network will be able to provide for lot connections in late 2025/26 which coincides with the PPC timing. Fortunately, the PPC land is serviced by a private consented borehole working in conjunction with storage tanks. The CIR recommends that water demand from future industrial activities utilises water from this arrangement until a public connection becomes available as there is sufficient capacity within the permit requirements to service proposed development. The CIR notes that water saving measures can be implemented to comply with the consented draw down rate.

In terms of utilities, the CIR notes that gas, power and telecommunications (including fibre) networks are available to service the PPC land.

Stormwater disposal is discussed at section 10.5 of this report.

Overall, there are no infrastructure servicing issues that would preclude the ability to carry out this PPC request. Any effects on the environment can be suitably avoided, remedied or mitigated.

10.3. Geotechnical Effects

The PPC request is supported by a Geotechnical Investigation Report ('**GIR**') prepared by ENGEO dated 23 June 2023, attached as **Appendix 6** to this application. Earthworks are also addressed in the CIR at **Appendix 5**. This section should be read in conjunction with these reports.

The GIR assesses the PPC land's suitability for future light industrial development, taking into account the geotechnical hazards normally applicable to land within Auckland, including slope

instability, consolidation settlement, liquefaction and soil erosion. This assessment relies on a combination of desktop analysis and site investigations.

The GIR finds that the PPC land is generally suitable for light industrial activities, noting the following.

- The PPC land is not subject to global slope instability as the naturally occurring slopes are typically flatter than 10 degrees. However, there are areas of localised instability due to over-steepened banks, which would need to be addressed by future land development;
- The soils observed on the PPC land are stiff to very stiff cohesive soils that are unlikely to be susceptible to consolidation settlements under lightweight industrial building loads;
- There are no active faults mapped within the PPC land or immediate surrounds, so the risk of ground rupture associated with faulting is assessed to be negligible;
- A low to moderate risk of liquefaction may be expected due to the geological setting which includes cohesive volcanic soils which are not normally subject to liquefaction, underlain by young alluvial deposits which may liquefy under seismic loads. These risks can be managed by conventional mitigation measures such as limiting foundation embedment depths; and
- No obvious soil scouring at overland flow paths was observed, however evidence for uncontrolled surface water overtopping banks was observed. Future civil design should take into account the potential scouring and soil erosion effects associated with concentrations of surface water flows in high rainfall events.

The AUP:OP provides a framework of provisions that require the stability of land to be addressed both at the subdivision and land development stages. Chapter E38 Subdivision – Urban sets a framework of objectives, policies and rules that provide direction for subdivision to not increase the risks of adverse effects from natural hazards. Rule E38.4.1(A11) requires resource consent for the subdivision of land subject to land instability, and is supported by matters of discretion and assessment criteria at E38.12.1(4) and E38.12.2(4) requiring consideration of the effects of remediating the instability hazard and the effect of the hazard on the intended use.

Chapter E12 Land disturbance – District requires that "earthworks are designed and undertaken in a manner that ensures the stability and safety of surrounding land, buildings and structures"[6]. It is likely that future land development will require resource consent as a restricted discretionary under Table E12.4.1, through which a consideration of effects on the stability and safety of surrounding land will be required[7].

Furthermore, Chapter E36 Natural hazards at Policy E38.3(33) seeks to "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 achieved, otherwise to remedy or mitigate residual risks and effects to people, property and the environment resulting from those hazards". Standard E6.6.1.11 requires the construction of new buildings and structures to be supported by a geotechnical completion report or similar professional report approved by Council.

[6] Policy E12.6.3(6)
[7] Specifically, the matters of discretion at E12.8.1(1) and assessment criteria at E12.8.2(2) require consideration of whether "earthworks and any associated retaining structures are designed and located to avoid adverse effects on the stability and safety of surrounding land, buildings and structures".

The AUP:OP framework is considered to be sufficient to manage potential adverse geotechnical effects on the PPC land and surrounding land. In addition, further assessment of the detailed structural design of buildings in relation to the ground conditions will be required through future building consent processes. Overall, the adverse geotechnical and land modification effects will be avoided, remedied or mitigated.

10.4. Contamination Effects

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('**NESCS**') is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed - and if necessary the land is remediated or the contaminants contained to make the land safe for human use.

In this regard, the PPC request is supported by Preliminary Site Investigation ('**PSI**') prepared by ENGEO dated 23 June 2023, attached as **Appendix 7** to this application. The PSI assesses the likelihood that a land use from the Activities or Industries List ('**HAIL**') has occurred on-site, and identify future consenting requirements under the NESCS and Chapter E30 Contaminated land of the AUP:OP.

The PSI relies on a combination of Auckland Council property files, historic aerial photographs and a site walkover to make this assessment. The PSI finds that a number of HAIL activities currently operate or may have occurred at the PPC land, which are summarised below:

- Historical horticulture across the northern part of the PPC land (HAIL ID A10);
- Underground storage tank (10,000L) at 9 Heights Road;
- Tractor maintenance and repair, and an automotive parts shop; and
- Current and former site buildings with potential contamination associated with lead-based paints and / or asbestos.

The PSI presents a conceptual site model for the various HAIL activities, which finds that further testing of soil and fill material is required to determine whether the risk of future works on the PPC land are acceptable. As such, the PSI recommends the preparation of a Detailed Site Investigation ('**DSI**') in the areas where potential HAIL land uses have been identified, noting that this is a required of resource consenting under the NES Soils. In addition, Chapter E30 of the AUP:OP contains a suite of provisions for managing the discharge of contaminants arising from development on land subject to contamination.

Based on this advice, there are robust resource consenting frameworks for future subdivision, development and activity on land on which HAIL activities may have occurred. Sections 9 and 10 of the NES Soils require the preparation of a DSI for future soil disturbance and subdivision activities. A controlled or restricted discretionary resource consent is required for such activities, depending on whether the proposal complies with the standards at Section 7 of the NES Soils.

Overall, the adverse effects of land contamination will be avoided, remedied and mitigated.

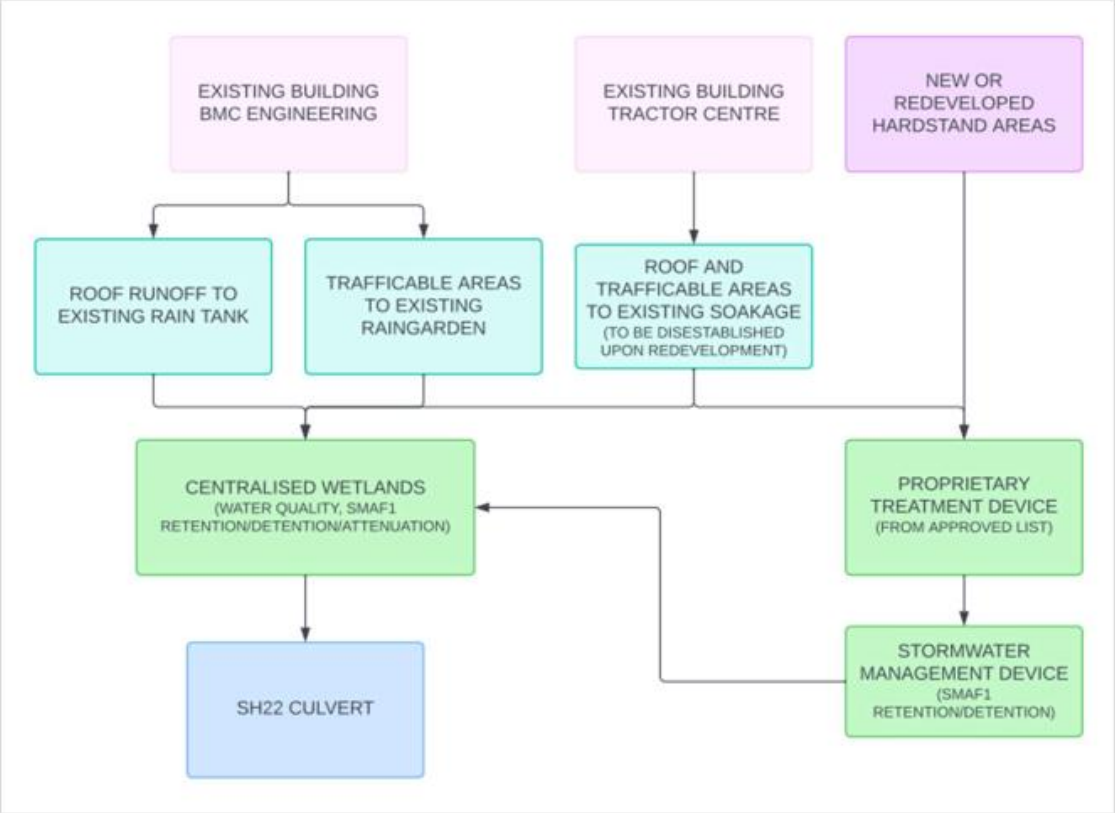
10.5. Stormwater and Flooding Effects

The PPC request is supported by a SMP prepared by Woods dated 18 October 2024, attached as **Appendix 8** to this application. The SMP has been updated since the original July 2023 PPC lodgement date to reflect the Clause 23 Healthy Waters ('**HW**') requests for further information outlined in Section 5 of the SMP. The SMP sets out the overarching approach to stormwater and

flood management on the PPC land and identify technical solutions to rezone the plan change extent to BLIZ.

The SMP has taken a flexible approach to the stormwater management solution or the PPC to address two possible scenarios. The first being retention of two existing consented buildings and development of the remainder of the site, or secondly enable the full redevelopment of the site. The proposed approach to stormwater and flooding is depicted in **Figure 22** below, and described in the below sections.

Figure 22: Proposed Stormwater Management Strategy (Source: Woods SMP)



The existing stormwater management on the property reflects the various land uses of the site over time and stormwater and flooding practices that were current when these different land uses were initiated. Recently consented development (i.e. the BMC Building) has included current best practice stormwater management techniques including a raingarden device. The development enabled by the PPC provides an opportunity for other parts of the site to be brought in line with current stormwater best practices as the PPC land is developed over time.

The stormwater management strategy for the PPC uses existing mechanisms in the AUP:OP to provide certainty that best practice stormwater management can be achieved as the site develops. In particular, in addition to the controls in the stormwater chapters (E8 and E9) of the AUP:OP the strategy proposes water quality and E10 SMAF-1 hydrology mitigation for all impervious areas within the PPC extent upon development or redevelopment.

There is no need for any bespoke stormwater management regime to be applied to PPC because as explained in the SMP, the existing SMAF-1 overlay provisions are capable of providing the required level of stormwater management and mitigation. The SMAF-1 overlay is an existing tool in the AUP:OP and one that is already used to manage stormwater in the locality, with the sites to the south and other areas of the catchment already subject to the SMAF-1 overlay. It is proposed to apply the SMAF-1 overlay to the entire PPC land extent. Inclusion in the SMAF-1 overlay will

require any future development to comply with the requirements set out in Chapter E10 of the AUP:OP. For example, new, or redevelopment of impervious areas (where greater than 50m^2), would require resource consent under the SMAF-1 Control.

10.5.1. Water Quality Treatment

The SMP seeks to minimise the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads, into sensitive receiving environments. Various devices were considered to provide for water quality treatment, including bioretention devices and proprietary devices.

Chapter E9 requires stormwater treatment for any future high contaminant generating car parks established on the PPC land. In accordance with E9.6.1.2 where stormwater is discharged to an existing authorised stormwater management device or system, treatment is required to be provided and designed in accordance with GD01, or through an alternative device providing an equivalent level of contaminant or sediment removal performance[8].

The SMP confirms that water quality treatment for all impervious areas will be achieved via a central proprietary device and wetland. Further, a set of proprietary devices that meet GD01 water quality treatment requirements is proposed to adequately address the potential contaminants of concern.

10.5.2. Water Hydrology

The SMP proposes to achieve hydrological mitigation in accordance with the SMAF-1 requirements which are comprehensively addressed in section 7.2.2 of the SMP. The AUP:OP contains a suite of provisions to enable hydrology effects to be considered at the time of development:

- Chapter E8 Stormwater – Discharge and diversion requires consent for stormwater discharge and diversion from impervious areas greater than 1,000m^2 in area[9], supported by standards requiring stormwater contaminants to be reduced or removed in accordance with the BPO[10] and assessment criteria requiring consideration of avoiding, or mitigating adverse effects, minimising stormwater flows and contaminants, minimising erosion and scour at the discharge points, and meeting relevant requirements for on-site soakage[11];
- Chapter E10 SMAF requires resource consent for the development of new or redevelopment of existing impervious areas greater than 50m^2 in area[12]. SMAF-1 standards require retention of at least 5mm runoff depth, and detention and a drain down period of 24 hours to meet a number of different technical volumes.

The SMP has confirmed that the PPC can achieve the required AUP:OP requirements. SMAF-1 retention standards can be achieved via infiltration to ground, reuse, and full detention where infiltration or reuse is not feasible. In terms of detention, calculated volumes can be held in management devices that gradually release the stored volume over a 24 hour period. In the case of the indicative masterplan, two centralised wetlands have been shown to provide an appropriate detention solution. Storage tanks could also be used as part of future detailed development

[8] E9.6.1.2(2) and E9.6.1.3(2)
[9] E8.4.1(A9) and (A10)
[10] E8.6.3.1(2)
[11] E8.7.2(1)
[12] E10.4.1(A3)

design. By way of example, the existing BMC building currently has tanks that capture roof runoff. The tanks can be retained/retrofitted to meet the SMAF-1 retention requirements.

Overall, the application of the SMAF-1 overlay to the PPC land extent will provide an appropriate planning mechanism to adequately consider and address water hydrology effects associated with any future BLIZ development. The technical analysis prepared in the SMP confirms this conclusion.

10.5.3. Flooding

The PPC land contains a flood plain and overland flowpaths. Flood modelling has been undertaken the PPC land and surrounding area and addressed in detail in section 8.3 of the SMP. This is based on the Whangapouri Catchment FHM Model provided by Council's HW and updated by Woods. This modelling was undertaken for the 10-year and 100-year Average Recurrence Interval scenarios (inclusive of 3.8°C climate change), and developed both an Existing Development and Maximum Probably Development assumptions to establish a baseline to test modelling scenarios. Afflux plots were then developed to show the flood level changes between the base MPD model and post development MPD model for the 10 and 100 year events.

The existing base model demonstrates that there is flooding within the PPC extent during the 10 year and 100 year ARI storm events. The recommended flood management options for the PPC includes flood storage attenuation. The storage pond will be designed to attenuate runoff in the 10 year and 100 year ARI storm events. The modelling finds that the proposed storage ponds will reduce flood levels between existing and post development models. Further, existing flooding levels will be reduced at the existing Tractor Centre building.

The model shows that there may be some surface flooding within the proposed JOALs/accessways in the 100 year event, but these can be resolved during detailed design in the future. Chapter E36 of the AUP:OP provides a framework for assessing future development and works within the 1 per cent AEP floodplain, by requiring resource consent for the following activities:

- Earthworks raising the ground levels more than 300mm and/or with a total fill volume greater than $10m^3$;
- All new structures and buildings and additions and alterations greater than $10m^2$ in gross floor area;
- Surface car parking areas and vehicle entry and exit points where the depth of flood waters exceeds 200mm above ground level; and
- Construction of stormwater management devices or flood mitigation works not proposed to be vested in Council.

Overall, the SMP confirms that there will be no flooding effects anticipated to arise on SH22 or any properties upstream or downstream of the PPC land as suitable flood storage attenuation devices can be accommodated within the PPC land extent to address the 10 year and 100 year ARI storm events to existing peak flow rates.

10.6. Ecological Effects

The PPC request is supported by an Ecology Report prepared by RMA Ecology dated 31 July 2024 attached as **Appendix 9** to this application. This report has been updated to reflect the Clause 23 requests for further information relating to ecology received from Council on 21 August 2023. The key findings of the Ecology Report are described in the below sections and should be read in conjunction with this report.

The Ecology Report finds that the PPC land does not support any streams, wetlands or indigenous vegetation. There are no wetlands or potentially qualifying wetlands within 100m of the PPC land, based on an examination of aerial photography and observations while on site looking for wetland plant species in the vicinity of the PPC land. Recently, several mature trees and low shrub and garden vegetation was removed from the western portion of the PPC land (both permitted and/or authorised works) which has removed remnant low value habitat area on the PPC land. A stand of some 15 trees remains on the central part of the developed hardstand and access area on the eastern portion of the PPC land.

In terms of avifauna, birds observed on the PPC land comprise common native or exotic species, with no At Risk or Threatened species of bird observed. The absence of indigenous vegetation across most of the PPC land means that there is little habitat for bird species. A Bat Survey was completed on the PPC land, and no bats were found to be using the PPC land. With respect to herpetofauna, there is no habitat for native lizards on the PPC land.

It is also noted in the Ecology Report that the removal of trees is likely to comply with the permitted activity standards of the AUP:OP.

Overall, the Ecology Report finds that the removal of all vegetation would have

- nil effects on wetlands, streams and indigenous vegetation; and
- nil or very low effect on bat habitat, lizard habitat and native bird resources.

Based on this assessment, the effects of the PPC on ecology values, particularly on streams, wetlands, indigenous flora and fauna and their habitats, are considered to be avoided, remedied or mitigated.

10.7. Landscape and Visual Effects

The PPC request is supported by a Landscape and Visual Effects Assessment ('**LVEA**') prepared by LA4 Landscape Architects dated 14 February 2023, attached as **Appendix 10** to this application. The LVEA has relied on the provisions of the BLIZ as a basis for understanding the potential landscape character and visual effects arising from the PPC.

The LVEA assesses the PPC land topography as having a south easterly slope from Heights Road, and containing and number of commercial activities supported by large storage yards, access drives and manoeuvring areas, as well as a two-storey dwelling is located at 49 Heights Road with vegetated and grassed grounds.

The surrounding environment is reported as comprising a mix of activities including rural lifestyle and commercial and glasshouse type horticulture, as well as infrastructural elements including the NIMT, the Glenbrook railway branch line and SH22. The Heights Park Cemetery located immediately to the south and west of the PPC land (primarily adjoining 49 Heights Road). This site contains burial plots, gardens, toilets, access drive and car parking areas. The cemetery is characterised by a large number of mature tree plantings located throughout the gardens.

10.7.1. Landscape Character Effects

The LVEA finds that the PPC land and surrounds exhibit relatively low landscape values and sensitivity associated with this PPC land, due to the PPC land being highly modified and lacking any significant landscape and natural character values. The report notes that "*development enabled by the PC would not introduce new elements or features that would adversely influence the*

landscape values and character of the area. There would be short term effects associated with earthworks and construction activities, however these would be for a brief duration"[13].

In addition, the LVEA notes that whilst the receiving environment currently comprises rural-residential activities, the PPC land and land to the south and west is anticipated to be urbanised under the AUP:OP and Structure Plan. Within this anticipated future environment, the PPC would have low adverse landscape effects on the PPC land and surrounding area.

Further to this assessment, it is noted that the PPC land sits within a natural basin and therefore any future development on the PPC land undertaken in accordance with BLIZ will sit within the PPC land and will not be prominent when viewed amongst the landscaped context of the wider area.

Based on this assessment, the adverse landscape and character effects of the PPC are considered to be avoided, remedied or mitigated.

10.7.2. Visual Effects

In terms of visual effects, the LVEA has assessed the effects of the potential development of the PPC land as enabled by the PPC provisions and depicted by the Indicative Masterplan. Five (5) viewpoints have been selected to represent the range of public and private views towards the PPC land. These are discussed below:

- Viewpoints 1 and 2 represent views from motorists using Paerata Road towards the PPC land. The visual effects of the PPC are considered to be **low**, given the prominence of existing business activities located within the PPC land, the utilitarian characteristics of the road network, the presence of high traffic volumes travelling road, and the nature of road users not being particularly sensitive to future development as they have only fleeting views of the PPC land;
- Viewpoint 3 is from a private property at 1173 Paerata Road, to the southeast of the PPC land. The visual effects of the PPC from this viewpoint are considered to be **low**, given the existing environment is already characterised by commercial activities and roading and rail infrastructure, and the majority of built development would be largely screened by landform and vegetation;
- Viewpoint 4 represents views from Heights Road looking in an easterly direction towards the PPC land, and encompasses the recently established shed towards the north of the PPC land, storage sheds, the NIMT railway line and embankment, rural properties beyond that, and a portion of the Heights Park Cemetery site. The visual effects of the PPC from this viewpoint are considered to be **low-moderate**. Whilst the road provides a large viewing audience, road users are unlikely to be sensitive to the effects of future development, as they have only fleeting views of portions of the PPC land. Future built elements within the PPC land will sit at a lower elevation to Heights Road, and the BLIZ requires a 2m wide front yard planted with a mixture of trees, shrubs or ground cover plants, which will assist to soften and partially screen the built development; and
- Viewpoint 5 represents views from the Heights Part Cemetery immediately south of the PPC land at 9 Heights Road, and encompasses several built elements within the

[13] para 6.14, LVEA

PPC land, including buildings, retaining walls, earthworked building platform, manoeuvring areas and storage yards. The visual effects of the PPC are considered to be **low-moderate**. Whilst the outlook from this PPC land would change noticeably from a partially developed site to a comprehensive build-out, this is not totally unexpected within the planning context of the area by the AUP:OP and Structure Plan, and adverse visual effects will be partially screened by mature tree plantings within the cemetery grounds. Sightlines to the PPC land will be limited due to the lower elevation of the PPC land in relation to the cemetery.

The visual effects of the PPC overall are considered to be low to low-moderate. With respect to viewpoints where the effects have been assessed by the LVEA as being low-moderate, we add the following:

- The NZILA Guidelines describe low-moderate effects as being "Evident visual change to the visual character of the landscape with a low to moderate level of effect in relation to landscape values and/or amenity values".
- In respect of Viewpoint 4 from Heights Road, whilst the current environment includes a peri-urban backdrop that includes rural-residential activities with large, landscaped areas, the future receiving environment to the south of the PPC land as anticipated by the AUP:OP and Structure Plan will be that of a light industrial area. This is likely to include land-extensive buildings, paved parking, loading and manoeuvring areas, storage of materials, and the roading network. Within this context, light-industrial development within the PPC land as enabled by the BLIZ will appear to be relatively unobtrusive, particularly when combined with front-yard landscaping to soften the effects of built and paved elements on the PPC land.
- In respect of Viewpoint 5 from Heights Park Cemetery, the Indicative Masterplan demonstrates that the establishment of a building alongside the southern site boundary with the cemetery could occur, which would partially screen views from the car parking area, gravestones, and footpaths within the cemetery. When combined with the existing mature plantings on the cemetery site, the adverse visual effects of the PPC on users of the cemetery site are likely to be significantly softened and screened by these features. As set out in section 6.4 of this report, the PPC has been discussed with Council's Cemetery Services team, who did not express any fundamental concerns regarding the visual effects of future development on the PPC land.

From a planning perspective, any visual changes are considered to be acceptable within the context of the changing environment from rural to urban as anticipated by the FUZ zoning, Structure Plan and other strategic planning documents. Overall, the adverse landscape and visual effects will be avoided, remedied and mitigated.

10.8. Economic Effects

The PPC request is supported by an Economic Assessment prepared by Insight Economics Limited and dated 29 August 2024, attached as **Appendix 11** to this application. This report should be read in conjunction with the effects assessment below.

The Economic Assessment assesses the rationale and need for the proposal, by summarising the findings of various reports, studies and market research. The report finds that there is significant

demand and need for industrial land within Pukekohe and Paerata. Objective 3 of the NPS-UD requires plans to enable more people to work in areas where there is high demand for business land. Prior reporting by Property Economics in 2018 identified a land supply deficit in West Franklin of 286ha by 2048; and a peer review by MRCagney concluded that 80 to 100ha of industrial land will be required in Pukekohe-Paerata within the same timeframe. On this basis, the Structure Plan identifies 100ha of industrial land to be provided within Pukekohe-Paerata.

The Economic Assessment goes on to assess research on current market demand, which finds that there is significant demand from industrial occupiers, particularly for warehousing to support online retailing and distribution. This is evidenced by low vacancy rates for industrial tenancies in South Auckland and across the region as a whole. Investor demand for industrial property is also identified due to the preference for commercial investment due to recently introduced tax settings on residential property investment.

The report finds that the PPC land is a good fit with industrial site and location criteria, drawing on criteria set out in the Structure Plan and from both a 2018 MR Cagney report and a 2011 Harrison Grierson report for Auckland Council[14]. This is because the PPC land has access to major transport routes, being SH22 and SH1, is a relatively large contiguous site that has the ability to buffer adverse effects to minimise reverse sensitivity, is visible from Paerata Road, has good proximity to planned public transport services (Paerata Rail Station), is relatively close to ports including Auckland Airport and Ports of Auckland, is close to other planned industrial land, workforce catchment and complementary business services and has access to the NIMT rail corridor.

The report identifies the likely economic effects of the proposal, which are that it:

- Meets short-term need for additional supply to demand from occupiers and investors;
- Improves the responsiveness of land supply to growth in demand over time, thereby flattening the growth in industrial land prices, and helping to control the cost of goods and services;
- Provides for direct and indirect benefits to GDP, jobs and wages through planning, design, development and buildings construction, which are estimated to total $20.6m in GDP and $11m in wages;
- Provides for ongoing employment, which is estimated to constitute permanent employment for 125 people, based on the average workspace ratio of 1 person per 100m^2 for South Auckland;
- Higher and better use of land, thereby maximising economic efficiency; and
- Requires the provision of infrastructure such as roads, water, wastewater and parks reserves. However, it is noted that all works within the PPC land will be the responsibility of the applicant, with the costs of works beyond the PPC land borne by the developer via development contributions levied on future industrial development. Infrastructure costs and risks to Council are deemed negligible.

As such, no adverse effects are anticipated in relation to economic effects, as the proposed rezoning meets short and long term demand for industrial activities, and provides economic

[14] **MR Cagney** (2018) Technical Note: Locational prerequisites for commercially successful business land and **Harrison Grierson** (2011) *Auckland Council Group 1 Business Land Assessment. A report for Auckland Council*

benefits from employment during design, development and construction and from ongoing employment on the PPC land. In summary, there will be no adverse economic effects of the PPC and overall there will be positive effects.

10.9. Mana Whenua Values

Mana whenua were consulted early on in the PPC process, with Ngāti Tamaoho taking the step to engage further in the process with hui, korero and provision of a memo outlining their key considerations with respect to cultural values.

Ngāti Tamaoho have identified the cultural landscape of Pukekohe as *"an area with historically fertile soil, important pā, and strategic maunga which all contributed to the settlement of the area. The area contained several prominent settlements include Pukekohekohe, Te Awanui, O Taikehu and many more which house some of Ngāti Tamaoho's prominent tupuna throughout history. Because of this, any proposed project must be done with respect and secure a better future for the area."*[15]

The PPC seeks to apply the SMAF-1 overlay to the PPC land to address the key cultural and sustainability recommendations of Ngāti Tamaoho. SMAF-1 will provide for water reuse, ensure best practice stormwater management principles are applied to the PPC land to avoid and mitigate effects on the receiving environment (nearby Whangapouri Stream upper catchment), and recognise the importance of the aquifers underlying the PPC land, by proposing retention function via infiltration to ensure there are no adverse effects caused by the future increase of impervious surfaces.

In addition, the PPC request will:

- Acknowledge potential for accidental discovery and need to follow due protocol. In this regard, future resource consent processes will be required for any subdivision or development of the land whereby these provisions will apply;
- The Indicative Masterplan shows that minimisation of the extent of earthworks can be achieved through the alignment of buildings with the contours of the land. Again, future resource consent processes will be required for any subdivision or development of the land and appropriate sediment and silt controls will be applied; and
- Acknowledge that the importance of indigenous flora and fauna is valued by Ngāti Tamaoho. Areas of landscaping in any future development scenarios can include indigenous vegetation to meet these kaitiaki goals.

Overall, the PPC is broadly aligned with the aspirations, cultural and kaitiaki values of Ngāti Tamaoho. In addition, engagement with mana whenua was undertaken with local mana whenua as part of the development of the Structure Plan which identifies the PPC land for future light industrial use to which this PPC is aligned. Overall, any adverse effects on mana whenua values from the PPC will be avoided, remedied and mitigated, and there will be positive effects associated with the application of SMAF-1 to the PPC land.

10.10. Positive Effects

The PPC will enable light industrial activity on the PPC land, and in particular small-scale warehousing, storage and light engineering and manufacturing activity (although a broad spectrum of industrial activities are enabled in the BLIZ). This will make a small but important

[15] Ngāti Tamaoho Memo, Appendix 13 to this PPC

contribution to meeting current and future significant demand for industrial growth, particularly by providing for smaller rural business and industrial activities that support the local agricultural sector.

There are already well established and consented rural business activities operating on the PPC land which provide an important contribution to the local rural sector. The proposed rezoning will result in a land zoning that better reflects the existing activities operating, and will enable improved site outcomes in the future through the application of the SMAF-1 controls to improve stormwater management and water quality as the site develops over time.

The PPC also provides for employment opportunities, through design, land development and construction, and through ongoing employment potential for 125 employees. In addition, the design and construction phase is anticipated to generate $20.6m in additional contributions to GDP.

By providing opportunities for local employment proximate to the established Pukekohe township as well as residential growth areas in Paerata, Drury and Opāheke, the PPC will reduce demands for travelling north to Auckland, resulting in fewer vehicle trips on SH1 and SH22. Shorter local trips will contribute to reduced greenhouse gas emissions.

There are no wetlands, streams or stands of native vegetation on the PPC land nor are there any important natural features or landscape character values identified. The PPC land has very low ecological value with no habitat of value to indigenous flora and fauna, making it an ideal site for redevelopment with future buildings and impervious surfaces.

The PPC land is able to be serviced by existing and proposed infrastructure including onsite wastewater and water capacity and devices until such point in time that planned bulk public infrastructure is delivered. Upgrades to Heights Road frontage will occur as a result of the PPC, improving access and safety to the PPC land and road network.

The applicant is motivated and ready to service the PPC land and provide for development capacity in the short term to ease pressure on business land supply in the Pukekohe area and potentially assist in reducing land and rental prices through increase in supply.

Comprehensive development of the landholding will see improvements to water quality and stormwater and flood management through the application of SMAF-1 controls, and onsite attenuation, including ponds. Amenity planting will also be implemented by future development in line with the BLIZ provisions.

The rezoning will enable the existing activities on the PPC land to reflect the existing use, and result in efficiency gains in the resource management system by avoiding the uncertainty of future resource consent processes currently the case with the FUZ zoning.

Overall, the proposal will result in positive effects on the environment.

10.11. Summary of Assessment of Environmental Effects

Based on the reporting and assessment undertaken by technical specialists, the PPC represents an appropriate use of the PPC land and will result in environmental outcomes that can reasonably be anticipated and accommodated on the PPC land.

Any adverse effects can be appropriately avoided, remedied or mitigated by the proposed provisions and supported by the findings of the expert reports appended to the application. As described above, there are also positive effects from the urbanisation of the PPC land.

11. Section 32 Assessment

The following sections of this report address the requirements of s32 of the RMA. Section 32(1), which requires an evaluation report to examine whether the objectives of the PPC are the most appropriate way to achieve the purpose of the RMA. The evaluation report must also examine the PPC against any other reasonably practical options for achieving the objectives (Section 32(1)(b)(i)); assess the efficiency and effectiveness of the provisions in achieving the objectives (Section 32(1)(b)(ii)); and provide a summary of the reasons for deciding the provisions (Section 32(1)(b)(iii)).

11.1. Objectives of the PPC

The overarching objective of the PPC is to enable the operation and expansion of light industrial activities at 9, 33 and 49 Heights Road, Pukekohe to meet current and future demand for industrial growth, consistent with the Structure Plan, whilst avoiding, remedying and mitigating adverse effects on the environment.

In addition to the above overarching objective, it is proposed that the PPC will adopt the planning framework of the AUP:OP. This will ensure that the PPC is consistent with the policy framework already in place for the wider environment and in accordance with the RMA. The key AUP:OP objectives relevant to this PPC are as follows:

Regional Policy Statement

- B2.2.1(2) Urban growth is primarily accommodated within the urban area (as identified in Appendix 1A).
- B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.
- B2.2.1(4) Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.
- B2.2.1(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.
- B3.2.1(5) Infrastructure planning and land use planning are integrated to service growth efficiently.
- B4.2.1(2) The ancestral relationships of Mana Whenua and their culture and traditions with the landscapes and natural features of Auckland are recognised and provided for.
- B7.2.1 (2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.
- B7.3.1 (3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.
- B7.4.1 (4) The adverse effects of point and non-point discharges, in particular stormwater runoff and wastewater discharges, on coastal waters, freshwater and geothermal water are minimised and existing adverse effects are progressively reduced.

- B7.4.1 (5) The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.

- B7.4.1 (6) Mana Whenua values, mātauranga and tikanga associated with coastal water, freshwater and geothermal water are recognised and provided for, including their traditional and cultural uses and values.
- B10.2.1(3) New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.
- B10.2.1 (4) The effects of climate change on natural hazards, including effects on sea level rise and on the frequency and severity of storm events, is recognised and provided for.
- B10.2.1 (5) The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.
- B10.2.1 (6) The conveyance function of overland flow paths is maintained.

Auckland-Wide Provisions

- E1.2(1) Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.
- E1.2(2) The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua.
- E1.2(3) Stormwater and wastewater networks are managed to protect public health and safety and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality.
- E2.2(1) Water in surface rivers and groundwater aquifers is available for use provided the natural values of water are maintained and established limits are not exceeded.
- E2.2(2) Water resources are managed within limits to meet current and future water needs for social, cultural and economic purposes.
- E2.2(5) Mana Whenua values including the mauri of water, are acknowledged in the allocation and use of water.
- E8 (Refer to E1 and E2 provisions above).
- E9 (Refer to E1 provisions above).
- E10.2(1) High value rivers, streams and aquatic biodiversity in identified urbanised catchments are protected from further adverse effects of stormwater runoff associated with urban development and where possible enhanced.
- E11.2(1) & E12.2(1) Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies or mitigates adverse effects on the environment.
- E15.2(1) Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.

- E27.2(1) Land use and all modes of transport are integrated in a manner that enables:
    (a) the benefits of an integrated transport network to be realised; and
    (b) the adverse effects of traffic generation on the transport network to be managed.
- E27.2(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.
- E30.2(1) The discharge of contaminants from contaminated land into air, or into water, or onto or into land are managed to protect the environment and human health and to enable land to be used for suitable activities now and in the future.
- E36.2(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.

Light Industry Zone

- H17.2(1) Light industrial activities locate and function efficiently within the zone
- H17.2(3) Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed

Future Urban Zone

- H18.2 Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes.

The list of objectives above has been selected for their particular relevance to the PPC request and the key issues requiring consideration in this application. For example, objectives relating to the BLIZ, freshwater systems, stormwater, natural hazards, transportation, subdivision and FUZ provide an overall comprehensive policy framework for the PPC request. For completeness of this assessment, where objectives have been omitted from consideration in the above list, this is either due to their irrelevance to the PPC, the higher order nature of other specific objectives, and/or the limited value of particular objectives to the material consideration of this application.

11.2. Evaluation of the Objectives against Part 2

The current objectives of the AUP:OP have been subject to robust assessment against the purpose of the RMA through the AUP:OP review process. However, having regard to the key topics above, a site-specific assessment of the objectives against Part 2 of the RMA is set out in the following sections. A broader assessment of the PPC against the objectives of the Regional Policy Statement to the AUP:OP is contained within **Appendix 2**.

11.2.1. Section 5 Purpose of the RMA

Section 5 sets out the purpose of the RMA, which broadly speaking is to promote the sustainable management of natural and physical resources. The PPC objectives will promote the sustainable management purpose contained in Section 5 of the RMA for the following key reasons:

- Provides for local employment opportunities and meets local and regional demand for industrial land capacity, in a manner that promotes economic and social well-being for people and communities, including future generations;
- Promotes economic and social well-being for people and communities by reflecting the aspirations of the Structure Plan which was developed through a thorough and robust planning process by the council with involvement from key stakeholders, mana whenua and the community;
- Promotes economic and social well-being for people and communities by providing employment opportunities within the Pukekohe catchment thereby creating choice for local people to work close to home without commuting out of the area;
- Promotes economic and social well-being for people and communities by providing for well-located business land within the FUZ and RUB and adjacent to the SH network and near to rail links and logistics operations to facilitate freight movement opportunities. Public transport options are located in the proximate area, and serviceability and route locations will improve as the area further develops over time;
- Promotes cultural wellbeing by having regard to the importance of mana whenua values associated with the cultural landscape, water quality and the receiving environment.
- Sustains the potential of physical resources as the PPC land can be adequately serviced by infrastructure, either through onsite devices and management options or connections to the public network, without adversely impacting the function and capacity of public infrastructure;
- Provides for the health and safety of people and communities by ensuring the safety and efficiency of the road network is maintained. Further, the PPC will ensure that acceptable access, parking, and bicycle facilities will be included in any future site design;
- Provides for the health and safety of people and communities by addressing natural hazards through consideration and appropriate design to address the overland flow paths and flood plain, alongside geotechnical considerations;
- Avoids, remedies or mitigates any adverse effects on the environment supports as set out in the assessment of effects in the environment in section 10. In particular:
    - water quality outcomes through best practice stormwater management by ensuring that effects on the receiving environment are avoided and the future quality of water is safeguarded;
    - Will not give rise to adverse effects on ecosystems, particularly given the existing low value habitat condition of the PPC land;
    - Ensures that effects from potentially contaminated land will be appropriately dealt with to address the health and safety of people, communities and the environment;
    - Ensuring that the anticipated future land use will not have adverse effects on the environment including amenity values of the PPC land and surrounding area.

Overall, for the above reasons it is considered that the PPC objectives will promote the sustainable management of natural and physical resources by enabling people to provide for their needs, whilst avoiding, remedying and mitigating effects on the environment.

11.2.2. Section 6 Matters of National Importance

Section 6 of the RMA sets out matters of national importance that decision-makers must recognise and provide for. The PPC objectives recognise and provide for the matters in Section 6 for the following key reasons:

- Best practice stormwater management principles will be applied, including the application of the SMAF-1 control layer to the PPC land to ensure water quality and water discharge avoids or mitigates effects on the receiving environment (Whangapouri Stream catchment) (s6(a) protection of rivers and their margins from inappropriate subdivision use and development);
- The SMP supporting the PPC demonstrates that any significant natural hazard risks in terms of s6(h) can be managed in relation to flood risk on-site without creating or worsening flood risks upstream or downstream of the PPC land by providing flood detention on the PPC land;
- The PPC land does not contain any areas of natural character, features, vegetation, habitats or landscapes that require preservation and protection in terms of s 6(b) of the RMA. The PPC land is currently utilised for rural and rural business-related activities and has low ecological and landscape character value; and
- Provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga in terms of s6(e) by having regard to the importance of mana whenua values associated with the cultural landscape, water quality and the receiving environment. In particular, best practice stormwater management and water quality approaches have been utilised to safeguard the life supporting capacity of water which has been identified as important through mana whenua engagement.

In summary, the application of the AUP:OP objectives to the PPC land will ensure that matters of national importance will be upheld. Of particular relevance to the PPC, natural hazards are able to be suitably addressed by the objectives of E1, E8, E9, E10, E11 and E36. The PPC objectives are considered to be consistent with Section 6.

11.2.3. Section 7 Other Matters

Section 7 of the RMA sets out other matters that decision-makers must have particular regard to. These include kaitiakitanga, the efficient use and development of natural and physical resources, the maintenance and enhancement of amenity values, the intrinsic values of ecosystems, maintenance and enhancement of the quality of the environment and the effects of climate change. The PPC objectives are consistent with Section 7 for the following key reasons:

- The PPC provides for an efficient use of a development ready land resource to meet demand for industrial growth on a site that is zoned FUZ and intended for light industrial use by the Structure Plan;

- Future development on the PPC land will maintain and enhance amenity values through landscaping as required by the BLIZ, and stormwater ponds as shown in the Indicative Masterplan;
- The use of stormwater devices consistent with best practice and application of SMAF-1 control overlay to the PPC land are anticipated to maintain and enhance the quality of the environment by mitigating stormwater quality and hydrology effects on the PPC land; and
- The PPC is considered resilient to the effects of climate change, particularly as flood modelling undertaken and described in the SMP is inclusive of a precautionary 3.8°C warming scenario.

11.2.4. Section 8 Treaty of Waitangi

Section 8 of the RMA directs decision-makers to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). The PPC is considered to be consistent with the principles of Te Tiriti o Waitangi.

As set out in section 6.1 of this report, the PPC has been circulated to those mana whenua groups identified as having an interest in the area. Further engagement was undertaken with Ngāti Tamaoho including a site walkover and sharing relevant specialist reports, with Ngāti Tamaoho preparing a report and recommendations on the PPC. We understand from this engagement that their key kaitiaki priorities lie particularly around water quality, natural hazards, indigenous biodiversity and sediment and erosion control. The PPC will in broad terms address the sustainability and cultural aspirations and values of mana whenua.

11.3. Assessment of the Options against the Provisions

Several practical and non-fanciful options have been put forward for consideration in this section. The options considered are retaining the status quo, application of the BLIZ, the Business Heavy Industry zone (BHIZ) and Business Mixed Use zone (BMUZ). These zonings have been selected for assessment against the provisions to best align with the anticipated business land use identified within the Structure Plan and FDS planning frameworks, and the existing uses already occurring on part of the PPC land extent, and similar business zonings within the nearby Pukekohe / Paerata area, including the Adams Road and Crown Road light industrial areas to the south and north respectively. We have also looked at whether a site-specific precinct would be a practical option to achieve the objectives.

The evaluation is required to contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal. In this case, the PPC land area is small (in comparison to many plan changes seeking live urban zoning on the periphery of urban Auckland) and the effects on the environment (as mitigated by the AUP:OP provisions) mean that the scale and significance of the PPC is low. Accordingly, we have adopted an issue focused approach for the purposes of evaluating these options against the objectives, and it is considered beneficial to group similar objectives together for the assessment tables below. These topics are:

1. Urban Growth and Land Use Development
2. Transportation
3. Infrastructure Provision and Delivery

4. Natural Hazards (flood risk, contaminated land and geotechnical constraints)
5. Natural Environment (water quality, ecosystems, and amenity values)

At the outset, it is considered that not all options are relevant to each topic and therefore a targeted assessment has been undertaken in the assessment tables below. In the case of Topic 1 Urban Growth and Land Use Development, the key issue was appropriate zoning, rather than the application of a precinct given the relative size of the PPC land extent, the existing FUZ zone and operational rural business activities, and the status of the Structure Plan. However, in the case of Topics 2 – 5, the option of site-specific precinct provisions was considered relevant given that site specific rules can be developed to address these specific topics. For example, precinct provisions relating to staging could feasibly be considered for Topic 3 Infrastructure Provision and Delivery. It is also noted that the option of a Mixed Use zone for the PPC land was considered impractical as part of the Topic 1 Urban Growth and Land Use Development s32 assessment and was not taken forward for further consideration in the subsequent Topic 2 – 5 assessments.

Section 32 requires the evaluation of the costs and benefits of the options to be quantified if possible. Where estimates of economic benefits are available these have been included but for the most part, given the options relate to the application of different planning regimes, the evaluation is necessarily qualitative.

11.3.1. Topic One: Urban Growth & Land Use Development

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3 – Heavy Industry Zone	Option 4: Mixed Use Zone
Description of Options	***This option involves retaining the FUZ and relying on a future Council-initiated plan change to rezone the land.*** The FUZ does not provide for urban activities and development prior to a plan change process being undertaken. Industrial activities are a discretionary activity in the FUZ by way of not being listed in Activity Table H18.4.1[16]. This is supported by objectives and policies that promote activities that are reliant on the productive capacity of the land or require a rural location to operate[17]. Future development within the FUZ is also required to maintain and complement rural character and amenity[18].	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control. The BLIZ is described in section 4.1 of this report.*** The application of the BLIZ would provide for the ongoing operation and expansion of industrial activities on the PPC land, through an enabling framework of zone provisions that support the efficient function of light industrial activities. Specifically, the BLIZ provides for warehousing, storage and light engineering activities anticipated on the PPC land, whilst maintaining flexibility for a range of industrial activities to establish on the site.	***This option involves rezoning the land from Future Urban to Heavy Industry and applying the SMAF – 1 Control.*** The Business – Heavy Industry Zone ('**BHIZ**') provides for industrial activities that may produce objectionable odour, dust and noise emissions. Whilst the BHIZ provides for industrial activities as permitted activities within the zone as per the BLIZ, it seeks to discourage commercial, residential and community activities sensitive to the effects of noxious industries.	***This option involves rezoning the land from FUZ to Mixed Use Zone and applying the SMAF – 1 Control.*** The Business – Mixed Use Zone ('**BMUZ**') provides for residential activity and smaller scale commercial activity, and is typically located around centres and on corridors served by public transport.
Benefits				
Environmental	Would result in fewer potential adverse environmental effects associated with proposed industrial development on the PPC land (i.e. increased impervious areas).	Gives effect to the planned and anticipated development of the FUZ land in accordance with the Structure Plan and FDS. Both these strategic documents have been developed through a robust planning process which has weighed environmental outcomes and determined that light industrial use of the land is appropriate. There are no important landscapes, features, water bodies, coastal areas or vegetated areas that require protection or enhancement. The PPC land has infrastructure capacity (either onsite or publicly available) to service the PPC and ensure adverse effects on the receiving environment are avoided or mitigated.	There are no important landscapes, features, water bodies, coastal areas or vegetated areas that require protection or enhancement. The PPC land has infrastructure capacity (either onsite or publicly available) to service the PPC and ensure adverse effects on the receiving environment are avoided or mitigated.	Enables some light industrial activities to establish, which is in accordance with the anticipated land use identified in the Structure Plan and FDS. Both these strategic documents have been developed through a robust planning process which has weighed environmental outcomes and determined that light industrial use of the land is appropriate. There are no important landscapes, features, water bodies, coastal areas or vegetated areas that require protection or enhancement. The PPC land has infrastructure capacity (either onsite or publicly available) to service the PPC and ensure adverse effects on the receiving environment are avoided or mitigated.
Economic	Would enable the ongoing operation of existing consented light industrial activities on the PPC land. FUZ provides for rural industries activities as a restricted discretionary activity, however the list of activities enabled by this definition is limited in scope.	Would enable the ongoing operation and expansion of existing light industrial activities on the PPC land in line with the plans and aspirations of the applicant who is ready and motivated to commence development. Would provide for future industrial tenancies to meet existing and anticipated demand, thereby	Would enable the ongoing operation and expansion of existing light industrial activities on the PPC land. Would assist with meeting demand for industrial activity, and provide for economic benefits to GDP and employment, similar to Option 2.	May result in increased contributions to employment and GDP relative to Options 2 & 3 by enabling greater commercial development at a higher intensity.

[16] With the exception of rural industries, which are a restricted discretionary activity under H18.4.1(A20)
[17] Objective H18.2(1) – (2) and Policy H18.3(1) – (2)
[18] Policy H18.3(3)

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3 – Heavy Industry Zone	Option 4: Mixed Use Zone
		making a contribution to reducing the cost of industrial tenancies, goods and services. Would contribute $20.6m and provide employment as a result of planning, design, land development and building construction.		
Social	Maintains the existing character and amenity values of the PPC land. Retains employment of staff for the existing operational activities.	Would provide ongoing employment for an additional 125 permanent staff. Provides certainty as to the future intended use of the land for the community.	Would provide ongoing employment for an additional 125 permanent staff. Provides certainty as to the future intended use of the land for the community.	Would result in increased housing supply and choice through the enablement of higher intensity residential development.
Cultural	Would result in fewer potential adverse environmental and cultural landscape effects associated with proposed industrial development on the PPC land (i.e. increased impervious areas).	Cultural recommendations pertaining to water quality and reuse, sediment and erosion control, and native planting can be addressed through the application of the proposed SMP provisions and AUP:OP Auckland Wide provisions.	Cultural recommendations pertaining to water quality and reuse, sediment and erosion control, and native planting can be addressed through the application of the proposed SMP provisions and AUP:OP Auckland Wide provisions.	Cultural recommendations pertaining to water quality and reuse, sediment and erosion control, and native planting can be addressed through the application of the proposed SMP provisions and AUP:OP Auckland Wide provisions.
Costs				
Environmental	The SMAF-1 control does not apply to the PPC land and thereby development is not required to be in accordance with higher order best practice water quality outcomes. Lack of industrial land capacity in the area results in increased vehicle trips outside of the Pukekohe Paerata area for employment, contributing to greenhouse gas emissions.	Relative to Option 1, this would enable a significant increase in impervious area, which if not properly managed would contribute to adverse stormwater and flooding effects without mitigation. However, these effects can be avoided, remedied and mitigated through the application of the SMAF 1 Control to the PPC land, the application of the SMP, and future discharge consent requirements.	Does not give effect to the planned and anticipated development of the FUZ land in accordance with the Structure Plan and FDS. Both these strategic documents have been developed through a robust planning process which has weighed environmental outcomes and determined that light industrial use of the land is appropriate. Relative to Option 1, this would enable a significant increase in impervious area, which would contribute to adverse stormwater and flooding effects without mitigation. However, these effects can be avoided, remedied and mitigated through the application of the SMAF 1 Control to the PPC land, the application of the SMP, and future discharge consent requirements. Would enable noxious air-discharging, noise and vibration heavy activities to locate proximate to sensitive receivers (Heights Park Cemetery and rural properties) in the short term, with further effects likely once the remaining FUZ zone area develops, which includes residential zones immediately west of the PPC land once this land becomes live zoned. The size, shape and topography of the PPC land it is not considered to be conducive to land-extensive	Does not give effect to the planned and anticipated development of the FUZ land in accordance with the Structure Plan and FDS. Both these strategic documents have been developed through a robust planning process which has weighed environmental outcomes and determined that light industrial use of the land is appropriate. Relative to Option 1, this would enable a significant increase in impervious area, which would contribute to adverse stormwater and flooding effects without mitigation. However, these effects can be avoided, remedied and mitigated through the application of the SMAF 1 Control to the PPC land, the application of the SMP, and future discharge consent requirements. Would result in higher trip generating activities in an area not yet highly serviced by public transport, leading to increased reliance on private vehicles. Higher demands for water and wastewater which may not be accommodated by existing private infrastructure.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3 – Heavy Industry Zone	Option 4: Mixed Use Zone
			industrial activity, promoted by the BHIZ which rely on large, flat sites on which to develop.	
Economic	Would delay the delivery of industrial land to meet current and anticipated demand, thereby increasing the cost of industrial tenancies, goods and services in the area. This is not in line with the policy directions on business land supply and economic growth (NPS-UD). Does not provide for local employment to support current and planned residential growth in Pukekohe and Paerata. Prevents the efficient use of land. The expert reporting confirms that the PPC land is able to accommodate light industrial activities and create employment. The applicant is ready and motivated to deliver additional light industrial land capacity.	The applicant will need to provide private funds to implement the onsite infrastructure necessary to service the development given that some aspects of the public infrastructure delivery are yet to come on line.	Would not promote smaller industrial tenancies due to large site size requirements. The applicant will need to provide private funds to implement the onsite infrastructure necessary to service the development given that some aspects of the public infrastructure delivery are yet to come on line.	Would not provide for current activities on the PPC land or the full suite of future light industrial activities on the site, and therefore would not meet current or future demand, thereby leading to secondary effects on prices of land, goods and services.
Social	Lack of employment land close to local communities (longer commute times). Lack of certainty as to the future use and timing of the release of this land.	Will change the character and amenity values of the landscape, particularly given that the immediate surrounding area will retain its FUZ zoning in the interim. However, it is noted that part of the PPC land is already utilised for light industrial activities.	Will change the character and amenity values of the landscape, particularly given that the immediate surrounding area will retain its FUZ zoning in the interim. The PPC land is not earmarked for heavy industry activity by the policy framework. The Structure Plan identifies future residential land use immediately west of the Cemetery land. There are likely to be future reverse sensitivity effects arising from the proximity of heavy industry next to potential future housing, and existing rural homesteads.	Could undermine the role, function and hierarchy of nearby centres at Pukekohe and the future centre at Paerata by promoting out-of-centre development. Potential for adverse social effects from incompatible land uses associated with intensive residential development.
Cultural	No change to cultural values.	Will result in the development of land with greater impervious surfaces and light industrial activities.	Will result in the development of land with greater impervious surfaces and industrial activities. Mana whenua have not been consulted regarding their views on whether heavy industry land would be supported.	Will result in the development of land with greater impervious surfaces, more intensive residential activities and business activities.
Efficiency and Effectiveness				
	This option is not considered to be efficient or effective, as it does not provide for industrial activities or local employment and the overarching objective of the PPC. This approach is likely to present significant challenges to obtaining resource consents for the expansion of existing industrial operations on the	This option is considered to be the most efficient and effective, as it enables industrial operations and growth on the PPC land whilst managing adverse effects; particularly stormwater, flooding and transport effects (discussed in proceeding tables). In addition, the activities enabled by the BLIZ would have acceptable adverse effects on the surrounding	This option is somewhat effective as it enables the operation and expansion of industrial activities, but is limited as it does not promote smaller tenancies, and would potentially result in greater adverse effects on the surrounding environment. The BHIZ is afforded a more enabling policy framework for air discharges involving higher levels	This option is not effective as does not provide for the full suite of light industrial activities on the PPC land to support the growth goals anticipated for the area. Further, the BMUZ will result in greater adverse effects on centres and transport networks when compared with other options.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3 – Heavy Industry Zone	Option 4: Mixed Use Zone
	PPC land and the ongoing development of the site to meet industrial demand in the area. Is inconsistent with the Structure Plan, FDS and Auckland Plan which collectively seek to enable light industrial development in this location. By awaiting a future plan change, this approach will result in more pronounced adverse economic effects on the supply of industrial land and competitive land markets, as land supply will not be as responsive to current and projected future demand. Secondary effects on the industrial land prices and the costs of goods and services that rely on light industrial operations are anticipated to arise as a result. While Option 1 will be in line with the new timeframes introduced by the FDS, the expert reporting identifies that industrial land is needed now, and the NPS-UD directs councils to be responsive to plan changes. The PPC documentation has demonstrated that the PPC land can support light industrial development, resulting in an efficient use of land and which meets the objectives.	environment. The BLIZ does not enable activities resulting in noxious air discharges, noise, and vibration, and therefore the zone is more compatible with surrounding existing and future land uses and particularly the Heights Park Cemetery and future residential land anticipated by the Structure Plan (west of the PPC land), when compared to Option 3. This option is consistent with the land use identified in the Structure Plan and the sequencing of land for development under the FULSS. The FDS released in 2023 has introduced new timeframes for urbanisation of this land, however, the PPC land can be adequately serviced by infrastructure (both private and public) to facilitate the anticipated development. The NPS-UD directs councils to be responsive to plan changes. The PPC documentation has demonstrated that the PPC land can support light industrial development, resulting in an efficient use of land and which meets the objectives.	of dust and odour under Chapter E14 of the AUP:OP compared with the BLIZ, which seeks that activities sensitive to these effects are further separated from the HIZ[19]. The BHIZ also requires larger sites to be created through subdivision in order to accommodate more land extensive activities[20]. This option would enable the ongoing operation and future development of light industrial activity on the PPC land. However, given the larger site size requirements of the BHIZ, it is unlikely to support smaller light industrial tenancies that respond to existing and future demand for such land. The size, shape and topography of the PPC land it is not considered to be conducive to land-extensive industrial activity, promoted by the BHIZ which rely on large, flat sites on which to develop. In addition, rezoning the land to BHIZ would enable noxious air discharging activities to establish adjacent to reasonably sensitive receiving environments; particularly the Heights Park Cemetery and future residential land to the west, and is not considered to be entirely compatible with the surrounding area. Further, this option is not entirely consistent with the Structure Plan and FDS, which envisages a BLIZ zoning in this location.	The BMUZ would not be an effective or efficient way of providing industrial expansion on the PPC land, as it does not provide for the full suite of industrial activities, as under Policy H13.3(9) it seeks to "*discourage activities, which have noxious, offensive, or undesirable qualities*". This is supported by a non-complying activity status for industrial activities within the BMUZ. As such, this option does not support the objective of the PPC, and will not enable the delivery of industrial land to meet current and project demand for industrial land in this region. May undermine the role and function of the nearby Pukekohe town centre and future Paerata town centre by enabling out-of-centre development. BMUZ is typically planned closer to the central core of a local centre. Further, this option is not consistent with the Structure Plan and FDS, which envisages a BLIZ zoning in this location.
Summary of Reasons				
	In summary, Option 2 is the best option for achieving the urban growth and land use development objectives of the PPC request. This involves the application of the BLIZ and SMAF-1 provisions to the PPC land. Option 2 balances the economic growth drivers, the strategic policy framework, and social, cultural and environment benefits and costs, whilst ensuring that effects on the environment are managed appropriately. This option is taken forward for assessment against the lower order topics in the proceeding tables.			

11.3.2. Topic Two: Transportation

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
Description of Options	***This option involves retaining the FUZ and relying on a future Council-initiated plan change to rezone the land.***	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control.***	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control and a Precinct Plan.***

[19] Refer to Policies D14.3(4) and (5).
[20] Under standard E38.9.2.3(1), the BLIZ requires a minimum/average net site area of 1,000m^2 / 2,000m^2, whereas the BHIZ requires a minimum/average net site area of 2,000m^2 / 5,000m^2.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
	The FUZ does not provide for urban activities and development prior to a plan change process being undertaken. Industrial activities are a discretionary activity in the FUZ by way of not being listed in Activity Table H18.4.1. Objective H18.2(3) requires that future urban development is not compromised by premature subdivision, use or development.	The application of the BLIZ would provide for the ongoing operation and expansion of industrial activities on the PPC land, through an enabling framework of zone provisions that support the efficient function of light industrial activities. Specifically, with respect to Transportation, the BLIZ option will apply the AUP:OP policy and rule framework to future development. The analysis below should be read in conjunction with the findings of the ITA.	This option looks at whether in addition to the BLIZ and SMAF-1 provisions, whether a site specific Precinct Plan is required to deliver the necessary land use objectives for the PPC land. Specifically, with respect to Transportation, Option 3 considers whether specific precinct provisions are required to address infrastructure opportunities and constraints relative to the PPC land and whether release of the land needs to be timed with the strategic road upgrades and public transport network delivery. The analysis below should be read in conjunction with the findings of the ITA.
Benefits			
Environmental	No change to the existing transportation environment of the PPC land and no additional demand generated on the network. The AUP:OP Chapter E27 Transportation provisions apply to the PPC land with respect to any future development in the FUZ.	This option supports the movement of people, goods and services by enabling light industrial activities to establish in a location proximate to the strategic transport networks of SH22, SH1 and the NIMT which important for addressing greenhouse gas emissions. It supports a quality compact urban form by enabling the development of FUZ land within the RUB and consistent with the Structure Plan and FDS. There are transport choices available with the Paerata Train Station located 1km from the PPC land, the local bus route is on SH22 (bus stop is located 1km from the PPC land), and a future walking and cycling corridor along SH22. The provisions of the AUP:OP will adequately address the transportation considerations of any future development as supported by the findings of the expert reports accompanying this application. Specifically, road access, parking, bicycling, onsite manoeuvring and trip generation effects are all considered by way of the Chapter E27 provisions.	This option supports the movement of people, goods and services by enabling light industrial activities to establish in a location proximate to the strategic transport networks of SH22, SH1 and the NIMT which is important for movement of freight efficiently and economically around the region. Minor changes to the Heights Road frontage of the property including widening the shoulder to improve safety can be incorporated into the Precinct Plan to provide certainty around safety outcomes specific to the PPC land rather than through a land covenant method. Introduction of staged development to coincide with the delivery of the Pukekohe North West Arterial (FDS prerequisite) would enable a fully planned and integrated transport network servicing the PPC land and wider Pukekohe area.
Economic	No change to the existing transportation environment of the PPC land and no additional demand generated on the network.	This option supports the movement of people, goods and services by enabling light industrial activities to establish in a location proximate to the strategic transport networks of SH22, SH1 and the NIMT which is important for movement of freight efficiently and economically around the region. The expert reporting has not identified any particular constraints on the delivery of transport outcomes on the PPC land. A road widening designation applies to the SH22 frontage of the PPC land, and this option does not preclude the delivery of any future regionally significant projects of this nature. Given the relative scale of the land holding and type of activity proposed, it is considered that the provisions of the AUP:OP will ensure that efficient onsite manoeuvring, access arrangements,	This option supports the movement of people, goods and services by enabling light industrial activities to establish in a location proximate to the strategic transport networks of SH22, SH1 and the NIMT which is important for movement of freight efficiently and economically around the region. Minor changes to the Heights Road frontage of the property including widening the shoulder to improve safety can be incorporated into the Precinct Plan to provide certainty around safety outcomes specific to the PPC land rather than through a land covenant method. These works would be delivered by the applicant. Introduction of staged development to coincide with the delivery of the Pukekohe North West Arterial (FDS prerequisite) would enable a

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		parking provision and any other facilities will be provided for in future development options. The expert reporting has confirmed that the anticipated trips from the option can be accommodated within the existing road network. Minor changes to the Heights Road frontage of the property including widening the shoulder to improve safety, can be protected through a land covenant agreement with Auckland Transport. Road upgrades adjoining the frontage would be delivered by the applicant.	fully planned and integrated transport network servicing the PPC land and wider Pukekohe area. The AUP:OP E27 provisions will ensure that efficient onsite manoeuvring, access arrangements, parking provision and any other facilities will be provided for in future development options.
Social	No change to the existing transportation environment of the PPC land and no additional demand generated on the network.	Provision of local employment opportunities provides choice to work close to home, thereby reducing trips outside of the area and relieving pressure on the SH1 network. Provides certainty as to the future intended use of the land for the community. Despite this option being able to be accommodated within the existing network, this option will be further supported by future planned and funded transport infrastructure: ▪ Paerata Train Station (due to be completed 2025) ▪ Pukekohe Arterials (ring road project to direct heavy traffic away from the Pukekohe town centre). NORs have been lodged to kick start this process. ▪ A walking and cycling corridor alongside SH22 connecting the local centres.	Provision of local employment opportunities provides choice to work close to home, thereby reducing trips outside of the area and relieving pressure on the SH1 network. Provides certainty as to the future intended use of the land for the community. Through the delay of land release to coincide with the delivery of the Pukekohe North West Arterial (FDS prerequisite) this option will provide for a fully planned and integrated transport network servicing the PPC land and wider Pukekohe area.
Cultural	No change to the existing transportation environment of the PPC land no impact on cultural values.	No change to the existing transportation environment of the PPC land no impact on cultural values.	No change to the existing transportation environment of the PPC land no impact on cultural values.
Costs			
Environmental	No costs arising from transportation matters on environmental outcomes as there is no change to the transport servicing arrangements for the PPC land.	While the expert reporting confirms that the proposed option can be readily accommodated by the existing transport network, this could be viewed as being not in line with the planned and coordinated delivery of land-use and transport planning envisaged by the FDS.	No costs arising from transportation matters on environmental outcomes from this option.
Economic	Inefficient use of land whereby expert reporting has confirmed that the development anticipated by Option 2 can be readily integrated with the existing transport network with acceptable effects on the transport network. Fails to bring land development on line sooner than anticipated to facilitate BLIZ for industrial land demand.	This option involves the urbanisation of land ahead of the planned delivery of transport infrastructure as set out in the FDS. Whilst the development will be ahead of with planned transport improvements (note that the Structure Plan timeframes do align with this option), expert reporting has confirmed that this Option can be accommodated by the existing transport network. The application of private land covenants to deliver transport improvements to Heights Road is not a preferred option for achieving planning outcomes in plan change requests. However, it is noted that	The development of precinct provisions would cost time and money to the applicant to write and develop. This would not be an efficient use of resources given that the existing provisions of the AUP:OP already adequately provide for and address the objectives of the PPC request with future consenting processes able to deliver the detailed upgrades required for Heights Road, and any access, parking, and servicing arrangements for the future activities. The expert reporting confirms that the PPC land can be readily accommodated on the existing road network. Delaying the

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		a resource consent process would be applicable for any future development of the PPC land, and the agreed improvements could readily be implemented by these mechanisms.	urbanisation of land to coincide with long timeframe roading network upgrades when the existing network is already able to facilitate additional traffic demand is uneconomic and would not provide for industrial land to come on line despite demand in the area for business land being high.
Social	Inefficient use of land which could be readily accommodated by the existing transport network in line with Option 2. Fails to bring land development online sooner than anticipated and provide employment opportunities close to local communities of Pukekohe and Paerata.	This option involves the urbanisation of land ahead of the planned delivery of transport infrastructure (Pukekohe North Werst arterial prerequisite) as set out in the FDS, despite the PPC land being able to be accommodated by the existing transport network.	Inefficient use of land which could be readily accommodated by the existing transport network in line with Option 2. Fails to bring land development on line sooner than anticipated and provide employment opportunities close to local communities of Pukekohe and Paerata.
Cultural	No costs arising from transportation matters on environmental outcomes as there is no change to the transport servicing arrangements for the PPC land.	This option involves the urbanisation of land ahead of the planned delivery of transport infrastructure (Pukekohe North Werst arterial prerequisite) as set out in the FDS, despite the PPC land being able to be accommodated by the existing transport network.	No costs arising from transportation matters on environmental outcomes as there is no change to the transport servicing arrangements for the PPC land.
Efficiency and Effectiveness			
	Having regard to the above, option 1 will not meet the objectives of the PPC. The existing rural business operations will continue, with the remainder of the PPC land used for rural or rural related activities. Any further development is required to have regard to the existing AUP:OP provisions relating to flood hazards, contaminated land and earthworks. However, the ability of additional industrial land to come online to address business land supply will not be realised, despite the expert reporting confirming that the surrounding road network can facilitate additional BLIZ development at this current time. This option will not result in the efficient use of land and is not an effective means to enable the PPC objectives as the development will need to apply for resource consents which are unlikely to issued as the FUZ zone policy framework would not support type of development anticipated by the Indicative Masterplan.	Whilst there is an argument that bringing land on line prior to the delivery of transportation infrastructure could result in an unintegrated planned environment which potentially will not achieve the goal of a well-functioning urban environment, in this case sufficient information is available via expert reporting to confirm that the surrounding road network can facilitate additional BLIZ development and the provisions of AUP:OP will ensure appropriate transportation outcomes with respect to the PPC land. This option will not generate unanticipated demand on the network infrastructure, nor preclude the ability of further transport infrastructure to be realised for the wider community. Any potential effects on the adjacent transport network can be mitigated through the upgrade of Heights Road to an urban frontage, and by installing a right-turning lane and widening the northern road shoulder. These works could be facilitated by way of a resource consent process under Chapter E27 or via a private land covenant agreement with Auckland Transport. It is also noted that the infrastructure prerequisites relating to the PPC land in the FDS – Pukekohe North West Arterial – can be overcome through the expert reporting confirming that the development can be accommodated within the existing network and that the delivery of the arterial will not be impacted by the development proposed by this Option. In terms of efficiency and effectiveness, given that the PPC land is able to facilitate the BLIZ and be supported by the existing road network	This Option has considered whether it is appropriate to apply a Precinct to the PPC land to address the release of land timed in accordance with the delivery of transport infrastructure, and whether site specific provisions are required to address the recommendations around the Heights Road frontage improvements. Given it has been demonstrated via the expert reporting that the surrounding road network can facilitate additional BLIZ development at this current time, it is considered that there is no benefit to delaying the release of land to coincide with the delivery of the Pukekohe North West Arterial transport network infrastructure. This would not reflect the efficient and effective use of land, and in particular, would unnecessarily delay the release of additional industrial land capacity in an area that is lacking business land supply and where the applicant is motivated and ready to bring land online sooner. With respect to the design changes recommended to Heights Road frontage, there are two options that can be applied to achieve these works that do not require the expense and additional layer of planning controls to achieve the same outcome. A more efficient and effective mechanism would be to apply a private land covenant to the title to reflect the agreements with Auckland Transport around these road improvements. Secondly, the existing AUP:OP provisions would also provide an appropriate mechanism to achieve these outcomes given that resource consents required under E27 (including trip generation and limited access road provisions) would necessitate consultation

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		subject to some minor changes to the road frontage of Heights Road, in our view, the most efficient use of this land is to enable the rezoning to provide for additional industrial land capacity in an area that is lacking business land supply. Overall, it is considered that the application of the BLIZ and SMAF-1, and associated AUP:OP provisions of E27, are the most efficient and effective measures to meet the objectives of the PPC relating to transportation.	and engagement with AT and NZTA whereby the same outcomes would likely be implemented. Overall, it is considered that Option 3 provides an unnecessary layer of additional planning controls to the PPC land that are already covered by the AUP:OP provisions. Therefore, a Precinct is not the most efficient and effective mechanism to deliver the infrastructure objectives of the PPC request.
Summary of Reasons			
	In summary, for the reasons outlined above, Option 2 is the best option for achieving the transportation objectives of the PPC request. This involves the application of the BLIZ and SMAF-1 provisions to the PPC land. It enables the land to be developed for future BLIZ activities, ensures that sufficient and acceptable transportation solutions are in place to service future development in a timely manner, and any effects can be appropriately managed or avoided.		

11.3.3. Topic Three: Infrastructure Provision & Delivery

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
Description of Options	***This option involves retaining the FUZ and relying on a future Council-initiated plan change to rezone the land.*** The FUZ does not provide for urban activities and development prior to a plan change process being undertaken. Industrial activities are a discretionary activity in the FUZ by way of not being listed in Activity Table H18.4.1. Objective H18.2(3) requires that future urban development is not compromised by premature subdivision, use or development.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control.*** The application of the BLIZ would provide for the ongoing operation and expansion of industrial activities on the PPC land, through an enabling framework of zone provisions that support the efficient function of light industrial activities. Specifically, with respect to Infrastructure Provision and Delivery, the BLIZ option will apply the AUP:OP policy and rule framework to future development.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control and a Precinct Plan.*** This option looks at whether in addition to the BLIZ and SMAF-1 provisions, whether a site specific Precinct Plan is required to deliver the necessary land use objectives for the PPC land. Specifically, with respect to Infrastructure Provision and Delivery, Option 3 considers whether specific precinct provisions are required to address infrastructure opportunities and constraints relative to the PPC land, including delaying the release of land until delivery of network infrastructure comes online.
Benefits			
Environmental	No change to the existing infrastructure servicing the PPC land and no additional demand generated on the network.	The expert reporting confirms that the PPC land has either existing onsite infrastructure in place (bore water, onsite wastewater device) to service the proposed BLIZ, or involves the provision of new infrastructure (i.e. attenuation ponds) to service the development. This infrastructure will not generate adverse impacts on the environment. The provisions of the AUP:OP will adequately address the infrastructural needs of any future development as supported by the findings of the expert reports accompanying this application.	The expert reporting confirms that the PPC land has either existing onsite infrastructure in place (bore water, onsite wastewater device) to service the proposed BLIZ, or involves the provision of new infrastructure (i.e. attenuation ponds) to service the development. This infrastructure will not generate adverse impacts on the environment. This proposed infrastructure servicing does not necessitate the application of specific precinct provisions for the type, location and design of this infrastructure. In terms of environmental benefits of delaying release of land until network infrastructure delivery, this will ensure a coordinated approach to the use of infrastructure in the district. Will also not have

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
			to rely on private consents and devices to deliver infrastructure and associated compliance issues that can arise.
Economic	No change to the existing infrastructure servicing the PPC land and no additional demand generated on the network.	Private infrastructure servicing (i.e. drainage and wetland storage devices) will be developed to achieve the environmental outcomes for the PPC land, including the stormwater and flood attenuation devices. There will be no costs to council to achieve this outcome. The use of private on-site devices and servicing on the PPC land does not necessitate the application of precinct provisions for the PPC land. The provisions of the AUP:OP will adequately address the infrastructural needs of any future development as supported by the findings of the expert reports accompanying this application.	The applicant will be able to tap in to the public network to deliver infrastructure solutions for the PPC land once these come on line, rather than providing site specific solutions at their own cost.
Social	No change to the existing infrastructure servicing the PPC land and no additional demand generated on the network.	The existing and proposed infrastructure will not generate demand on the network capacity that would prevent people and their communities from meeting their own infrastructure needs.	The anticipated build out and area capacity will have been built into the network infrastructure provision so that there is sufficient capacity to service future development on the PPC land along with the wider community's capacity.
Cultural	No change to the existing infrastructure servicing the PPC land and no additional demand generated on the network.	The existing and proposed infrastructure will not adversely effect water quality and downstream effects on the receiving environment. The application of the SMAF-1 provisions will enable water reuse to be facilitated on PPC land which was a key value identified through the mana whenua engagement process.	The existing and proposed infrastructure will not adversely effect water quality and downstream effects on the receiving environment. The application of the SMAF-1 provisions will enable water reuse to be facilitated on PPC land which was a key value identified through the mana whenua engagement process. The existing provisions of the AUP:OP will ensure that cultural outcomes are addressed as part of any future development stage. The network infrastructure provision will have been subject to mana whenua engagement processes as part of their development.
Costs			
Environmental	No costs to infrastructure provision and delivery on environmental outcomes as there is no change to the existing infrastructure servicing arrangement for the PPC land.	While for the most part the PPC will utilise private infrastructure solutions to facilitate the development rather than public reticulation which may be viewed as more environmentally efficient and effective, the expert reporting confirms that the proposed infrastructure solution for the PPC is acceptable and any adverse effects on environmental outcomes can be avoided or mitigated. Relies on consenting process for delivery and compliance to ensure that infrastructure is used in accordance with any consent requirements.	While the network infrastructure may be considered more environmentally efficient and effective (well-functioning urban environment), the expert reporting confirms that the proposed infrastructure solution for the PPC is acceptable and any adverse effects on environmental outcomes can be avoided or mitigated. Therefore, given that there is an acceptable and appropriate environmental infrastructure solution already available for the PPC land, this would be an inefficient use of land to delay timing to the delivery of network infrastructure.
Economic	Inefficient use of land which is already serviced by existing infrastructure and/or able to privately provided to bring land development on line sooner than anticipated to facilitate BLIZ for industrial land demand.	This option involves the urbanisation of land ahead of the planned delivery of infrastructure as set out in the FDS. Whilst the development will be ahead of planned infrastructure delivery (note that the Structure Plan timeframes do align with this option), this Option will not generate demand and capacity issues on the network	The development of precinct provisions would cost time and money to the applicant to write and develop. This would not be an efficient use of resources given that the existing consents and provisions of the AUP:OP already adequately provide for and address the objectives of the PPC request with respect to infrastructure provision. Further, the

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		infrastructure provision as the PPC land is broadly able to provide for its own infrastructure servicing.	expert reporting confirms that the proposed infrastructure solution for Option 2 is acceptable. The expert reporting confirms that the PPC land can be adequately serviced immediately. Delaying the urbanisation of land to coincide with long timeframe infrastructure when a suitable solution already exists would not provide for industrial land to come on line despite demand in the area for business land being high.
Social	Inefficient use of land which is already serviced by existing infrastructure and/or able to privately provided to bring land development on line sooner than anticipated and employment opportunities close to local communities of Pukekohe and Paerata.	This option involves the urbanisation of land ahead of the planned delivery of infrastructure as set out in the FDS, despite the applicant being able to self service the PPC land with infrastructure.	Inefficient use of land which is already serviced by existing infrastructure and/or able to privately provided to bring land development on line sooner than anticipated and employment opportunities close to local communities of Pukekohe and Paerata.
Cultural	No costs to infrastructure provision and delivery as there is no change to the existing infrastructure servicing arrangement for the PPC land.	This option involves the urbanisation of land ahead of the planned delivery of infrastructure as set out in the FDS, despite the applicant being able to self service the PPC land with infrastructure.	No costs to infrastructure provision and delivery as the PPC land land release will coincide with network infrastructure delivery.
Efficiency and Effectiveness			
	Having regard to the above, option 1 will not meet the objectives of the PPC. The existing rural business operations will continue, with the remainder of the PPC land used for rural or rural related activities. Any further development is required to have regard to the existing AUP:OP provisions relating to flood hazards, contaminated land and earthworks. However, the ability of additional industrial land to come on line to address business land supply will not be realised, despite the PPC land having adequate infrastructure capacity and servicing arrangements to facilitate additional development. This option will not result in the efficient use of land and is not an effective means to enable the PPC objectives as the development will need to apply for resource consents which are unlikely to issued as the FUZ zone policy framework would not support type of development anticipated by the Indicative Masterplan.	Whilst there is an argument that bringing land on line prior to the delivery of network infrastructure could result in an unintegrated planned environment which potentially will not achieve the goal of a well-functioning urban environment, in this case sufficient information is available to confirm that the PPC land is able to be serviced by both existing infrastructure or by way of infrastructure servicing proposed by the applicant. This option will not generate unanticipated demand on the network infrastructure, nor preclude the provision of network infrastructure for the wider community. It is also noted that the reasons for requiring the infrastructure prerequisites relating to the PPC land in the FDS – Isabella Pump Station and Adams Road reservoir – can be overcome through the specifics of this option. Namely, an existing WW system is able to service the development until the Isabella PS comes on line in 2028. Further, the proposal has a private bore water supply available. In terms of efficiency and effectiveness, given that the PPC land is able to facilitate the BLIZ, in our view, the most efficient use of this land is to enable the rezoning to provide for additional industrial land capacity in an area that is lacking business land supply. Overall, it is considered that the application of the BLIZ and SMAF-1 are the most efficient and effective measures to meet the objectives of the PPC relating to infrastructure.	Whilst there is an argument that bringing land on line prior to the delivery of network infrastructure could result in an unintegrated planned environment which potentially will not achieve the goal of a well-functioning urban environment, in this case sufficient information is available to confirm that the PPC land is able to be serviced by both existing infrastructure or by way of infrastructure servicing proposed by the applicant. This option will not generate unanticipated demand on the network infrastructure, nor preclude the provision of network infrastructure for the wider community. It is also noted that the infrastructure prerequisites relating to the PPC land in the FDS – Isabella Pump Station and Adams Road reservoir – can be overcome through the specifics of this option. Namely, an existing WW system is able to service the development until the Isabella PS comes on line in 2028. Further, the proposal has a private bore water supply available. While the expert reporting has confirmed that there are no infrastructural constraints that require specific provisions to be adopted to facilitate this option (the AUP:OP standards are sufficient), if a Precinct Plan were to be proposed, this could look at the timing of the delivery of the land use activities and development to coincide with the delivery of the network infrastructure. Given it has been demonstrated that the PPC land can adequately function with the existing and proposed infrastructure put forward in the expert reports, it is considered that there is no benefit to delaying the release of land to coincide with the delivery of the network infrastructure. This would

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
			not reflect the efficient and effective use of land, and in particular, would unnecessarily delay the released of additional industrial land capacity in an area that is lacking business land supply and where the applicant is motivated and ready to bring land online sooner. Overall, it is considered that Option 3 is not the most efficient and effective mechanism to deliver the infrastructure objectives of the PPC request.
Summary of Reasons			
	In summary, for the reasons outlined above, Option 2 is the best option for achieving the infrastructure objectives of the PPC request. This involves the application of the BLIZ and SMAF-1 provisions to the PPC land. It enables the land to be developed for future BLIZ activities, ensures that sufficient and acceptable infrastructure solutions are in place to service future development in a timely manner, and any effects can be appropriately managed or avoided.		

11.3.4. Topic Four: Natural Hazards

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
Description of Options	***This option involves retaining the FUZ and relying on a future Council-initiated plan change to rezone the land.*** The FUZ does not provide for urban activities and development prior to a plan change process being undertaken. Industrial activities are a discretionary activity in the FUZ by way of not being listed in Activity Table H18.4.1. Objective H18.2(3) requires that future urban development is not compromised by premature subdivision, use or development.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control.*** The application of the BLIZ would provide for the ongoing operation and expansion of industrial activities on the PPC land, through an enabling framework of zone provisions that support the efficient function of light industrial activities. Specifically, with respect to natural hazards, the BLIZ option will apply the AUP:OP policy and rule framework to future development and SMAF-1 controls.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control and a Precinct Plan.*** This option looks at whether in addition to the BLIZ and SMAF-1 provisions, whether a site specific Precinct Plan is required to deliver the necessary land use objectives for the PPC land. Specifically, with respect to natural hazards, Option 3 considers whether specific precinct provisions are required to address natural hazard related opportunities and constraints relative to the PPC land.
Benefits			
Environmental	No change to the existing hazards. AUP:OP provisions will apply to any future development of the PPC land.	The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. Expert reporting has confirmed that the PPC land can be developed for BLIZ and a SMP has been developed to support this. In particular, stormwater discharge arising from new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream receiving freshwater bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. Expert reporting has also confirmed that any contaminated land or Geotech constraints can be addressed by the existing provisions of the	The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. Expert reporting has confirmed that the PPC land can be developed for BLIZ and a SMP has been developed to support this. In particular, stormwater discharge arising from new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream receiving freshwater bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. Expert reporting has also confirmed that any contaminated land or Geotech constraints can be addressed by the existing provisions of the

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		AUP:OP and will not preclude future development from occurring on the PPC land.	AUP:OP and will not preclude future development from occurring on the PPC land. While there is a flood zone identified on the PPC land, this is clearly notated on the GIS and subject to the relevant provisions of the AUP:OP that address flood hazards, including Chapter E36. These provisions adequately cover the development requirements for flood hazards. Similarly, E30 and E11 and E12 address contaminated land and earthworks. For these reasons, it is not considered necessary to prepare site specific precinct provisions to address the natural hazards that are applicable to the PPC land.
Economic	No costs arising to manage or remedy any natural hazards that may be present on the PPC land (i.e. flooding). AUP:OP provisions will apply to any future development of the PPC land.	Expert reporting has confirmed that the PPC land can be developed for BLIZ despite the flood plain, contaminated land and Geotech constraints. A SMP has been developed to support this and Geotech and PSI reports prepared. Stormwater discharge arising new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons, communities and water bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. The applicant will privately fund the necessary infrastructure servicing and capacity to achieve the environmental outcomes for the PPC land, including the stormwater and flood attenuation devices.	Expert reporting has confirmed that the PPC land can be developed for BLIZ despite the flood plain, contaminated land and Geotech constraints. A SMP has been developed to support this and Geotech and PSI reports prepared. Stormwater discharge arising new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons, communities and water bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. These hazards do not necessitate the application of precinct provisions for the PPC land. The provisions of the AUP:OP will adequately address the hazards as supported by the findings of the expert reports accompanying this application.
Social	No change to existing hazards that are present on PPC land. AUP:OP provisions will apply to any future development of the PPC land.	Stormwater discharge arising new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons and communities. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. Any potential contaminated land effects will be addressed by E30 to control potential effects on the health and safety of people through the earthworks phases of future development.	Stormwater discharge arising new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons and communities. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. Any potential contaminated land effects will be addressed by E30 to control potential effects on the health and safety of people through the earthworks phases of future development. These hazards do not necessitate the application of precinct provisions for the PPC land. The provisions of the AUP:OP will adequately address the hazards as supported by the findings of the expert reports accompanying this application.
Cultural	The PPC land will retain its existing cultural values.	Water quality and reuse, and sediment and erosion control was identified as an important kaitiaki value through the mana whenua engagement process. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site and SMAF-1 provisions will apply.	Water quality and reuse, and sediment and erosion control was identified as an important kaitiaki value through the mana whenua engagement process. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site and SMAF-1 provisions will apply.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
		The application of the AUP:OP Auckland Wide controls ensures that future development is undertaken with GD-01 earthworks provisions to protect the receiving environment.	The application of the AUP:OP Auckland Wide controls ensures that future development is undertaken with GD-01 earthworks provisions to protect the receiving environment.
Costs			
Environmental	This option will not involve any natural hazard costs relating to environmental outcomes.	This option will not involve any natural hazard costs relating to environmental outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.	This option will not involve any natural hazard costs relating to environmental outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.
Economic	This option will not involve any natural hazard costs relating to economic outcomes.	The applicant will privately fund the necessary infrastructure servicing and capacity to achieve the environmental outcomes for the PPC land, including the stormwater and flood attenuation devices.	The development of precinct provisions would cost time and money to the applicant to write and develop. This would not be an efficient use of resources given that the existing provisions of the AUP:OP already adequately provide for and address the objectives of the PPC request with respect to natural hazards.
Social	This option will not involve any natural hazard costs relating to social outcomes.	This option will not involve any natural hazard costs relating to social outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.	This option will not involve any natural hazard costs relating to social outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.
Cultural	This option will not involve any natural hazard costs relating to cultural outcomes.	This option will not involve any natural hazard costs relating to cultural outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.	This option will not involve any natural hazard costs relating to cultural outcomes as any effects associated with flooding, contaminated land and earthworks can be appropriately managed on PPC land.
Efficiency and Effectiveness			
	Having regard to the above, the Option of retaining the FUZ zoning will reap a neutral cost benefit result. The existing rural business operations will continue, with the remainder of the PPC land used for rural or rural related activities. Any further development is required to have regard to the existing AUP:OP provisions relating to flood hazards, contaminated land and earthworks.	Whilst the application of the BLIZ to the land will ultimately result in greater impervious surfaces of the PPC land and the expansion of business activities, the expert reporting confirms that the BLIZ can be applied and natural hazards will not be exacerbated. In particular, stormwater discharge arising from new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons and freshwater bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. The provisions of E36 Natural Hazards and Flooding, E30 Contaminated Land and E11/E12 will apply to earthworks. The application of these standards will ensure that the natural hazards objectives will be achieved. Overall, it is considered that the application of the BLIZ and SMAF-1 are the most efficient and effective measures to meet the objectives of the PPC relating to natural hazards.	Whilst the application of the BLIZ to the land will ultimately result in greater impervious surfaces of the PPC land and the expansion of business activities, the expert reporting confirms that the BLIZ can be applied and natural hazards will not be exacerbated. In particular, stormwater discharge arising from new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons and freshwater bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. The provisions of E36 Natural Hazards and Flooding, E30 Contaminated Land and E11/E12 will apply to earthworks. The application of these standards will ensure that the natural hazards objectives will be achieved. The expert reporting has not identified any specific constraints or opportunities relevant to this PPC land only that would generate the need for precinct plan provisions to address future effects or mitigating factors, that are not already covered by the provisions of the AUP:OP.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
			In summary, it is considered that Option 3 would create an unnecessary layer of additional planning controls that would not be efficient or effective in achieving the objectives of the PPC.
Summary of Reasons			
	In summary, for the reasons outlined above, Option 2 is the best option for achieving the natural hazard objectives of the PPC request whilst enabling the overarching PPC objective to be met. This involves the application of the BLIZ and SMAF-1 provisions to the PPC land. It enables the land to be developed for future BLIZ activities, whilst ensuring that the objectives pertaining to the natural hazards are addressed, and any effects can be appropriately managed or avoided.		

11.3.5. Topic Five: Natural Environment

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
Description of Options	***This option involves retaining the FUZ and relying on a future Council-initiated plan change to rezone the land.*** The FUZ does not provide for urban activities and development prior to a plan change process being undertaken. Industrial activities are a discretionary activity in the FUZ by way of not being listed in Activity Table H18.4.1. Objective H18.2(3) requires that future urban development is not compromised by premature subdivision, use or development. The AUP:OP policy and rule framework applies.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control. The BLIZ is described in section 4.1 of this report.*** The application of the BLIZ would provide for the ongoing operation and expansion of industrial activities on the PPC land, through an enabling framework of zone provisions that support the efficient function of light industrial activities. Specifically, with respect to natural environment considerations, the BLIZ option will apply the AUP:OP policy and rule framework to future development.	***This option involves rezoning the land from Future Urban to Light Industry and applying the SMAF – 1 Control and a Precinct Plan.*** This option looks at whether in addition to the BLIZ and SMAF-1 provisions, whether a site-specific Precinct Plan is required to deliver the necessary land use objectives for the PPC land. Specifically, with respect to natural environment considerations, Option 3 considers whether specific precinct provisions are required to address natural environment related opportunities and constraints relative to the PPC land.
Benefits			
Environmental	Any future development is required to adhere to the standard AUP:OP provisions as they apply to the FUZ. Less impervious surfaces when compared to Option 2 and 3.	The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. No landscapes, features, water bodies, stands of native vegetation and habitat, or coastal areas of value have been identified in the expert reporting that necessitate protection. Any future development is required to adhere to the AUP:OP provisions. Elements of yard landscaping, and that associated with the stormwater ponds, will contribute to the aesthetic of the PPC land.	The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. No landscapes, features, water bodies, stands of native vegetation and habitat, or coastal areas of value have been identified in the expert reporting that necessitate protection. Therefore, precinct mechanisms are not necessary to create another layer of protection. Any future development is required to adhere to the standard AUP:OP provisions. Elements of yard landscaping, and that associated with the stormwater ponds, will contribute to the aesthetic of the PPC land. It is not considered necessary to include a precinct plan to identify these ponds and landscaping yards as these will already be required through the specific provisions of the AUP:OP (Chapters E10, E8 and H17) at the time of future development.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
			A riparian yard is shown on the Structure Plan through the southern part of the PPC land. As noted throughout this report, there is no open watercourse through the PPC land and therefore the riparian notation is incorrect.
Economic	There are no economic benefits on the natural environment from this option.	The applicant is able to fund and provide for the necessary wastewater and stormwater infrastructure to service the land. This infrastructure will ensure any adverse effects on the receiving environment are avoided or mitigated.	The applicant is able to fund and provide for the necessary wastewater and stormwater infrastructure to service the land. This infrastructure will ensure any adverse effects on the receiving environment are avoided or mitigated.
Social	The PPC land will retain its existing character and amenity values. The existing consented rural business activities will remain in operation providing some employment within proximity to the local community.	The rezoning will enable additional employment land to be made available to local communities in the Pukekohe Paerata area, reducing commute times.	The rezoning will enable additional employment land to be made available to local communities in the Pukekohe Paerata area, reducing commute times. There are no particular social outcomes that have been identified by the expert reporting or consultation engagement as requiring particular relevance to the PPC land which would warrant specific precinct provisions.
Cultural	The PPC land will retain its existing cultural values.	Water quality and reuse, and sediment and erosion control was identified as an important kaitiaki value through the mana whenua engagement process. The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. The application of the AUP:OP Auckland Wide controls ensures that future development is undertaken with GD-01 earthworks provisions to protect the receiving environment. No specific cultural heritage features or landscapes have been identified on the PPC land that warrant specific precinct provisions. The AUP:OP provides for accidental discovery protocols to apply to the PPC land through the resource consent process.	Water quality and reuse, and sediment and erosion control was identified as an important kaitiaki value through the mana whenua engagement process. The SMAF-1 provisions will ensure that the water quality discharging to the receiving environment will achieve best practice management principles. The application of the AUP:OP Auckland Wide controls ensures that future development is undertaken with GD-01 earthworks provisions to protect the receiving environment. No specific cultural heritage features or landscapes have been identified on the PPC land that warrant specific precinct provisions. The AUP:OP provides for accidental discovery protocols to apply to the PPC land through the resource consent process. No specific precinct plan provisions are necessary to address cultural outcomes in relation to this PPC land.
Costs			
Environmental	The AUP:OP natural environment standards which apply to development in the FUZ zone are in some respects more permissive than Option 2 and 3 (i.e. non applicability of SMAF-1), and will result in lessor environmental benefits.	Will result in the development of land with greater impervious surfaces and light industrial activities.	Will result in the development of land with greater impervious surfaces and light industrial activities.
Economic	There are no economic costs on the natural environment from this option.	The applicant will privately fund the necessary infrastructure servicing and capacity to achieve the environmental outcomes for the PPC land.	The development of precinct provisions would cost time and money to the applicant to write and develop. This would not be an efficient use of resources given that the existing provisions of the AUP:OP already adequately provide for and address the objectives of the PPC request.

OPTION	Option 1: Do Nothing – Future Urban Zone	Option 2 – BLIZ (PPC)	Option 3: BLIZ Zoning with Precinct Plan
Social	Inefficient use of land. Additional serviced land is not made available for light industrial use, thereby limiting employment opportunities within close proximity to communities.	Change in character from the existing environment on the receiving community.	Change in character from the existing environment on the receiving community.
Cultural	There are no obligations to improve the existing cultural values of the PPC land.	Will result in the development of land with greater impervious surfaces and light industrial activities.	Will result in the development of land with greater impervious surfaces and light industrial activities.
Efficiency and Effectiveness			
	Having regard to the above, retaining the FUZ reaps no real benefit to the PPC land in terms of maintaining and enhancing natural environment values and achieving the objectives. The existing rural business operations will continue, with the remainder of the site used for rural or rural related activities. There are no mechanisms proposed to improve environmental opportunities on the PPC land, such as improvements to water quality and the flood hazard risk through the application of the SMAF-1 provisions proposed by Option 2 and 3.	Whilst the application of the BLIZ to the land will ultimately result in greater impervious surfaces of the PPC land and the expansion of business activities, the mitigating measures such as the SMP provisions, landscaped yards, stormwater ponds, and application of the AUP:OP provisions will ensure that the natural environment objectives can be achieved. In particular, stormwater discharge arising new impervious areas enabled by the BLIZ can be appropriately attenuated and treated on-site to minimise effects on downstream persons and freshwater bodies. The PPC land can be developed whilst maintaining the flood storage function of the natural basin of the site. The application SMAF-1 provisions will improve the stormwater management of the PPC land. There are no natural features (no streams, vegetated areas, habitat or landscapes) on the PPC land that require protection, enhancement or maintenance. Therefore, the use of the PPC land for BLIZ activities will not be in conflict with the natural environment objectives of the AUP:OP. Overall, it is considered that the application of the BLIZ and SMAF-1 are the most efficient and effective measures to meet the objectives of the PPC.	Whilst the application of the BLIZ to the land will ultimately result in greater impervious surfaces of the PPC land and the expansion of business activities, the mitigating measures such as the SMP provisions, landscaped yards, stormwater ponds, and application of the AUP:OP provisions will ensure that the natural environment objectives can be achieved. There are no natural features (no streams, vegetated areas, habitat or landscapes) on the PPC land that require protection, enhancement or maintenance. Further, the expert reporting has not identified any specific constraints or opportunities relevant to this PPC land only that would generate the need for precinct plan provisions to address future effects or mitigating factors, that are not already covered by the provisions of the AUP:OP. In summary, it is considered that Option 3 would create an unnecessary layer of additional planning controls that would not be efficient or effective in achieving the objectives of the PPC.
Summary of Reasons			
	In summary, for the reasons outlined above, Option 2 is the best option for achieving the natural environment objectives of the PPC request. This involves the application of the BLIZ and SMAF-1 provisions to the PPC land. It enables the land to be developed for future BLIZ activities, whilst ensuring that the objectives pertaining to the natural environment can be achieved, and any effects can be appropriately managed or avoided.		

11.3.6. Evaluation of Options

Having regard to the comprehensive assessments above, it is considered that the most efficient and effective option for achieving the objectives is Option 2 - rezone the PPC land from FUZ to BLIZ, apply the SMAF-1 control to the entirety of the land, and apply the existing AUP:OP provisions to the PPC land, to manage the way in which the PPC land is used and developed. This option best aligns with the Structure Plan, reflects the planning and policy framework, addresses potential adverse environmental effects, balances costs and benefits, and is the most appropriate way to achieve the purpose of the RMA.

11.4. Risk of Acting or Not Acting

Section 32(2)(c), requires an assessment of risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. As demonstrated by the specialist reports supporting the PPC request, there is sufficient information to understand the effects of the PPC.

If a PPC was not undertaken, the rezoning would be delayed until a public plan change was advanced by the Council. No such plan change is proposed, and therefore this would lead to a delay in future industrial land supply and employment, and secondary effects on the prices of goods and services.

11.5. Summary

In accordance with Section 32(1)(a), the objectives of the proposal are considered the most appropriate way to achieve the sustainable purpose of the RMA as defined under Part 2 through the application of the BLIZ zone and SMAF-1 controls to realise the sustainable development potential of the land whilst, avoiding and mitigating adverse effects, and enabling people and communities to provide for their environmental, economic, social and cultural well-being.

An assessment under Section 32(1)(b) has been undertaken, which assesses rezoning to BLIZ as the most appropriate way to achieve the objectives of the PPC, because it is the most efficient and effective option when compared with the status quo, rezoning to BHIZ or BMUZ, or applying a precinct and the associated costs and benefits.

Under Section 32(2)(c), there is sufficient information to ensure that there is little risk in advancing the PPC, whilst the risk of not acting will lead to tangible adverse economic effects on industrial land, employment and goods and services.

12. Conclusion

The purpose and objective of the PPC is to enable the ongoing operation and expansion of light industrial activities on 5.35ha of land at 9, 33 and 49 Heights Road, Pukekohe to meet current and future demand for industrial growth, consistent with the Structure Plan, whilst avoiding, remedying and mitigating adverse effects on the environment. An Indicative Masterplan has been developed to support the PPC request

It is proposed to rezone the PPC land from FUZ to BLIZ and apply the SMAF-1 control to the entirety of the land. It is proposed to apply the existing AUP:OP provisions to the PPC land, including the BLIZ zone and Auckland-wide provisions, to manage the way in which the PPC land is used and developed. The existing AUP:OP designation, controls and overlays that apply to the PPC land will be retained.

The PPC is broadly consistent with the strategic policy framework and the objectives and policies of the Council's planning documents. This report confirms that the PPC aligns with the higher order national policy framework, specifically the NPS-UD in achieving a well-functioning urban environment. At the regional level, the PPC aligns with the policy framework and timing set out in the Structure Plan.

While the FDS sets in place a new timeframe for land release and infrastructure sequencing this report, in conjunction with the suite of expert reporting appended to this PPC request, has demonstrated that the PPC land can readily accommodate the proposed rezoning and subsequent development at an earlier timeframe than that anticipated by the FDS. This is particularly the case given that a large portion of the PPC land is already developed with consented rural business activities that service the local rural sector and the rezoning will result in an opportunity to better reflect the existing land uses and regularise and improve the planning framework that applies to the PPC land. Importantly, the PPC land provides an opportunity to deliver additional development ready business land to meet local and regional demand for light industrial land capacity, and contribute to local employment opportunities on well-located urban land within the RUB and adjacent to the state highway network and near to rail links to facilitate freight movement opportunities. The PPC will also provide local employment within the Pukekohe catchment thereby creating choice for local people to work close to home without commuting out of the area.

A robust Section 32 analysis has been prepared at section 11 of this report to support the PPC request. Alongside specialist assessments, this report concludes that the proposal to apply the BLIZ, SMAF-1 control and the existing provisions of the AUP:OP to the PPC land is the most efficient and effective option to achieve the objectives of the PPC and relevant statutory documents and the purpose of the RMA.

An effects assessment commensurate with the scale and significance of the request is set out at section 10 of this report in accordance with Clause 22(2). Based on the reporting and assessment undertaken by technical specialists, the PPC represents an appropriate use of the PPC land and will result in environmental outcomes that are anticipated by the existing FUZ and Structure Plan planning framework. Any adverse effects can be appropriately avoided, remedied or mitigated by the proposed provisions. There will also be significant positive effects from the urbanisation of the PPC land including provision of industrial land and local employment opportunities in Pukekohe.

Overall, the PPC request is considered an appropriate and acceptable planning outcome. The PPC is in accordance with the requirements of the relevant sections of the RMA, including Part 2, and it is recommended that the Council approve the PPC request.