

REPORT TO THE JOINT HEARINGS PANEL

WAITAKERE CITY DISTRICT PLAN

PROPOSED PLAN CHANGE 13 (HOBSONVILLE AIRBASE)
PROPOSED PLAN CHANGE 14 (HOBSONVILLE VILLAGE CENTRE)
PROPOSED PLAN CHANGE 15 (MASSEY NORTH)
PROPOSED PLAN CHANGE 16 (MANAGING CITY GROWTH)
PROPOSED PLAN CHANGE 17 (NEW LYNN)
PROPOSED PLAN CHANGE 18 (CITY WIDE URBAN DESIGN RULES)

BUSINESS

File Reference : Report WCC 5
Date : 5 October 2006

1. OUTLINE

This report considers submissions and further submissions which were received in response to proposed Plan Changes 13-18 to the Waitakere City District Plan (referred to in this report as “the Plan”). Other submissions to the Plan Changes will be considered in subsequent hearing reports.

This report has been prepared in accordance with section 42(a) of the Resource Management Act 1991 (“the RMA”) to assist the Joint Auckland Regional Policy Statement (“RPS”) and District Plan Changes Hearings Panel (“the Hearings Panel”) with its consideration of submissions received in respect of the Plan Changes.

The report discusses each submission or groups of similar submissions and includes a recommendation on submissions that has been made by staff preparing the report, **but it is not the decision of the Waitakere City Council** (“the Council”). Recommendations are not directly made with respect to further submissions in support of or in opposition to submissions. However, the recommendations follow that of the original submission.

Submitters and further submitters are invited to attend the hearing and present evidence in support of their submissions for the Hearings Panel to consider. Alternatively if submitters and further submitters are unable to attend the hearing they may provide written evidence which will be tabled for the Hearings Panel to consider.

Following consideration of all the submissions and supporting evidence, if any, presented by the submitters and further submitters at the hearing to the Hearings Panel, the Hearings Panel will make recommendations to the Waitakere City Council. The Council will consider those recommendations and then make a decision concerning each submission.

The suggested amendments to the Waitakere City District Plan arising from the staff recommendations discussed throughout this report are listed in full in Appendix 1. The suggested amendments are set out in the same style as the Waitakere City District Plan. However it should be noted that a number of submissions, that will be considered separately from this report, have sought broad amendments to the content and direction of other proposed changes and the inclusion of additional matters. This may result in some changes to the wording, structure and format of these provisions, which is not reflected in Appendix 1.

2. BACKGROUND

Proposed Plan Changes 13-18 (“the Plan Changes”) were notified on 31 March 2005 as a requirement of the Local Government (Auckland) Amendment Act 2004 (“the LGAAA”). Amongst other things, the LGAAA required Auckland local authorities to prepare and notify changes to their district plans to provide for integrated land transport and land use provisions that are consistent with the Auckland Regional Growth Strategy.

The LGAAA and the relationship between the LGAAA and the RMA is discussed further in section 3 of this report.

In response to the requirements of the LGAAA, the Council publicly notified six Plan Changes (being Plan Changes 13 to 18 inclusive). The Plan Changes provide for:

- The establishment of three new peripheral urban growth areas, which are primarily intended to provide for the development of commercial and industrial activities (Plan Changes 13, 14 and 15);
- The introduction of a new chapter in the Policy Section of the District Plan to provide additional objectives and policies concerned with the management of growth (Plan Change 16);
- Specific rules and supporting policies intended to facilitate and encourage the intensification of development in and around the New Lynn town centre (Plan Change 17); and
- The establishment of new rules to more effectively manage the impacts of growth and intensification (Plan Change 18).

This report addresses those submissions that relate to infrastructure and natural resources issues. It follows the report regarding general growth principles and issues, while submissions relating to other topics will be addressed in subsequent reports.

3. STATUTORY FRAMEWORK

3.1 Local Government (Auckland) Amendment Act 2004

The LGAAA requires that all councils in the Auckland Region integrate their land transport and land use provisions and ensure these are consistent with the Auckland Regional Growth Strategy, give effect to its growth concept and contribute to the matters specified in Schedule 5.

Part 2 of the LGAAA focuses on “Auckland Region land transport and stormwater” and includes sections 6 to 44. The purpose of Part 2 is set out in section 6:

“The purpose of this Part is to-

- (a) assign to the Auckland Regional Council principal responsibility for-*
 - i.) setting the strategy for the Auckland regional land transport system; and*
 - ii) integrating the planning, funding and development of the Auckland regional land transport system; and*
 - iii) stormwater funding in the long-term interests of the Auckland Region (to the extent that this function was, before the commencement of this Act, the responsibility of Infrastructure Auckland; and*
- (b) establish the Auckland Regional Transport Authority and Auckland Regional Holdings to assist the Auckland Regional Council to discharge that responsibility; and*
- (c) dissolve Infrastructure Auckland, and transfer its assets and liabilities to Auckland Regional Holdings and other organisations; and*
- (d) require Auckland local authorities to prepare and notify changes to the policy statement and plans under the Resource Management Act 1991 to provide for integrated land transport and land use provisions that are consistent with the Auckland Regional Growth Strategy.”*

The subsection of key interest here is section 6(d). It is important to note that the test in section 6(d) is one of consistency, a more stringent requirement than that in the RMA where the test at the time of the notification of Proposed Plan Changes 13-18 was for regional and district plans not to be inconsistent with higher statutory documents, such as a regional or national policy statement.

Section 40 defines the extent of land transport and land use changes as follows:

- “(1) A land transport and land use change is a change or variation to an Auckland planning document by including issues, objectives, policies, and descriptions of methods for the purpose of-
- (a) Giving effect, in an integrated manner, to the growth concept in the Auckland Regional Growth Strategy prepared under section 37SE of the Local Government Act 1974; and
 - (b) contributing, in an integrated manner, to the matters specified in Schedule 5.
- (2) A change for the purposes of subsection (1)(a) and a change for the purposes of subsection (1)(b) must, in relation to each other, be integrated.”

A change for the purposes of subsection (1) (a) and a change for the purposes of subsection (1)(b) must, in relation to each other, be integrated.

Section 40 (1) further underscores the importance of the ARGS by requiring changes or variations to give effect to the ARGS growth concept. The importance of integration is stressed through Section 40(1)(b) and (2).

Schedule 5: Land transport and land use changes, indicates that for section 40 (1) (b) the matters are as follows:

- “(a) providing increased certainty in the assessment of resource consents, designations, and plan changes related to transport and urban form, and ensuring that transport and land use patterns are aligned to achieve sustainability, efficiency, and liveability in the Auckland Region; and
- (b) managing transport and transport infrastructure, facilitating a multimodal transport network, and facilitating integrated transport management; and
- (c) reducing adverse effects of transport on the environment (including improving air and water quality, reducing noise and stormwater, improving heritage protection and reducing community disruption and transport land use), and reducing the adverse effects and increasing the positive interactions of transport and land use; and
- (d) supporting compact sustainable urban form and sustainable urban land use intensification (including location, timing and sequencing issues, and associated quality, character, and values of urban form and design); and
- (e) integrating transport and land use policies to reinforce metropolitan urban and rural objectives of the Auckland Regional Policy Statement, the development of a competitive and efficient economy and a high quality of life, underpinned by a quality environment and amenity.”

The matters that the LGAAA requires to be included in changes to statutory documents support the RMA’s purpose of promoting sustainable management of natural and physical resources.

3.2 Resource Management Act 1991 Provisions

The purpose of the RMA, as outlined in Part II, is the sustainable management of natural and physical resources. Part II also outlines the matters, including those matters of national importance, to which the Council must have regard to and provide for in achieving that purpose.

The purpose of a district plan as outlined in section 72 is to assist the Council to carry out its functions. The Councils’ functions are outlined in section 31 as the control of actual and potential effects of the use, development or protection of land and associated natural and physical resources in order to achieve the purpose of the RMA. Councils are obliged to establish, implement and review the objectives, policies and methods to achieve this and can also include rules, which prohibit, regulate or allow certain activities.

3.3 The Relationship Between the RMA and the LGAAA

The matters that the LGAAA requires be included in changes to statutory documents, that is, changes consistent with the ARGS and to give effect to its growth concept, can be taken as promoting the RMA’s purpose of promoting sustainable management of natural and physical resources.

The impetus for the ARGS grew out of the statutory processes surrounding the region’s first ARPS, and the region’s desire to work together more strategically to enhance the region’s future. Environmental protection and sustainable management of the region’s natural and physical resources is central to the ARGS.

The Local Government Act (LGA 1974) gave statutory recognition to the Auckland Regional Growth Forum and legitimised work on a growth strategy through a 1998 amendment. Section SE37 stated that:

- (1) *The Auckland Regional Council must prepare and adopt a regional growth strategy for its region.*
- (2) *The objective of the strategy for the Auckland Region will be to ensure growth is accommodated in a way that meets the best interests of the inhabitants of the Auckland Region.*
- (3) *The regional growth strategy prepared under this section may include (but need not be limited to):*
 - (a) *Identification of the anticipated and preferred locations of growth within the Auckland Region:*
 - (b) *A statement of key values for considering growth issues:*
 - (c) *Information about future growth to assist regional providers of infrastructure to plan to meet future requirements:*
 - (d) *Such other matters as are considered appropriate."*

Subsection 4 required that an (Auckland) regional growth strategy not be inconsistent with any operative or proposed regional policy statement, while 5 provided for reviews.

It is acknowledged that the RMA and the LGAAA legislative language varies somewhat, and may give rise to a range of views about what is appropriate, and under what statute. For the avoidance of doubt, this hearing report assumes that the changes proposed are to meet the LGAAA requirements, and that these requirements fall within the RMA's requirements. Again, for the avoidance of doubt, if there are any doubts, or the appearance of potential conflicts between the two statutes and their requirements, the LGAAA, as the more specific legislation applies.

4 OTHER RELEVANT DOCUMENTS / STRATEGIES

4.1 The Auckland Regional Growth Strategy: 2050

An Overview

The ARGS represents the future vision for the Auckland region by its councils working jointly together in the Auckland Regional Growth Forum. It seeks to promote the sustainable management of the region's resources within a sustainable development framework. It was launched by Auckland councils in late 1999, with the then reviewed Regional Land Transport Strategy (ARLTS).

The strategy provides a vision for what Auckland could look like in 2050 when it may have a population of 2 million. It built on the policy approach in the ARPS. However it contrasts with the ARPS and District Plans that under the RMA are operative for 10 years, and tend to focus on a far shorter time horizon. The ARGS seeks to take an integrated strategic approach to regional growth management into the longer term. Its vision is to sustain:

- strong, supportive communities;
- a high quality living environment;
- a region that is easy to get around; and
- protection of the coast and surrounding natural environment.

The ARGS states that:

"Three key themes relating to the major issues and growth pressures facing the Auckland region emerge from these prioritised desired outcomes. They are:

- *Desirable communities and diversity and choice optimised*
- *Accessibility optimised*
- *Natural and physical environment optimised"*

When the ARGS was launched Auckland councils signed a Memorandum of Understanding committing themselves to its effective implementation through appropriate resourcing of growth work, through committing to develop sector agreements within two years of the ARGS having been signed, and implementing these.

One crucial aspect of implementation includes ongoing changes to RMA policy statements and plans to incorporate relevant aspects of the ARGS and its sector agreements.

The Growth Concept

The “Growth Concept” is a snapshot of how the region could look at 2050 if growth is managed according to the vision, outcomes and principles. Key features of the “Growth Concept” are:

- that growth will be managed by promoting quality, compact urban environments (intensification); this will assist with managing the effects of growth;
- most growth within the existing metropolitan area with development outside current urban limits only where environmental, accessibility and community principles can be met;
- most urban growth focused around town centres and major transport routes to create higher density communities, with a variety of housing, jobs, services, recreational and other activities (mixed use);
- much less emphasis on general infill throughout suburban areas;
- development of the most highly valued and sensitive natural areas is avoided.

Looking out to 2050, some expansion in new greenfield areas was seen as necessary to provide sufficient land and locational choice for dwellings and businesses. If all proposed greenfield development proceeds the Auckland region’s metropolitan area may increase by about 10% or 5000 hectares, over the 50-year timeframe.

By 2050, more than a quarter of the population (more than 500,000 people) could be living in higher density, multi-unit accommodation compared with less than an eighth or 125,000 people in 1996. However, even after 50 years, 70% of people could still live at lower densities in the suburbs and rural areas.

It is acknowledged that the LGAAA requirement to give effect to the growth concept is somewhat problematic for the Section 32 evaluation. The ARGS is a broad brush strategic document, reliant on technical and consultative work done to underpin it but which is not part of it. The ARGS notes that:

“The Growth Concept is essentially a snapshot that illustrates how the Growth Forum believes the region could look in the year 2050 if growth is managed according to the vision, outcomes and principles contained in the strategy. The Growth Concept provides one possible future scenario for the Auckland region. The use of sector and local area agreements provides flexibility for a number of alternative scenarios to eventuate at a sector level. Therefore sector and local area agreements may result in changes to this Growth Concept as other options are assessed against the vision, priority outcomes and principles and agreed by the Growth Forum and its members at a sector level.” (p27)

In other words, further work may raise issues with the focus of growth in a specific area, and which could compromise the vision, outcomes and principles. Maintaining the commitment to the ARGS may require reconsideration of detailed aspects of sector and other agreements and thus changes to them, and to the growth concept.

In addition, further technical work may well be needed to implement sector agreements and to include relevant aspects in district plans. At times, such work may require details of sector agreements to be reconsidered and may result in changes to them.

The way that the ARGS is set up is important. It outlines a vision, key principles and outcomes with a growth concept; these are to be implemented through Memoranda of Understanding between the councils (and also with others), through the development of sector agreements, and sector agreement implementation of these through various mechanisms including changes to statutory documents. The ARGS broad brush picture is expected to remain the largely the same or similar, but the specifics may alter.

Each step in the process enables further consideration of whether what was envisaged in the higher, more general document actually continues to be a good fit with the ARGS vision, principles and outcomes, or whether further refinement is necessary. The ARGS acknowledges it is a living strategy, that reviews will be important and its implementation needs to reflect emerging issues.

5. DISCUSSION OF SUBMISSIONS

5.1 Submissions Relating to One or More Plan Changes

The following submissions have been made to all six plan changes, with the same wording in respect of each submission point. They are therefore considered comprehensively in the following sections.

5.1.1 Plan Change 13, 14, 15, 16, 17 and 18

(a) Whole Plan Change

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/61	Progressive Enterprises Limited	Retain the plan change and adopt insofar as it is consistent with a centres-based approach to planning for retail and business development; is consistent with the Auckland Regional Growth Strategy and Auckland Regional Policy Statement; and is commensurate with the needs of the community in particular the need to maintain and enhance the growth and development of existing and proposed business centres in the District; and, subject to specific amendments sought in submissions 108/62 - 108/72.	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
108/105	Progressive Enterprises Limited	Retain and adopt the plan change insofar as it is consistent with a centres-based approach to planning for retail and business development; is consistent with the Auckland Regional Growth Strategy and Auckland Regional Policy Statement; and is commensurate with the needs of the community in particular the need to maintain and enhance the growth and development of existing and proposed business centres in the District; and, subject to specific amendments sought in submissions 109/105 - 108/124.	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd

Discussion:

The submitter supports Plan Changes 13 and 16 provided it is in accordance with a centres-based policy for retail and business development. The submitter also seeks consistency with the ARGS and the RPS and other the specific relief sought in its submissions.

A centres-based policy is an important component of the Council's overall strategy for urban consolidation and its obligations to provide intergrated land transport and land use provisions consistent with the ARGS and the LGAAA. A key component to the consolidation strategy is the management of retail and business development and centres. The Plan promotes a hierarchy of business development sequencing with the centralisation of retail and business activities, particularly within existing and proposed town centres at the top of this hierarchy. A secondary hierarchy applies to the periphery of town centres for activities that are not well accommodated within them. The strategy also enables a third hierarchy for certain business development along specifically identified major roads. This is the case with the proposed business corridor between Hobsonville Road and the new motorway extension (Plan Change 14). This location, however, is not considered appropriate for higher intensity retail activities that are traditionally found in retail and town centres. On this basis, this approach is not inconsistent with a centres-based policy.

A focus of the Council's centres-based policy is the concentration of retail activities in town centres and on existing and/or proposed passenger transport routes. This will promote the improved viability of passenger transport, reduce vehicle trip frequency and length and relieve the wider pressures on the City's water and land resources and infrastructural systems that arise from the outward expansion of the urban area.

Equally as important, the strategy also recognises a need to respond to the important economic and social needs of the community, represented by the physical environment within town centres. That physical environment has a heavy reliance on the retail sector and amenity values and could suffer through the

unmanaged establishment of retail development elsewhere. It is important to ensure the positive effects on amenity values that are derived from the concentration of retail and community facilities are recognised, provided for and maintained. It is also noted that the above strategies have been fully tested by the district planning process (including appeals to the Environment Court) and is now operative.

Plan changes 13-18 have been prepared in accordance with this strategy and provide for a new town centre at the Hobsonville Village Centre and at Massey North while also consolidating and revitalising its town centre at New Lynn. At the same time, Plan Change 14 is focused on business and industry activities with a compact mixed use town centre. It is considered that these proposed plan changes are consistent with a centres-based policy and the regional instruments referred to in the submission. Furthermore, it is considered that the plan changes are consistent with the provisions of the LGAAA as it promotes town centres and associated urban form that are favourable to establishing efficient public and land transport systems.

It is not considered appropriate to consider the other specific relief requested by the submitter in this report as these are best considered at a later hearing that deals with specific provisions in the various plan changes. On this basis it is recommended that these submission be accepted in part insofar as they support the plan changes on the basis that they are consistent with a centres-based policy and are consistent with the ARGS and RPS. These are commensurate with the needs of the community in particular the need to maintain and enhance the growth and development of existing and proposed business centres in the District.

Recommendation:

That submissions 108/61 and 108/105 be accepted in part.

**5.1.2 Whole Plan Changes - Growth
Plan Change 13, 14, 15, 16 and 17**

(a) Whole Plan Change

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
107/72	Westfield (New Zealand) Limited	Amend the plan change to be consistent with the Auckland Regional Growth Strategy and encourage a centres based approach to planning for business activity including: (a) Maintaining and enhancing transportation efficiency through the development and intensification of appropriately located business centres; (b) Enabling a compact and coherent urban form; (c) Maintaining and enhancing the City's existing resources including existing and proposed town centres; and (d) Ensuring the continued function and social role of Waitakere's existing business centres.	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited
107/92	Westfield (New Zealand) Limited	Amend the plan change to be consistent with the Regional Growth Strategy and to encourage a centres based approach to planning for business activity including: (a) Maintaining and enhancing transportation efficiency through the development and intensification of appropriately located business centres; (b) Enabling a compact and coherent urban form; (c) Maintaining and enhancing the City's existing resources including existing and proposed town and village centres; and (d) Ensuring the continued function and social role of Waitakere's existing business centres.	Opposed By: 153 The National Trading Company of New Zealand Ltd 109 The Warehouse Ltd 110 Warehouse Stationery Limited Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The relief sought by this submitter is similar to that sought by Progressive Enterprises above (108/61 and 108/105) with regard to a centres-based approach but has a particular focus on the appropriate location of business centres, maintaining a compact urban form and ensuring the continued function and social role of existing business centres.

It is considered, for the reasons outlined in the above analysis, that the proposed plan changes have adopted an approach that meets the submitters concerns regarding centres policy and consistency with regional planning instruments. It is therefore considered that no changes need to be made to the plan changes to achieve this. The submitter may be able to provide additional clarification on how these provisions can better meet the relief requested. They are invited to provide (at the hearing of this submission or part of another hearing) specific relief that has been requested as part of other submissions. On this basis it is recommended that the submissions be accepted in part.

Recommendation:

That submissions 107/72 and 107/92 be accepted in part.

5.1.3 Plan Change 14 and 15

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/82	The Warehouse Ltd	Amend Plan Change 14: <ul style="list-style-type: none"> the 9th bullet of Policy 11.38; and Amend Plan Change 15 <ul style="list-style-type: none"> The 3rd bullet of Policy 11.44 to read: <i>“transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”.</i> 	Opposed By: 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited
109/92	The Warehouse Ltd	Amend the third bullet of Policy 11.44 to read: <i>“Ensuring that transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”</i>	Opposed By: 107 Westfield (New Zealand) Limited 108 Progressive Enterprises Limited 208 Sylvia Park Business Centre Limited
110/82	Warehouse Stationery Limited	Amend Plan Change 14: <ul style="list-style-type: none"> the 9th bullet of Policy 11.38; and Amend Plan Change 15 <ul style="list-style-type: none"> The 3rd bullet of Policy 11.44 to read: <i>“transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”.</i> 	Opposed By: 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited
110/92	Warehouse Stationery Limited	Amend the third bullet of Policy 11.44 to read: <i>“Ensuring that transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”</i>	Opposed By: 107 Westfield (New Zealand) Limited 108 Progressive Enterprises Limited 208 Sylvia Park Business Centre Limited
111/79	The National Trading Company of New Zealand Limited	Amend Plan Change 14: <ul style="list-style-type: none"> the 9th bullet of Policy 11.38; and Amend Plan Change 15 <ul style="list-style-type: none"> The 3rd bullet of Policy 11.44 to read: <i>“transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”.</i> 	Opposed By: 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited
111/89	The National Trading	Amend the third bullet of Policy 11.44 to read:	Opposed By: 107 Westfield (New Zealand)

	Company of New Zealand Limited	<i>“Ensuring that transport and land use patterns are aligned to achieve sustainability, liveability, and a competitive and efficient economy”</i>	Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited
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Discussion:

The relevant bullet points for Policy 11.38 (Plan Change 14) and Policy 11.44 (Plan Change 15) read:

“ensuring that transport and land use patterns are aligned to achieve sustainability, efficiency and liveability.”

The submitter seeks that these policies be changed to specifically recognise a competitive and efficient economy as stated in sub-section (e) of Schedule 5. However, it is considered that the policies as they presently stand reflect sub-section (a) of Schedule 5. However, sub section (e) also refers to *“a high quality of life, underpinned by a quality environment and amenity”*. It is considered that these are all important outcomes for a new town centre development and can be combined into a single policy statement. Such a statement could be worded thus:

“ensuring that transport and land use patterns are aligned to achieve sustainability, efficiency, ~~and liveability,~~ a competitive economy and a high quality of life underpinned by a quality environment and amenity.”

It is therefore recommended that the submissions be accepted in part in as much as the amendment to Policy 11.38 is accepted, and repeated in Policy 11.44. The two policies be reworded as outlined above.

Recommendation:

That submissions 109/82, 109/92, 110/82, 110/92, 111/79 and 111/89 are accepted in part.

**5.1.4 All Plan Changes
Educational and Employment Initiatives**

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
299/10	Unitec New Zealand	Retain the Plan Change. Unitec supports the Waitakere City strategy to attract more of its citizens to work and be educated within their city.	
299/11	Unitec New Zealand	Retain the Plan Change. Unitec supports the Waitakere City strategy to attract more of its citizens to work and be educated within their city.	

Discussion:

The submitter supports the plan change on the basis that it will enable Waitakere City residents to work and be educated in the City. It is noted that educational facilities are enabled by the plan changes and the provision of these facilities is consistent with the overall vision and strategy of development. No amendments are recommended.

Recommendation:

That submissions 299/10 and 299/1 be accepted.

5.1.5 All Plan Changes Growth-Attracting Centres

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
299/5	Unitec New Zealand	Retain the Plan Change. Unitec supports Waitakere City in the establishment of logical growth-attracting centres that will drive the development of a viable integrated	Supported By: 300 IMF Westland Ltd

		public/private transport system, reduce loading-growth on the present motorway corridors, and provide increased access to and available opportunities, for education in the city.	
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Discussion:

This submitter supports the plan changes on the basis that the centres will drive the development of a viable integrated public/private transport system, reduce loading-growth on the present motorway corridors, and provide increased access to and available opportunities for education in Waitakere City. It is noted that educational facilities are enabled by the plan changes and the provision of these facilities is consistent with the overall vision and strategy for development.

Recommendation:

That submission 299/5 be accepted.

5.2 Submissions Relating to Specific Plan Changes

5.2.1 Plan Change 14 - Hobsonville Village Centre

(a) Policy 11.40: Hobsonville Village Centre - Precinct A

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
182/6	Palmers Gardenworld Ltd	Amend Policy 11.40 along with its associated explanation to distinguish between the different types of retail activity and in particular to recognise that large format and yard based retail activities such as garden centres may be appropriate within Precinct A.	<p>Supported By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd</p> <p>Opposed By: 250 Auckland Regional Council 108 Progressive Enterprises Limited 300 IMF Westland Ltd 259 Transit New Zealand</p>

Discussion:

The submitter seeks an explanation to distinguish between differing types of retail activity and recognition that large format and yard-based retail activities (such as garden centres) are appropriate in Precinct A.

The wording of the relevant paragraph in Policy 11.40 is as follows:

“Precinct A will have limited opportunities for retail activities to establish as these should be located in the Mixed Use Town Centre- Precinct B. The exception to this is the provision for retail which supports the local employee community, such as convenience food outlets. Subsidiary manufacturing retail and yard based retail are provided for as these are unsuitable in the town centre. Other retail activities should be located in the mixed use town centre precinct to encourage public transport routes to service the area.”

Turning to the first aspect of the relief sought, it is considered that the policy adequately distinguishes between the various types of retail activity types as it clearly states that only yard based and manufacturing retail are provided for in Precinct A and it also states that other forms of retail should be located in the Mixed Use Town Centre – Precinct B. The second aspect of the relief sought also requires no further explanation as Policy 11.40 also clearly states that “*manufacturing retail and yard based retail are provided for as these are unsuitable in the town centre*”.

On this basis, it is recommended that the submission be rejected.

Recommendation:

That submission 182/6 is rejected

(b) Policy 11.40 Provision for Retail Activities Near the Motorway Interchange

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/88	The Warehouse Ltd	Delete the second paragraph of Policy 11.40 and replace with the following: <i>“That part of Precinct A close to the motorway interchange is an ideal location for car focussed retail such as supermarkets and other large format retailing. Pedestrian oriented retail is better located in the Mixed Use Town Centre - Precinct B. Provision should also be made in Precinct A for retail that supports the local employee community such as convenience food outlets. Subsidiary manufacturing retail and yard based retail are provided for as these are also well suited to this light industrial area.”</i>	Opposed By: 107 Westfield (New Zealand) Limited 258 Auckland Regional Transport Authority 250 Auckland Regional Council 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited 300 IMF Westland Ltd

Discussion:

The submission seeks a change to Policy 11.40 that specifically recognises that part of Precinct A close to the motorway interchange is suitable for “*car focussed retail such as supermarkets and other large format retailing*”.

This, however, is not the focus of Precinct A, which is specifically intended to be an employment precinct to meet an identified shortfall in employment land in Waitakere City. Whilst locations close to the interchange may be an attractive location for vehicle-focussed retail activities, the Council needs to provide employment land in locations that are efficient in terms of private and public transport to meets the requirements of a growing City. This has been clearly established in the Council’s own business analysis that has identified that over 50% of the resident working population commutes out of Waitakere on a daily basis and the Council has a policy of reducing this ratio so that 60% of the population has employment within Waitakere City.

Analysis by independent land use and economic development consultants have also suggested that Waitakere alone will need a minimum 276 hectares of additional business land by 2021, including intensification of a further 39 hectares of existing business land. By 2033 a minimum of 649 hectares is required to maintain Waitakere’s current ratio of local employment. (Kemp report¹, 2004). On this basis, the majority of land in the Hobsonville Corridor has been identified for employment purposes (Precinct A) and retail activities have been intentionally restricted to ensure that the opportunity to provide local employment opportunities is not lost. As stated in the Policy, Precinct B has been set aside as mixed use town centre with specific provision for a wide range of retail activities including “*car focussed retail activities*”. On this basis, it is recommended that the submission be rejected.

Recommendation:

That submission 109/88 be rejected.

5.2.2 PLAN CHANGE 15

(a) Special Areas 11.44 - 9th Bullet Activity Thresholds

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
300/31	IMF Westland Ltd	Seeks that if Submission 300/27 is not accepted, reject the 9 th bullet of Policy 11.44 and replace with the following: <i>“imposing thresholds to ensure the establishment of a vibrant mixed use Town Centre including office, community,</i>	Support and Opposed By: 81 IB, GA and IE Midgley

¹ An Assessment of Industrial Land Needs and Development Opportunities in the Massey North - Hobsonville Corridor. Derek Kemp 2004

		<i>commercial and residential activities provided that where thresholds are proposed to be delayed / exceeded by an applicant, it can be demonstrated that the objectives of this policy can still be achieved or otherwise facilitated.”</i>	
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Discussion:

The submitter is generally supportive of the Plan Change as it provides for the sustainable management of natural and physical resources and is in accordance with sound resource management practice. The submitter, however, has sought that the policy framework be replaced with its own version (submission 300/27, with its version annexed as Attachment A to its submission). In the event that this relief is not granted, the submitter seeks a range of changes to individual provisions including the new 9th bullet of Policy 11.44 above. Policy 11.44 relates to Council’s Plan Change 15, and specifically the Massey North Town Centre Special Area.

The requested relief seeks a broad discretion to delay or exceed the proposed activities thresholds in recognition of staging and market demand issues. The Activity Thresholds have been devised to set specific limits in order to achieve a cohesive and balanced urban form that integrates with other planned urban development components such as infrastructure, the location of public open space and public transport facilities. In this regard, the establishment of a vibrant mixed use Town Centre requires such strict activity thresholds. Whilst providing for a broad flexibility can be seen as being desirable to a developer, to allow development to be responsive to certain market or demand conditions,, too much flexibility may threaten the effectiveness, or even dilute Council’s vision, for Massey North and the coherent quality of urban development that is envisaged there. It is considered that the submitter’s requested relief seeks discretion to alter the Activity Thresholds that is too broad and could threaten the quality of the urban form sought by the plan change.

This relief is subject to the Council considering submission 300/27. This submission is located in Category H, which is contained in a forthcoming report about Hobsonville / Massey North. The recommendation made below is therefore subject to and subservient to any recommendations made in relation to submission 300/27.

Recommendation:

That submission 300/31 is rejected

(b) Policy 11.44 Mixed Use Ratios

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
257/242	Waitakere City Council	Amend Policy 11.44 to clarify the minimum mixed use ratios that are expected for individual developments involving mixed use activities.	Supported By: 250 Auckland Regional Council Opposed By: 107 Westfield (New Zealand) Limited 108 Progressive Enterprises Limited

Discussion:

The above submission is part of a comprehensive submission made by the Council to clarify the intent of the plan change and to strengthen the wording of the issues, policies, rules and assessment criteria to reflect the need for strategic management of the key growth issues facing the City in addition to the requirements of the LGAAA and Part II of the RMA. The submission seeks to provide further clarification of the minimum mixed use ratios or individual mixed use activities so that the purpose and application of these controls is better understood and implemented.

Whilst the relief sought is supported in principal, no specific details of the changes have been provided and it is expected that this will be forthcoming at the hearing. On this basis it is recommended that the submission be accepted in part, subject to specific evidence on the changes proposed for Policy 11.44.

Recommendation:

Submission 257/242 be accepted in part.

5.2.3 PLAN CHANGE 16

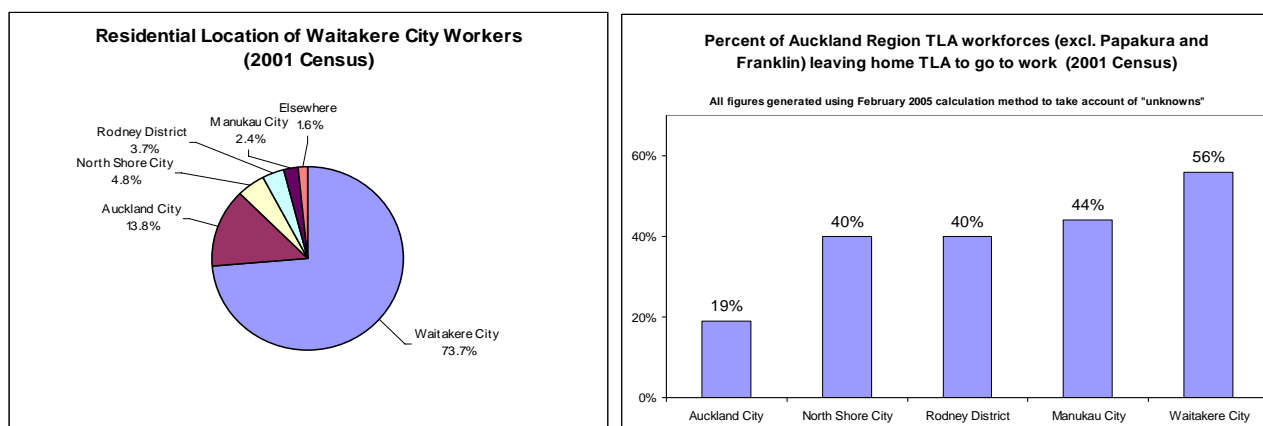
(a) Issue 5 Employment Opportunity

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
250/180	Auckland Regional Council	Amend issue 5 by deleting reference to the employment/residents self sufficiency ratio and adding a paragraph which acknowledges that Waitakere City is part of the wider metropolitan area and is also served by a number of employment opportunities in adjoining territorial authorities, including some that have direct rail access.	<p>Supported By: 258 Auckland Regional Transport Authority</p> <p>Opposed By: 300 IMF Westland Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)</p>

Discussion:

The submitter has concerns with statements in the proposed plan change that aim to achieve a target of 60% of the workforce working locally (in Waitakere) and not having to commute out of the City for employment. The submitter considers that this measurement is not meaningful on the basis that it treats a territorial authority's boundary in isolation and does not recognise, for instance, employment areas directly adjoining Waitakere City where commuting may be relatively short and convenient (i.e. Rosebank Road). The submitter considers that the issue should centre on the relationship between residents, sub-regional centres and the transport system. The submitter also objects to the 60% employment target on the basis it is yet to be demonstrated whether it is either sustainable or appropriate in the regional context.

In response to this submission, it is noted that there is strong empirical evidence that Waitakere City has one of the highest workforce/employment imbalances in the Region as shown on the census information below².



Furthermore, the proposed target of 60% of Waitakere City's population working within its District is similar to existing ratios that exist in North Shore City, Auckland City and Manukau City. In this context, Waitakere City is clearly over-represented, if not out-of-step, with other cities in the Region with regard to the ratio of workforce to employment. Even if the existing workforce/employment ratio were to be adjusted for adjoining sub-regional employment centres adjoining Waitakere City, it is considered that the ratio would still be unacceptably high compared with other cities in the Region. On the basis of the above census information, it is considered that the proposed target of 60% of the workforce working in Waitakere (i.e. no more than 40% commuting outside the District) is reasonable within a regional context.

A target of 60% of Waitakere City's population working within its District promotes the sustainable management of natural and physical resources and is good for the health and wellbeing of the community for the following reasons:

² Submission by Waitakere City Council on the draft Auckland Business Location Strategy pg 4.

- It places less burden on existing motorway and arterial infrastructure which is currently under considerable pressure from commuter traffic;
- It places less pressure on public transport infrastructure which is currently underdeveloped and does not meet the needs of a flexible commuter population;
- Living and working locally contributes the health and wellbeing of people and communities through less commuting time each day, the ability to walk or cycle to work and increased work flexibility (part-time, flexi-shift and telecommuting etc);
- It places less pressure on non-renewable fuel resources; and
- It creates more opportunities to sustain and develop businesses that support the local workforce.

This imbalance is recognised in the Draft Auckland Business Location Strategy where it is stated:

There has been renewed investment and growth in town centres and the CBD. However, despite the signs of a return to a compact city, the Auckland region remains relatively dispersed. A key feature of activity in such a dispersed economy is the commuting of labour to work. This contributes to traffic congestion and adds to the overall cost of doing business. Increasingly businesses are recognising the costs associated with commuting and are seeking to locate close to their primary source of labour.

In addition, planning by local government for business growth, has, in some areas, not kept up with residential growth. This has led to a sub-regional imbalance of business land that has exacerbated traffic congestion as new residents in newly developed residential areas are forced to commute to traditional business locations. In recent years, the development of new business areas has been concentrated in the south of the region, particularly in Manukau City. This has led to a strong north/west to south commuting pattern.

Care needs to be taken in responding to this imbalance. It is not sufficient to simply provide new greenfield business areas where currently there is little business land. Such an approach would threaten the compact city growth concept, and may not significantly add to local employment as invariably land extensive business sectors will seek to locate in these areas. Such sectors do not provide many FTEs relative to floorspace. Therefore in redressing this imbalance, it will be important to advance a comprehensive approach that seeks to grow local employment through intensification of existing business areas as well as by identifying new business areas.³

It is considered that the range of plan changes promoted by the Council is addressing this issue in a comprehensive, co-ordinated and sustainable manner and is consistent with the above statements. Whilst the Massey North Plan Change does create new greenfield areas for business activity, this has been undertaken in conjunction with new town centre development and residential growth areas. In addition, Plan Change 17 promotes a comprehensive range of changes to the Community and Environment rules in New Lynn to promote intensification on existing “brownfield” areas, whilst Plan Change 14 provides for an employment-related corridor between the new motorway extension and Hobsonville Road. On the basis of the above, it is recommended that the submission be rejected.

Recommendation:

That submission 250/180 be rejected.

(b) Objective 0 Retail Activities

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
107/90	Westfield (New Zealand) Limited	Amend Objective 0 as follows (or words to like effect) (addition underlined and deletion in strikethrough): <i>“To manage growth in such a way around town centres and transport corridors, well integrated, with high amenity values and providing appropriately for additional population, employment, community and business services (<u>including retail</u>), by managing</i> ”	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited

³ The Auckland Region Business Land Strategy (Draft) pg 22

108/123	Progressive Enterprises Limited	Amend Objective 0 by deleting those words struck through, and adding those words underlined (or words to like effect): <i>“To manage growth in such a wayaround town centres and transport corridors, well integrated, with high amenity values and providing appropriately for additional population, employment, community and business services (<u>including retail</u>), by managing</i> ”.	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
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Discussion:

The submitters seek amendments to Objective 0 so that it specifically refers to “town centres” and excludes “transport corridors”. The submitters also seek a specific reference to “retail” activity under the reference to “community and business services”. The submitters are particularly concerned about the potential provision for retail development in the Northern Strategic Growth Area (“NorSGA”) corridor and “key transport corridors” as referred to in Plan Change 16 on the basis that ad hoc retail development outside high density centres, town centres and sub-regional centres is likely to compromise the functioning of such centres.

A centres-based policy is closely tied to the Council’s overall strategy for urban consolidation and its obligations to provide for an intergraded land transport and land use provisions consistent with the ARPS. A key component to the consolidation strategy is the management of retail and business development and centres. Plan Change 16 promotes the centralisation of retail and business activities, particularly within existing and proposed town centres. The strategy also enables some business development along major roads, subject to policy and assessment criteria, as a means of encouraging consolidation of urban activities. This is the case with the proposed business corridor between Hobsonville Road and the new motorway extension. This location, however, is not considered appropriate for retail activities that are traditionally found in retail and town centres. On this basis a corridors-based policy is not inconsistent with the retail component of the centres-based policy.

Objective 0 is a broad objective intended to cover all aspects of planned urban growth and as such needs to consider all aspects of urban growth rather than retail activity in isolation. To limit the focus of urban growth to town centres only would in fact be inconsistent with the Council’s urban growth strategy and would not enable the range of other urban, and especially employment-based activities, that are not otherwise best suited to high density centres and town centres. On this basis, it is recommended that the submission be rejected.

Recommendation:

That submissions 107/90 and 108/123 are rejected.

I Issue 5 Sub regional centres

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
250/179	Auckland Regional Council	Amend issue 5 to refer to New Lynn, Henderson and Westgate as sub-regional centres, as per the Auckland Regional Policy Statement, not “town centres”.	Supported By: 300 IMF Westland Ltd

Discussion:

The submitter wishes to achieve consistency in terminology between the proposed plan changes and the ARPS. It is noted that Issue 5 refers to these urban areas as both “centres” and “town centres”. Whilst, consistency is desirable in order to avoid confusion or ambiguity, it should also be recognised that district planning documents need to avoid unnecessary jargon terms and use terms that have a plain and simple meaning at the district level. “Town centres” is a term that is considered to be easily understood and recognised by all users of the District Plan and the proposed plan changes. Accordingly, it is recommended that the references be changed to “town centres” with a bracketed reference be placed into the paragraph linking back to the ARPS terms as follows:

“Council has a strategic policy of directing growth into its three primary town centres as identified in the ARGS – New Lynn, Henderson, and Westgate/Massey North (“town centres” includes “sub-regional centres outlined in the ARPS).

Recommendation:

That submission 250/179 be accepted in part.

(d) Policy 0.10 Employment Land

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
300/101	IMF Westland Ltd	Delete Policy 0.10 unless the criteria and the basis of assessment are provided in order to clearly assess the merits of a proposal.	Support and Opposed By: 81 IB, GA and IE Midgley

Discussion:

The submitter has identified an apparent ambiguity between the statement in Policy 0.10 and Policy 0.9 that peripheral urban growth should be restricted to those areas subject to the current proposed plan changes.

Policy 0.10 states that:

“The supply of, and the demand for, employment land should be continuously monitored so that sufficient land remains available to accommodate the City’s employment growth and business needs. If necessary, further plan changes should be initiated at any time as necessary to provide for employment / business needs.”

Policy 0.9 states that:

“If regional and sub-regional growth strategies are to be successful, there should be no need for the formal introduction of plan changes for new growth areas on the periphery of the City, other than those identified in the Waitakere Growth Management Strategy, until at least 2021.”

Policy 0.9 specifically identifies those urban growth areas subject to the proposed plan changes and as recognised in the Regional Growth Strategy and the Northern and Western Sectors Agreement and states that peripheral urban growth be limited to these areas. However, the explanation of this policy also specifically identifies that monitoring of residential household growth needs to occur as this may lead to a requirement for further urban land to be established. The explanation also states that any departure from the policy will require justification and a critical examination of the success of consolidation policies.

Policy 0.10 relates specifically to the monitoring of employment land and the need to promote additional plan changes to provide for additional business land. As with the explanation for Policy 0.9, any desire to provide more urban land for employment needs to subject to the same levels of justification and critical examination.

There is an argument for combining both the policies together as they are addressing similar issues associated with monitoring urban growth and justifying any additional land for this purpose. However, as the provision of additional employment land within Waitakere City is proposed to service not only planned residential growth but the existing balance of residents to workers within the City, there is a strong reason to keep Policy 0.10 as a specific policy. It is recommended, however, that it be amended to reflect the need for robust justification as stated in the explanation for Policy 0.9.

Waitakere City Council has also submitted on Policy 0.10 to clarify the following issues:

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
257/320	Waitakere City Council	Amend Policy 0.10 and its associated ‘Explanation’ to provide for the careful management of future ‘Employment Area’ development, particularly in and around existing and future town centres. Employment land should also be appropriately located so that land use and transportation development can be integrated and environmental effects minimised.	Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd (‘Monier

			Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)
257/321	Waitakere City Council	Amend Policy 0.10 by adding those words in italics and underlined (or words to like effect): <i><u>"Ad hoc employment/business growth in inappropriate environments shall be avoided.</u></i> The supply of, and demand for, employment land should be continuously monitored so that sufficient land remains available to accommodate the city's employment growth and business needs. If necessary, further plan changes should be initiated at any time as necessary to provide for employment / business land needs."	Supported By: 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn) Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd

This submission seeks to clarify the intention that ad hoc employment/business growth in appropriate locations should be avoided. This would include areas outside the existing or approved MUL. It is considered that the proposed relief sought by the Council gives adequate certainty and scope to ensure that the policy is not inconsistent with regional planning documents. However, in the interests of clarity, Policy 0.10 could also be amended to explicitly refer to land within the MUL. Such an amendment could read as follows:

"Ad hoc employment/business growth in inappropriate environments shall be avoided. However, the supply of, and the demand for, employment land within the Metropolitan Urban Limits should be continuously monitored so that sufficient land remains available to accommodate the City's employment growth and business needs. If necessary, further plan changes should be initiated at any time as necessary to provide for employment / business needs."

The Explanation for Policy 0.10 should be amended as follows:

Explanation

If the percentage of people employed in the city relative to the resident workforce is to increase then every opportunity needs to be taken to provide for employment growth. Land suitable for business (including industrial) development is a scarce resource. Those areas which have been identified for such activity, including Working Environments and employment areas outside town centre cores, need to be reserved and protected for employment purposes. Further areas also need to be provided, particularly in locations which offer flexibility for business of a variety of types and scale, and in locations accessible to transport networks. The ability of the city's resources to meet demands for business location shall be strictly monitored and factors such as the expected rate of population and household growth may change and have an impact on if or when further land is required. If found to be necessary, further district plan changes will be promulgated to provide for those demands. However, any departure from this policy will require justification in terms of relevant regional policy instruments and agreements, and a critical examination of the success of consolidation policies.

Recommendation:

That submission 300/101, 257/320 and 257/321 be accepted in part and that the policy be reworded as outlined above.

(e) Section 6.1.2 Attracting Business

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
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300/102	IMF Westland Ltd	Amend 6.1.2, the paragraph commencing “In the last decade....” To insert an additional item being: <i>(iii) Further emphasis in the region of the Albany and Manukau nodes that are significant regional attractors to business due to scale and opportunities for significant aggregation of economic uses in new and attractive locations that are growing. The City has failed to adequately compete regionally for necessary employment due to the lack of reenfield opportunities of scale that exist within commercially desirable urban locations in the City.</i>	Opposed By: 250 Auckland Regional Council Support and Opposed By: 81 IB, GA and IE Midgley
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Discussion:

Section 6.1.2 Theme Two: City Form describes the pattern of urbanisation in Waitakere City post-World War II and the planning issues that have resulted from this pattern. It is stated that this pattern of urban development, with its lower population densities, vehicle dominated street pattern and reliance on private vehicle transport has become unsustainable. The section also states that recent changes in the last decade have reinforced the unsustainable nature of this City form including the decline of city/resident workforce ratio and the emergence of large scale retailers in areas highly accessible by car.

The submitter seeks an additional item within this section as outlined above to provide a sound platform to attract business to the City and to compete within the Region. The suggested additional item seeks recognition that the growth of the Albany and Manukau sub-regional centres and a perceived failure by the City to compete regionally for employment related opportunities has reinforced the unsustainability of the post-World War II urban form.

It is considered that the submitter has not comprehended the nature or purpose of the strategic discussion in 6.1.2 and the submission does not add anything meaningful to the understanding of the planning and resource management issues stemming from the pattern of urban form over the last five decades.

Recommendation:

That submission 300/102 be rejected

(f) Policy Section 6.1.1 Terminology

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
107/85	Westfield (New Zealand) Limited	Amend Part 6.1.1 Theme One: Environmental Thresholds, ninth paragraph as follows (addition underlined and deletion in strikethrough):: <i>“.....At the strategic level this involves a focus on intensification around the major town centres (New Lynn, Henderson and Massey North) with a secondary emphasis on other town centres <u>along</u> and regional road routes.”</i>	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited
108/118	Progressive Enterprises Limited	Amend Part 6.1.1 Theme One: Environmental Thresholds, ninth paragraph by deleting the struck through word and adding the word underlined (or words to like effect): <i>“...At the strategic level this involves a focus on intensification around the major town centres (New Lynn, Henderson and Massey North) with a secondary emphasis on other town centres <u>along</u> and regional road routes.....”</i>	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd

Policy Section Objective 0 Terminology

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/115	Progressive Enterprises Limited	Amend Objective 0 by deleting the struck through word, and adding the word in italics and underlined (or words to like effect): <i><u>"To manage growth in such a way – focused in and around town centres <u>along</u> and transport corridors....."</u></i>	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 115 JH Lockington and DA Lyon 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 110 Warehouse Stationery Limited
107/82	Westfield (New Zealand) Limited	Amend Objective 0 as follows (addition underlined and deletion in strikethrough): <i><u>"To manage growth in such a way focused in and around town centres <u>along</u> and transport corridors"</u></i>	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitters both seek a change in the wording of the two provisions by replacing "and" with "along" so that the meaning of the provisions is amended as sought. As it stands the provision places primary importance on the three major town centres and places a secondary importance on other (smaller) town centres and regional road routes. By changing the reference to "along regional road routes" the whole meaning changes as the provision would only refer to the "other town centres" located "along regional road routes" rather than the regional road routes themselves as a secondary emphasis.

This is not the intention of the provision as the proposed plan changes clearly provide for a centres-based approach to urban development as a primary focus (especially for high intensity and retail activities) while also promoting a corridors-based policy, especially for employment activities along regional road routes. In these areas retail activities suited to town centres are not encouraged. Accordingly, changing the wording as sought would change the meaning of the provision to the extent that it would be inconsistent with the Council's overall growth concept. For this reason, it is recommended that the submission be rejected.

Recommendation:

That submissions 107/82, 107/85, 108/115 and 108/118 be rejected.

(g) Section 6.1.1 Theme Two Terminology

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
107/86	Westfield (New Zealand) Limited	Amend Part 6.1.1 Theme Two: City Form, last paragraph by deleting those words struck through: <i><u>"The approach that the District Plan has adopted is to integrate land use a[nd] transport planning by reinforcing the centralisation of key activities around existing town centres (particularly New Lynn, Henderson and Massey North/Westgate), railway stations and transport centres and regional roads."</u></i>	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited
108/119	Progressive Enterprises Limited	Amend Part 6.1.1 Theme Two: City Form, last paragraph by deleting those words struck through:	Supported By: 208 Sylvia Park Business Centre Limited

		<i>“The approach that the District Plan has adopted is to integrate land use a[nd] transport planning by reinforcing the centralisation of key activities around existing town centres (particularly New Lynn, Henderson and Massey North/Westgate), railway stations and transport centres and regional roads”.</i>	300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd
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Discussion:

Both submitters, as with the discussion above for submissions 107/85 and 108/118, seek that references to the Council’s corridors-based policy be deleted. The submissions also acknowledge a simple typographical error.

The proposed plan changes clearly provide for a centres-based approach to urban development as a primary focus (especially for high intensity and retail activities) while also promoting a corridors-based policy, especially for employment activities along regional road routes. In these areas retail activities suited to town centres are not encouraged. Accordingly, deleting reference to “railway stations and transport centres and regional roads” as sought would not be inconsistent with the Council’s overall growth concept. For this reason, it is recommended that the submission be deleted.

It is recommended however, that the typographical error recognised in both the submissions be corrected so that the provision reads:

“The approach that the District Plan has adopted is to integrate land use a and transport planning by reinforcing the centralisation of key activities around existing town centres (particularly New Lynn, Henderson and Massey North/Westgate), railway stations and transport centres and regional roads ...”.

Recommendation:

That submissions 107/86 and 108/119 be rejected but correction of the typographical error be accepted as outlined above.

(h) Objective 0 Explanation Retail Activities

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/124	Progressive Enterprises Limited	Amend the plan change by including the following addition after the second paragraph of the Explanation (or words to like effect): <i><u>“This objective recognises the benefits of a centres based approach include reduced vehicle trips (both in terms of distances and trip numbers) and the creation of compact mixed use centres which have a high level of urban amenity”.</u></i>	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
107/91	Westfield (New Zealand) Limited	Amend the plan change by including the following addition after the second paragraph of the Explanation (or words to like effect): <i><u>“This objective recognises the benefits of a centres based approach include reduced vehicle trips (both in terms of distances and trip numbers) and the creation of compact mixed use centres which have a high level of urban amenity”.</u></i>	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitter seeks an additional comment in the Explanation for Objective 0 that recognises the positive benefits of a centres-based approach. This is considered to be consistent with the Council’s approach to growth and would add additional meaning and understanding to the explanation of the objective. It is therefore recommended that this submission be accepted. However, the word “include” appears to be in the

wrong tense and would have better meaning if it were changed to “including”. The amendment to the provision would therefore read as follows:

“This objective recognises the benefits of a centres based approach including reduced vehicle trips (both in terms of distances and trip numbers) and the creation of compact mixed use centres which have a high level of urban amenity”.

Recommendation:

That submission 108/124 and 107/91 be accepted in part with the second paragraph of the Explanation for Objective 0 amended as outlined above.

(i) Issue 5.0 Specific Bullet 7

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/122	Progressive Enterprises Limited	Amend Issue 5.0 Specific, bullet 7, by adding those words underlined (or words to like effect): <i>“Ensuring that newly developed or redeveloped areas are adequately supported by community services, business activities (including retail), infrastructure and transport networks”.</i>	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 250 Auckland Regional Council
107/89	Westfield (New Zealand) Limited	Amend Issue 5.0 by adding those words underlined (or words to like effect): <i>“Ensuring that newly developed or redeveloped areas are adequately supported by community services, business activities (including retail), infrastructure and transport networks”.</i>	Supported By: 300 IMF Westland Ltd Opposed By: 250 Auckland Regional Council Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitter seeks a specific bracketed reference to “retail” activity under the reference to “business activities”. Whilst this would provide additional and specific clarification of “business activities” it is considered that such clarification is not necessary as retail activity is clearly a subset of business activity and any specific reference may give the impression that retail activity has a special prominence or importance among other business activities. For this reason, it is recommended that the submission be rejected.

Recommendation:

That submissions 107/89 108/122 be rejected.

(j) Issue 5 Policy 0.10 Employment land

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
250/194	Auckland Regional Council	Delete policy 0.10 and add a new policy requiring the monitoring of urban growth, including the implications of the adopted landuse on transport patterns and costs.	Opposed By: 300 IMF Westland Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd (‘Monier Brickmakers’) 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)

Discussion:

The submitter seeks the deletion of Policy .010 and its replacement with a policy to monitor urban growth including the implications of the adopted land use on transport patterns and costs. However, Policy 0.10 is an objective that is particularly focused on the provision of employment and business land. The provision of additional employment business land to meet the needs of the community is a strategic objective of the Council, and in particular, the desire to have a greater percentage of employment within the City and the

corresponding in terms of transport efficiency and community wellbeing. For this reason, it is recommended that the submission be rejected.

Recommendation:

That submission 250/194 be rejected.

(k) Policy Section Objective 0 – Explanation Terminology

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/116	Progressive Enterprises Limited	Amend the fifth paragraph of the Objective 0 Explanation by deleting those words struck through: <i>“The objective is to create compact urban development focused on town centres/transport nodes which has strong provision</i> ”.	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd
107/83	Westfield (New Zealand) Limited	Amend the fifth paragraph of the Objective 0 Explanation by deleting those words struck through: <i>“The objective is to create compact urban development focused on town centres/transport nodes which has strong provision</i> ”.	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitter seeks the deletion of the reference to “transport nodes” as part of the explanation for Objective 0. This is a consistent theme with this submitter who supports the proposed plan change in as far as it promotes a centres-based approach (particularly retail) for business development but is opposed to business development along corridors and transport nodes.

The clear intention of the proposed plan change to provide for a centres-based approach to urban development as a primary focus (especially for high intensity and retail activities) while also promoting a corridors-based policy, especially for employment activities along regional road routes. In corridors high intensity retail activities more suited to town centres are not encouraged. Accordingly, changing the wording as sought would be inconsistent with the Council’s overall growth concept. For this reason, it is recommended that the submission be rejected.

Recommendation:

That submissions 108/116 and 107/83 be rejected.

(l) Policy Section 6.2.4 Retail Activities and Employment Growth

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
108/109	Progressive Enterprises Limited	Amend Section 6.2.4 Retail Activities and Employment Growth by adding those words in italics and underlined (or words to like effect): <i>“Taking all of the above in to account, the following issues need to be recognised when sustainably managing the effects from retail activity:-</i>	Supported By: 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited

		<u>The location of retail uses outside high density centres may result in increased vehicle trips and subsequent adverse effects on the efficiency of the traffic network”.</u>	109 The Warehouse Ltd
107/76	Westfield (New Zealand) Limited	Amend Section 6.2.4 Retail Activities and Employment Growth by adding those words underlined (or words to like effect): <i>“Taking all of the above in to account, the following issues need to be recognised when sustainably managing the effects from retail activity:- <u>The location of retail uses outside high density centres may result in increased vehicle trips and subsequent adverse effects on the efficiency of the traffic network”.</u></i>	Supported By: 300 IMF Westland Ltd Opposed By: 110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitter seeks to add the above issue to the list of issues in Section 6.2.4. However, this issue appears to be addressed in the 8th and 9th bullet points which state:

- *“Urban consolidation is also important in order to reduce the environmental impacts of motor vehicles. A focus of retail activities in town centres (most of which are centrally located) and on existing and/or proposed passenger transport routes will increase the viability of passenger transport, reduce vehicle trip frequency and length and relieve the wider pressures on the City’s water and land resources, infrastructural systems and ecosystem stability, which arise from the outward expansion of the urban area.*
- *The strategy also recognises a need to respond to the important economic and social needs of the community, represented by the physical environment within town centres. That physical environment relies substantially on the retail sector and could suffer through the establishment of inappropriate retail development elsewhere. It is important to ensure the adverse effects on the social amenity derived from such facilities and services are avoided, remedied or mitigated.”*

For this reason, the addition of the extra text as sought by the submitters is considered to be unnecessary and repetitive. It is therefore recommended that the submissions be accepted in part as the relief sought is already addressed in the current provisions.

Recommendation:

That submissions 108/109 and 107/76 be accepted in part, with no amendments required.

(m) Issue – Managing City Growth Policy 0.3 Providing for All Retail Formats

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/117	The Warehouse Ltd	Amend Policy 0.3 by adding those words underlined: <i>“Opportunities for intensive residential and mixed use development, <u>including all retail formats, in town centres other than New Lynn, Henderson and Massey North/Westgate, and also around town centres and on major traffic routes, should be provided for and encouraged.”</u></i>	Opposed By: 108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd
110/117	Warehouse Stationery Limited	Amend Policy 0.3 by adding those words underlined: <i>“Opportunities for intensive residential and mixed use development, <u>including all retail formats, in town centres other than New Lynn, Henderson and Massey North/Westgate, and also around town centres and on major traffic routes, should be provided for and encouraged.”</u></i>	Opposed By: 108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited
111/114	The National	Amend Policy 0.3 by adding those words	Opposed By:

	Trading Company of New Zealand Limited	underlined: “ <i>Opportunities for intensive residential and mixed use development, including all retail formats, in town centres other than New Lynn, Henderson and Massey North/Westgate, and also around town centres and on major traffic routes, should be provided for and encouraged.</i> ”	208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited
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Discussion:

The submitter seeks that Policy 3 be amended to specifically refer to “*all retail formats*” with regard to activities in town centres other than New Lynn, Henderson and Massey North/Westgate. The submitter also seeks an amendment from “*regional traffic routes*” to “*major traffic routes*” in terms of where such activities should be encouraged.

Retail formats come in a variety of forms, some of which are more appropriate in high density town centres than others. To provide a blanket encouragement of all retail formats in all other town centres would not be sound resource management practice as it would not differentiate between the various forms of retail and their different environmental effects. Furthermore, the submitter does not provide any resource management justification why retail formats warrant specific mention over other types of mixed use activity.

With regard to the change of wording for “traffic routes” from “regional” to “major”, the submitter offers no resource management reasoning why this wording change is necessary. In the absence of adequate justification, it is recommended that the submissions be rejected.

Recommendation:

That submissions 109/117, 111/114 and 110/117 be rejected.

(n) Issue – Managing City Growth Policy 0.9 – Hobsonville Village Centre Provision for retail activities predominantly accessed by car near motorway interchange

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/119	The Warehouse Ltd	Amend the explanation for the Hobsonville Village Centre of Policy 0.9 to insert the words “, <i>including the operators of car focussed retail</i> ”, after the words “to the commercial sector”.	Opposed By: 258 Auckland Regional Transport Authority 108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited
110/119	Warehouse Stationery Limited	Amend the explanation for the Hobsonville Village Centre of Policy 0.9 to insert the words “, <i>including the operators of car focussed retail</i> ”, after the words “to the commercial sector”.	Opposed By: 258 Auckland Regional Transport Authority 107 Westfield (New Zealand) Limited 108 Progressive Enterprises Limited 250 Auckland Regional Council 208 Sylvia Park Business Centre Limited
111/116	The National Trading Company of New Zealand Limited	Amend the explanation for the Hobsonville Village Centre of Policy 0.9 to insert the words “, <i>including the operators of car focussed retail</i> ”, after the words “to the commercial sector”.	Opposed By: 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited 258 Auckland Regional Transport Authority

			250 Auckland Regional Council 259 Transit New Zealand
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Discussion:

The submitter seeks specific reference to “*operators of car focussed retail*” in the explanation for the Hobsonville Village Centre in Policy 0.9. It is noted that in Policy 11.39 to Proposed Plan Change 14 the following is stated about the Hobsonville Village Centre:

“The Hobsonville Village Centre is a Special Area that will primarily provide for employment and retail opportunities that will service projected population growth at Hobsonville and the Hobsonville Peninsula. The retail node should consist of a mix of large format retail sleeved by specialty retail stores to provide a variety of shopping experiences at the Centre.”

It is considered that this specific statement in Policy 11.39 adequately recognises the type of retail activities sought by the submitters (the term “*large format retail*” being relatively synonymous with the term “*car focused retail*”). On this basis, it is considered the relief sought by the submitter is adequately provided in Policy 11.39. The submission should therefore be accepted to that extent.

Recommendation:

That submission 109/119, 111/116, and 110/119 be accepted in part, with no amendments required.

(o) Whole Plan Change Local Employment

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
330/3	The Michael Bridgford Family Trust	Support the Proposed Plan Change 16 – Massey North	

Discussion:

This is a general support for the whole plan change as notified. It is recommended that the submission be accepted.

Recommendation:

That submission 330/3 be accepted.

(p) 5.5.24 Whole Plan Change Special Area Rules Job Opportunities

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
4/5	Rexford Family Trust	Retain in Plan Change 16 the provision for job opportunities embedded in these plan changes.	

Discussion:

This is a general support for the whole plan change as notified with particular reference to the provision for job opportunities. As the creation of additional urban zoned land for employment activities within Waitakere City is a specific outcome sought by this plan change, it is recommended that the submission be accepted.

Recommendation:

That submission 4/5 be accepted.

(q) 6.1.2 City Form

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
203/24	AMP NZ Property Development Ltd & AMP	Retain the current passages in Part 6.1.2 (Theme Two: City Form) that are proposed in the plan change to be deleted relating to retail trends and the concern regarding the location	Supported By: 81 IB, GA and IE Midgley Opposed By: 110 Warehouse Stationery

	Capital Investors (NZ) Ltd	of retail activities.	Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 250 Auckland Regional Council
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Discussion:

The passage in question is part of the discussion of City Form in 6.1.2 about the adverse effect that vehicle orientated subdivision and development has had on the city form. The proposed plan change seeks that Item (i) be deleted and replaced with a new Item (i), and item (ii) be amended as follows:

In the last decade, a number of changes have emerged which reinforce the unsustainable nature of this City form. These developments are:

“(i) The further decline of the employment within the city/resident workforce ratio. In 2003 the majority of the resident workforce was employed outside the city. This not only affects the economic health of the city, and the desirable balance of land use activity, but also results in traffic congestion and transport costs for residents.

~~(i) the relocation of retail activities away from traditional town centres, into areas where there is cheap accessible land capable of accommodating large stores (larger than those normally found in the core areas of the town centres), and providing for extensive car parks. Deregulation in the mid to late 1980s and rapid changes in technology have had a dramatic effect. Import quotas were reduced or abolished, retail trading hours were changed, and there were major changes in the liquor laws. The effects of these changes can probably be best seen in the larger supermarkets which now operate over greatly increased hours.~~

~~It is a change intended to pass transport costs on to residents. They would now bear the cost of travelling to the new centres, rather than the retailers who had previously absorbed the cost of transporting the goods to town centres and local shopping areas. This has occurred around Lincoln Road where there has been considerable pressure to expand as a retail centre. This relocation encourages vehicle trips as people travel across town to a number of areas, rather than carrying out their shopping within a relatively central area largely accessible by foot.~~

(ii) the centralisation of retail services traditionally supplied by dairies and local shops in residential areas. This is ~~also~~ part of the a general change mentioned above where retailers are seeking economies of scale that support the provision of large scale retail services in areas that are highly accessible by car.

A challenge to traditional urban form has come from the advent of home-occupations, which provide alternatives to the need to commute to other areas of the City, or the region. This has the potential to reduce car trips.”

The submitter seeks that the strikethrough text remains. Since this passage was written, and in particular since the LGAAA was enacted, the Council has recognised that the development of town centres needs to recognise the range of employment and business activities in addition to retail activity. This is intended to create an appropriate mix of activities that will promote the sustainable intensification of town centres. On this basis it is considered that the existing passages should be amended to recognise this focus. The suggested wording of the passages is as follows:

(i) The relocation of employment and business activities away from traditional town centres, into areas where there is cheap accessible land capable of accommodating large stores or businesses (larger than those normally found in the core areas of the town centres), and providing for extensive car parks. Deregulation in the mid to late 1980s and rapid changes in technology have had a dramatic effect. Import quotas were reduced or abolished, retail trading hours were changed, and there were major changes in the liquor laws. The effects of these changes can probably be best seen in the larger supermarkets which now operate over greatly increased hours.

It is a change intended to pass transport costs on to residents. They would now bear the cost of travelling to the new centres, rather than the retailers who had previously absorbed the cost

of transporting the goods to town centres and local shopping areas. This has occurred around Lincoln Road where there has been considerable pressure to expand this area as a retail and employment centre. This relocation encourages vehicle trips as people travel across town to a number of areas, rather than carrying out their shopping within a relatively central area largely accessible by foot.

- (ii) The centralisation of retail and employment activities traditionally supplied by corner dairies and local businesses in residential areas. This is part of a general change mentioned above where retailers are seeking economies of scale that support the provision of large scale retail services in areas that are highly accessible by car.

A challenge to traditional urban form has come from the advent of home-occupations, which provide alternatives to the need to commute to other areas of the City, or the region. This has the potential to reduce car trips.

- (iii) The further decline of the employment within the city/resident workforce ratio. In 2003 the majority of the resident workforce was employed outside the City. This not only affects the economic health of the City, and the desirable balance of land use activity, but also results in traffic congestion and transport costs for residents.

Recommendation:

Submission 203/24 is accepted in part subject to the recommended amendment above.

5.2.4 PLAN CHANGE 17

(a) Whole Plan Change Educational and Employment Initiatives

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
299/12	Unitec New Zealand	Retain the Plan Change. Unitec supports the Waitakere City strategy to attract more of its citizens to work and be educated within their city.	

Discussion:

The submitter supports the plan change on the basis that it will enable Waitakere City residents to work and be educated in the City. It is noted that educational facilities are enabled by the plan changes and the provision of these facilities is consistent with the overall vision and strategy of development.

Recommendation:

That submission 299/12 be accepted.

(b) Policy 11.19 Mixed use

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
162/10	Redwood Group Limited	Retain policy 11.19 which encourages the residential use of town centres to enable intensification and enhance vibrancy and mix of uses.	Opposed By: 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong

			Building Supplies Ltd (Placemakers New Lynn)
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Discussion:

The submitter supports Policy 11.19 and seeks that it be retained. This policy enables residential activities and the intensification of the New Lynn town centre in order to provide a mix of activities that will encourage vibrancy in the locality. A mix of uses in centres is imperative if the City is to remain compact and limit cross city /regional travel. It is recommended that this submission be accepted.

Recommendation:

That submission 162/10 is accepted.

5.2.5 PLAN CHANGE 18

(a) Citywide Rule 4.0 Mixed Use

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
300/122	IMF Westland Ltd	Amend to insert an appropriate mixed use definition: <i>“Mixed use buildings are those buildings that deliver a residential use above ground floor retail or commercial use where such residential use is no less than 50% of the total Gross Floor Area of the building.”</i>	Support and Opposed By: 81 IB, GA and IE Midgley

Discussion:

The submitter mistakenly claims that there is no definition of “mixed use” in the Plan Change and has indicated concern that the definition needs to ensure that commercial/ retail developments do not “masquerade” as mixed use. The submitter has offered a definition to ensure that a minimum residential intensity is achieved. However, the Plan Change does contain a definition of “mixed use” (at the end of Citywide Rule 1 – General Apartment Design) as follows:

“Mixed Use

means the integration of compatible land uses/activities in one locality, block or building and includes a mixture of Residential Activities and Non-Residential Activities such as apartments or medium density housing and commercial, retail, hospitality or recreational.

The need to clarify the nature of mixed use developments and where they occur is important. The submitter’s concern about unintended development occurring as a result of poor definition is recognised. The definition requested by the submitter includes a minimum residential component. This ratio is considered to be too inflexible, as there is potential for mixed use to be a variety of both residential and non-residential activities, as indicated in the notified version of the definition.

The Council has clarified in its Transport Report (WCC No 3) that the term “transport corridors” should be amended to become “high density corridors”, and it is appropriate that this term be used in the revised definition. For this reason it is considered that the submission be accepted in part, and that while the nature of mixed use is clarified, the residential ratio sought by the submitter is not specifically included.

Mixed Use

means a building and/or an identified mixed use area, where a combination of residential activities and non-residential activities is provided for by the Plan.

In the case of any mixed use building, including any new building proposed in an identified mixed use area, the ground floor of the building shall have a minimum internal stud height of 3.6 metres.

For the avoidance of doubt:-

- Unless specifically required by the rules, mixed use buildings may be used entirely for residential activities;

- In the case of retail activities, the mixed use building and/or identified mixed use area shall be located in town centres and high density corridors, and shall be subject to any rules relating to the size of premises or total quantum of retail floorspace as specified in the relevant rules;
- Mixed use activities are included in Community and Community Periphery Environments as a combination of residential activities and non-residential activities, but are excluded in all Working Environments.

The notified version of the definition has been expanded to provide the clarity and certainty sought by the submitter. It therefore applies to both individual buildings and also to areas (including Community and Community Periphery Environments as provided for in the third bullet point) identified in the Plan. This clarifies what was meant by the word “locality” in the notified version. A consequential change to notified Policy 0.1 is required to align the definition and the Policy, as follows:

POLICY 0.1.

The further development or re-development of urban areas should be planned to provide the following:

- In the town centre areas identified as Community Environment, Community Periphery Environment or identified mixed use area within a Special Area provision for mixed use development, including residential activity, above ground floor level;

The inclusion of the 3.6 metre stud height is taken from Rule 4.1(a) in the notified City Wide Rule 4 – Mixed Use, and it is useful to include this in the definition (but not exclude it from the Rule as a consequence).

Following on from that, the bullet points provide the clarity sought by the submitter, outlining what Plan Rules apply to mixed use developments and identified mixed use areas.

In terms of the first bullet point, the key matter is that the ground floor is built with a 3.6 metre high stud, enabling mixed use to occur there for the duration of the life of the building. On occasion, the ground floor may be used for residential purposes, recognising the changing nature of the use. Where this residential use on ground floor outcome is not sought, a Rule can be inserted into the plan requiring that, in an identified mix use locality, either a ratio of residential / non-residential activities in mixed use buildings will apply, or that it is appropriate that residential use be located above ground floor level. This requirement will change according to the different nature of different mixed use areas.

In terms of the second bullet point, the key matter is that the a Rule can be inserted into the plan requiring that in an identified mix use locality, a ratio of residential / non-residential activities in mixed use buildings will apply. Again this ratio will change according to the different nature of different mixed use areas.

The third bullet point has been discussed above.

The above amendments are considered to achieve clarification of the definition, while reliance is placed on the imposition of specific ratios in identified mixed use areas. The specific ratios are address in submissions 257/412 and 257/486 below.

Recommendation:

That submission 300/122 be accepted in part, to the extent of the recommended change to the definition provided above.

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
257/412	Waitakere City Council	Amend the Plan Change to clarify in policies and/or rules the minimum mixed use ratios that are expected for individual developments involving mixed use activities.	Opposed By: 95 Housing New Zealand Corporation (1) 109 The Warehouse Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company)

			215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn) 218 AMP Capital Investors (NZ) Limited 110 Warehouse Stationery Limited
257/486	Waitakere City Council	Amend the Plan Change to clarify in policies and/or rules the minimum mixed use ratios that are expected for individual developments involving mixed use activities.	Opposed By: 95 Housing New Zealand Corporation (1) 184 West Auckland Land Holdings Ltd 109 The Warehouse Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn) 218 AMP Capital Investors (NZ) Limited 110 Warehouse Stationery Limited

Discussion:

The submitter seeks that there be amendments to City Wide Rules 1, 2, 3, and 4 in Plan Change 18 to clarify policies and/or rules on what minimum mixed use ratios are expected for individual mixed use developments and or areas identified for mixed use activities. Such clarification would be beneficial, and more detail needs to be presented at the forthcoming Urban Design Hearing before specific changes to identified mixed use areas can be recommended. Accordingly, it is recommended that the submission be accepted in principle at this stage.

Recommendation:

That submissions 257/412 and 257/486 be accepted in principle, subject to further clarification about where ratios apply and what the ratios are at the Hearing..

(b) City Wide Rule 3.0 – General Performance Standards Provision for Large Format Retail

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/139	The Warehouse Ltd	If the whole Proposed Plan Change is not rejected and submission 109/138 is rejected, amend standards to enable large format retail to establish in a viable format.	Supported By: 184 West Auckland Land Holdings Ltd Opposed By: 208 Sylvia Park Business Centre Limited
110/139	Warehouse Stationery Limited	If the whole Proposed Plan Change is not rejected and submission 110/138 is rejected, amend standards to enable large format retail to establish in a viable format.	Opposed By: 208 Sylvia Park Business Centre Limited

Discussion:

The submitter seeks that large format retail be enabled in a viable format should submission 110/138 be rejected or if the whole Plan Change is not rejected. Submission 110/138 seeks a number of amendments and deletions to provisions in Plan Change 18 focused on the provision for large format retail. It is considered that the relief sought by the submitter cannot be considered until the detailed submission is heard at the later hearing that focuses upon urban design. Accordingly, it is recommended that the submission be accepted in part at this stage.

Recommendation:

That submission 109/139 and 110/139 be accepted in part.

(d) Policy 11.45 Providing for Large Format Retail

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/134	The Warehouse Ltd	If the whole Proposed Plan Change is not rejected, insert the words " <i>Where practicable</i> " at the beginning of the second sentence of the 2 nd bullet and replace the words " <i>in all cases</i> " with " <i>where practicable</i> " in the final sentence of the 2 nd bullet of Policy 11.45.	Supported By: 184 West Auckland Land Holdings Ltd Opposed By: 250 Auckland Regional Council 208 Sylvia Park Business Centre Limited
110/134	Warehouse Stationery Limited	If the whole Proposed Plan Change is not rejected, insert the words " <i>Where practicable</i> " at the beginning of the second sentence of the 2 nd bullet and replace the words " <i>in all cases</i> " with " <i>where practicable</i> " in the final sentence of the 2 nd bullet of Policy 11.45.	Opposed By: 208 Sylvia Park Business Centre Limited 250 Auckland Regional Council

Discussion:

The submitters seek flexibility for the provisions in Policy 11.45 that sets out the design expectation for development at street frontages. As this is a policy and not a rule, these provisions are intended to provide a degree of design guidance to achieve an overall cohesive urban form through the application of consistent urban design principles. The appropriate application of design practicality and flexibility is through the performance standards and assessment criteria in section 3.0 of the Plan Change and this is also enabled through the resource consent process. Accordingly, it is considered that there is no particular resource management reason to build the degree of flexibility sought by the submitters into the policy and it is therefore recommended that the submissions be rejected.

Recommendation:

That submissions 109/134 and 110/134 be rejected.

(e) Policy Section Policy 11.45 Providing for Large Format Retail

NO.	Submitter	Summary of Decision Sought	Further Submitter/s
109/135	The Warehouse Ltd	If the whole Proposed Plan Change is not rejected, delete the 4 th bullet of Policy 11.45.	Supported By: 184 West Auckland Land Holdings Ltd Opposed By: 250 Auckland Regional Council 208 Sylvia Park Business Centre Limited
110/135	Warehouse Stationery Limited	If the whole Proposed Plan Change is not rejected, delete the 4 th bullet of Policy 11.45.	Opposed By: 208 Sylvia Park Business Centre Limited 250 Auckland Regional Council

Discussion:

The submitter seeks the deletion of the 4th bullet point of Policy 11.45 which reads:

"Larger format retail developments, including Mall type developments should be sleeved by outward facing, smaller scale activities along street frontages, avoiding large expanses of blank, inactive facades at street level. Along other street frontages, facades should be articulated. Doors, windows and openings should be provided."

The submitter's stated reason for deleting this policy is that strict design controls are often not practicable for large format retail developments. However, it is considered that the policy outlines broad urban design principles rather than strict design controls in order to achieve an overall consistency, coherency and quality

of urban design for mixed use town centres. On this basis it is recommended that the provision remain and that the submission be rejected.

Recommendation:

Submissions 109/135 and 110/135 be rejected.

Report prepared by Eryn Shields, Principal Planner, Waitakere City Council.

APPENDIX 1 RECOMMENDED AMENDMENTS

Additions shown underlined, and deletions in ~~strikethrough~~.

RECOMMENDED CHANGES TO PLAN CHANGE 14 – HOBSONVILLE VILLAGE CENTRE

Policy 11.38 – 9th bullet point be amended to read:

“ensuring that transport and land use patterns are aligned to achieve sustainability, efficiency, ~~and~~ liveability, a competitive economy and a high quality of life underpinned by a quality environment and amenity.”

[109/82]
[111/79]

RECOMMENDED CHANGES TO PLAN CHANGE 15 – MASSEY NORTH

Policy 11.44 – 3rd bullet point be amended to read:

“ensuring that transport and land use patterns are aligned to achieve sustainability, efficiency, ~~and~~ liveability, a competitive economy and a high quality of life underpinned by a quality environment and amenity.”

[109/82, 109/92]
[110/82, 110/92]
[111/79, 111/89]

RECOMMENDED CHANGES TO PLAN CHANGE 16 – MANAGING CITY GROWTH

Issue 5.0 – Managing City Growth – 12th paragraph be amended to read:

“Council has a strategic policy of directing growth into its three primary town centres as identified in the ARGs – New Lynn, Henderson, and Westgate/Massey North (“town centres” has the same meaning as “sub-regional centres in the ARGs).”

[250/179]

Objective 0 – amend the 2nd paragraph to add the additional text to read:

Significant Urban intensification has been occurring in town centres and neighbourhood centres and along transport corridors. Additional intensification has however been occurring outside these areas which is not supportive of promoting sustainable urban development or integrating transport and land use planning. The Aim of this objective is to re-direct urban growth to areas that support sustainable compact urban form. *“This objective recognises the benefits of a centres based approach including reduced vehicle trips (both in terms of distances and trip numbers) and the creation of compact mixed use centres which have a high level of urban amenity.”*

[107/91]
[108/124]

Policy 0.1. – amend the first bullet point to read:

The further development or re-development of urban areas should be planned to provide the following:

- In the town centre areas identified as Community Environment, Community Periphery Environment or identified mixed use area within a Special Area provision for mixed use development, including residential activity, above ground floor level;

[300/122]

Policy 0.10 Explanation – be amended to read:

“Ad hoc employment/business growth in inappropriate environments shall be avoided. The supply of, and the demand for, employment land within the Metropolitan Urban Limits should be continuously monitored so that sufficient land remains available to accommodate the City’s employment growth and business needs. If necessary, further plan changes should be initiated at any time as necessary to provide for employment / business needs.”

Explanation

If the percentage of people employed in the city relative to the resident workforce is to increase then every opportunity needs to be taken to provide for employment growth. Land suitable for business (including industrial) development is a scarce resource. Those areas which have been identified for such activity, including Working Environments and employment areas outside town centre cores, need to be reserved and protected for employment purposes. Further areas also need to be provided, particularly in locations which offer flexibility for business of a variety of types and scale, and in locations accessible to transport networks. The ability of the city’s resources to meet demands for business location shall be strictly monitored and factors such as the expected rate of population and household growth may change and have an impact on if or when further land is required. If found to be necessary, further district plan changes will be promulgated to provide for those demands. However, any departure from this policy will require justification in terms of relevant regional policy instruments and agreements, and a critical examination of the success of consolidation policies.

[257/320]
[257/321]
[300/102]

Part 6.1.1 Theme Two: City Form – amend the last paragraph to read:

“The approach that the District Plan has adopted is to integrate land use and transport planning by reinforcing the centralisation of key activities around existing town centres (particularly New Lynn, Henderson and Massey North/Westgate), railway stations and transport centres and regional roads ...”

[107/86]
[108/119]

217 Part 6.1.2 City Form amend Items (i) and (ii) as follows:

- (i) The relocation of employment and business activities away from traditional town centres, into areas where there is cheap accessible land capable of accommodating large stores or businesses (larger than those normally found in the core areas of the town centres), and providing for extensive car parks. Deregulation in the mid to late 1980s and rapid changes in technology have had a dramatic effect. Import quotas were reduced or abolished, retail trading hours were changed, and there were major changes in the liquor laws. The effects of these changes can probably be best seen in the larger supermarkets which now operate over greatly increased hours.

It is a change intended to pass transport costs on to residents. They would now bear the cost of travelling to the new centres, rather than the retailers who had previously absorbed the cost of transporting the goods to town centres and local shopping areas. This has occurred around Lincoln Road where there has been considerable pressure to expand this area as a retail and employment centre. This relocation encourages vehicle trips as people travel across town to a number of areas, rather than carrying out their shopping within a relatively central area largely accessible by foot.

- (ii) The centralisation of retail and employment activities traditionally supplied by corner dairies and local businesses in residential areas. This is also part of the a general change mentioned above where retailers are seeking economies of scale that support the provision of large scale retail services in areas that are highly accessible by car.

A challenge to traditional urban form has come from the advent of home-occupations, which provide alternatives to the need to commute to other areas of the City, or the region. This has the potential to reduce car trips.

- (iii) The further decline of the employment within the city/resident workforce ratio. In 2003 the majority of the resident workforce was employed outside the City. This not only affects the economic health of the City, and the desirable balance of land use activity, but also results in traffic congestion and transport costs for residents.

[203/24]

RECOMMENDED CHANGES TO PLAN CHANGE 18 – CITY WIDE URBAN DESIGN RULE

Amend City Wide Rule 1 – Mixed use Definition as follows:

MIXED USE

~~means the integration of compatible land uses/activities in one locality, block or building and includes a mixture of Residential Activities and Non-Residential Activities such as apartments or medium density housing and commercial, retail, hospitality or recreational.~~

Mixed Use

means a building and/or an identified mixed use area, where a combination of residential activities and non-residential activities is provided for by the Plan.

In the case of any mixed use building, including any new building proposed in an identified mixed use area, the ground floor of the building shall have a minimum internal stud height of 3.6 metres.

For the avoidance of doubt:-

- Unless specifically required by the rules, mixed use buildings may be used entirely for residential activities;
- In the case of retail activities, the mixed use building and/or identified mixed use area shall be located in town centres and high density corridors, and shall be subject to any rules relating to the size of premises or total quantum of retail floorspace as specified in the relevant rules;
- Mixed use activities are included in Community and Community Periphery Environments as a combination of residential activities and non-residential activities, but are excluded in all Working Environments.

[300/122]

INDEX OF SUBMISSIONS AND FURTHER SUBMISSIONS ADDRESSED IN REPORT WCC 5

Report section	Submitter Name	Sub Number	Plan Change	Supported by	Opposed by
5.1.1	Progressive Enterprises Limited	108/61 108/105	All	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
5.1.2	Westfield (New Zealand) Limited	107/72 107/92	13, 14, 15, 16 and 17	300 IMF Westland Ltd Supported and Opposed By: 208 Sylvia Park Business Centre Limited	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
5.1.3	The Warehouse Ltd The National Trading Company of New Zealand Limited Warehouse Stationery Limited	109/82 109/92 111/79 111/89 110/82 110/92	14 and 15		107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited
5.1.4	Unitec New Zealand	299/10 299/11	All		
5.1.5	Unitec New Zealand	299/5	All	300 IMF Westland Ltd	
5.2.1	Palmers Gardenworld Ltd	182/6	14	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd	250 Auckland Regional Council 108 Progressive Enterprises Limited 300 IMF Westland Ltd 259 Transit New Zealand
5.2.1	The Warehouse Ltd	109/88	14		107 Westfield (New Zealand) Limited 258 Auckland Regional Transport Authority 250 Auckland Regional Council 208 Sylvia Park Business Centre Limited 108 Progressive Enterprises Limited 300 IMF Westland Ltd
5.2.2	IMF Westland Ltd	300/31	15	81 IB, GA and IE Midgley	81 IB, GA and IE Midgley
5.2.2	Waitakere City Council	257/242	15	250 Auckland Regional Council	107 Westfield (New Zealand) Limited 108 Progressive Enterprises Limited
5.2.3	Auckland Regional Council	250/180	16	258 Auckland Regional Transport Authority	300 IMF Westland Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)
5.2.3	Westfield (New Zealand) Limited	107/90	16	300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By:

					208 Sylvia Park Business Centre Limited
5.2.3	Progressive Enterprises Limited	108/123	16	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
5.2.3	Auckland Regional Council	250/179	16	300 IMF Westland Ltd	
5.2.3	IMF Westland Ltd	300/101	16		81 IB, GA and IE Midgley
5.2.3	Waitakere City Council	257/320 257/321	16	142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)
5.2.3	IMF Westland Ltd	300/102	16	250 Auckland Regional Council	81 IB, GA and IE Midgley
5.2.3	Westfield (New Zealand) Limited Progressive Enterprises Limited	107/85 108/118	16	300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited
5.2.3	Progressive Enterprises Limited Westfield (New Zealand) Limited	108/115 107/82	16	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	115 JH Lockington and DA Lyon 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 110 Warehouse Stationery Limited
5.2.3	Westfield (New Zealand) Limited Progressive Enterprises Limited	107/86 108/119	16	300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd Support and Opposed By: 208 Sylvia Park Business Centre Limited
5.2.3	Progressive Enterprises Limited Westfield (New Zealand) Limited	108/124 107/91	16	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
5.2.3	Progressive Enterprises Limited	108/122	16	208 Sylvia Park Business Centre Limited	250 Auckland Regional Council

	Westfield (New Zealand) Limited	107/89		300 IMF Westland Ltd	
5.2.3	Auckland Regional Council	250/194			300 IMF Westland Ltd 142 PLC New Zealand Ltd 213 CSR Building Products NZ Ltd ('Monier Brickmakers') 214 Henkel NZ Ltd (The Sellotape Company) 215 Huhtamaki NZ Limited 216 Waitakere Working Environment Group 217 Sullivan & Armstrong Building Supplies Ltd (Placemakers New Lynn)
5.2.3	Progressive Enterprises Limited Westfield (New Zealand) Limited	108/116 107/83	16	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 250 Auckland Regional Council 109 The Warehouse Ltd.
5.2.3	Progressive Enterprises Limited Westfield (New Zealand) Limited	108/109 107/76	16	208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd
5.2.3	The Warehouse Ltd The National Trading Company of New Zealand Limited Warehouse Stationery Limited	109/117 111/114 110/117	16		108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited 300 IMF Westland Ltd
5.2.3	The Warehouse Ltd The National Trading Company of New Zealand Limited Warehouse Stationery Limited	109/119 111/116 110/119	16		258 Auckland Regional Transport Authority 108 Progressive Enterprises Limited 250 Auckland Regional Council 107 Westfield (New Zealand) Limited 208 Sylvia Park Business Centre Limited
5.2.3	The Michael Bridgford Family Trust	330/3	16		
5.2.3	Rexford Family Trust	4/5	16		
5.2.3	AMP NZ Property Development Ltd & AMP Capital Investors (NZ) Ltd	203/24	16	110 Warehouse Stationery Limited 111 The National Trading Company of New Zealand Limited 109 The Warehouse Ltd 250 Auckland Regional Council	81 IB, GA and IE Midgley
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					Building Supplies Ltd (Placemakers New Lynn)
5.2.5	IMF Westland Ltd	300/122	18	81 IB, GA and IE Midgley	81 IB, GA and IE Midgley
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5.2.5	Warehouse Stationery Limited	109/134	18	184 West Auckland Land Holdings Ltd support 109/134	250 Auckland Regional Council 208 Sylvia Park Business Centre Limited
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5.2.5	109/135	The Warehouse Ltd	18	184 West Auckland Land Holdings Ltd	250 Auckland Regional Council 208 Sylvia Park Business Centre Limited
5.2.5	110/135	Warehouse Stationery Limited	18		208 Sylvia Park Business Centre Limited 250 Auckland Regional Council