

Feedback to the Auckland Unitary Plan

Industrial Business Improvements Districts (‘Industrial BIDs’)

31 May 2013

1 Executive Summary

- 1.1 This Feedback on the draft Auckland Unitary Plan (March 2013) (**'Unitary Plan'**) is made by six industrial business improvement districts (**'Industrial BIDs'**) from across the Auckland region, representing a significant number of heavy and light industrial businesses.¹
- 1.2 The six Industrial BIDs cover East Tamaki, Mahunga Drive (Mangere), North Harbour (south of Albany), the Church-Neilson/south Onehunga area, Rosebank and Wiri. Together, we estimate that these six Industrial BIDs represent over half of all land zoned Light and Heavy Industry in Auckland.
- 1.3 Consequently we ask that this Feedback be given the priority it deserves. We are very concerned about the 'residential focus' of the Unitary Plan, and weight likely to be given to residential issues during feedback. *Without adequate planning provision for light and heavy industrial businesses, Auckland won't be able to support the employment needs of its future population or efficiently distribute goods/service to provide for their needs.*
- 1.4 This Feedback begins by reiterating some of the most important aspects of the Auckland Plan for light and heavy industrial businesses:
- a Directive 6.3 of the Auckland Plan seeks to *"protect, enhance and improve business-zoned areas and business improvement districts"*.²
 - b Population growth means an additional 276,700 jobs will be needed in Auckland by 2041. *Better planning is needed to connect where people live, where they work and how they get there.*³
 - c High concentrations of employment are found in the business areas 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).⁴
 - d There is concern over the scarcity of industrial land (particularly within the Rural Urban Boundary ('RUB')) to meet these 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.⁵
- 1.5 Many of these issues are also identified as concerns in the business precinct and strategic plans developed by the six Industrial BID areas in partnership with Auckland Council over the last few years. Picking up on these issues, the Feedback addresses the following:

¹ These industrial Business Associations have adopted the Business Improvement District (BID) Partnership Programme, funded by a targeted rate collected by Auckland Council. The BID partnership programme does not replicate services provided by Council, but channels the capabilities and knowledge of the private sector to improve economic outcomes and achieve common goals. The six Industrial BIDs include: the Greater East Tamaki Business Association Inc, the Mahunga Drive Business Association Inc, the North Harbour Business Association Inc, the Onehunga Business Association Inc, the Rosebank Business Association Inc, and the Wiri Business Association Inc.

² *Auckland Plan*, Directive 6.3

³ *Auckland Plan*, paras 386 and 387

⁴ *Auckland Plan*, para 385

⁵ *Auckland Plan*, paras 390 and 391.

- a the Unitary Plan does not adequately address the need to protect existing industrial land in Auckland or provide for more (especially inside the RUB)
- b 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
- g Transport and land use are not well integrated for industrial areas
- h A minimum 5-star Green Star Industrial rating is too high for industrial areas
- i The 90 L_{max} dBA 2200 – 0700 noise allowance must be retained for industrial zones
- j More flexible/smaller lot sizes should be provided for subdivision in industrial areas
- k Buffers under electricity transmission lines for non-sensitive uses in industrial areas should be removed
- l Certain heritage/tree protection in industrial areas appears inappropriate

1.6 Finally, the Industrial BIDs wish to take this opportunity to thank the Council and its officers for the time they have taken to attend seminars, consult and meet with representatives of the Industrial BIDs during the preparation of this Feedback. They would also like to thank those business leaders who also freely gave their precious time and experience to participate in the seminars and discussions that contributed to the production of this document.

1.7 All enquiries on this submission may be directed to:

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2 About the Industrial BIDs

2.1 This Feedback is provided on behalf of six industrial business improvement districts representing six industrial areas within Auckland. They are:⁶

- a the Greater East Tamaki Business Association Inc
 - i 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).

⁶ <http://www.getba.org.nz/>; <http://mahungadrive.biz/page1.php>; <http://www.nhba.org.nz/>; <http://www.onehunga.net.nz/>; <http://rosebankbusiness.co.nz/>; <http://www.wiribiz.org.nz/>

- b Mahunga Drive Business Association Inc
 - i The Mahunga Drive Business Association Inc covers those businesses located within Mahunga Drive, Hastie Avenue and Rymer Place in the Mangere Ward of Auckland. Currently there are 48 businesses operating in this light industrial area. The Association is also advocating on behalf of over 700 light and heavy industry businesses in the James Fletcher Drive/Salesyard Road area, who are not currently members of a local business association. In recognition of this the Associations is researching the feasibility of an expansion into the Otahuhu Ward through the B.E.A.R. program.
- c North Harbour Business Association Inc
 - i The North Harbour Business Association Inc is an industrial BID area, representing over 2,500 businesses and commercial property owners within the North Harbour area. With the successful expansion poll conducted this year, the area will represent a further 1,400 members. The businesses comprise of a mix of Small Medium Enterprises (SME), multinational organisations representing sectors such as ICT, business services, specialist manufacturing and light – medium warehousing. In addition to these businesses, key educational institutions such as Unitec, Pinehurst, Kristin and Albany Primary schools as well as four additional vocational institutions, are all within an industrial estate which is on average less than 20 years old.
- d Onehunga Business Association Inc (Church-Neilson)
 - i The Onehunga/Church-Neilson business precinct employs over 14,600 people. By 2050, the Church-Neilson business precinct is expected to grow by at least an additional 5,000 workers, to support employment in the range of 20,000 to 26,000 workers.⁷
- e Rosebank Business Association Inc
 - i The Rosebank Business Improvement District is a commercial and industrial hub of 450 businesses located on the Rosebank Peninsula in the West Auckland. It has direct access to the SH16 North-Western Motorway and once the Waterview tunnel is completed, will link to the SH20 Airport Motorway. Businesses in the area generate an estimated \$1 billion in revenue, pay rates of \$4.5 million and employ about 8,000 people. The predictions are that this workforce will increase to 20,000 by 2025.
- f Wiri Business Association Inc
 - i The area covered by the Wiri Business Association Inc is about one third of the greater Wiri industrial area within the Manurewa Local Board area. It is located close to the southern motorway and airport. It has the Ports of Auckland Inland Port within its boundaries. The area generally comprises manufacturing and distribution

⁷ Church-Neilson Business Precinct Plan (2010). This is part of a larger study titled 'It's my backyard'. The Church-Neilson Business Precinct Plan may be found on the website - <http://www.itsmybackyard.co.nz/> and the Onehunga Business Association website.

activities. There are some 300 businesses, generating \$4 million in rates and 6000 jobs.

- 2.2 Together, we estimate that these six Industrial BIDs represent businesses in over half of all land zoned Light and Heavy Industry in Auckland. Consequently we ask that this Feedback be given the priority and weight it deserves.

3 Understanding the Unitary Plan

- 3.1 We understand that the Unitary Plan will be Auckland’s planning ‘rulebook’, setting out where and how our city grows in the future. This rulebook is an important step in bringing Auckland together as one region. It replaces the 14 former regional and district plans with one document focused on delivering the vision of the Auckland Plan. The Unitary Plan offers a simpler, more consistent set of rules that will apply Auckland-wide.
- 3.2 The Unitary Plan is a draft for informal public feedback. The feedback from this round of engagement is expected to help the Council make sure there will be a high quality plan ready for notification and formal consultation later in the year.

4 The Auckland Plan

- 4.1 The Auckland Plan (also referred to as the spatial plan) is the broad-based 30-year strategy for Auckland. We understand from officers of the Council that they are seeking for the Unitary Plan to ‘give effect’ to the Auckland Plan. The proposed statutory relationship is that the Unitary Plan must have regard to the Auckland Plan.
- 4.2 Most of the Industrial BIDs made submissions on the Auckland Plan and acknowledge that it is an important strategic document for Auckland. In giving effect to the Auckland Plan, it is submitted that the Unitary Plan must implement the key directives and acknowledge the main statements of the Auckland Plan.
- 4.3 Consequently, this Feedback begins by reiterating some of the most important aspects of the Auckland Plan for business, particularly light and heavy industrial businesses.
- a Directive 6.3 of the Auckland Plan seeks to “*protect, enhance and improve business-zoned areas and business improvement districts*”.⁸
 - b The Auckland Plan seeks to safeguard existing industrial zoned land and promote efficient use of business land. Overall, it directs that new industrial activities be focused in existing locations (brownfield intensification) and new greenfield areas be gradually released for development over time.

Employment

- c In terms of future employment, population growth means an additional 276,700 jobs will be needed in Auckland by 2041. Just over half (51%) of these will be in the central area, with a further quarter in south Auckland. To create a sustainable city, the growth in Auckland must support and strengthen existing communities and their employment opportunities. *Better planning is needed to connect where people live, where they work and how they get there.*⁹

⁸ Auckland Plan, Directive 6.3

⁹ Auckland Plan, paras 386 and 387

Business land development

- d Auckland is New Zealand's main commercial centre for finance, insurance, transport/logistics, business services, and is the largest centre for manufacturing. Auckland Council is responsible for ensuring that sufficient business and employment land is available for future growth and development. The location of industrial, office and retail activities must occur in a coordinated and strategic manner to maximise liveability and economic productivity.¹⁰
- e High concentrations of employment are found in the business areas situated along Auckland's two major economic corridors: the main southern motorway and the rail corridors (Penrose, Wiri). There is also an arc of business land running from East Tamaki through to the airport, and to the north, concentrations of employment occur along the northern motorway (Takapuna/Smales Farm, Wairau Valley, North Harbour and Rosedale Industrial Estates and Albany).¹¹

Industrial land demand

- f Most of the land requirement is in the industrial areas in southern Auckland. Industrial demand is likely to expand southwards as the demands on more centrally located land increase, causing prices to rise.¹²
- g Growth in the 'golden triangle' (Auckland, Hamilton, Tauranga) is likely to continue. The airport, as a key transportation and distribution hub, will continue to be a major driver of business location, as will population growth, which is likely to be strongest in the southern parts of Auckland.¹³

Business land supply

- h The Auckland Plan recognises existing business land:¹⁴
 - i 930 hectares are zoned but currently vacant
 - ii 510 hectares of brownfields are available for redevelopment
 - iii 450 hectares of greenfields have been committed within the RUB
- i The Auckland Plan notes that location and configuration of this land may not be ideal, and some flexibility is needed to provide additional capacity (e.g. in southern Auckland).¹⁵
- j The Auckland Plan provides that at least 1,400 hectares of additional greenfields land will be provided for business activities outside the RUB. Approximately 1,000 hectares will be for business activities that require large tracts of land (e.g. manufacturing, transport and storage, logistics and similar activities). 400 hectares will be for commercial

¹⁰ *Auckland Plan*, para 385

¹¹ *Auckland Plan*, para 385

¹² *Auckland Plan*, para 389

¹³ *Auckland Plan*, para 389

¹⁴ *Auckland Plan*, paras 127, 387, 388. See also Maps D.1 and D.2.

¹⁵ *Auckland Plan*, paras 127, 387, 388. See also Maps D.1 and D.2.

activities (retail, office and service activities). The total area of business land available for development is 3,290 hectares.¹⁶

Protect industrial land

- k There is concern over the scarcity of industrial land to meet these 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.¹⁷

5 Industrial BID Precinct Plans

- 5.1 The Auckland Council plays a key role in promoting and managing growth in Auckland. Planning must pave the way for business expansion and support region-wide economic growth.
- 5.2 To help plan for the future of some business areas, Auckland Council has worked with businesses and other stakeholders to develop Business Precinct Plans. These are set within context of the Auckland Plan and the Economic Development Strategy. Business Precinct Plans provide the guiding framework to support business and employment growth within key business areas.¹⁸
- 5.3 Three Business Precinct Plans have been established for industrial areas: the East Tamaki Business Precinct Plan, the Rosebank 2030 business precinct plan and the Church-Neilson 2050 business precinct plan.¹⁹ In addition, each of the other three industrial BIDs providing this Feedback have strategic plans identifying similar planning issues.²⁰
- 5.4 Consequently, the second part of this Feedback begins by reiterating some of the most important common themes of these business precinct and strategic plans:

Industrial land is critically important

- a Traditionally, these industrial precincts 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 land must be protected

- b Industrial zoned land is a precious resource. It must be protected against the encroachment from general business, retail and residential use. Open space,

¹⁶ *Auckland Plan*, paras 127, 387, 388. See also Maps D.1 and D.2.

¹⁷ *Auckland Plan*, paras 390 and 391.

¹⁸ <http://www.aucklandcouncil.govt.nz/EN/planspoliciesprojects/councilpolicies/easttamakibusinessprecinctplan/Pages/home.aspx>:

¹⁹ <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/>

²⁰ See Mahunga Drive Business Association Inc, Strategic Focus 2012-2018 and Work Plan 2012-2013; <http://www.wiribiz.org.nz/>; <http://www.nhba.org.nz/>

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 centres.

Current constraints on industrial business land

- c Precinct plans have identified several constraints on industrial land use:
 - i the fragmentation of land holdings, the lack of a mechanism to support land assembly (brownfield development), the lack of flexible land use structures for different industrial business activities and poor macro-economic conditions for managing land use
 - ii environmental constraints (e.g. demands for better air quality, amenity, ecological corridor development, heritage protection, coastal character, open space, tree protection and infrastructure (such as high-voltage power lines). Land contamination, instability and use of hazardous substances also constrain industrial land use)
 - iii transport constraints (e.g. the ability of the existing road network to accommodate current and future traffic/transport demands; the possibility of major disruption from future transport links; major intersection under-development; and insufficient provision of public transport)
 - iv community constraints (e.g. demands for siting prisons, stadiums and places of worship in industrial areas)

6 Feedback

- 6.1 The third part of this Feedback address the issues identified above in the context of the Unitary Plan.

The Unitary Plan does not adequately address the need to protect existing industrial land in Auckland or provide for more

- 6.2 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.

Feedback

Our Feedback is that we are pleased the Unitary Plan recognises the importance of industrial land and clearly identifies two zones – Light and Heavy Industry.

Nonetheless, we are concerned that there remains 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.

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).

Better planning is needed from the Unitary Plan to connect where people live, where they work and how they get there.

Light and Heavy Industrial areas are appropriately simplified into two zones

- 6.3 We understand that most industrial areas in current Auckland 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.

Feedback

Our Feedback is that we are pleased overall with the Unitary Plan Light and Heavy Industry zoning.

Nonetheless, we say that neither the planning maps, nor the text of the Plan reflect the level of detail set out in the Precinct Plans for Rosebank, East Tamaki or Church-Neilson (Onehunga), for example. To address this, we suggest consideration be given to ensuring the detail set out in the Precinct Plans be reflected in the Unitary Plan. More broadly, we believe industrial areas are of such critical importance that business precinct planning should be established for all significant industrial zones across Auckland.

On a more specific note, we say that the properties on the corner of Hastie Ave and Mahunga Drive may be incorrectly zoned in the maps or have been inappropriately rezoned (single house Residential) along with 4 adjoining properties along Mahunga Drive. These properties are currently all light industry (as are all properties along Mahunga Drive (on both sides) up to where a stream passes under the road. It appears 51 Hastie Ave (marked as 2 properties, should be 3 Units A, B and C). In our submission, the zoning for this area should revert to Light Industry.

Activities allowed in the Heavy Industry zones are generally appropriate

- 6.4 We understand that the permitted and restricted discretionary activities in the Heavy Industry zone include those that may produce unpleasant or noxious odour, dust and noise emissions. The construction, alteration and demolition of buildings is allowed. Industrial activities (meaning the manufacturing, assembly, packaging, wholesaling or storage of products or the processing of raw materials and other ancillary activities (subject to air discharge requirements)) are allowed. However, offices are only allowed that are accessory to an industrial activity on the site (and the GFA does not exceed 20% of all buildings on the site). Education facilities are allowed if they are accessory to an industrial activity on the site.

Feedback

Our Feedback is that we are pleased the Unitary Plan acknowledges heavy industrial activities are necessary in the region. We are pleased that educational facilities are restricted to those 'accessory to an industrial activity on the site' as we have concerns that this is currently not being observed in some heavy industry areas.

Nonetheless, we are concerned that the broad range of activities allowed in heavy industry zones may allow activities that are not strictly heavy industrial (e.g. wholesaling and storage of products). With limited supply of heavy industrial land within the RUB, we believe it is critical this land be reserved predominantly for heavy industrial use (e.g. manufacturing).

On a minor point, the Plan should provide for small offices on 'bare land' (e.g. a yard office) and consequently this rule needs to be redrafted.

Activities allowed in the Light Industry zone are generally appropriate

- 6.5 We understand that the permitted and restricted discretionary activities in Light Industry zones include industrial activities (meaning the manufacturing, assembly, packaging, wholesaling or storage of products or the processing of raw materials and other ancillary activities (subject to air discharge requirements). The construction, alteration and demolition of buildings is allowed. Trade suppliers including Bunnings and Mitre 10; motor vehicle sales and garden centres are allowed as is retail associated with an industrial activity and convenience retail. Offices that are accessory to an industrial activity on the site and where the GFA does not exceed 20% of all buildings on the site are allowed. We understand that waste management facilities are industrial activities permitted in light industrial areas.

Feedback

Our Feedback is that we are pleased the Unitary Plan acknowledges light industrial activities are necessary in the region.

Nonetheless, we say that

- *we are concerned that there is little distinction between light and heavy industrial zones*
- *we are concerned that the broad range of activities allowed in light industry zones may allow a number of activities that are not strictly light industrial, but more retail (e.g. trade suppliers and garden centres) or heavy industry (e.g. waste management facilities). With dwindling supplies of light industrial land within the RUB, we believe it is critical this land be reserved for light industrial use.*

What is not expected in light and heavy industry zones is generally appropriate

6.6 We understand that some of the activities in light and heavy industry zones may be categorized as follows:

<i>Activity</i>	<i>Light Industry Zone</i>	<i>Heavy Industry Zone</i>
Dwellings	Non-complying	Prohibited
Large Format Retail	Non-complying	Prohibited
Retail which is neither a Trade Supplier, associated with an industrial activity, or convenience retail	Non-complying	Non-complying
Care centres	Discretionary	Non-complying
Education facilities not associated with industry	Discretionary	Discretionary
Churches	Discretionary	Non-complying
Offices that are not accessory	Non-complying	Non-complying

6.7 Our Feedback is that we believe the above activities in light and heavy industry zones should be categorized as follows:

<i>Activity</i>	<i>Light Industry Zone</i>	<i>Heavy Industry Zone</i>
Dwellings	Non-complying	Prohibited
Large Format Retail	Non-complying	Prohibited
Retail which is neither a Trade Supplier, associated with an industrial activity, or convenience retail	Non-complying	Non-complying
Care centres	<u>Non-complying</u>	<u>Prohibited</u>
Education facilities not associated with industry ²¹	<u>Non-complying</u>	<u>Non-complying</u>
Churches	Discretionary	Non-complying
Offices that are not accessory	Non-complying	Non-complying

²¹ Due to the nature of the North Harbour Business Association area, this part of the Feedback does not represent that Association.

Feedback

Our Feedback is that we are pleased the Unitary Plan restricts dwellings, large format retail, retail, care centres, education facilities and offices from light and heavy industrial zones.

Nonetheless, we say that –

- *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 are better placed in light industrial areas (which are typically adjacent to heavy industrial areas) and prohibited from heavy 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 industries.*
- *with regard to education facilities, we are again concerned that these are 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.²²*
- *with regard to 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.²³*

What can be built in Light and Heavy Industry Zones is generally appropriate

- 6.8 We understand that there are a number of controls proposed for building in light and heavy industrial areas. Our feedback is as follows:

²² Due to the nature of the North Harbour Business Association area, this part of the Feedback does not represent that Association.

²³ Due to the nature of the North Harbour Business Association area, this part of the Feedback does not represent that Association.

<i>Control</i>	<i>Proposal in Unitary Plan</i>	<i>Our Feedback</i>
Height	Building height 20m unless within 50m of a residential or open space zone, where it is 10m	<p>While 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 current 'no height limit' in the legacy Manukau District Plan.</p> <p><i>Our feedback is that there should be no height limit in either the light or heavy industry zones.</i></p>
Yard	<p>Yard</p> <ul style="list-style-type: none"> - Front = 3m - Side and rear = 5m (only if adjacent space to Residential or Open Space zone) - 10m, from the edge of any permanent or intermittent stream - If yard is required, it is to be landscaped 	<p><i>Our feedback for Yards is that industrial land is an important resource and should be fully utilised:</i></p> <ul style="list-style-type: none"> - <i>Front = 2m (we understand this is the requirement under the legacy Auckland City District Plan (Isthmus))</i> - <i>Side and rear = 5m (we accept that this requirement should only apply if the site is adjacent to Residential or an Open Space zone)</i> - <i>10m, from the edge of any permanent or intermittent stream is too restrictive and should revert the 5m requirement (as for Residential or Open Space zone), and this 5m limit should also apply to coastal protection yards</i> - <i>the requirement for landscaping should only apply to the front yard</i>
Maximum impervious area	80% maximum impervious area	We understand the maximum impervious area requirements under the legacy Manukau District Plan were more generous and might

		revert to those requirements.
Parking and loading	<p>Parking: one space for every 50m² GFA</p> <p>Loading: 3 per > 10,000m² plus 1 for every additional 7,500m²</p>	<p><i>Our feedback for Parking is that it should be one space for every 100m² GFA</i></p> <p><i>The Loading requirement is appropriate.</i></p>
Cycle parking	<p>1 plus 1 space per 800 m² GFA of associated office (visitor)</p> <p>1 per 20 employees (long-stay)</p>	<p><i>Our feedback is that these requirements seem excessive for industrial areas.</i></p>

The Air Quality Industry Transition overlay unduly restricts industrial activities

- 6.9 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.

Feedback

Our feedback is that we are pleased:

- *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 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 should be addressed first.*

Nonetheless, we say that:

- *the Plan should introduce stronger measures to control emissions from indoor solid fuel domestic fires in priority to measures to regulate emissions from industrial areas*
- *the Policies on Industrial Air Quality Amenity need to be rebalanced in favour of protecting the ability of some industrial processes to discharge emissions*
- *Reverse Sensitivity and Separation Distances should be strengthened in favour of industrial activities. In particular, the policies should be rewritten to prohibit zones and activities sensitive to air discharges (such as residential and mixed use zones and associated activities) from locating within 500m of a Heavy Industry zone.*
- *the Air Quality Industry Transition overlay policies should be strengthened in favour of industrial activities, so that activities sensitive to air discharges cannot locate within 500m of the boundary of a Heavy Industrial area unless the effects of those emissions can be avoided, remedied or mitigated by the sensitive activity. Activities sensitive to air discharges should consider relocating to achieve appropriate separation distances from industrial activities.*

Specifically, we say that:

- *we are particularly concerned by the Air Quality Industry Transition restrictions on the use of industrial land in east-East Tamaki (adjoining residentially zoned land), in Onehunga (due to the southern extension of the town centre and residential intensification), and in Wiri (land adjoining the Browns Road School)*
- *in East Tamaki, we understand the air quality overlay of Highbrook Drive in the planning maps has an error and needs to be corrected; the Air Quality Industry Transition overlay into the Heavy Industry zone from the Highbrook Precinct is in error and needs to be removed (as this is zoned Light*

Transport and land use are not well integrated for industrial areas

- 6.10 We agree that 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. Three transport projects are critical to future industrial growth – the AMETI, East-West Link and additional Waitemata Harbour Crossing. For example, the current single Waitemata Harbour crossing is a significant limiter on economic growth, through significant loss of productivity compounded by an inability to plan with confidence.
- 6.11 We believe the current transport systems are proving restrictive for employment of key skills. As a consequence, we support the necessary investment to develop effective Localised Economic Centres, centered around industrial areas. Included in this Feedback is the request for an escalation of a strong sub-regional focus through the Unitary Plan to plan for development to reflect and support the existing sub-regional economic areas of strength (e.g North Harbour's strength in ICT).

Feedback

Our feedback is that we are pleased the Unitary Plan acknowledges the importance of transport and land use integration to enabling economic well-being.

Nonetheless, we say that:

- the Regional Policy Statement provisions of the Plan do not sufficiently emphasise the importance of freight movement and other related business travel (2.1.2, 2.3.3).*
 - similarly, these provisions do not sufficiently recognise or address the importance of freight movement and other related business travel within, from or to the industrial areas of the region (2.1.2, 2.3.3).*
 - the three transport projects critical to industrial growth – the AMETI, East-West Link and additional Waitematā Harbour Crossing should be highlighted in these provisions (2.1.2, 2.3.3).*
- Similarly, the Regional and district objectives and policies of the Plan do not sufficiently address these transport issues or an emphasis on Localised Economic Centres (3.1, 3.2, 3.2.3.10, 3.2.3.11)*

Specifically, we say that:

- we are pleased the Unitary Plan retains the existing district plan building line*

for road widening designations along Rosebank Road, but submit that should this widening not occur soon, that the designation be lifted to allow the land to revert to use by the businesses affected (Rosebank 2030 Business Precinct Plan (2008), page 16)

- we are concerned that insufficient progress is being made to establish effective public transport services to meet the needs of workers in the industrial areas of Auckland*
- we remain concerned that the future form and location of the Gloucester Park interchange in Onehunga has not been resolved (which could provide some relief to Neilson Street traffic with improved connections to SH20 (Church-Neilson Business Precinct Plan (2010), page 144))*
- we support the following transport projects: Albany Highway; Albany Highway South upgrade (Sunset to SH18); North Bus-way Extension Stations; SH18/Albany Highway (improved exit safety)*
- we welcome the completion of the Western Ring Route for 2016, but are concerned the western ring route motorway connection to the northern motorway at Albany will not be completed by that time – introducing significant traffic volumes. It is vital that the interchange at Constellation be given priority.*

A minimum 5-star Green Star Industrial rating is too high for industrial areas

- 6.12 The BID Precinct Plans 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; Rosebank 2030 Business Precinct Plan (2008), page 21*).
- 6.13 An objective of the the Unitary Plan is a quality and sustainable built environment that minimises the environmental impact of new buildings and development (2.2.2 (1(e))). 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, Rule 4.2.5.4 (1.3) provides 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 5-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.

Feedback

Our feedback is that we are pleased the Unitary Plan acknowledges that new industrial buildings present opportunities to use innovative sustainable technologies, but we are concerned that a minimum 5-star level from the Green Star Industrial Tool is too high a goal at this point in time, and suggest we aspire to a lower level (e.g. 3-star level).

The 90 L_{max} dBA 2200 – 0700 noise allowance must be retained for industrial zones

- 6.14 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.

Feedback

Our feedback is that we are pleased:

- the Plan sets noise standards within Light and Heavy industrial zones ($L_{Aeq(15\ min)}$ 65dB for Light and $L_{Aeq(15\ min)}$ 70dB for Heavy, at all times) to reflect the predominant functions of these zones (4.2.5.2 (1.1))*
- the Plan provides for a High Land Transport Noise Overlay (the overlay is 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).*
- new noise sensitive land uses (such as dwellings, hotels, hospitals, childcare centres and schools) will need to protect/insulate themselves against this noise so that sleep is protected, indoor amenity is maintained and the noise does not adversely affect teaching in classrooms. This should also incidentally provide some protection from nearby industrial noise.*
- the Plan provides for regulation of noise sensitive land uses in centres and mixed use zones (Rule 4.4.1.5.2.1). 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. Again sleep, indoor amenity and classrooms are to be protected. This should be beneficial to Light Industrial zones nearby (See Rule 4.2.5.2.1.1.5(c&d). We encourage lowering the noise levels for habitable rooms (except bedrooms and sleeping areas) and classrooms from 45 to 40dB to improve the protection of these rooms and potential for reverse sensitivity.*

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.*

More flexible/smaller lot sizes should be provided for subdivision in industrial areas

- 6.15 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 of fragmentation of land holdings, the need for a mechanism to support land assembly – “brownfield development”, and the need for flexible land use structures. However, the subdivision controls for the Light and Heavy Industry zones are simply minimum lot sizes of 2000m² and 5000m² respectively.

Feedback

Our feedback is that we are concerned that:

- not enough attention has been placed in the Unitary Plan on addressing fragmentation of land holdings, mechanisms to support land assembly – “brownfield development”, or flexible land use structures in Light and Heavy Industry areas*
- the regional and district objectives, policies and rules of the Unitary Plan should address these issues specifically in relation to subdivision in industrial zones*

We believe:

- more flexible provisions (such as those in the legacy Manukau City District Plan) regarding subdivision in Light and Heavy Industry areas be retained and applied to the Unitary Plan (particularly for ‘brownfields’ development). Here the minimum lot size is 2000m² reducible to 1000m² provided that the average lot area of lots in any subdivision shall not be less than 2000m²*

Buffers under electricity transmission lines for non-sensitive uses in industrial areas should be removed from the Unitary Plan

- 6.16 The electricity transmission network is important to Auckland’s industrial areas. The transmission corridor traverses through the East Tamaki, Onehunga and North Harbour business areas, and alongside the Mahunga Drive and Rosebank business areas.
- 6.17 Under the National Policy Statement on Electricity Transmission 2008 (‘NPSET 2008’), the Council is required to identify an appropriate buffer corridor below and around high voltage transmission lines and transmission towers/poles within which it can be expected that sensitive activities will generally not be provided for in plans. This is to avoid risks posed by this infrastructure. The Council proposes three types of buffer corridors to manage subdivision and development in proximity to the transmission lines and towers/poles.

Feedback

Our feedback is that we:

- *disagree with the Unitary Plan's interpretation of the NPSET 2008.*
- *the draft provisions in the Unitary Plan establish a buffer corridor around transmission lines creating a proposed buffer corridor each up to 64 metres wide across properties in several industrial areas of Auckland.*
- *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, there is no need for the Unitary Plan to include buffers for non-sensitive uses and these should be removed from the Unitary Plan and the 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.*
- *submit that buffer corridors be removed for non-sensitive uses (such as those in industrial areas) as compliance with NZECP34 is mandatory and sufficient to meet the requirements of NPSET 2008*
- *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.*
- *submit 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.*

Certain heritage/tree protection in industrial areas appears inappropriate

- 6.18 We acknowledge that historic heritage and character is important to Auckland because it helps us understand and appreciate our history, culture and identity. We understand that a pre-1944 building demolition control applies to areas in Auckland identified as having been settled pre-1944. This proposes a precautionary approach and restricts demolition of residential and non-residential buildings.

Feedback

Our feedback is that we are concerned that:

- the Unitary Plan unnecessarily sets a pre-1944 building demolition control overlay over industrial-zoned land north of Walmsley Road in Mangere, north and south of Puhinui Rd (near Noel Burnside Rd) in Wiri, north and south of Browns Rd, Wiri, south and east of Flexis and south of Church Streets in Onehunga*
- we question the appropriateness of historic heritage sites at 2 Patiki Road Rosebank (Pollens Brickworks), and 2 Spring Street & 273 Neilson Street in Onehunga*
- we question the value of the 2 notable trees at 1 Jomac Place in the Rosebank industrial area*

7 Acknowledgement

- 7.1 Finally, the Industrial BIDs wish to take this opportunity to thank the Council and its officers for the time they have taken to attend seminars, consult and meet with representatives of the Industrial BIDs during the preparation of this Feedback.
- 7.2 The Industrial BIDs would also like to thank those business leaders who also freely gave their precious time and experience to participate in the seminars and discussions that contributed to the production of this document.