

**BEFORE THE AUCKLAND UNITARY PLAN INDEPENDENT HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 1991 and the Local Government (Auckland Transitional Provisions) Act 2010

**AND**

**IN THE MATTER** of Topic 051-054 Centre Zones, Business Park and Industries zones, Business activities and Business controls

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REBUTTAL STATEMENT OF EVIDENCE OF JANINE BRINSDON AND KEVIN MOORE ON BEHALF  
OF NORTH HARBOUR BUSINESS ASSOCIATION (Inc.)

31 AUGUST 2015

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**Assumptions:**

**NHBA has not undertaken independent verification of Auckland Council's modelling used to assess the economic impacts of the Unitary Plan, nor the supply and future demand of industrial and commercial land/development opportunities.**

**Our positioning is based on the assumption that Council's modelling is both robust and accurate. If this proves not to be the case, our position and subsequent evidence may need to change.**

## NHBA Rebuttal statements:

### Reference: Statement of evidence of Gregory Michael Akehurst on behalf of Auckland Council, 27 July 2015

In his evidence, Akehurst states 'Industrial land is in relative short supply. It is difficult to identify, to zone and to protect into the future. Therefore office or retail activities that seek to locate on the relatively low cost industrial land are dissuaded through the use of stringent assessment criteria. These are appropriate and should help protect the stock of industrial land into the future' (point J, page 4).

Whilst we agree in principle that industrial land is in short supply and needs protecting to manage future demands, the age of North Harbour Business Improvement District would make repurposing of existing premises – designed to accommodate commercial activities, uneconomical.

However for the reasons quoted above, the 'low costs' associated with industrially zoned land (point 7.84, page 36) supports NHBA's submission and position – as being a primary reason why LFR should not be a Permitted activity within the Light Industrial, or General Business Zones. Household travel efficiency (point E, page 3) supports the need for retail clustering within centres and the need for a depth of employment diversity within economically viable and sustainable business/economic hubs.

Or another way of saying it is...

Household travel efficiency should not be restricted to consumer behaviour, but considered within the context of employment diversity within economic hubs.

We disagree with Akehurst's evidence, (point K, page 5). While acknowledging that Industrial areas do require a portion of commercial service and retail to meet the needs to businesses within, he states that this has been adequately provided for within the PAUP.

In his further evidence (point 7.38, page 28) he reinforces the need to 'provide sufficient flexibility to allow a degree of choice if the opportunity arises for a particular business, while appropriately not providing an attraction away from the higher order centres where office activity needs to be concentrated'.

Our disagreement is based on lack of options for expansion of the current commercial service and retail within the Light Industrial and General Business zones. We believe these restraints will constrict the natural growth of a successful and vibrant business community, within a manageable geographical footprint. For example, based on the restrictive office space provisions, (100sqm GFA or 30% of GFA as an accessory activity), a small commercial service provider would not be able to naturally grow to a level where moving to a Business Park or Metropolitan Centre facility would be financially viable. For example, moving beyond 7.93 employees, while still staying connected to their established local client base.

Reverting back to 100sqm **per tenancy, not site**, for offices within the Light Industrial zones, would provide increased business confidence, and therefore local employment, while enabling the business owner time to upscale their business to a level which supports the relocation to a neighbouring premium commercial location.

NOTE: Commercial service providers do not have a business park facility close by as Albany Metropolitan centre is still greenfields.

### **Mixed Use Zones:**

Within our business district, there are significant pockets of Mixed Use activities. These are predominately commercial or industrial rather than retail.

While we accept Akehurst's position that it does not make sense to limit or restrict the degree of intensity of retail development if this provides for local household 'convenience' needs to be met, efficiently and effectively, **we disagree with this position if the MU Zone is located adjacent to LI zones.**

We oppose small – medium supermarkets, 450-2000 sqm. (per tenancy), or larger supermarkets to be located within MU zones, if they are adjacent to Light Industrial zones, as we believe retail of this scale, will have an adverse effect on the neighbouring Metropolitan Centre, and result in traffic generation and parking demand overflows, to the detriment of the wider commercial area.

We accept the position taken in point 7.81 (page 35), providing the size limit to offices with MU zone is 500 sm<sup>2</sup> per tenancy not site.

### **Existing Office or Retail in LI Zones:**

Whilst we agree with the overriding principle of simplifying the consenting process for permitted and restricted discretionary activities across all zones, we question the additional compliance cost vs impact on the existing network of centres, when accessing a change of use for smaller premises.

### **Reverse sensitivity in the LI zone adjoining HI zones: (reference Statement of Evidence of Jarette Wickham on behalf of Auckland Council, 27 July 2015).**

Whilst we agree with the council's position that lawfully established heavy industry activities will be permitted within a LI zone, in order to maximise the ROI for investors and tenants, we dispute that the mitigation of reverse sensitivity should fall on the LI businesses, rather than those undertaking heavy industry activities. This is particularly applicable when the heavy industry element is an isolated, minority activity within a wider light industrial zone. We accept the 100 m buffer as an acceptable outcome of mediation however wish it be noted that we would prefer 50 m.