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Auckland Council
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Proposed Auckland Unitary Plan - Submission

This Submission to the Proposed Auckland Unitary Plan ('Unitary Plan') is made by the Greater East Tamaki Business Association Inc.

East Tamaki is a manufacturing and distribution hub of some 2,000 businesses located close to the southern motorway, airport and port in the Manukau/Howick wards of Auckland. The area generates \$3 billion to the New Zealand economy each year, \$19 million in rates, and 30,000 jobs (with projected jobs of 45,000 on completion of the Highbrook Business Park).

Although this is an individual Submission, many of the matters raised in the Submission align with the Submissions made by the Mahunga Drive Business Association Inc, the Onehunga Business Association Inc (Church-Neilson), the Wiri Business Association Inc and the Rosebank Business Association Inc. In that regard, these Submissions collectively represent the views of over half of all businesses located in Light and Heavy Industry zones in Auckland.

The Submitter wishes to take this opportunity to thank those business leaders who also freely gave their time and experience to participate in the discussions that contributed to the production of this document.

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The Greater East Tamaki Business Association Inc wishes to be heard and will consider presenting a joint case with other industrial business associations making similar submissions (i.e. the Mahunga Drive Business Association Inc, the Onehunga Business Association Inc, the Wiri Business Association Inc and the Rosebank Business Association Inc).

1. Introduction – Industrial land is a scarce resource of major importance **that must be protected**

There are only nine small areas of heavy industry zoned land in the entire Auckland region (Silverdale, The Concourse (Waitakere), Rosebank, Span Farm (Waitakere), Onehunga/Penrose, James Fletcher Drive, East Tamaki, Wiri and Hunua Road (Papakura)). The Unitary Plan does not zone any more heavy industry land (apart from a small site east of Carbine Road, Mt Wellington) within the Rural Urban Boundary ('RUB').

As noted in the legacy Manukau City District Plan, “[t]hese areas are a scarce resource of major importance because they are areas where potentially noxious activities can be established with separation from sensitive activities. Therefore, it is important that the use of this resource be maximised for potentially noxious activities and not other business activities which can be established in a wide range of other areas. (Manukau City District Plan, 14.9.6).

Directive 6.3 of the Auckland Plan directs us to “*protect, enhance and improve business-zoned areas and business improvement districts*”.

Population growth means an additional 276,700 jobs will be needed in Auckland by 2041. As the Auckland Plan noted “*Better planning is needed to connect where people live, where they work and how they get there.*”¹

High concentrations of employment are found in the ‘industrial’ business areas of Auckland. They are situated along the main southern motorway and the rail corridors. There is also an arc of business land running from East Tamaki through Onehunga/Mangere to the airport, west to Rosebank and to the north, where concentrations occur along the motorway and major arterials.²

There is significant concern over the scarcity of industrial land to meet forecast demands. Nearly one third of industrial land has been used for non-industrial purposes over the past decade, principally for retail, office and residential use. The Auckland Plan states that Auckland’s restricted store of industrial land must be actively managed to ensure that industrial activity – critical to Auckland’s economic performance – is not impeded. This requires the safeguarding of existing industrial-zoned sites, effective reuse of brownfield sites, and the provision of new industrial-zoned land in suitable locations.³

Of equal concern is the increasing impact on the permitted use of industrial land from nearby sensitive activities (such as residential development). Reverse sensitivity, particularly associated with permitted noise effects from industrial activities, is undermining use of industrial land. So too is the layer-upon-layer of regulation in the Unitary Plan that cumulatively restricts the uses that can be made of industrial land. Intensive residential development (which in many cases is being planned close to industrial land) has the potential to exacerbate these problems.

In our view, these concerns need to be emphasised a lot more strongly in the Unitary Plan. It is critical that that the use of the industry land (in particular heavy industrial land) be maximised for use by industrial activities and not for other business, or community activities - which can be established in a wide range of other areas – or that activities in these areas are impeded by nearby land uses sensitive to these activities (such as residential uses).

¹ *Auckland Plan*, paras 386 and 387

² *Auckland Plan*, para 385

³ *Auckland Plan*, paras 390 and 391.

Many of the issues set out in this Submission were raised in the combined Industrial Business Improvement District Feedback made to the Draft Unitary Plan in March 2013.

This Submission addresses the following:

- a existing industrial land must be protected and new industrial land created (especially inside the RUB)
- b the Light and Heavy Industrial areas are appropriately simplified into two zones
- c activities allowed in the Heavy Industry zones are generally appropriate
- d activities allowed in the Light Industry zone are generally appropriate
- e what is not expected in Light and Heavy Industry zones is generally appropriate
- f the Air Quality Industry Transition overlay unduly restricts industrial activities and is not supported
- g transport and land use are not well integrated for industrial areas whose needs must be emphasised
- h Green Star rating is not an appropriate regulatory measure for inclusion in the Plan
- i the noise controls are generally appropriate for industrial zones
- j more flexible/smaller lot sizes should be provided for subdivision in heavy industrial areas
- k buffers under electricity transmission lines in industrial areas should be removed
- l the Port Precinct should provide for POAL's Option 2

2. Existing industrial land must be protected and new industrial land created (especially inside the RUB)

As noted in the introduction, there are very few areas of heavy industry zoned land in the Auckland region.

The Auckland Plan recognizes there is 1,890 hectares of existing business land within the RUB and provision for 1,400 hectares of additional greenfield land (with 1,000 hectares earmarked for industrial activities) outside the RUB. We understand that the Unitary Plan makes similar provision, but importantly does not provide for any significant new Light or Heavy Industry zoned land within the RUB. In fact, although it is difficult to be exact, our overall impression is that a significant quantity of land currently zoned 'light industrial' has been rezoned to other uses (e.g. Mixed Use). In addition, there are a number of new proposals that will likely constrain the current use of industrial land (such as controls over air quality) - further limiting its availability for industrial purposes.

The legacy Rodney District Plan spelt out the problem of protecting industrial land use: "Some "people intensive" business activities, including residential activities, may be tempted, perhaps by lower land values or environmental standards, to seek to locate in business area[s] ... If such activities involve significant retail development, and/or generate significant numbers of people, conflicts can arise with the other businesses in the area. The conflicting standards required by the "people intensive" activities ... undermine the areas suitability for activities requiring lower levels of amenity value, which they are intended to accommodate."

The Auckland Plan states that Auckland's restricted store of industrial land must be actively managed to ensure that industrial activity is not impeded. This requires the safeguarding of existing industrial-zoned sites, effective reuse of brownfield sites, and the provision of new industrial-zoned land in suitable locations.⁴

We particularly support the 'Commercial and Industrial Growth' provisions of the Regional Policy Statement part of the Unitary Plan (Part 1, Chapter B, 3.1). These provisions are highly supportive of industrial development within the Auckland region. However, we are concerned that these objectives and policies do not appear to be properly reflected in the subordinate rules, or by the zoning changes proposed under the Plan. Our Submission is that the goals of the RPS must be cascaded through the rest of the Plan. The goal of "enabling sufficient supply of land for industrial activities" must be especially reflected (by not reducing the amount of heavy industrial land zoned in Auckland particularly through re-zoning).

One example that especially concerns us is the O-I Glass factory in Penrose. This site has been a glass factory for 92 years and directly employs over 260 people. It is clearly a 'heavy industrial' activity. Under the proposed Unitary Plan, the North Eastern part of the Penrose area (including the O-I site) has been re-zoned under the Plan to "light industrial". This means the O-I glassworks (among several other businesses) would be inappropriately zoned. This will make resource consent applications and further investment in the site more difficult, not for the technical merit of such projects, but for the fact that the character of the activity is now inappropriate for the zone it finds itself in.

In our view, we must actively plan for more industrial land to ensure land is available for these uses across the Auckland region.

⁴ *Auckland Plan*, paras 390 and 391.

2.1 Industrial Land - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The reasons for our Submission</i>	<i>Relief Sought</i>
Mayor's Foreword	Support partially	The Mayor's Foreword must recognise the importance of Auckland as New Zealand's main commercial and industrial centre.	Amend as follows: "[The Proposed Auckland Unitary Plan] also aims to enable business <u>and industrial</u> growth and support job creation – crucial elements for healthy economic performance."
Part 1 – Chapter A.1.4 Our Urban Environment	Support partially	This section of the Unitary Plan should recognise the importance of Auckland as New Zealand's main commercial centre and that sufficient business and employment land is available for future growth and development, especially for industrial areas.	Insert paragraph as follows: <u>Auckland is New Zealand's main commercial centre for finance, insurance, transport/ logistics, business services, and is the largest centre for manufacturing. The Unitary Plan must ensure that sufficient business and employment land (particularly industrial land) is available for future growth and development. The location of industrial activities must occur in a coordinated and strategic manner to maximise liveability and economic productivity.</u>
Part 1 – Chapter A.1.6 Our Economy	Support partially	This section of the Unitary Plan should recognise the importance of Auckland as New Zealand's main commercial centre. Sufficient business and employment land must be available for future growth and development, especially for industrial areas.	Insert paragraph as follows: <u>Auckland is New Zealand's largest centre for manufacturing and transport/ logistics. The Unitary Plan must ensure that sufficient business and employment land (particularly industrial land) is available for future growth and development of these activities. The zones for industrial activities must be protected, particularly from resident growth, to maximise economic productivity.</u>
Part 1 – Chapter A 3.1 Auckland Plan	Support partially	The Unitary Plan must be informed by existing precinct plans, particularly the East Tamaki Business Precinct Plan, the Rosebank 2030 business precinct plan and the Church-Neilson 2050 business precinct plan. ⁵	Insert paragraph as follows: <u>The Unitary Plan also guides and [must be informed by] the development and implementation of area plans, precinct plans and master plans. These plans spatially outline the aspirations and strategic directions for localised parts of Auckland, within the context of the Auckland Plan and the resource management framework in the Unitary Plan.</u>

⁵ <http://www.aucklandcouncil.govt.nz/EN/planspoliciesprojects/councilpolicies/easttamakibusinessprecinctplan/Pages/home.aspx>; <http://rosebankbusiness.co.nz/rosebank-2030-business-precinct-plan>;
<http://www.onehunga.net.nz/infrastructure/church-neilson-business-plan-2050/>

<p>Part 1 – Chapter B 1.1 Enabling quality urban growth</p>	<p>Support partially</p>	<p>The Unitary Plan must recognise the importance of business and employment opportunities. We are concerned about the ‘residential focus’ of the Unitary Plan (i.e. that too much weight is being given to residential issues over business and employment needs, especially for industrial areas).</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> - a bullet point should be inserted in paragraph 4 of the sub-section titled ‘Our sense of place’: <ul style="list-style-type: none"> • business growth and the support of job creation - a phrase should be inserted in paragraph 1 of the sub-section titled ‘Social Well-being’: <p>Aucklanders’ quality of life and their social well-being is influenced by the affordability of housing, access to quality public open space, business/employment opportunities and access to social and community infrastructure.</p> - a phrase should be inserted in paragraph 3 of the sub-section titled ‘Supply of land in appropriate locations’: <p>Auckland faces many challenges in accommodating growth. Development must optimise the benefits of transport integrated with land use, while providing high quality urban living, lifestyle choices, business/employment opportunities, a healthy environment and protection of Mana Whenua interests. A compact well-designed urban form is the primary approach to achieving this balance.</p> - the following Strategic Direction 6 from the Auckland Plan should be added at the end of this section: <p>Develop an economy that delivers opportunity and prosperity for all Aucklanders and New Zealand.</p>
<p>Part 1 – Chapter B 1.2 Enabling economic well-being</p>	<p>Support partially</p>	<p>The Unitary Plan should recognise the importance of business and employment opportunities. We are concerned about the ‘residential focus’ of the Unitary Plan (i.e. that too much weight is being given to residential issues over business and employment needs).</p> <p>The Port of Auckland is by far the highest value port in New Zealand and for the sake of the country needs to remain so. Ports of Auckland is New Zealand’s largest and most important seaport, handling 37% of the country’s total</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> - a paragraph should be inserted in the sub-section titled ‘Explanation’: <p>High concentrations of important employment are found in the business areas of Auckland situated along the main southern motorway and the rail corridors (Penrose, Wiri). There is also an arc of business land running from East Tamaki through Onehunga/Mangere to the airport, west to Rosebank and to the north, where concentrations occur along the motorway and major arterials (e.g. North Harbour). The protection and enhancement of these areas are critical for business and employment opportunities (particularly those zoned industrial).</p> - a paragraph should be amended in the sub-section titled ‘Urban form’: <p>“These activities face pressure from higher value activities including retail, service</p>

		<p>seaport trade, and 31% of trade across all ports, including airports. Proposals that reduce the current and future needs and potential for the Port of Auckland need to be critiqued in the light of these facts.</p>	<p>sectors and, in many some places, residential growth.”</p> <p>- a paragraph should be inserted in the sub-section titled ‘Physical infrastructure’:</p> <p><u>The Port of Auckland is by far the highest value port in New Zealand and for the sake of the country needs to remain so. Ports of Auckland is New Zealand’s largest and most important seaport, handling 37% of the country’s total seaport trade, and 31% of trade across all ports, including airports. Approximately \$26.4 billion of trade passes through Ports of Auckland (POAL) each year made up of \$9.6 billion of exports and \$16.8 billion of imports. By value, POAL is New Zealand’s largest port for both imports and exports. Of imports through the Ports, 90% is destined for an area within a 35km radius of the Ports. Proposals that reduce the current and future needs and potential for the Port of Auckland need to be critiqued in the light of these facts.</u></p> <p>- a new sub-section titled ‘Industrial land’ should be inserted:</p> <p><u>Industrial land</u></p> <p><u>Traditionally, the industrial precincts of Auckland (such as East Tamaki and Onehunga) have been competitive in attracting businesses because of the availability of lower-priced land, larger sites, industrial zoning, strategic location (transport, employees and infrastructure) and accessibility to markets. They are critically important for production, manufacturing, distribution, storage, wholesale, construction, and property/business services. They support employment and wealth generation. Industrial zoned land is a precious resource. It must be protected against the encroachment from general business, retail and residential use. Open space, recreational use (stadiums), community/social facilities (e.g. prisons) also encroach on industrial uses. Protecting industrial land for industrial uses will also ensure business services, office and retail activities are located in town centres.</u></p> <p>- the following Strategic Directive 6.3 from the Auckland Plan should be added at the end of this section:</p> <ul style="list-style-type: none"> • <u>protect, enhance and improve business-zoned areas and business improvement districts.</u>
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Part 1 – Chapter B 2.1 Providing for growth in a quality compact urban form	Support partially	This section must be read together with the Commercial and Industrial Growth section and not be prioritised over that later section.	Objectives, policies, methods relating to business land supply and business activities are in the RPS - Commercial and Industrial Growth section. These sections need to be read together.
Part 1 – Chapter B 3.1 Commercial and industrial growth	Support partially	<p>We are concerned that there is a scarcity of industrial land to meet the employment forecast demands. Residential intensification will put pressure on industrial land to be used for non-industrial purposes. We are very concerned that a significant quantity of land currently zoned 'light industrial' is being rezoned to other uses (e.g. Mixed Use), particularly as the likely use of these zones for residential development will create reverse sensitivity issues for existing and new industry.</p> <p>The Auckland Plan recognizes there is 1,890 hectares of existing business land within the RUB and provision for 1,400 hectares of additional greenfield land (with 1,000 hectares earmarked for industrial activities) outside the RUB. We understand that the Unitary Plan makes similar provision, but importantly does not provide for any additional Light or Heavy Industrial zoned land within the RUB. In fact, although it is difficult to be exact, our overall impression is that a significant quantity of land currently zoned 'light industrial' is being rezoned to other uses (e.g. Mixed Use). In addition, there are a number of new proposals that will likely constrain the current use of industrial land - further limiting its availability for industrial purposes.</p>	<p>Support</p> <p>(9) Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.</p> <p>(10) Locate industrial land where it is relatively flat, and there is quick and efficient access to freight routes, rail or freight hubs, ports and airports.</p> <p>(11) Provide for the efficient use of scarce industrial land and avoid incompatible activities by:</p> <ul style="list-style-type: none"> a. limiting the scale and type of non-industrial activities on land zoned for light industry b. preventing non-industrial activities establishing on land zoned for heavy industry. <p>Amend as follows:</p> <p>Insert these paragraphs -</p> <p>Objectives ... 4 Avoid reverse sensitivity effects by requiring residential subdivision, use and development to not occur in a location or form that constrains the use of scarce light and heavy industrial land.</p> <p>Policies ... 12.Avoid reverse sensitivity effects by requiring residential subdivision, use and development to not occur in a location or form that constrains the use of scarce light and heavy industrial land.</p> <p>Insert under the heading “Non-Regulatory – Funding and Assistance” the following text:</p> <p>Council to support the ongoing development and advancement of industrial business improvement districts.</p>

		<p>In our submission, industrial land must be actively protected and managed to ensure that industrial activity is not impeded. For its use to be maximised, the Unitary Plan must safeguard existing industrial-zoned sites, provide for the effective use of brownfield sites, and provide new industrial-zoned land in suitable locations (both within and outside the RUB).</p> <p>Better planning is needed from the Unitary Plan to connect where people live, where they work and how they get there.</p>	
Part 1 - Chapter B 6.1 Air	Support partially	The Unitary Plan should recognise the importance of business and employment opportunities. We are concerned about the 'residential focus' of the Unitary Plan, and that too much weight is being given to residential issues over business and employment needs, especially for industrial areas.	<p>Amend as follows:</p> <p>Introduction Motor vehicles, domestic fires and to a much lesser extent industry are the main sources of our urban air pollution.</p>
Part 1 - Chapter B 10 Methods	Support partially	The Unitary Plan should recognise the importance of business and employment opportunities. We are concerned about the 'residential focus' of the Unitary Plan, and that too much weight is being given to residential issues over business and employment needs.	<p>Amend as follows:</p> <p>Under the section of the Table 'Non-statutory plans, strategies and statutory plans under other legislation' include:</p> <ul style="list-style-type: none"> • "Precinct plans" <p>Under the section of the Table 'Funding and assistance' include:</p> <ul style="list-style-type: none"> • Industrial business improvement districts

<p>Part 1 – Chapter B 12 Environmental results anticipated</p>	<p>Support partially</p>	<p>The Unitary Plan should recognise the importance of business and employment opportunities. We are concerned about the ‘residential focus’ of the Unitary Plan, and that too much weight is being given to residential issues over business and employment needs, especially for industrial areas.</p>	<p>Amend as follows:</p> <p>Under the section of Table 2, we seek amendments as follows:</p> <p>Industrial growth occurs in appropriate locations that: promote sustainable and on-going economic development provide for the efficient use of buildings, land and infrastructure in business areas avoid conflicts between incompatible activities Avoids reverse sensitivity from residential or other development</p> <p>The proportion of floorspace land (1,890 hectares) within appropriately zoned locations as identified in the Unitary Plan for industrial purposes does not reduce below that identified at the date of notification of this Unitary Plan.</p>
<p>Part 2 – Chapter D – 4 Future Urban Zone</p>	<p>Support</p>	<p>The Unitary Plan Future Urban Zone should recognise the importance of business and employment (especially industrial) opportunities. We are concerned about the ‘residential focus’ of the Unitary Plan, and that too much weight is being given to residential issues over business and employment needs. Future industrial land use must be prioritised over other land uses.</p> <p>As stated in section 2.6.5 (22) (Strategic Policies – Urban Structure – Future Urban Areas), an important Policy of the Auckland Council Regional Policy Statement (page 31) is:</p> <p>22. To ensure sufficient land is identified and provided, including through zoning, to meet existing and anticipated demand for Industrial Activities, including Land Extensive Industrial Activities, having regard to the following: (i) reverse sensitivity effects; (ii) being appropriately located with good transport access to the arterial road network, port, airport and railways, and avoiding direct access to sensitive local</p>	<p>None</p>

		streets;(iii) not detracting from the safety and function of the arterial road network; and(iv) avoiding adverse effects on the safe, efficient and sustainable operation of regionally significant Infrastructure.	
Part 5 – Appendix 1.1 – Structure plan requirements for future urban zoned greenfield and brownfield land	Support partially	The Unitary Plan Future Urban Zone Structure Plans should recognise the importance of industrial zoning, which must be prioritised over other land uses.	<p>Amend as follows, by inserting</p> <p>Structure planning is to be used to: i Prioritise the provision of Heavy and Light Industry zones</p> <p>Structure planning must consider the following: m the prioritisation of the provision of Heavy and Light Industry zones</p> <p>The structure plan content</p> <p>The structure plan must identify, investigate and address the following matters:</p> <p>a.urban growth</p> <p>i.the future supply and projected demand for residential and business land (particularly Heavy and Light Industrial land as a priority) in the structure plan areas is consistent with council’s land release strategy and will achieve an appropriate capacity to meet the sub–regional greenfield growth projections for new dwellings in the Auckland Plan (2012) Development Strategy.</p> <p>d.use and activity vii the prioritisation of the provision of Heavy and Light Industry land uses</p>

3. Light and Heavy Industrial areas are appropriately simplified into two zones

We understand that most 'industrial' areas in the Unitary Plan have been zoned either Light or Heavy Industry. This is largely consistent with the Business 5 and 6 zoning under the previous legacy District Plans.

The Light Industrial zone provides for light industrial activities that do not generate objectionable odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities. Due to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate. An exception is made for trade suppliers, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations.

The Heavy Industrial zone provides for industrial activities that may produce objectionable odour, dust and noise emissions. Air quality emissions standards that are different to the rest of Auckland will often apply. A key attribute of the zone is that it contains sites large enough to accommodate large-scale low intensity industrial activities. Sensitive activities are not appropriate in the zone and buildings are expected to have a mainly functional standard of amenity. The zone is typically located close to key freight routes.

The term "Industrial activities" is defined in the Unitary Plan to mean "the manufacturing, assembly, packaging, wholesaling or storage of products or the processing of raw materials and other accessory activities".

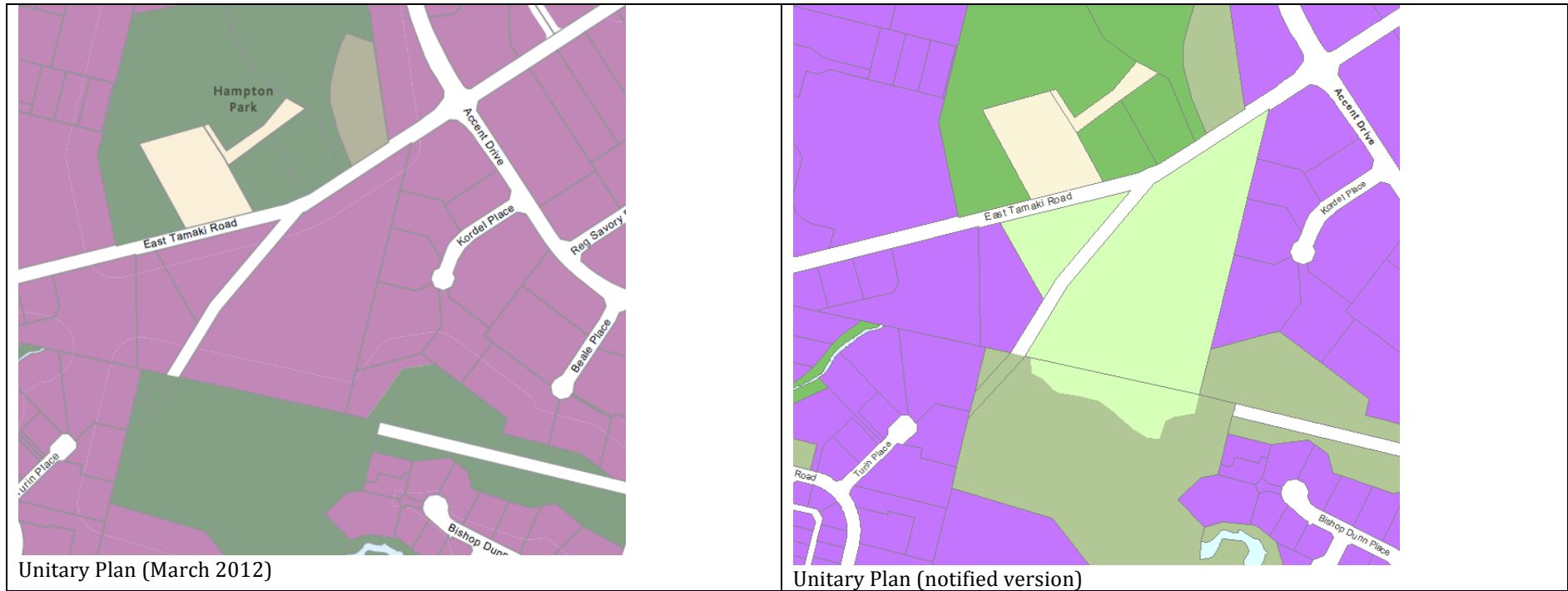
Our submission supports this approach.

3.1 Re-zoning of Light Industry zoned land south of East Tamaki Road to Public Open Space

However, we are concerned and raise questions concerning the re-zoning of Light Industry zoned land south of East Tamaki Road and Hampton Park to Public Open Space (Sport and Recreation).

Light Industry zoned land is a scarce resource of major importance because these are areas where industrial activities can be established with separation from sensitive activities. It is important that the use of this resource be maximised for industrial activities and not other activities which can be established in a wide range of other areas.

We have made enquiries of Auckland Council for the reasons for this change, but we have not been able to obtain an answer within the timeframes. As a consequence, until we are satisfied of the reasons for this change, we oppose the re-zoning of this Light Industry zoned land south of East Tamaki Road to Public Open Space (Sport and Recreation).



4. The Objectives and Policies of the Heavy Industrial zone are generally appropriate

As noted above, the Heavy Industry zone provides for industrial activities that may produce objectionable odour, dust and noise emissions.

Part 2 – Chapter D 3.11 Heavy Industry zone

Zone description

This zone provides for industrial activities that may produce objectionable odour, dust and noise emissions. Air quality emissions standards that are different to the rest of Auckland will often apply. A key attribute of the zone is that it contains sites large enough to accommodate large-scale low intensity industrial activities.

Sensitive activities are not appropriate in the zone and buildings are expected to have a mainly functional standard of amenity. The zone is typically located close to key freight routes.

Objectives

- 1.The efficiency of heavy industry is maximised without being unreasonably constrained by other activities.
- 2.Heavy Industry zoned land, and activities that are required to locate there because of the nature of their operation, are protected from the encroachment of:
 - a.sensitive activities such as residential, community, education or medical facilities
 - b.commercial activities that are more suited to other business zones.
- 3.The supply of large sites within the zone is not reduced by inappropriate fragmentation of those sites by subdivision.
- 4.Adverse effects on the natural environment and general amenity, both within the zone and on adjacent areas, are managed.

Policies

- 1.Enable heavy industrial activities to operate with a level of certainty that their operations will not be unreasonably constrained by other activities.
- 2.Prevent activities which do not support the primary function of the zone, such as:
 - a.residential activities other than for persons whose duties require them to live on-site
 - b.office activities other than accessory office activities
 - c.retail activities other than convenience-type retail to serve local worker population
 - d.the establishment of commercial activities that do not have a functional requirement to be located within the Heavy Industrial zone
 - e.community, educational or medical facilities sensitive to the effects of industrial activities.
- 3.Avoid subdivision that results in the creation of small sites.
- 4.Require development that adjoins public open space or residential zones to maintain the amenity values of those places.
- 5.Manage development so that it does not adversely affect the safe and efficient operation of the transport network, particularly for freight.
- 6.Control building location, height and bulk so that it does not adversely affect amenity in adjoining streets, Public Open Space and Residential zones. Particular consideration will be given to potential visual effects, dominance, loss of privacy and shading.

4.1 The Objectives and Policies of the Heavy Industrial zone - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The Reasons for our Submissions</i>	<i>Relief Sought</i>
Part 2 – Chapter D 3.11 Heavy Industry zone	Support partially	We are concerned about the siting of places of worship in heavy industrial areas. We are also concerned that the definition of “education” facilities excludes “care centres” and “tertiary education facilities”, but we believe these facilities should also be excluded from heavy industrial areas.	<p>Amend as follows:</p> <p>Objectives 2.Heavy Industry zoned land, and activities that are required to locate there because of the nature of their operation, are protected from the encroachment of: a.sensitive activities such as residential, community, education or medical facilities (particularly places of worship and including care centres and tertiary education facilities)</p> <p>Policies 2.Prevent activities which do not support the primary function of the zone, such as: e.community, educational or medical facilities sensitive to the effects of industrial activities (particularly places of worship and including care centres and tertiary education facilities) 6.Control building location, height and bulk so that it does not adversely affect amenity in adjoining streets, Public Open Space and Residential zones. Particular consideration will be given to potential visual effects, dominance, loss of privacy and shading.</p>

5. The Objectives and Policies of the Light Industry zone are generally appropriate

As noted above, the Light Industrial zone provides for light industrial activities that do not generate objectionable odour, dust or noise emissions.

Part 2 – Chapter D 3.10 Light Industry zone

Zone description

This zone provides for light industrial activities that do not generate objectionable odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities.

Due to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate. An exception is made for trade suppliers, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations.

Objectives

1. Light industrial activities locate and function productively within the zone.
2. The establishment of activities that may diminish the efficiency and functionality of the zone for industrial activities is avoided.
3. Adverse effects on the natural environment and general amenity, both within the zone and on adjacent areas, are managed.
4. Development avoids adverse effects on the amenity of adjacent public open spaces and residential zones.

Policies

1. Enable a range of light industrial activities to locate in the zone.
2. Avoid activities that create reverse sensitivity effects and constrain the establishment and operation of light industrial activities.
3. Limit retail activities in the zone to:
 - a. convenience retail that serves the local worker population
 - b. trade suppliers, service stations, motor vehicle sales and garden centres.
4. Avoid:
 - a. office activities, except where they are accessory to the primary activity on-site
 - b. residential activities other than for persons whose duties require them to live on-site.
5. Require development that adjoins public open space or residential zones to maintain the amenity values of those places.
6. Manage development so that it does not adversely effect the safe and efficient operation of the transport network, particularly for freight.

5.1 The Objectives and Policies of the Light Industry zone - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The reasons for our Submissions</i>	<i>Relief Sought</i>
Part 2 – Chapter D 3.10 Light Industry zone	Support partially	<p>We are concerned about the siting of places of worship in light industrial areas.</p> <p>We are also concerned that the definition of “education” facilities may exclude “care centres” and “tertiary education facilities”.</p> <p>We note that the phrase “early childhood learning services” is used on occasion in the Plan in addition to “care centres” and should also be identified for exclusion.</p> <p>We submit that “care centres” and “early childhood learning services” should be excluded from light industrial areas (unless there are exceptional circumstances).</p> <p>We believe education facilities should be excluded from light industrial areas where they are not related to industrial activities.</p>	<p>Amend as follows:</p> <p>Zone description Due to the industrial nature of the activities, sensitive activities such as residential, community, office or retail activities that are not related to the predominant use on-site are not appropriate (particularly places of worship, care centres, early childhood learning services and education facilities unrelated to industrial activities).</p> <p>Objectives 2.The establishment of activities that may diminish the efficiency and functionality of the zone for industrial activities is avoided (particularly places of worship, care centres, early childhood learning services and education facilities unrelated to industrial activities).</p> <p>Policies 4.Avoid: c. places of worship, care centres, early childhood learning services and education facilities unrelated to industrial activities.</p>

6. The Status of Activities in the Heavy and Light Industrial zones are generally appropriate

The Activity Table at **Part 3 – Chapter I - 3 1 Activity Table Industrial Zones** (set out below) specifies the activity status of activities in the Industrial zones.

Activity	Heavy Industry	Light Industry
Accommodation		
Workers accommodation - one persite	P	P
<u>Dwellings</u>	Pr	NC
Commerce		
<u>Commercial services</u>	NC	D
<u>Dairies up to 100m² GFA</u>	P	P
Drive-through facilities	NC	RD
<u>Entertainment facilities</u>	NC	D
<u>Food and beverage up to 100m²GFA</u>	P	P
<u>Garden centres</u>	NC	RD
<u>Large format retail</u>	Pr	NC
<u>Motor vehicle sales</u>	NC	RD
<u>Offices</u> that are accessory to an industrial activity on the <u>site</u> and: a. the office <u>GFA</u> does not exceed 30 per cent of all <u>buildings</u> on the <u>site</u> or b. the office <u>GFA</u> does not exceed 100m ²	P	P
<u>Offices</u> that are accessory to an industrial activity on the <u>site</u> and the office <u>GFA</u> exceeds 30 per cent of all <u>buildings</u> on the <u>site</u>	RD	RD
<u>Offices</u> not otherwise provided for	NC	NC

<u>Retail</u> accessory to an industrial activity on the <u>site</u> , where the goods sold are manufactured on <u>site</u> and the <u>retail GFA</u> does not exceed 10 per cent of all <u>buildings</u> on the <u>site</u>	P	P
<u>Retail</u> , up to 450m ² , not otherwise provided for	NC	NC
<u>Service stations</u>	P	P
<u>Show homes</u>	NC	P
Storage and lock-up facilities	NC	P
<u>Trade suppliers</u>	NC	RD
Community		
<u>Care centres</u>	NC	D
<u>Community facilities</u>	NC	D
<u>Education facilities</u> that are accessory to an industrial activity on the <u>site</u>	P	P
<u>Education facilities</u> not otherwise provided for	D	D
<u>Emergency services</u>	D	P
<u>Hospitals</u>	NC	D
Industry		
<u>Industrial activities</u>	P	P
Rural		
<u>Animal breeding or boarding</u>	NC	P
<u>Horticulture</u>	NC	P
Development		
Construction of <u>buildings</u>	P	P
Additions and alterations to <u>buildings</u>	P	P

Demolition of <u>buildings</u>	P	P
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6.1 The Status of Activities in the Heavy and Light Industrial zones - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The reasons for our Submissions</i>	<i>Relief Sought</i>															
Part 3 – Chapter I 3 1 Activity Table Industrial Zones	Support partially	<p>This Activity Table appropriately recognises the importance of light and heavy industrial land for these types of activities. In particular, we are pleased the Unitary Plan restricts dwellings, large format retail, retail generally, care centres, education facilities unrelated to industrial activities, places of worship and offices from light and heavy industrial zones.</p> <p>Further reasons are that –</p> <ul style="list-style-type: none"> with regard to care centres, we are concerned that these are allowed in heavy industrial areas (albeit non-complying). Having regard to the noxious activities permitted in heavy industry areas, we believe care centres should be prohibited from heavy industrial areas and non-complying in light industrial areas. Further, we remain concerned that care centres are generators of traffic at peak times, and likely to also pose reverse sensitivity issues for heavy and light industries. For clarification, we have also sought that early childhood learning services be prohibited and non-complying activities in 	<p>Amend as follows:</p> <table border="1"> <thead> <tr> <th><i>Activity</i></th> <th><i>Heavy Industry Zone</i></th> <th><i>Light Industry Zone</i></th> </tr> </thead> <tbody> <tr> <td>Care centres and early childhood learning services</td> <td>Prohibited</td> <td>Restricted discretionary</td> </tr> <tr> <td>Education facilities and tertiary education facilities not otherwise provided for</td> <td>Prohibited</td> <td>Restricted Discretionary</td> </tr> <tr> <td>Education facilities related to industrial activities</td> <td>Restricted discretionary</td> <td>Discretionary</td> </tr> <tr> <td>Places of worship</td> <td>Prohibited</td> <td>Prohibited</td> </tr> </tbody> </table> <p>We note that the term ‘places of worship’ is not defined and nor the term ‘church’ in the Unitary Plan.</p> <p>The Manukau City District Plan defines ‘places of assembly’ and ‘church’. Based on the Manukau definition of ‘church’ we suggest a definition of places of worship as follows:</p> <p>“Places of worship means premises used predominantly for religiously-orientated activities, including worship, ceremonies, instruction and meetings. Ancillary uses may include educational, recreational, cultural, social, charitable activities, vicarages and community purposes meetings, but schools or recreation and entertainment facilities are excluded.”</p>	<i>Activity</i>	<i>Heavy Industry Zone</i>	<i>Light Industry Zone</i>	Care centres and early childhood learning services	Prohibited	Restricted discretionary	Education facilities and tertiary education facilities not otherwise provided for	Prohibited	Restricted Discretionary	Education facilities related to industrial activities	Restricted discretionary	Discretionary	Places of worship	Prohibited	Prohibited
<i>Activity</i>	<i>Heavy Industry Zone</i>	<i>Light Industry Zone</i>																
Care centres and early childhood learning services	Prohibited	Restricted discretionary																
Education facilities and tertiary education facilities not otherwise provided for	Prohibited	Restricted Discretionary																
Education facilities related to industrial activities	Restricted discretionary	Discretionary																
Places of worship	Prohibited	Prohibited																

		<p>these zones respectively.</p> <ul style="list-style-type: none"> with regard to education facilities, we are again concerned that these are generally allowed in heavy industrial areas (having regard to the noxious activities permitted in these areas). Further, we are concerned that education facilities are generators of traffic at peak times, take up on-street parking and are likely to also pose reverse sensitivity issues for nearby heavy industries. However, where the education facilities are related to industrial activities with regard to places of worship (churches), we are again concerned that these are allowed in heavy industrial areas (having regard to the noxious activities permitted in these areas). We are concerned that churches often have associated education facilities that pose reverse sensitivity issues for nearby heavy industries. Churches also take up on-street parking and pose reverse sensitivity issues for nearby heavy industries. We believe they should be specifically prohibited from heavy industrial areas and non-complying in light industry areas. 	
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7. What can be built in Light and Heavy Industry Zones is generally appropriate

There are a number of controls proposed for building in light and heavy industrial areas.

Our submission supports these sections, but seeks the following amendments:

Building Height - Our submission is that there should be no limit to building height in either the light or heavy industrial zones. The reasons for our submission are that although we expect building heights higher than 20m in Light and Heavy Industry areas to be rare, we are concerned that this provision is more restrictive than the 'no height limit' in the legacy Manukau District Plan (Rule 14.11.1).

Maximum impervious area - Our submission is that the maximum impervious area should be 90%, which we understand was the maximum impervious area allowed under the legacy Manukau District Plan.

Yards - Our submission is that:

- Front = 2m (we understand this is the requirement under the legacy Auckland City District Plan (Isthmus)) (Rule 8.8.1.3)
- Side and rear = 5m (we accept that this requirement should only apply if the site is adjacent to Residential or an Open Space zone)
- 25m from the coast is too restrictive. A 10m limit should apply to coastal protection yards. In our view, the practices of industrial activities regarding spills and stormwater have improved markedly in recent years and there is no longer a need to tie up precious industrial land unproductively by requiring such large set-backs.
- the requirement for low level limited landscaping should only apply to the front yard and not rear or side yards.

Parking Spaces - Our submission is that it is sufficient to provide for one space for every 100m² GFA in a warehousing and storage site in industrial zone (but may be more appropriate for one space for every 50m² GFA for a manufacturing site) – it is an inefficient use of land to provide for greater levels of parking than necessary.

Cycle parking - Our submission is that the increase from 1 per 800 m² in the Draft Unitary Plan to 1 per 1000 m² is appropriate.

Minimum loading space requirements - Our submission is that the minimum loading space requirements are appropriate.

7.1 Light and Heavy Industry Zones - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The Reasons for our Submissions</i>	<i>Relief Sought</i>
Part 3 – Chapter 11.5 Development Controls - Industrial zones (<i>Building Height</i>)	Support partially	There should be no limit to building height in either the light or heavy industrial zones. Although we expect building heights higher than 20m in Light and Heavy Industry areas will be rare, we are concerned that this provision is more restrictive than the ‘no height limit’ in the legacy Manukau District Plan (Rule 14.11.1).	Amend as follows: 5.1 Building height Purpose: <ul style="list-style-type: none"> •manage the effects of building height. •allow reasonable sunlight and daylight access to streets, public open space, the subject site and nearby sites •avoid visual dominance effects. <p>1. Buildings must not exceed 20m in height in Light Industry zones, but may be unlimited in height in Heavy Industry zones.</p>
Part 3 – Chapter 1.5 Development Controls - Industrial zones (<i>Maximum Impervious Area</i>)	Support partially	The maximum impervious area should be 90%, which we understand was the maximum impervious area allowed under the legacy Manukau District Plan.	Amend as follows: 5.3 Maximum impervious area Purpose: manage the amount of stormwater runoff generated by a development. <p>1. Maximum impervious area: 80 90 per cent.</p> <p>2. Maximum impervious area within a riparian yard: 10 per cent.</p>
Part 3 – Chapter 1.5 Development Controls - Industrial zones (<i>Yards</i>)	Support partially	In our submission yard controls should be: <ul style="list-style-type: none"> - Front = 2m (we understand this is the requirement under the legacy Auckland City District Plan (Isthmus)) (Rule 8.8.1.3) - Side and rear = 5m (we accept that this requirement should only apply if the site is adjacent to Residential or an Open Space zone) 	Amend as follows: 5.4 Yards Purpose: <ul style="list-style-type: none"> •provide a buffer and screening between industrial activities and neighbouring residential activities and public open space, to mitigate adverse visual and nuisance effects •ensure buildings are adequately set back from lakes, streams and the coastal edge to maintain water quality, amenity, provide protection from natural hazards, and potential access to the coast.

		<ul style="list-style-type: none"> - 25m from the coast is too restrictive. A 10m limit should apply to coastal protection yards. In our submission on-site controls within industrial sites have improved markedly and there is no longer justification for such expansive yard requirements (which restrict this land from being used for productive uses) - the requirement for low level limited landscaping should only apply to the front yard and not rear or side yards. - Principles of Crime Prevention Through Environmental Design (e.g. Surveillance and Sightlines: See and Be Seen) should be followed in restricting unnecessary requirements for trees and shrubs 	<p>Table 7</p> <table border="1" data-bbox="1182 229 1962 603"> <thead> <tr> <th data-bbox="1182 229 1487 277">Yard</th> <th data-bbox="1487 229 1962 277">Heavy Industry and Light Industry</th> </tr> </thead> <tbody> <tr> <td data-bbox="1182 277 1487 368">Front</td> <td data-bbox="1487 277 1962 368">2m 3m Yards are not required for internal roads or service lanes</td> </tr> <tr> <td data-bbox="1182 368 1487 427">Rear</td> <td data-bbox="1487 368 1962 427">5m where the rear boundary adjoins a residential zone or public open space</td> </tr> <tr> <td data-bbox="1182 427 1487 486">Side</td> <td data-bbox="1487 427 1962 486">5m where the side boundary adjoins a residential zone or public open space</td> </tr> <tr> <td data-bbox="1182 486 1487 545">Riparian</td> <td data-bbox="1487 486 1962 545">10m from the edge of permanent and intermittent streams</td> </tr> <tr> <td data-bbox="1182 545 1487 603">Coastal protection yard</td> <td data-bbox="1487 545 1962 603">10m 25m, or as otherwise specified in appendix 6.7</td> </tr> </tbody> </table> <p><u>1. Front yards (excluding access points) must be planted with shrubs and grass within and along the full extent of the yard.</u></p> <p>1. Front yards (excluding access points) must be planted with trees, shrubs and ground cover plants within and along the full extent of the yard. Planting must include specimen trees capable of achieving a height of 5m within five years of planting and spaced at a minimum of one every 5m along the full length of the yard.</p> <p>2. Side and rear yards must be planted with trees, shrubs and ground cover plants within and along the full extent of the yard to provide a densely planted visual buffer for a depth of at least 3m. Landscape planting must cover the full area of the specified yard and be capable of achieving a dense visual screen to a height of 5m within five years of planting.</p>	Yard	Heavy Industry and Light Industry	Front	2m 3m Yards are not required for internal roads or service lanes	Rear	5m where the rear boundary adjoins a residential zone or public open space	Side	5m where the side boundary adjoins a residential zone or public open space	Riparian	10m from the edge of permanent and intermittent streams	Coastal protection yard	10m 25m , or as otherwise specified in appendix 6.7
Yard	Heavy Industry and Light Industry														
Front	2m 3m Yards are not required for internal roads or service lanes														
Rear	5m where the rear boundary adjoins a residential zone or public open space														
Side	5m where the side boundary adjoins a residential zone or public open space														
Riparian	10m from the edge of permanent and intermittent streams														
Coastal protection yard	10m 25m , or as otherwise specified in appendix 6.7														
Part 3 – Chapter H 1.2 - 3.2 Number of parking and loading spaces (<i>Parking spaces</i>)	Support partially	It is sufficient to provide for one space for every 100m ² GFA in a warehousing and storage site in industrial zone (but may be more appropriate for one space for every 50m ² GFA for a manufacturing site) – it is an inefficient use of land to provide for greater levels of parking than necessary.	<p>Amend Table 4 as follows</p> <table border="1" data-bbox="1182 1123 1962 1398"> <tbody> <tr> <td data-bbox="1182 1123 1568 1246"><u>All warehousing and storage, and lock-up facilities and freight depots</u></td> <td data-bbox="1568 1123 1962 1246"><u>1 per 100m² GFA.</u></td> </tr> <tr> <td data-bbox="1182 1305 1568 1398"><u>All other industrial activities (including manufacturing)</u></td> <td data-bbox="1568 1305 1962 1398"><u>1 per 50m² GFA, or 0.7 per FTE employee (where the number of employees is</u></td> </tr> </tbody> </table>	<u>All warehousing and storage, and lock-up facilities and freight depots</u>	<u>1 per 100m² GFA.</u>	<u>All other industrial activities (including manufacturing)</u>	<u>1 per 50m² GFA, or 0.7 per FTE employee (where the number of employees is</u>								
<u>All warehousing and storage, and lock-up facilities and freight depots</u>	<u>1 per 100m² GFA.</u>														
<u>All other industrial activities (including manufacturing)</u>	<u>1 per 50m² GFA, or 0.7 per FTE employee (where the number of employees is</u>														

				known), whichever is the lesser	
Part 3 – Chapter H 1.2 - 3.1 Number of parking and loading spaces (<i>Cycle parking rates</i>)	Support	We support this increase from 1 per 800 m ² in the Draft Unitary Plan to 1 per 1000m ² <u>GFA</u>	Amend Table 5 as follows		
		.	All other <u>industrial activities</u> and storage and lock-up facilities	1 per 1000m ² <u>GFA</u>	
Part 3 – Chapter H 1.2 - 3.1 Number of parking and loading spaces (<i>Minimum loading space requirements</i>)	Support	The Loading requirement is appropriate.	Table 7: Minimum loading space requirements		
			Activity	GFA	Minimum Rate
			<u>Retail and indust rial activities</u>	<100 m ²	No loading required
				>100 and < 5,000 m ²	1
				>5,000 and <10,000 m ²	2
				>10,000 m ²	3 plus 1 for every additional 7,500 m ²

8. The Air Quality Industry Transition overlay unduly restricts industrial activities

It is accepted that clean air is fundamental to health, well-being and the environment. While Auckland has good air quality, emissions regularly do not meet all of the environmental standards for air quality. The main contributors to air pollution are domestic fires, transport (predominantly motor vehicle emissions), and to a much lesser extent, industry. The Unitary Plan acknowledges that some industrial processes cannot avoid discharging contaminants into the air and their operations need to be recognized and provided for. We are pleased that incompatible land uses and activities (such as industrial and residential) are intended to be separated and reverse sensitivity issues are to be avoided. However, our submission is strongly that industrial activities are critical to the economy of Auckland and must be permitted in priority to other activities that cause poor air quality (e.g. traffic and domestic fires). These latter activities must be addressed first.

Air Quality Transport Corridor Separation

The Air Quality Transport Corridor Separation overlay applies to identified strategic traffic routes in urban Auckland. The width of the overlay varies depending on the volume of traffic carried by particular roads, or particular stretches of road. (e.g. it discourages new childcare facilities from locating within 150m of regional strategic network roads, and 70m of regional arterial network roads, as shown on the Air Quality Transport Corridor Separation overlay). The purpose of the overlay is to avoid adverse air quality effects of vehicle emissions on land use activities involving people with particular sensitivities to these emissions. Young children are identified as a group with high sensitivity to the adverse effects of vehicle emissions in terms of their health and overall well-being.

Air Quality – Industry Transition

The Heavy Industry zone is a reduced air quality amenity area. This enables activities that require regional air discharge consents to be located in an area which has a lower amenity than what is generally accepted in other zones. For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance. In our submission this has been a serious mistake, but the solution is not to place new restrictions on heavy industry areas. In our submission, we should accept the mistake and the current state, but not allow it to be exacerbated – we should restrict any further intensification of these encroached areas.

Air Quality – Sensitive Activity Restriction

The purpose of the Sensitive Activity Restriction overlay is to prevent activities sensitive to air discharges establishing close to a Heavy Industry zone. This will ensure that industries' ability to obtain air discharge consents is not restricted by the close proximity of activities sensitive to air discharges. It will also ensure that industries that require regional air discharge consents do not have adverse effects on activities that are sensitive to air discharges.

In greenfield areas the overlay will surround the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, to prevent zones that provide for activities sensitive to air discharges from locating in close proximity. In brownfield areas, where the zone surrounding the Heavy Industry zone does not provide for activities sensitive to air discharges (eg the Light Industry zone, General Business zone) the overlay will also be applied to a distance of 500m from the Heavy Industry zone edge.

In some cases, however, there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge. In these situations it is proposed –

1. where it is one of the following zones, the Air Quality – Industry Transition overlay is applied over the relevant area of the Heavy Industry zone

a. residential zones allowing a density of more than one dwelling per site (eg Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones)

b. all business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre and Mixed Use);

Our submission opposes this approach. We accept that allowing these areas to be zoned in this way has been a serious mistake, but the solution is not to place further restrictions on heavy industry areas. In our submission, we should accept the mistake, but not allow it to be exacerbated - by restricting any further intensification of these encroached areas.

Our submission is that the Sensitive Activity Restriction overlay should accept the existing zoning of these adjacent areas, but be redrafted to restrict any further intensification (e.g. if the zone is currently Mixed Housing Urban, in the Sensitive Activity Restriction overlay, it cannot be rezoned Terraced Housing and Apartment zones).

This is similar to the proposal set out in Point 2 (ie. where the zone permits lower intensity activities that are sensitive to air discharges (eg Single House zone, Countryside Living zone), the Air Quality – Sensitive Activities Restriction overlay is applied over these zones).

8.1 Air Quality - Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>
Part 2 – Chapter E – 7.10 Air Quality Transport Corridor Separation	Support	The reasons for our views are that we support the Air Quality Transport Corridor Separation overlay so as to avoid adverse air quality effects of vehicle emissions on land use activities involving people with particular sensitivities to these emissions. This will further restrict the location of activities involving people with particular sensitivities to these emissions in industrial areas.	None
Part 2 – Chapter E – 7.11 Air Quality Industry Transition	Oppose	The Heavy Industry zone is a critical zone because it is a reduced air quality amenity area. This enables select but critical activities (such as thermal electricity generation plants) that require regional air discharge consents to be located in an area which has a lower amenity than what is generally accepted in other zones. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. Heavy industry should not be restricted to allow for activities sensitive to air discharges that have encroached within this 500m distance.	Delete the entire section.
Part 2 – Chapter E – 7.12 Sensitive Activity Restriction	Partial Support	The Heavy Industry zone is a critical zone because it is a reduced air quality amenity area. This enables select but critical activities (such as thermal electricity generation plants) that require regional air discharge consents to be located in an area which has a lower amenity than what is generally accepted in other zones. For this reason	Amend as follows: Overlay description ... For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. <u>For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones.</u> In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance ...

		<p>activities sensitive to air discharges should not be located within 500m of heavy industry zones. Heavy industry should not be restricted to allow for activities sensitive to air discharges that have encroached within this 500m distance.</p>	<p>In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge. In these situations;</p> <p>1.where it is one of the following zones, the Air Quality—Industry Transition overlay is applied over the relevant area of the Heavy Industry zone;</p> <p>a.residential zones allowing a density of more than one dwelling per site (eg Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones)</p> <p>b.all business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre and Mixed Use)</p> <p>2.where the zone permits lower intensity activities that are sensitive to air discharges (eg Single House zone, Countryside Living zone), the Air Quality—Sensitive Activities Restriction overlay is applied over these zones. Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated. Activities within the Heavy Industry zone are still required to adequately separate activities with air discharges from those activities sensitive to them, so the sensitive activities within these areas are still protected</p> <p><u>In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones and business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre and Mixed Use. Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated</u></p> <p>Policies</p> <p>...</p> <p>2.Locate the overlay so that:</p> <p>b.in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones:</p> <p>i.City Centre zone</p>
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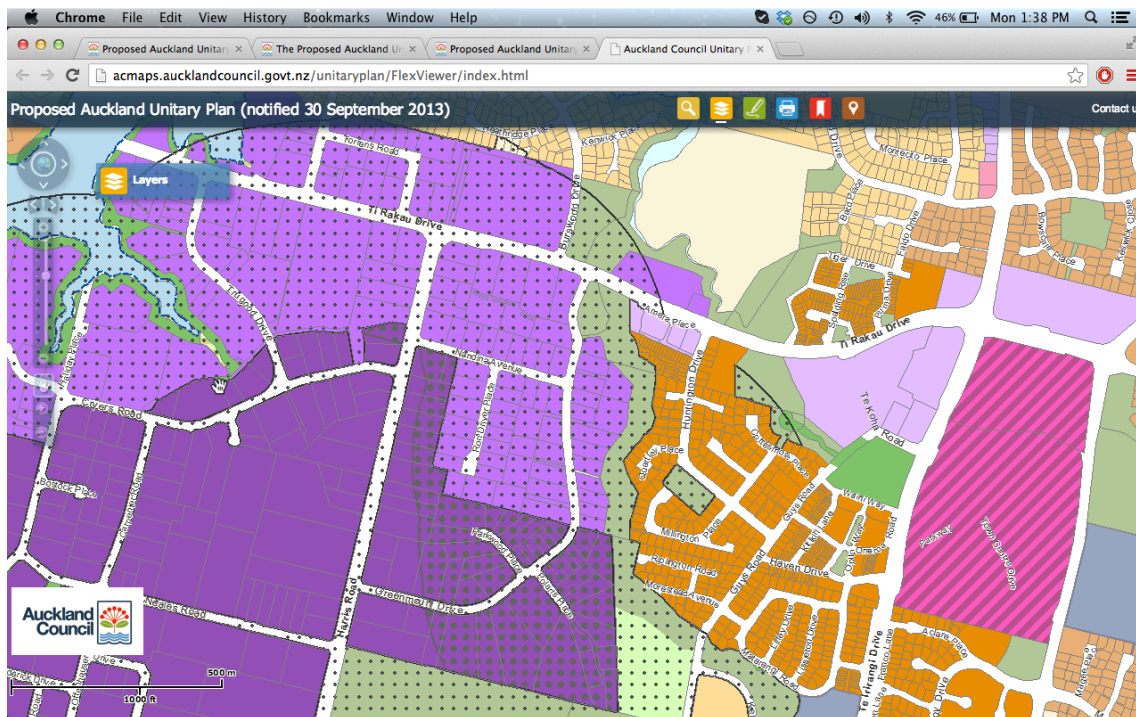
			<ul style="list-style-type: none"> ii. Metropolitan Centre zone iii. Town Centre zone iv. Local Centre zone v. Neighbourhood Centre zone vi. Mixed Use zone vii. Mixed Housing Urban zone viii. Mixed Housing Suburban zone ix. Terraced Housing and Apartment zone x. Healthcare Facility zone xi. Retirement Village zone. <p>3. Avoid locating zones within 500m of a Heavy Industry zone if they provide for <u>activities sensitive to air discharges</u> as permitted activities.</p> <p>4. Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for <u>reverse sensitivity</u> effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).</p> <p>5. Avoid locating <u>activities sensitive to air discharges</u> within 500m of the Heavy Industry zone edge, unless the activity has:</p> <ul style="list-style-type: none"> a. a permitted activity status; or b. it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).
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8.2 Air Quality – Specific Submissions

We are particularly concerned by the Air Quality Industry Transition restrictions on the use of heavy industrial land in the eastern part of East Tamaki (i.e. east of Harris Road, around Greenmount Drive) that adjoins residentially zoned land. This area is identified as that shaded with large dots in the dark purple zone in the map below. Our submission opposes the Part 2 – Chapter E – 7.11 Air Quality Industry Transition generally, but particularly in this area.

The reasons for our submission are that the Heavy Industry zone is a critical zone because it is a reduced air quality amenity area. This enables select but critical activities (such as thermal electricity generation plants) that require regional air discharge consents to be located in an area which has a lower amenity than what is generally accepted in other zones. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. Heavy industry should not be restricted, as the Air Quality Industry Transition overlay provides, to allow for activities sensitive to air discharges to be protected that have encroached within this 500m distance.

Our submission seeks the following relief: Deletion of the Air Quality Industry Transition overlay, particularly for this area.



9. Transport and land use are not well integrated for industrial areas

Transport and land use are closely interrelated and should be mutually supportive. Well-designed transport systems service business growth and development. As noted in the Auckland Plan (paras 755-756), for the transport system to support Auckland’s future business development, “particular emphasis must be given to freight movement and other related business travel on international, national, and Auckland-wide transport corridors.” Three transport projects are critical to future industrial growth – the AMETI, East-West Link and additional Waitemata Harbour Crossing.

9.1 Transport and land use are not well integrated for industrial areas – Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>
Part 1 – Chapter B – 1.2 Enabling economic well-being	Partial support	The reasons for our views are that we support in emphasis in the Auckland Plan (para 755), that particular emphasis must be given to freight movement and other related business travel on international, national, and Auckland-wide transport corridors.	Amend the section on Transport and land use by inserting the following sentence: Transport and land use are closely interrelated and should be mutually supportive. The road network is the main interface of Auckland’s transport system with land use. The impacts of land use on the operation and management of the road should be considered as part of delivering an efficient transport system. Particular emphasis must be given to freight movement and other related business travel on international, national, and Auckland-wide transport corridors. Well-designed transport systems service growth and development, and reinforce urban development patterns.
Part 1 – Chapter B 3.3 Transport	Partial support	The reasons for our views are that we support in emphasis in the Auckland Plan (para 755), that particular emphasis must be given to freight movement and other related business travel on international, national, and Auckland-wide transport corridors.	Amend the Introduction by inserting the following sentence at the end of paragraph 3: Particular emphasis must be given to freight movement and other related business travel on international, national, and Auckland-wide transport corridors. Amend the Objectives by inserting the following objective: Placing particular emphasis to freight movement and other related business travel on international, national, and Auckland-wide transport corridors. Amend the Policies by adding a fifth Policy under the heading ‘Provision of an integrated transport system’: Placing particular emphasis on freight movement and other related business travel on international, national, and Auckland-wide transport corridors.

10. Green Star rating is not an appropriate regulatory measure for inclusion in the Plan

An objective of the Unitary Plan is a quality and sustainable built environment that minimises the environmental impact of new buildings and development. Under this objective, new industrial buildings are required to incorporate best practice sustainable design for: energy efficiency; renewable energy generation and distribution; waste minimisation; and water sensitive design (to maximise water re-use and reduce stormwater runoff). Correspondingly, Rules provide that a new building with a GFA of 5000m², where 80 per cent of the GFA is to be used for industrial activities and 60 per cent is solely for industrial activities, must be designed and constructed to a minimum 4-star level from the New Zealand Green Building Council Green Star Industrial Tool (2009). The rule does not apply to: extensions and alterations to existing industrial buildings; converting an existing building to industrial activities; or industrial activities accessory to another use.

We recognise that new buildings present opportunities to use innovative sustainable technologies that reduce demands on energy and water consumption, and lower operational costs (e.g. *East Tamaki Business Precinct Plan* (2011), page 29).

However, we support the concerns of the Property Council set out in its Feedback to the Draft Unitary Plan (May 2013). In particular, the concern is that market based tools such as Green Star rating are not suited to being enshrined in prescriptive rules in the Unitary Plan. Proper thought needs to be given to the impacts on and potential unintended consequences for tenants, owners and the achievement of public policy objectives. Adding to already high costs of development and construction is likely to have negative implications for progressing key public sector policies. The rules in the Unitary Plan will impose a financial burden on the property sector, which is already struggling to come to terms with seismic strengthening, increasingly expensive insurance and other imposts from regulatory requirements (such as changes to the fire code). The consent process outlined is onerous and complex.

We submit that these rules on Green Star rating be deleted from the Unitary Plan and that instead, work and engagement be undertaken with the private sector to determine alternative more practical ways of achieving sustainability objectives.

10.1 Green Star rating is not an appropriate regulatory measure for inclusion in the Plan

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>
Part 2 – Chapter C 7.7 Sustainable design	Oppose	The reasons for our views are that market based tools such as Green Star rating are not suited to being enshrined in prescriptive rules in the Unitary Plan.	Delete Policy 1. Require medium and large-scale office and industrial buildings to be designed to meet sustainable building standards.
Part 3 – Chapter H 6.4 Sustainable development	Oppose	The reasons for our views are that market based tools such as Green Star rating are not suited to being enshrined in prescriptive rules in the Unitary Plan.	Delete the provisions in Part 3 – Chapter H 6.4 Sustainable development concerning industrial buildings.

11. The noise controls are generally appropriate for industrial zones

Noise from industrial areas may cause adverse effects on amenity in nearby areas. The Unitary Plan seeks to protect noise-sensitive land activities (such as dwellings, hotels, hospitals, childcare centres and schools) from the effects of noise coming from adjacent zones. The Plan sets noise standards within zones (such as Light and Heavy industrial zones) to reflect the predominant functions of the zone, recognising the potential adverse effects noise generation may have on more sensitive adjacent zones (such as residential zones). The Plan prevents noise-sensitive activities from establishing in commercial and industrial zones. It requires noise-sensitive land activities to be located and/or designed to mitigate any reverse sensitivity noise effects (especially from high-use roads). As these high-use roads generally intersect Light and Heavy industrial zones, these zones also benefit from these rules by restricting sensitive activities.

11.1 The noise controls are generally appropriate for industrial zones – Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>						
Part 3 – Chapter H 6.2 – 1.1 Noise arising from activities within zones	Support	<p>The reasons for our views are that we agree that Plan should set noise standards within zones (such as Light and Heavy industrial zones) to reflect the predominant functions of the zone, recognising the potential adverse effects noise generation may have on more sensitive adjacent zones (such as residential zones).</p> <p>Nonetheless, we are concerned that: the 90 L_{max} dBA 2200 – 0700 allowance has not been carried over from the legacy district plans to the Unitary Plan and submit that the 90 L_{max} dBA 2200 – 0700 allowance be retained for Light and Heavy Industry zones.</p>	<p>None. We support the following standards:</p> <p>Table 6</p> <p>10. The L_{Aeq(15 min)} noise level and maximum noise level (L_{AFmax}) arising from an activity in the Industrial, General Business and Business Park zones measured at or within the boundary of any other property in those zones must not exceed the following levels.</p> <table border="1"> <thead> <tr> <th></th> <th>Light Industry Zones</th> <th>Heavy Industry</th> </tr> </thead> <tbody> <tr> <td>All times</td> <td>65dB L_{Aeq} (15min)</td> <td>70dB L_{Aeq} (15min)</td> </tr> </tbody> </table>		Light Industry Zones	Heavy Industry	All times	65dB L _{Aeq} (15min)	70dB L _{Aeq} (15min)
	Light Industry Zones	Heavy Industry							
All times	65dB L _{Aeq} (15min)	70dB L _{Aeq} (15min)							

<p>Part 3 – Chapter H 6.2 – 1.1 Noise arising from activities within zones development</p>	<p>Support</p>	<p>The reasons for our views are that we support regulation of noise sensitive land uses in centres and mixed use zones. New noise sensitive land uses in these areas will be required to protect themselves against both the existing noise levels on adjacent roads and the noise levels that other activities can make in these areas. Sleep, indoor amenity and classrooms are to be protected. This benefits Light Industrial zones nearby. We particularly support the noise levels for habitable rooms (except bedrooms and sleeping areas) and classrooms from being 40dB to improve the protection of these rooms and potential for reverse sensitivity.</p>	<p>None. We support the following standards:</p> <p>Any bedroom, sleeping area, class room or habitable room accommodating an activity sensitive to noise must be designed and/or insulated so that the internal noise levels do not exceed the following levels.</p> <p>Table 9</p> <table border="1" data-bbox="1137 459 1998 603"> <tr> <td>Bedrooms and sleeping areas</td> <td>35dB LAeq(15min) at all times</td> </tr> <tr> <td>Habitable rooms (except bedrooms and sleeping areas) and classrooms in an educational facility</td> <td>40 dBA LAeq(1 hour) at all times</td> </tr> </table>	Bedrooms and sleeping areas	35dB LAeq(15min) at all times	Habitable rooms (except bedrooms and sleeping areas) and classrooms in an educational facility	40 dBA LAeq(1 hour) at all times		
Bedrooms and sleeping areas	35dB LAeq(15min) at all times								
Habitable rooms (except bedrooms and sleeping areas) and classrooms in an educational facility	40 dBA LAeq(1 hour) at all times								
<p>Part 3 – Chapter J 1.5 – High Land Transport Noise</p>	<p>Support</p>	<p>The reasons for our views are that we support provision for a High Land Transport Noise Overlay as it will further protect Light and Heavy Industrial areas from reverse sensitivity effects related to noise.</p> <p>The overlay has been applied 40m on both sides of the boundary of roads and rail corridors that have, or are likely to have over the next 10 years, traffic volumes of more than 20,000 vehicles per day or in the case of rail corridors more than 12 day time or six night time train movements).</p>	<p>None. We support the following standards:</p> <p>Except in centres and mixed use zones, where additional requirements may apply, the following rule in Table 1 applies to any new or altered activities sensitive to noise located within the High Land Transport Noise overlay. Any new activities sensitive to noise and any new bedroom, sleeping area, habitable room or classroom added to an existing activities sensitive to noise within the High Land Transport overlay must be designed and/or insulated, or screened by suitable barriers on the property so that the internal noise levels, measured in those rooms do not exceed:</p> <p>Table 1:</p> <table border="1" data-bbox="1137 1141 2042 1311"> <thead> <tr> <th>Type of use</th> <th>Maximum internal noise level</th> </tr> </thead> <tbody> <tr> <td>Bedrooms and sleeping areas</td> <td>35dB LAeq(1 hour) at all times</td> </tr> <tr> <td>Habitable rooms (except bedrooms and sleeping areas), and classrooms in an educational facility</td> <td>40dB LAeq(1 hour) at all times</td> </tr> </tbody> </table>	Type of use	Maximum internal noise level	Bedrooms and sleeping areas	35dB LAeq(1 hour) at all times	Habitable rooms (except bedrooms and sleeping areas), and classrooms in an educational facility	40dB LAeq(1 hour) at all times
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12. More flexible/smaller lot sizes should be provided for subdivision in industrial areas

Subdivision is the process of dividing a parcel of land or a building into one or more further parcels, or changing an existing boundary location. Subdivision is fundamental to place-shaping. The BID Precinct Plans raise concerns within industrial areas about the fragmentation of land holdings, the need for a mechanism to support land assembly – “brownfield development”, and the need for flexible land use structures.

However, our submission is that the subdivision controls proposed for Heavy Industry zones are too restrictive.

12.1 More flexible/smaller lot sizes should be provided for subdivision in industrial areas – Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>		
Part 2 – Chapter H 5 – Subdivision - 2.3.2 – Business zones	Partial Support	The reasons for our submission is that more flexible provisions (such as those in the legacy Manukau City District Plan) regarding subdivision in Heavy Industry areas should be retained (particularly for ‘brownfields’ development). In the legacy Manukau City Plan, the minimum lot size for Business 6 zoned land (Industrial) is 2000m ² reducible to 1000m ² provided that the average lot area of lots in any subdivision shall not be less than 2000m ² .	Standard	Light Industry	Heavy Industry
			Minimum site size	1000m ²	2000m² 1000 m²
			Minimum average site size	2000m ²	5000m² 2000 m²

13. The electricity transmission corridor in Light and Heavy Industry areas should be removed

The electricity transmission network is important to Auckland's industrial areas.

Policy 11 of the National Policy Statement on Electricity Transmission 2008 ('NPSET 2008'), provides that: "Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent." Sensitive activities is defined in the NPSET 2008 - "includes schools, residential buildings and hospitals". This is to avoid risks posed by this infrastructure to these activities.

The Unitary Plan provides for an electricity transmission corridor covering 12m (both sides) from the transmission centre line. The transmission corridor traverses through East Tamaki and Onehunga business areas, and alongside the Mahunga Drive and Rosebank business areas. The corridor places restrictions on activities sensitive to the effects of transmission lines, such as residential and care centres. However, in recognition of the level of built development and the need to provide landowners some flexibility, the Unitary Plan takes a more permissive approach to certain building works, such as alterations and extensions and normal farming operations. This is subject to certain standards being met, including the maintenance of access to transmission line support structures and the requirement to meet the New Zealand Electrical Code of Practice (NZECP34:2001). This code sets minimum safe distances from transmission lines to protect people, property, vehicles and mobile plant from harm or damage from electrical hazards. Subdivision generally requires resource consent in order to ensure the layout of future buildings do not unduly constrain the operation and maintenance of the transmission lines.

We disagree with the Unitary Plan's interpretation of the NPSET 2008. The Unitary Plan establishes a buffer corridor around transmission lines up to 12 metres wide across heavy and light industry properties. The NPSET 2008 requires an "appropriate" buffer corridor for towers and transmission lines in which "sensitive activities will generally not be provided for". Under NPSET other measures to protect the national grid can be limited to what is "reasonably possible". NPSET does not require buffer corridors for non-sensitive activities. Thus, in our submission, there is no need for the Unitary Plan to include buffers for non-sensitive uses (such as those in Light and Heavy Industry zoned areas) and these should be removed from the Unitary Plan across these industrial areas. Compliance with NZECP 34:2001 is mandatory and that is sufficient to ensure the safe operation of the transmission system across industrial properties.

Because of the impact on the value and use of underlying property, Transpower should be required to notify Local Boards and property owners of all planned operational changes, maintenance (except for emergency repairs), equipment replacement and upgrades, including changes which would raise or lower lines. We submit further that statements of intent should be added to the Unitary Plan to place underground transmission assets that are now above ground as currently they seriously reduce the value and use of underlying private property and reduce the recreational and ecological values of harbours and waterways they cross. Council should work with NZTA, KiwiRail and Transpower to underground these assets in road and rail corridors.

13.1 The electricity transmission corridor in Light and Heavy Industry areas should be removed – Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>Reasons for the Submission</i>	<i>Relief Sought</i>
Part 2 – Chapter E 1.4 Electricity Transmission Corridor	Oppose	<p>We disagree with the Unitary Plan’s interpretation of the NPSET 2008. The Unitary Plan establishes a buffer corridor around transmission lines up to 12 metres wide across heavy and light industry properties.</p> <p>The NPSET 2008 requires an “appropriate” buffer corridor for towers and transmission lines in which “sensitive activities will generally not be provided for”. Under NPSET other measures to protect the national grid can be limited to what is “reasonably possible”. NPSET does not require buffer corridors for non-sensitive activities.</p> <p>Thus, in our submission, there is no need for the Unitary Plan to include buffers for non-sensitive uses (such as those in Light and Heavy Industry zoned areas) and these should be removed from the Unitary Plan across these industrial areas.</p> <p>Compliance with NZECP 34:2001 is mandatory and that is sufficient to ensure the safe operation of the transmission system across industrial properties.</p>	<p>Amend as follows:</p> <p>Overlay description</p> <p>...</p> <p>Under the National Policy Statement on Electricity Transmission 2008, the council is required to identify <u>an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for</u> and provide a buffer corridor below and around high voltage transmission lines and transmission towers/poles. These lines and tower/poles are owned and operated by Transpower New Zealand Limited and form part of the national electricity grid. <u>Sensitive activities is defined in the NPSET 2008 as “includes schools, residential buildings and hospitals”.</u></p> <p>The purpose of these buffer corridors is to manage subdivision and development of <u>sensitive activities (including schools, residential buildings and hospitals)</u> within close proximity to the high voltage transmission lines and transmission towers/poles, in order to prevent risks to people and property; protect the electricity transmission network; <u>and</u> preserve line access for inspection and maintenance and to protect amenity values.</p> <p>High voltage transmission lines pose a risk of electrical hazard in situations where development occurs too close to the lines and may result in injury to persons or damage to property. This can be either as a result of direct contact with the lines or where an electric arc (or ‘flashover’) contacts structures, such as <u>buildings</u>. Conversely, development in close proximity to transmission lines can pose risks to the electricity transmission network itself. These risks include ‘<u>reverse sensitivity</u>’ effects, a loss of security of supply through outages or physical damage to support structures, constraints on access to the line and support structures for inspection and maintenance purposes and inability to undertake line upgrades. <u>Development in close proximity to high voltage transmission lines and transmission towers/poles is controlled by the New Zealand Electrical Code of Practice (NZECP34:2001).</u></p> <p>...</p> <p>The electricity transmission corridor covers the area 12m (both sides) from the transmission centre line in zones in which <u>sensitive activities (includes schools,</u></p>

			<p><u>residential buildings and hospitals) are generally provided for.</u> In zones (such as Light and Heavy Industry zones) where <u>sensitive activities (includes schools, residential buildings and hospitals) are generally not provided for, no buffer is necessary and none is included.</u></p> <p>The corridor places restrictions on <u>sensitive activities (such as schools, residential buildings and hospitals).</u> activities sensitive to the effects of transmission lines, such as residential and care centres. However, in recognition of the level of built development and the need to provide landowners some flexibility, the Unitary Plan takes a more permissive approach to certain building works, such as alterations and extensions and normal <u>farming</u> operations. This is subject to certain standards being met, including the maintenance of access to transmission line support structures and the requirement to meet the New Zealand Electrical Code of Practice (NZECP34:2001). This code sets minimum safe distances from transmission lines to protect people, property, vehicles and mobile plant from harm or damage from electrical hazards. Subdivision generally requires resource consent in order to ensure the layout of future <u>buildings</u> do not unduly constrain the operation and maintenance of the transmission lines.</p> <p>Objective</p> <p>1. The efficient development, operation and upgrading of the electricity transmission network (national grid) is not unnecessarily constrained by subdivision, land use and development. To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while: managing the adverse environmental effects of the network; and managing the adverse effects of other activities on the network</p> <p>Policy</p> <p>1. Require subdivision, land use and development within the electricity transmission corridor to be undertaken so that it:</p> <ul style="list-style-type: none"> a. meets the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34: 2001) b. does not compromise security of supply and/or the integrity of transmission assets c. does not compromise existing access to conductors and support structures for maintenance and upgrading works d. does not foreclose operation and maintenance options or the carrying out of planned upgrade works e. manages activities sensitive to transmission lines to avoid exposure to risk and minimise exposure to nuisance, such as noise, line drip and flashovers
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			<p>f.takes transmission assets into account at the design stage of subdivision by locating compatible activities under or in close proximity to lines.</p> <p><u>1. To identify an appropriate buffer corridor in those zones within which sensitive activities (includes schools, residential buildings and hospitals) will generally not be provided for.</u></p>
Part 3 – Chapter J 1.4 Electricity Transmission Corridor – 1 – Activity Table	Partially support	<p>As noted above, in our submission, there is no need for the Unitary Plan to include buffers for non-sensitive uses (such as those in Light and Heavy Industry zoned areas).</p> <p>To clarify this, we submit that a statement be included in the Activity Table that the provisions do not apply in in Light and Heavy Industry zoned areas.</p>	<p>Amend by inserting the following sentence into the introductory paragraph:</p> <p>The following table specifies the development activities within the electricity transmission corridor. <u>Note that the electricity transmission corridor does not traverse Light or Heavy Industry zoned land. As a consequence, development activities in those zones are not affected by these rules in this section.</u></p>
Maps - Electricity Transmission Corridor overlay	Oppose	<p>As noted above, in our submission, there is no need for the Unitary Plan to include buffers for non-sensitive uses (such as those in Light and Heavy Industry zoned areas).</p> <p>To clarify this, we submit that the maps be amended to remove the Electricity Transmission Corridor overlay in all Light and Heavy Industry zoned areas.</p>	<p>Amend the maps be remove the Electricity Transmission Corridor overlay in all Light and Heavy Industry zoned areas.</p>

14. The Port Precinct should provide for POAL's Option 2

The Port precinct includes the land and the CMA north of Quay Street between the eastern side of Marsden Wharf and the eastern side of the Fergusson Reclamation. The reclaimed land and wharf structures named Bledisloe Terminal, Bledisloe Wharf, Jellicoe Wharf, Fryberg Wharf and Ferguson Wharf are primary vessel loading and unloading areas. Cargo storage, cargo handling and ancillary port activities are undertaken on the balance of the area fronting Quay Street.

The council is undertaking a stage two study on the future operation and development of the Port of Auckland. The results of this study may inform any changes to the port precinct provisions with regard to reclamation. In the interim, the Unitary Plan provides that until the results of a study on the future operation and development of the port clearly identifies whether and when further reclamation is required to enable that future operation, further reclamation within the Port precinct is to be avoided.

As the Council's stage two study on the future operation and development of the Port of Auckland was not available during the submission period, we have relied on the Ports of Auckland *Ports of Auckland Development Proposals* (May 2013) PDD Interactive Consultation Document⁶ in preparing this Submission.

It is our submission that the Port of Auckland is by far the highest value port in New Zealand and for the sake of the country needs to remain so. Ports of Auckland is New Zealand's largest and most important seaport, handling 37% of the country's total seaport trade, and 31% of trade across all ports, including airports. Proposals that reduce the current and future needs and potential for the Port of Auckland need to be critiqued in the light of these facts.

As a consequence, it is our submission that the Port will need to expand moderately as Auckland's population and freight demands grow. We support Option 2 of the *Ports of Auckland Development Proposals* (May 2013) (page 20) for the Port to become more efficient by consolidating container operations to the east and general cargo to the west. We also submit that the people of Auckland are now well served with public open space along the city waterfront, and that the remaining port area should be utilised primarily for productive economic activities. Option 2 proposes to create a 'sub zone' which would set a limit on how far north the port could expand but allow it to continue operations. Part of Option 2 includes the extension of Bledisloe wharf for accommodating large ocean liners and for no berths to face Devonport on Bledisloe wharf. Option 2 also provides for the release of Captain Cook Wharf for public use.

In our submission, Option 2 needs to be provided for in the Unitary Plan.

⁶ http://www.poal.co.nz/about_us/PDD_interactive/index.html#2

14.1 Port Precinct– Detailed Submissions

<i>Provision</i>	<i>Support/Oppose</i>	<i>The reasons for our Submission</i>	<i>Relief Sought</i>
Part 2 – Chapter F 3.8 - Port	Support partially	As a consequence, it is our submission that the Port will need to expand moderately as Auckland’s population and freight demands grow. We support Option 2 of the <i>Ports of Auckland Development Proposals</i> (May 2013) (page 20) for the Port to become more efficient by consolidating container operations to the east and general cargo to the west. We also submit that the people of Auckland are now well served with public open space along the city waterfront, and that the remaining port area should be utilised primarily for productive economic activities. Option 2 proposes to create a ‘sub zone’ which would set a limit on how far north the port could expand but allow it to continue operations. Part of Option 2 includes the extension of Bledisloe wharf for accommodating large ocean liners and for no berths to face Devonport on Bledisloe wharf. Option 2 also provides for the release of Captain Cook Wharf for public use.	Amend as follows: 10. Avoid further reclamation within the precinct until the results of a study on the future operation and development of the port clearly identifies whether and when further reclamation is required to enable that future operation. 10. Provide for further reclamation within the precinct in accordance with Option 2 of the <i>Ports of Auckland Development Proposals</i> (May 2013).
Part 3 – Chapter K 3.7 - Port	Support partially	As noted above, we support Option 2 of the <i>Ports of Auckland Development Proposals</i> (May 2013).	Amend Part 3 – Chapter K 3.7 - Port - to provide for Option 2 of the <i>Ports of Auckland Development Proposals</i> (May 2013).