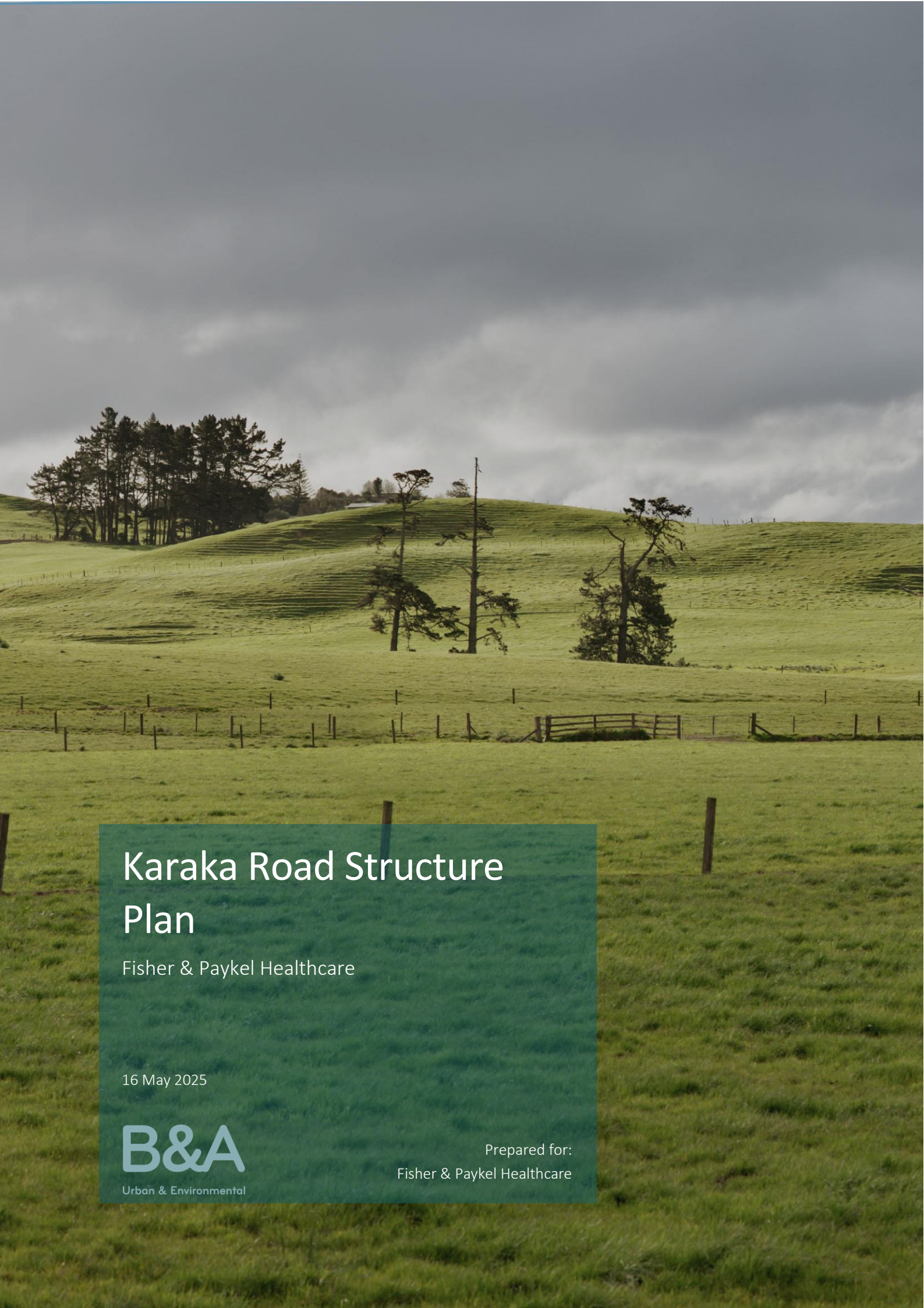




Karaka Road Structure Plan

Fisher & Paykel Healthcare

16 May 2025

B&A
Urban & Environmental

Prepared for:
Fisher & Paykel Healthcare

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1.0 The Karaka Road Structure Plan

1.1 Introduction

The Karaka Road Structure Plan demonstrates how the 105 hectares of Future Urban and Rural – Mixed Rural zoned land bound by Karaka Road (State Highway 22 ('SH22')) and the North Island Main Trunk Line ('NIMT') ('the Site') can be urbanised to enable the development of a healthcare manufacturing and research and development campus that integrates with the remainder of the planned Drury-Opāheke Structure Plan area and surrounding urban zoned land.

The Structure Plan area includes approximately 86 hectares of Future Urban zoned land identified within the Drury-Opāheke Structure Plan area and 19 hectares of land zoned Rural - Mixed Rural immediately west of the Rural Urban Boundary ('RUB').

In accordance with Appendix 1 – Structure Plan Guidelines of the Auckland Unitary Plan (Operative in Part) ('AUP'), the Structure Plan includes an assessment of the existing environment conditions, statutory framework and infrastructure requirements to determine the land uses and the transport and service network within the Structure Plan area.

The Structure Plan format is as follows:

- Vision
- Design principles
- Key spatial design moves, including:
 - Natural and cultural landscape;
 - Land use;
 - Open space and recreation;
 - Movement and transport; and
 - Infrastructure.

Following the outline of these below, the Structure Plan addresses the Appendix 1 – Structure Plan Guidelines of the AUP, and in particular the following:

- Structure Plan purpose and context;
- Strategic planning context;
- Matters to identify, investigate, and address;
- Consultation and engagement; and
- Specialist documents.

In summary, the urbanisation of the Structure Plan area will enable the development of a healthcare manufacturing and research and development campus, that will contribute to achieving a well-functioning urban environment. Technical analysis to inform the Structure Plan concludes that there are infrastructure solutions to service urbanisation of the land. These infrastructure solutions are either existing funded projects or other upgrades where various funding arrangements including future development contributions can be put in place to cover costs.

The Karaka Road Structure Plan satisfies the Appendix 1 – Structure Plan Guidelines of the Auckland Unitary Plan and gives effect to the Auckland Regional Policy Statement.

The Vision, Key Outcomes, Design Principles, and Key Spatial Design Moves of the Structure Plan are set out below.

1.2 Vision

The Vision for the Karaka Road Structure Plan is:

An environment that enables the development of a comprehensive industrial campus as a significant employment node, which inspires innovative solutions that improve patient care and outcomes to deliver sustainable and profitable growth.

1.3 Design Principles

A number of appropriate best practice urban and environmental principles have informed the development of the Structure Plan:



1. Economic opportunity

Bring economic benefits to the Karaka and Drury centres with more people who can easily access employment, shops and services.



2. Responding to landscape and ecology

The site has a recognised character area with Oiroa Creek as its natural feature. Develop a landscape strategy and open space network to protect, enhance and maintain landscape elements within the site.



3. Establishing a secure environment

Utilising landscape strategies and networks to create a secure environment which helps to foster innovation.



4. Connection into the wider network

Key transport connections which increase the accessibility to and from the site are provided.



5. Integration of amenities

Offer increased access to amenities for surrounding residential areas and F&P Healthcare employees.

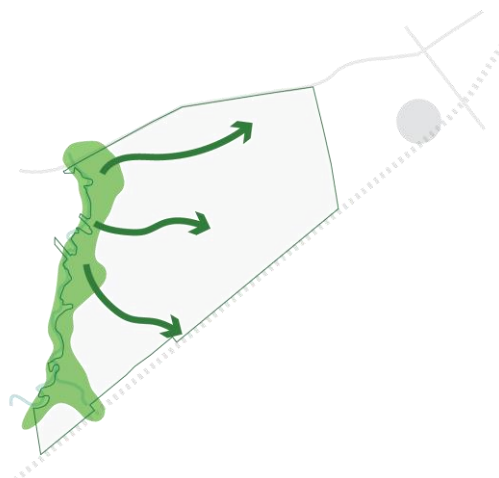


6. Quality public realm

Ensure quality business / industrial development is integrated with surrounding residential uses and the natural environment.

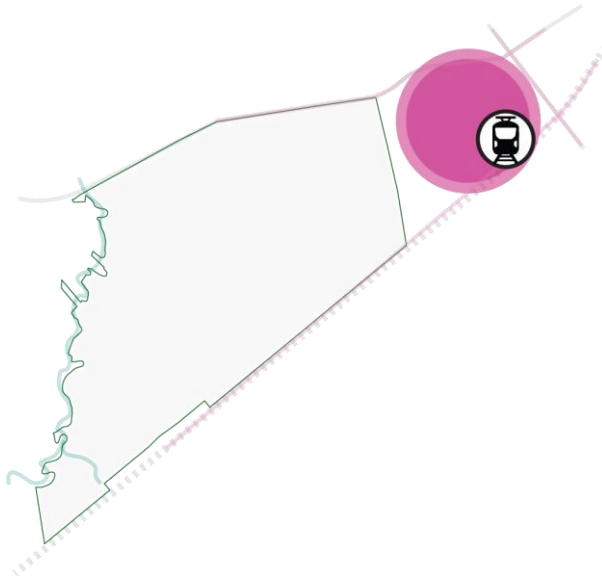
1.4 Key Moves

Development of the Structure Plan has been informed by the following key spatial design moves and organising elements, developed in accordance with the vision and design principles:



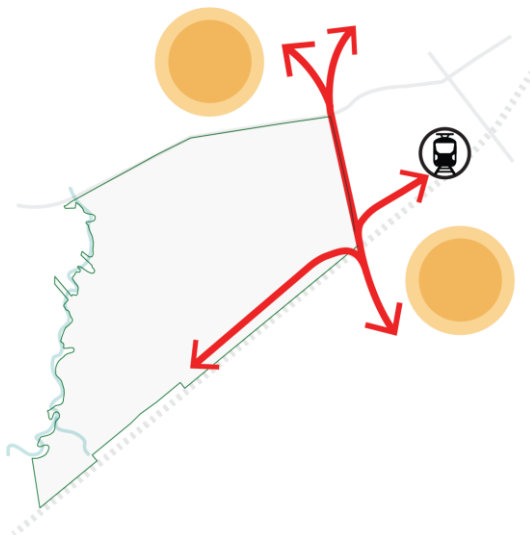
Key Move 1

A landscaped area along Oiroa Creek and within the Site to provide for recreational opportunities, ecological benefits, balance built form and natural open spaces, and create a natural buffer between urban and rural zones.



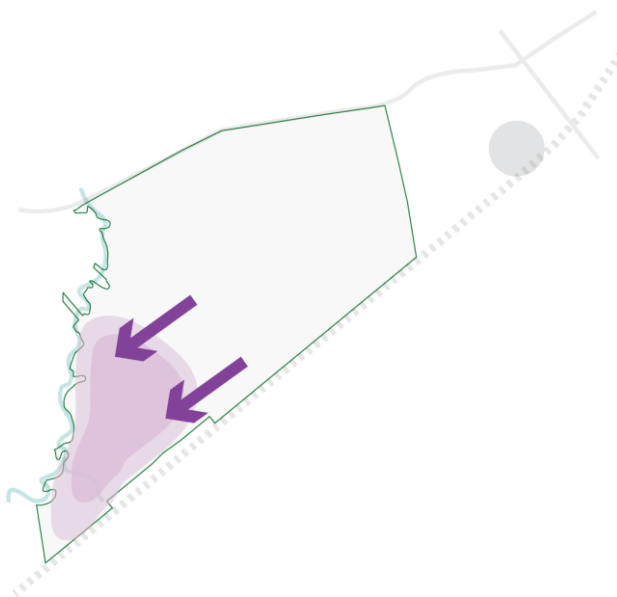
Key Move 2

A proposed local amenity area including a park, a mix of uses including residential and convenience retail and services, a park and ride and access to public transport that responds to the opportunity of the confirmed railway station location.



Key Move 3

Maintain a north/south active mode connection which links residential areas and surrounding amenities/services on either side of the rail corridor as well as connecting parts of the Site with public transport and local amenity areas.

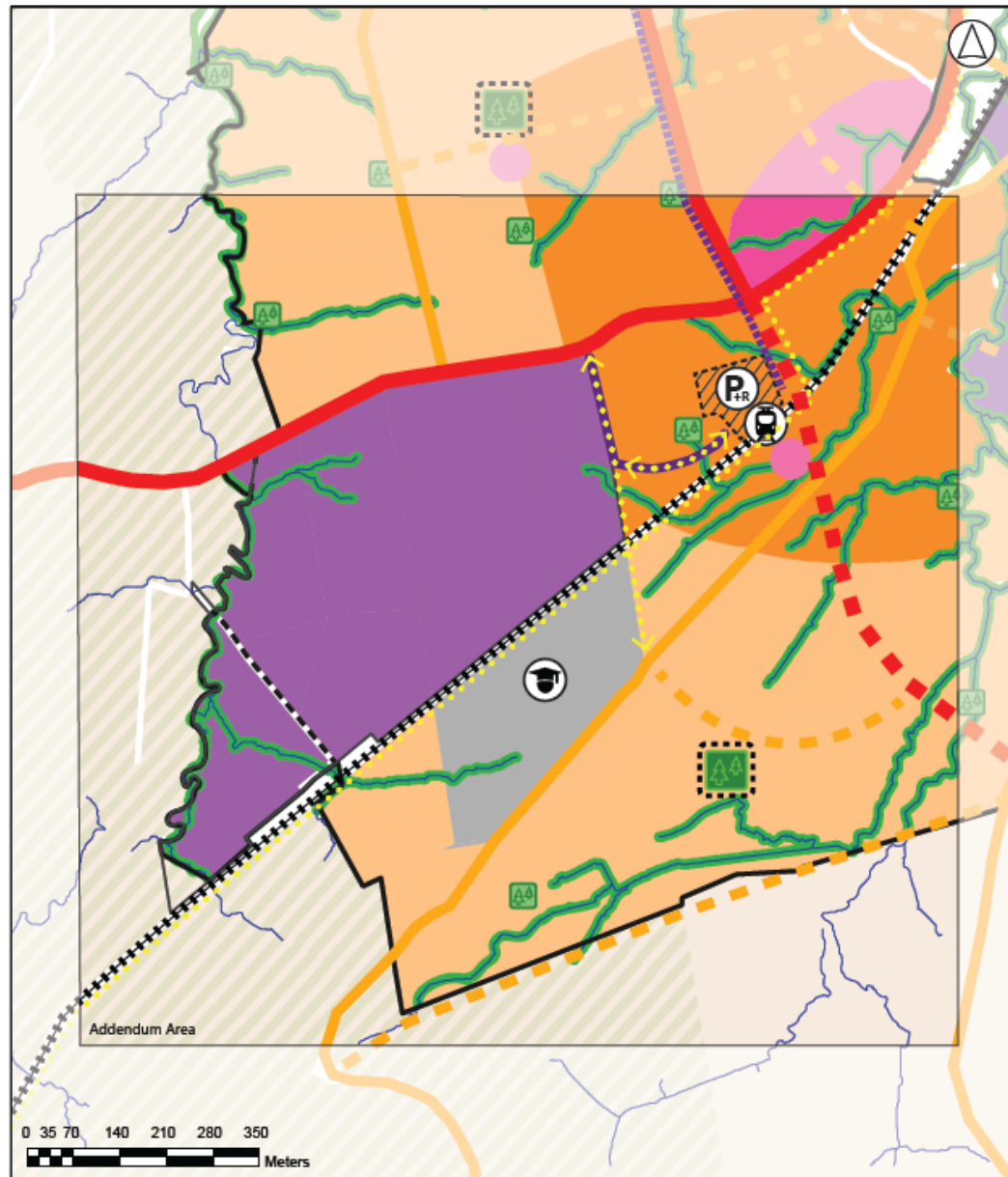


Key Move 4

Extension of the future urban area to the natural boundary created by Oiroa Creek to increase local employment opportunities.

1.5 Structure Plan Elements

Taking into account the Vision, Design Principles, and Key Moves, several structuring elements have been derived to give effect to the above matters to ensure that the Structure Plan area will be well-integrated with the existing and future planned urban environment (refer **Figure 1**).



Karaka Road Structure Plan

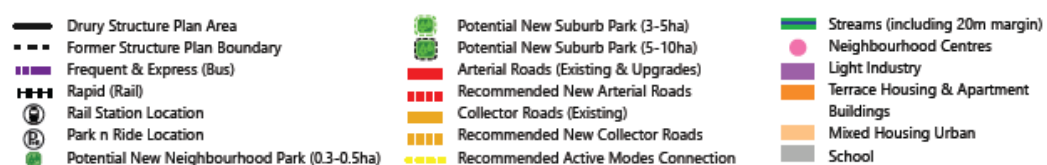


Figure 1: Karaka Road Structure Plan

1.5.1 Natural and Cultural Landscape

Key objectives

- Respect and enhance mana whenua values
- Protect, enhance and restore key riparian corridors
- Protect and enhance the existing and future habitat networks

A Regenerative Natural and Cultural Landscape

Well-protected, self-regenerating and highly connected natural areas provide a wide range of benefits, including local fauna and flora habitat that positively impact the wider regional ecological network. The Structure Plan outlines the protection and restoration of ecologically significant streams and wetlands.

The Structure Plan seeks to recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the cultural landscape at Karaka Road. These values include but are not limited to:

- The whenua, in particular the impacts from removal of topsoil, changes to the site topology and potential of movement of soils into different takiwa.
- Ongoing connections to the Oiroa Creek awa.
- Mauri, particularly in relation to freshwater.

Stormwater Management

In addition to protecting and enhancing the natural and cultural landscape, the Structure Plan will seek to manage the impact of development on stormwater quantity and quality on receiving water environments through implementing the best practicable option for stormwater management, as set out in the Woods Karaka Road Stormwater Management Plan dated June 2024. In summary this includes:

- SMAF 1 hydrological mitigation;
- A mixture of communal and at source devices;
- Pipe network for primary conveyance;
- Overland Flood Path for secondary conveyance;
- Inert roofing and cladding materials for buildings; and
- At source treatment for stormwater runoff from carparks and high use roads.

1.5.2 Land Use

- Promote a well-functioning urban environment
- Provide economic growth and significant employment opportunities
- Integrate with the existing and planned urban environment

Planning Approach

Development of the Structure Plan has been informed by an analysis of both the land within the Structure Plan area and the context of the land within the wider Drury West area.

An extensive process of issue identification and constraints mapping underpinned by a suite of supporting specialist documents has been undertaken to inform the spatial configuration of the Structure Plan and to determine the most appropriate land uses, taking into account the following:

- The spatial relationship to the existing live zoned urban areas of Drury West and the designated Ngākōroa Railway Station;
- A quality compact urban form and well-functioning urban environment;
- Recognition and protection of the cultural landscape;
- Active mode connections linking to the Ngākōroa Railway Station, the Waipupuke neighbourhood centre and open space and education facilities;
- Reinforcing existing transport infrastructure, transportation considerations and connectivity with the wider area;
- Sustainability considerations including the reduction of Vehicle Kilometres Travelled ('VKTs');
- Natural environment considerations – watercourses and wetlands;
- Natural hazard constraints including flooding; and
- Infrastructure provision, including three waters management.

The Structure Plan identifies a logical contiguous connection to the existing and planned urban environment of Drury West. The proposed land use primarily includes Business – Light Industry zoning to provide for the development of a new employment hub and specialised campus in research and development and manufacturing to support development of successful and thriving communities.

The preferred Structure Plan land use layout is shown in **Figure 1** above.

Business Land Use

The Structure Plan includes Business – Light Industry zone over the entire area to enable the development of a second Fisher & Paykel Healthcare ('FPH') campus in New Zealand. The campus would be focussed on research and development, manufacturing and office activities, and would provide significant employment opportunities within a walkable distance to the designated Ngākōroa Railway Station.

The Business - Light Industry zoning is commensurate to activities planned within the FPH campus and has been informed by the Economics Assessment by Property Economics to maximise the economic land use efficiency of the land and enable the development of a significant employment hub in Drury West. Examples from local and international FPH campuses are shown in the **Figures 2, 3 and 4** below.



Figure 3 Photograph of the existing East Tāmaki Fisher & Paykel Healthcare Campus



Figure 2 Photograph of the Daniell Building at the existing East Tāmaki Fisher & Paykel Healthcare Campus



Figure 4 Existing Tijuana, Mexico Fisher & Paykel Healthcare Campus

Interface and Edge Conditions

The location, type and form of the urban edge and its appropriateness to the surrounding rural and future urban residential area has been considered. In all instances the urban-rural edge is separated by natural or manmade landscape features such as permanent streams, established roads and the NIMT railway network.

1.5.3 Open Space and Recreation

Key objectives

- Green multipurpose corridors contribute to connectivity and stormwater management.
- Celebrate and enhance the riparian margins.
- Reflect mana whenua Matauranga and integrate Te Auranga design principles.

The Structure Plan integrates the existing natural features of the site and establishes a connected green multipurpose corridor along Oiroa Creek. In particular the Structure Plan seeks to provide a landscaped corridor with functions including stormwater management, recreational opportunities, and ecological benefits which provide a natural buffer between urban and rural zones. The north-south landscaped area along Oiroa Creek and the western boundary, provides a riparian corridor. This assists in establishing ecological benefits, amenity for future employees on campus, as well as providing a natural buffer between the FPH campus and the rural zoned land to the west of the Structure Plan area.

1.5.4 Movement and Transport

Key objectives

- An efficient multi-modal network.
- Sustainable and convenient public transport options.

Active transportation is the most healthy, affordable, environmentally-friendly, and inclusive form of transport. The Karaka Road Structure Plan focusses on encouraging sustainable and multi-modal transport choices that promote a healthy lifestyle and reduce car-dependent transport.

Key features within this network include the following:

- Wider active mode network connections to the planned residential community in the Waipupuke Precinct, the Ngākōroa Railway Station and education facilities; and
- Strategic access points into the Structure Plan area to minimise impacts on the safety and efficiency of operations along SH22.

Safe Transport Network

A number of transport infrastructure upgrades have been identified to support development of the Structure Plan area as well as other planned development within the wider area. These upgrades are outlined in more detail within Section 7.7.

1.5.5 Three Waters Infrastructure

Key Objective

- Provide all necessary infrastructure to facilitate development of the land.

Urban development within the Structure Plan area can be supported by infrastructure, including:

- The Council's Drury-Opāheke Structure Plan (2019) originally proposed a network of local gravity wastewater pipes supported by a large number of pumpstations and rising mains which ultimately discharged to the Bremner Road pumpstation. More recent engagement with Watercare Services Limited ('WSL') has revealed that the current wastewater design includes a gravity transmission line which will be constructed to service the wider Drury West area. An extension to the proposed transmission gravity pipe is required to service the Structure Plan area which will originate at the FPH site, via a permanent public pumpstation located on the western portion of the site. The pumpstation will convey flows north, via a public rising main along Karaka Road and Jesmond Road to Manhole 13 where it connects with the WSL transmission network. An Infrastructure and Funding Agreement (IFA) is expected to be entered into between FPH and WSL which will outline the contributions by FPH to this key wastewater infrastructure.
- The Council's Drury-Opāheke Structure Plan indicates a new water supply main along Karaka Road is planned to service the growth potential in Drury West, as shown in **Figure 5** below.

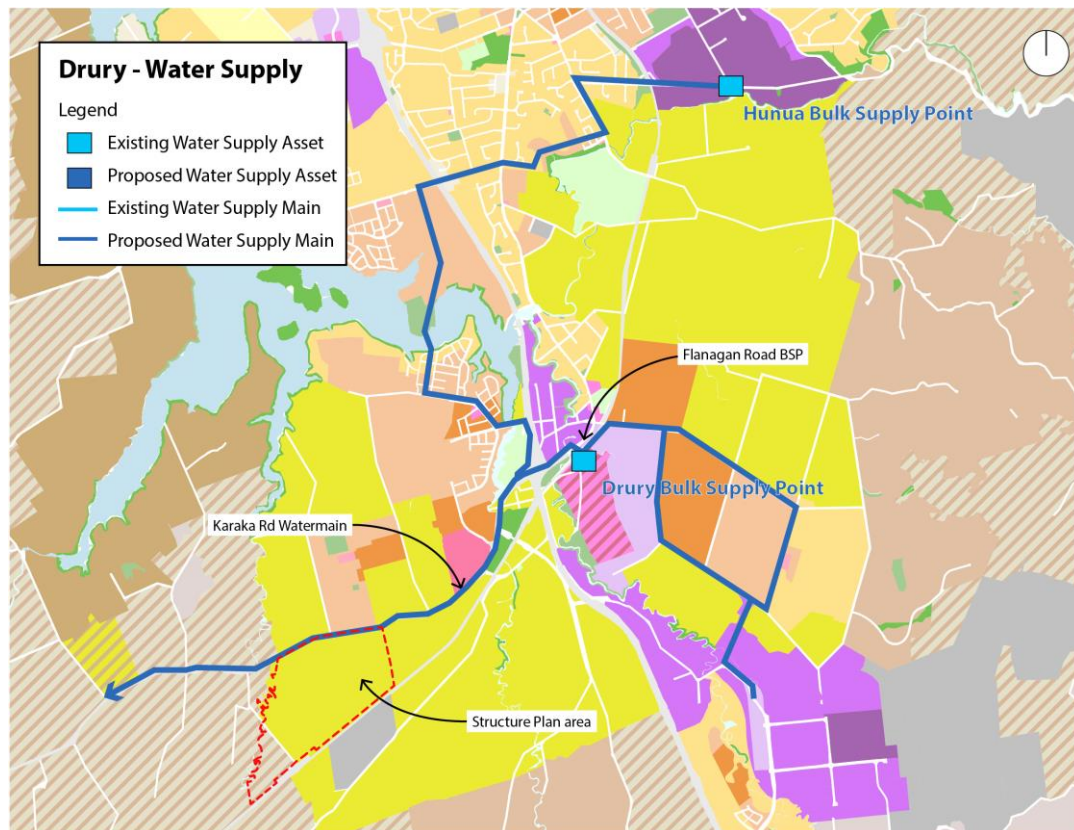


Figure 5 Water Supply servicing strategy for the Drury-Opāheke Future Urban area (Auckland Councils Drury-Opāheke Structure Plan (2019))

Recent engagement with Veolia has confirmed that water supply for the Structure Plan area will be extended from the bulk supply point on Flanagan Road to the site frontage along Karaka Road, which will be delivered as development occurs. To provide resilience, a loop back to the Flanagan Road bulk supply point through Bremner Road and Jesmond Road will need to be completed as part of the network.

2.0 Structure Plan Purpose and Context

2.1 Structure Plan Purpose

The Structure Plan area includes approximately 86 hectares of Future Urban zoned land located within the Rural Urban Boundary ('RUB') and 19 hectares of land zoned Rural - Mixed Rural immediately west of the RUB. The Structure Plan sets out how this area can be developed to accommodate a new FPH campus and integrate with the existing and planned surrounding urban environment.

FPH owns the land within the Structure Plan area and commenced the Structure Planning process in 2022 to inform future development of the Karaka Road site.

As outlined in Section 1 above, this Structure Plan establishes the land use, all modes of transport connections, and network of open spaces within the Structure Plan area in accordance with the requirements of Appendix 1 to the AUP. Importantly, section 1.2(4) of Appendix 1 promotes the preparation of a structure plan as a precursor to a plan change to rezone Future Urban zoned land.

Preparation of this Structure Plan has been informed by a suite of technical reports across a wide range of disciplines and in response to the specific environmental conditions of the Karaka Road Structure Plan area. This also captures the engagement with key stakeholders, which includes the local community, key infrastructure providers, Auckland Council, council-controlled organisations, Waka Kotahi and mana whenua. A public consultation open day was held on 10 February 2024. This included a number of individuals and groups passing through a public display of information panels setting out the future development aspirations of the Structure Plan area.

The Structure Plan area is currently predominantly zoned Future Urban. The RUB applies along the zone boundary in between the Future Urban and Mixed Rural zoned portions of the Structure Plan boundary. The live zoned Waipupuke Precinct is located directly adjacent to the Structure Plan area on the opposite side of State Highway 22 and approximately 300m west of the designated and funded Ngākōroa Railway Station.

2.2 Local Context

The Karaka Road Structure Plan area is located in Drury West, on the southern edge of the Auckland metropolitan area and approximately 40km/45min drive from the Auckland CBD. **Figure 6** below shows Drury West in a wider regional context.

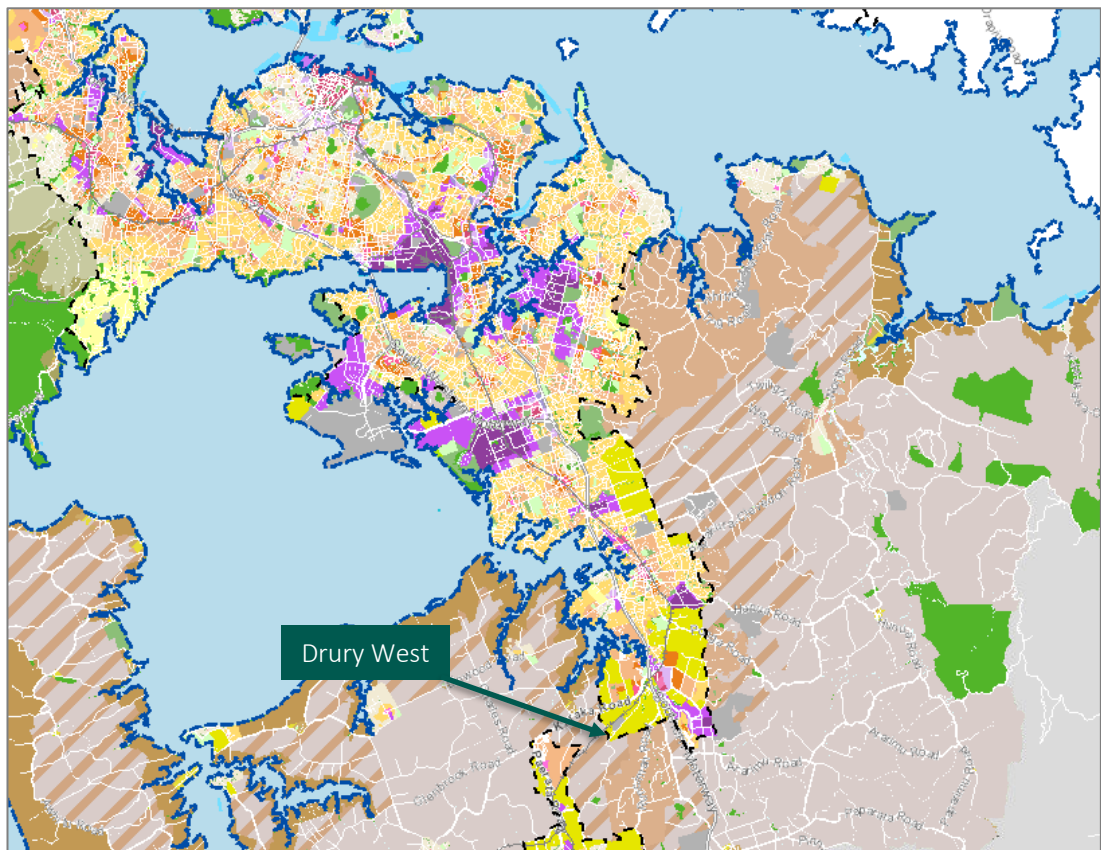


Figure 6 The Karaka Road Structure Plan area within the wider Auckland region.

The Structure Plan area is located in an area of Auckland that has experienced significant growth and urbanisation in recent years, with several planned greenfield expansions scheduled for the near future. The Drury area together with other developments in South Auckland is expected to accommodate a significant proportion of greenfield growth. There are opportunities to leverage from planned infrastructure required to support the urbanisation of Drury and development in the

Structure Plan area. The Structure Plan area also presents an opportunity to provide an employment hub and local jobs to support the emerging community within Drury.

Land within Drury West includes both Future Urban and Urban zoned land as shown in **Figure 7** below. Directly north of the Structure Plan area on the opposite side of SH22 is approximately 56 hectares of Mixed Housing Urban, Terraced Housing and Apartment Building, and Neighbourhood Centre zoned land. This land forms the Waipupuke Precinct rezoned under Plan Change 61 to the AUP. Urban zoned land is also located to the northeast, adjacent to the Pahurehure Inlet, and comprises Mixed Housing Suburban, Mixed Housing Urban, Terraced Housing and Apartment Building, and Town Centre zoned land. The new Drury Metropolitan Centre is located approximately four kilometres to the northeast along with the new planned Drury Central Train Station. Further west is the Paerata Rise residential subdivision which is currently being developed and seeks to establish some 4,500 homes by 2035.

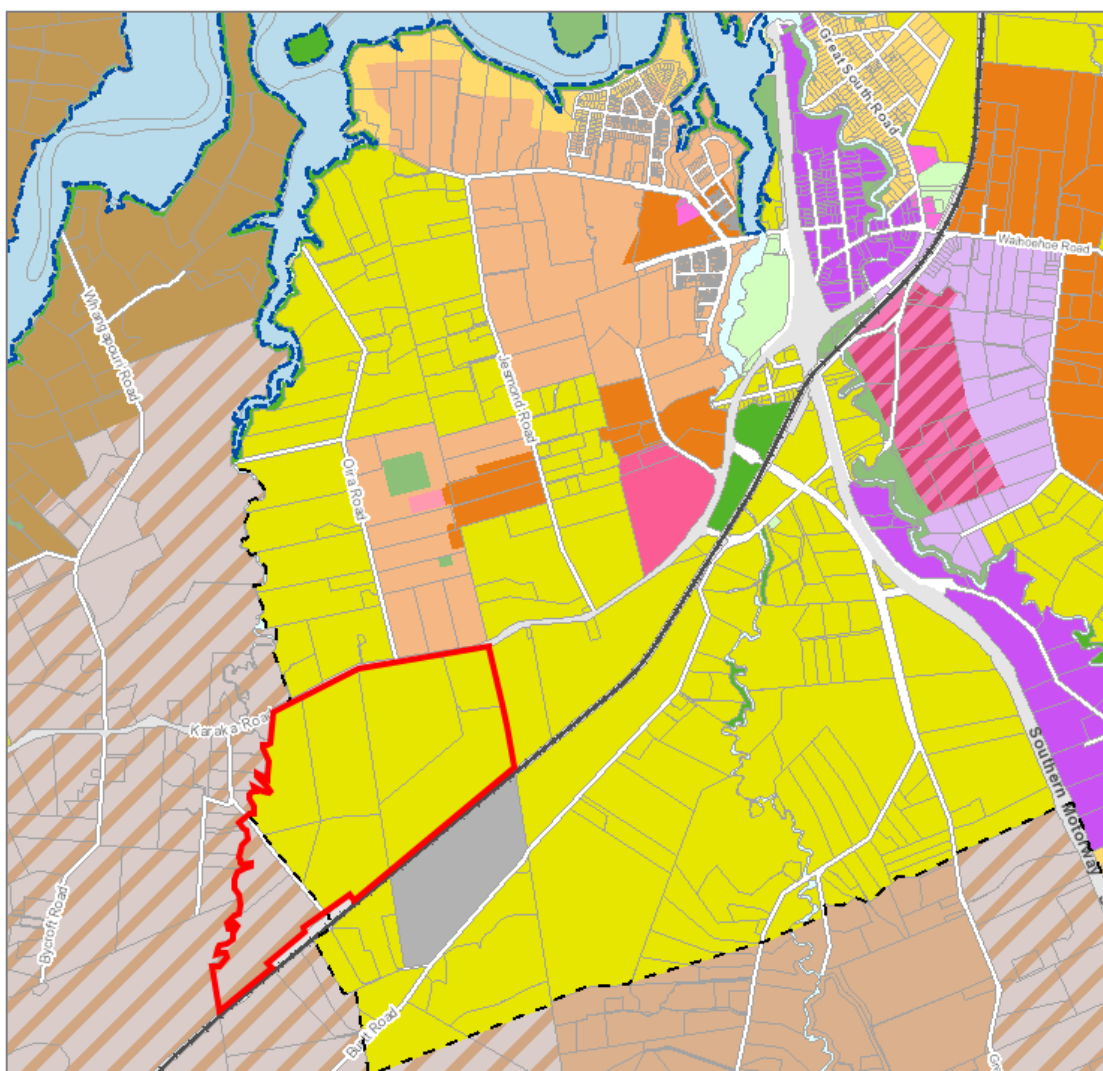


Figure 7 The Structure Plan area (red) and the operative zoning pattern in Drury West (source: Auckland Council GIS).

In 2019, Auckland Council completed Structure Planning for 1,921 hectares of land within the Drury-Opāheke Structure Plan area. The Drury-Opāheke Structure Plan area is part of Auckland's southern growth area and includes the largest proportion of future urban areas in Auckland, at

45%. This includes the large future urban areas of Takaanini, Drury-Opāheke, and Pukekohe-Paerata. The total population in this southern growth area is anticipated to grow from 193,000 in 2016 to 353,000 by 2046.

The 2019 Drury-Opāheke Structure Plan land use map is shown in **Figure 8 below**. This land use map shows that residential activity in the form of Mixed Housing Suburban and Mixed Housing Urban zoning is proposed over the Structure Plan area including a potential new suburb park and three potential new neighbourhood parks. Additionally, the land use map also shows an indicative new Centre along the Karaka Road frontage of the Structure Plan area, an indicative new collector road running in a north-south direction connecting to the other side of the NIMT line, and a series of permanent and intermittent streams.

This Structure Plan is proposed in replacement of the Drury-Opāheke Structure Plan for this part of Drury West. It proposes industrial activity and zoning over the entire Structure Plan area and will provide opportunity for the development of a second FPH campus, which will act as a significant employment hub and catalyst for economic activity and growth in Drury West.

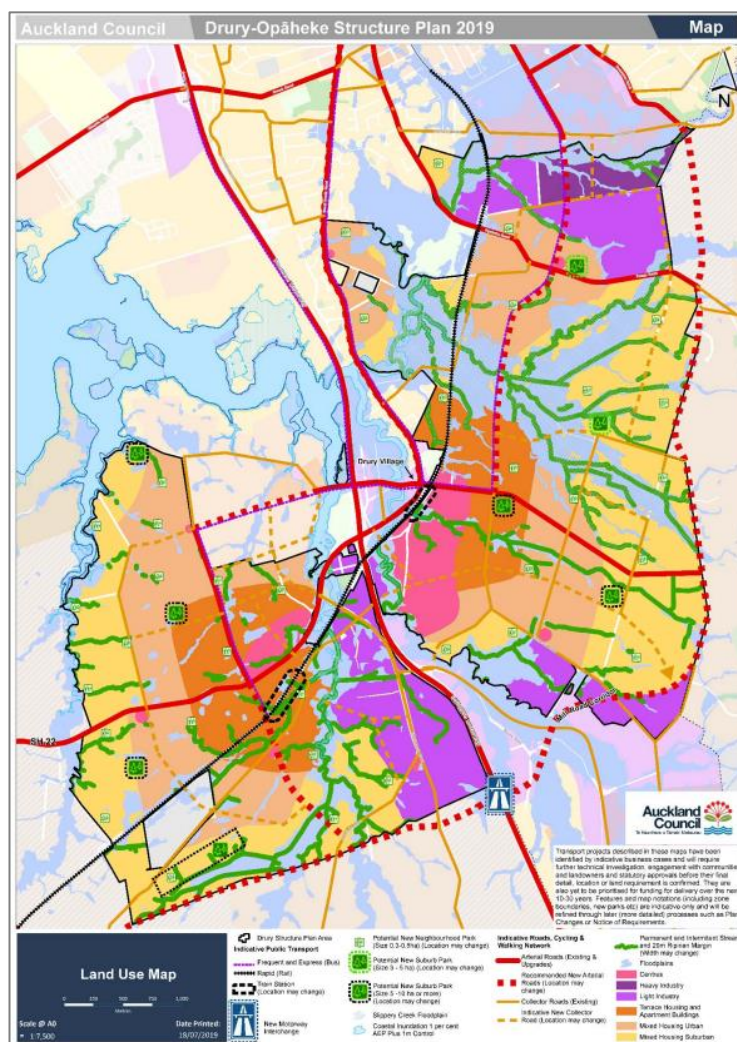


Figure 8 2019 Drury-Opāheke Structure Plan land use map (source: Auckland Council).

2.3 The Structure Plan Area

2.3.1 Overview

The Structure Plan area comprises a total land area of 105 hectares made up of approximately 85 hectares of Future Urban zoned and 20 hectares of Mixed Rural zoned land. The Structure Plan area is a physically well-defined area bound by SH22 to the north, Oiroa Creek to the west, the railway network of the NIMT Line to the south, where the planned Ngākōroa Railway Station is located approximately 300 to the east.

Land within the Structure Plan area is currently used for agricultural purposes as a high-end producer of hothouse fresh produce. Two large hothouse buildings are located at the southern end of the Structure Plan area directly adjacent to the NIMT line, in addition to various other buildings and structures associated with the packaging and distribution of fresh produce grown on site.

The topography of the Structure Plan area slopes down in a west to east direction towards Oiroa Creek. Vegetation within the Structure Plan area is highly modified and largely grazed pasture. There is no vegetation identified as Significant Ecological Areas ('SEA') within the Structure Plan area itself or within its immediate vicinity, with the closest SEA being located approximately 1.3 kilometres to the north. The pasture on site is generally interspersed with maintained shelterbelt planting, amenity vegetation, and riparian vegetation.

The Structure Plan area includes a number of waterbodies, including the Oiroa Creek along the western boundary, which is the only permanent stream present. Other intermittent streams and natural inland wetlands are located in the northern portion of the Structure Plan area.

FPH has land interests over the entire Structure Plan area.

2.3.2 Transport Connections

The Structure Plan area is bound by SH22 to the north and the NIMT to the south. SH22 serves as the main access to and from the Structure Plan area. SH22 connects to State Highway 1 ('SH1') at the Drury interchange to the east and Paerata and Pukekohe to the west. Other key transport links include Glenbrook Road and SH22 roundabout to the west, and Oira Road and Jesmond Road, which intersect with SH22. Both the Oira Road and Jesmond Road intersections are planned to be upgraded as part of development within the adjacent Waipupuke Precinct.

Significant infrastructure upgrades are also planned for the surrounding area (refer **Figure 9** and **Figure 10** below) to provide improved travel choices for public transport and active modes as well as improved safety and efficiency of private vehicle travel. The new Ngākōroa Railway Station is located approximately 300m from the Structure Plan area and is funded under the New Zealand Upgrade Programme ('NZUP'). The Drury West Station is planned for completion in 2024 and will include a bus interchange, park and ride facilities, walking and cycling paths, and upgrades to supporting roadways.

Other committed and planned transport upgrades which will improve connections for the Structure Plan area include:

- The Drury Arterial FTN network
- SH22 upgrades

- Drury Central Train Station and Interchange
- Ngākōroa Railways Station and Interchange
- Papakura to Drury State Highway 1 improvements
- Papakura to Pukekohe rail electrification
- Southern Frequent Transit Network bus routes including Takanini and Great South Road

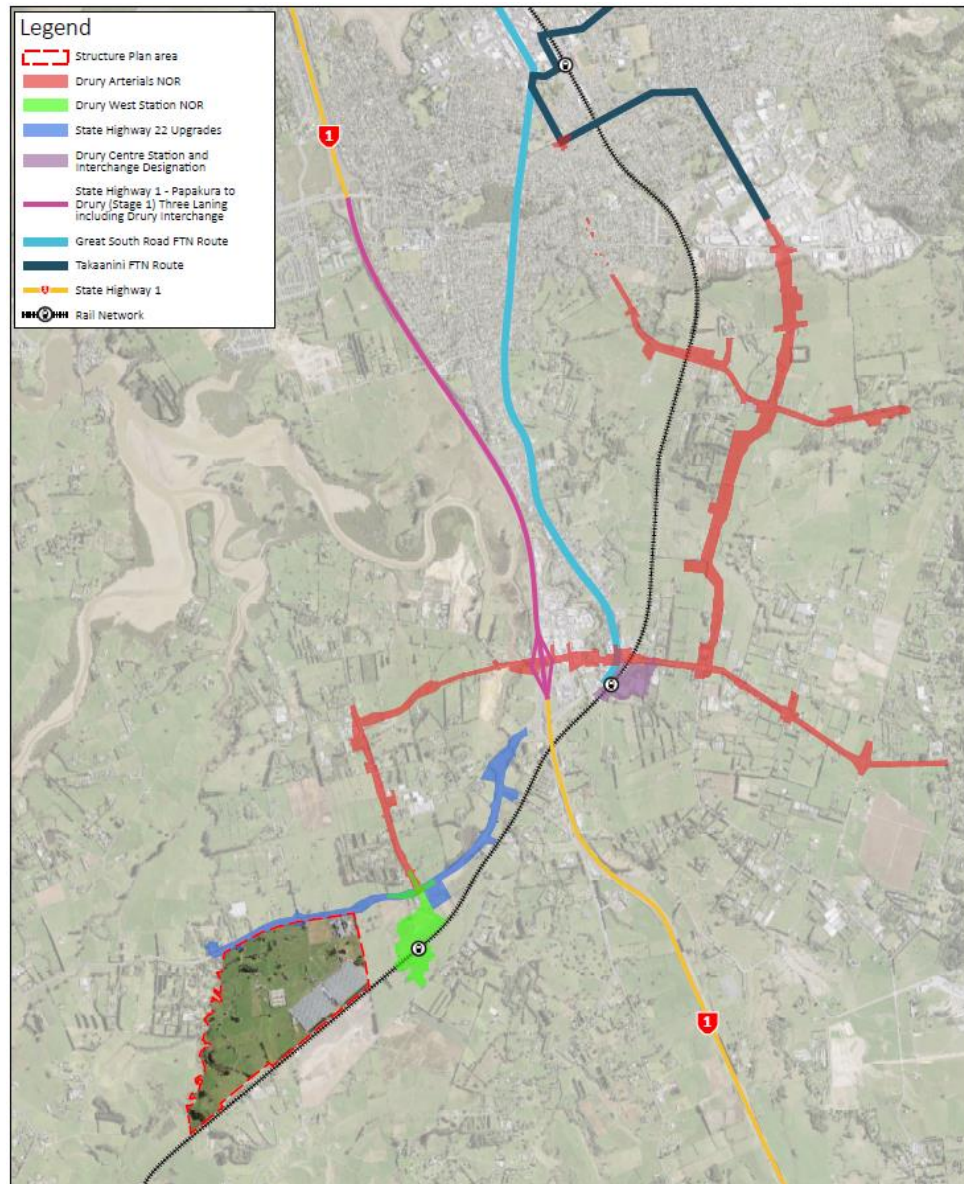


Figure 9 Planned transport infrastructure projects surrounding Structure Plan area.

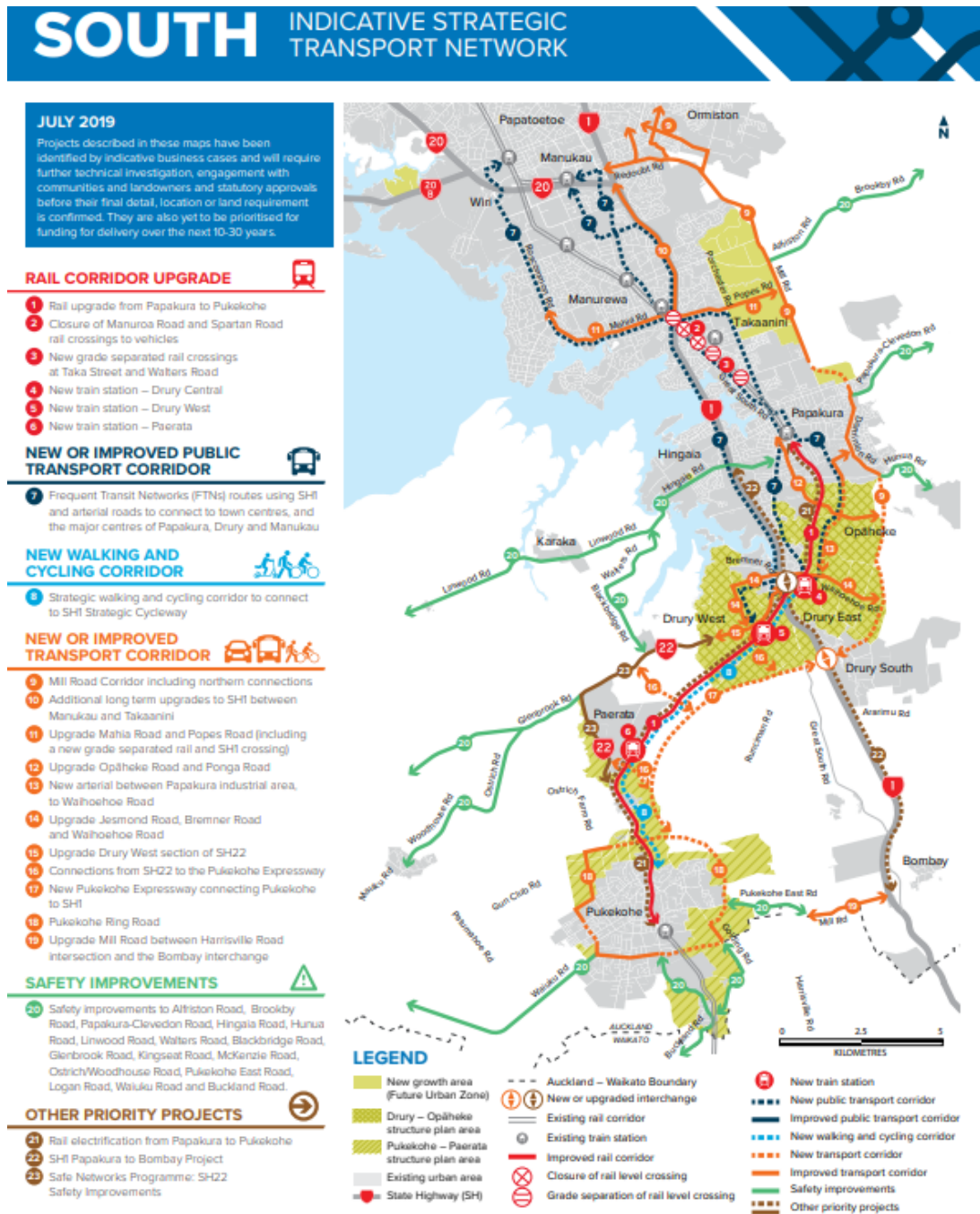


Figure 10 Supporting Growth Southern Transport Upgrades.

The State Highway 22 upgrades along the northern boundary of the Structure Plan area will extend from the Drury Interchange at State Highway 1 to Oiroa Creek. This upgrade will include active transport facilities and associated infrastructure with the widening of SH22 for two additional lanes. The Concept Plan for this upgrade is shown in **Figure 11** below.



Figure 11 Concept plan for SH22 Upgrade relative to general extent of Structure Plan area circle in red.

2.3.3 Employment Centres

The Structure Plan area is strategically located in proximity to several business hubs and centres in southern Auckland, as shown in **Figure 12** below. Within the surrounding Drury area, a Neighbourhood Centre is planned approximately 600m to the north of the Structure Plan area in the Waipupuke Precinct, a Town Centre is planned approximately 800m to the west in the Drury 2 Precinct, and a new Metropolitan Centre is planned in the Drury Centre Precinct 2km away in Drury East. The large Drury South industrial area is also located 1.6km to the south-east of the Structure Plan area.

The nearest established Metropolitan Centre is located in Papakura, approximately 7km to the north of the Structure Plan area. The existing light/heavy industry area approximately 8.9km to the north-east in Papakura offers a range of business and employment opportunities as well.

Given this existing and planned network of centres surrounding the Structure Plan area, the Structure Plan does not provide for the development of a new Centre. However, significant employment and economic opportunities will be introduced by the Structure Plan with the proposed Business - Light Industry zoning.

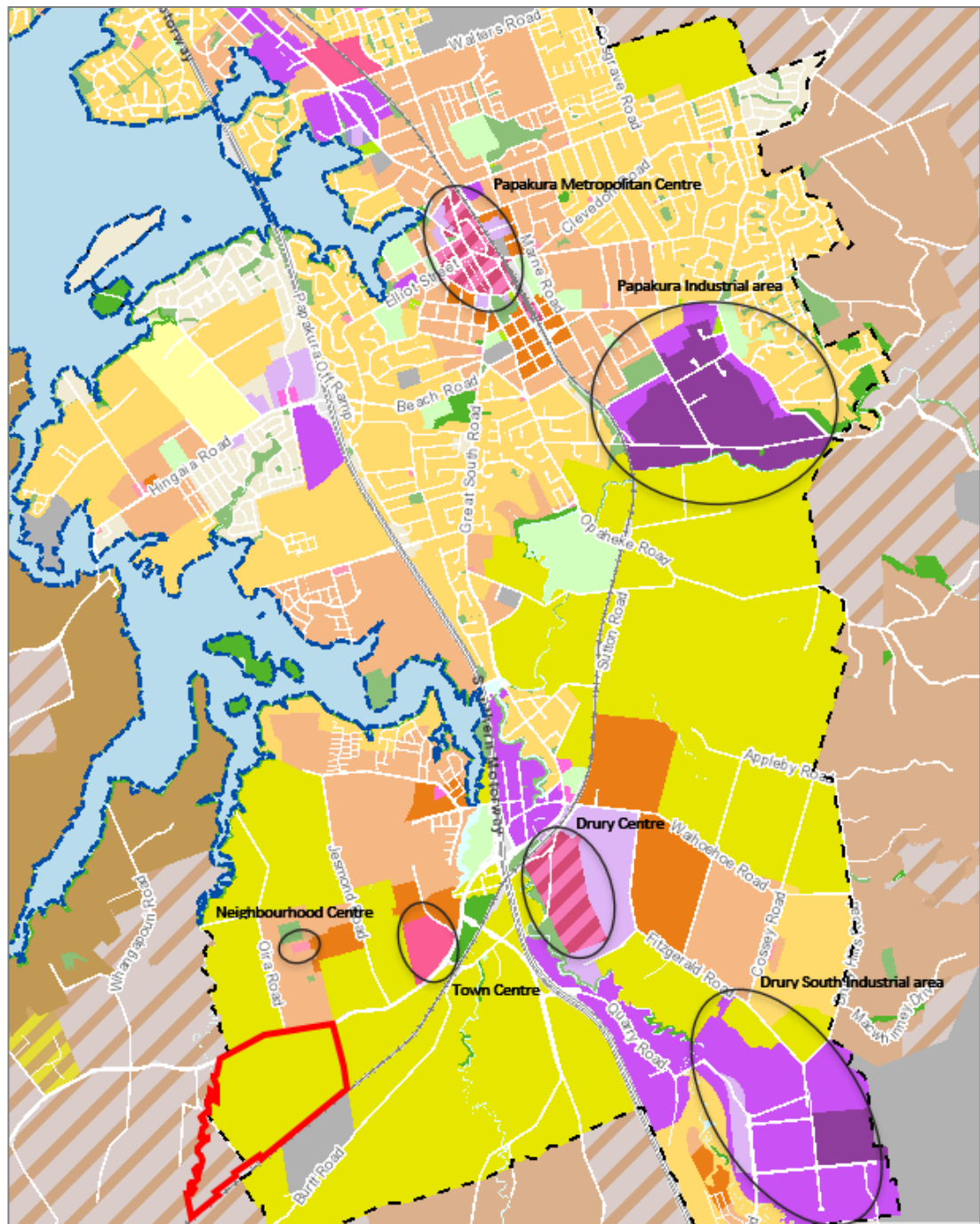


Figure 12 Surrounding Centres Network.

2.3.4 Social Infrastructure

The Structure Plan area is accessible to a range of social infrastructure including the major subregional healthcare facilities of Pukekohe Hospital, Manukau SuperClinic and Middlemore Hospital within a 14-24km radius of the Structure Plan area. There are also several primary and secondary education facilities within the existing urban areas of Pukekohe and Papakura, as well as a range of community facilities including libraries, community centres, open spaces and amenities. The new Drury Metropolitan Centre, over time, is also expected to provide for the development of additional social infrastructure.

2.4 The Growth Challenge

In 2023 the population of Auckland – Tāmaki Makaurau was estimated at 1.71 million and is anticipated to grow and change significantly over the next 30 years; Auckland’s population is projected to grow by around 520,800 people, to reach 2.23 million by 2053¹.

The challenge for Auckland is how to accommodate this growth with jobs and housing, in a sustainable manner while delivering the integrated provision of infrastructure to support this growth.

Under the National Policy Statement on Urban Development 2020 (‘NPS-UD’) Auckland Council has responsibilities to ensure that there is *at least* sufficient development capacity to meet expected demand for housing and business at all times (Policy 2). This is reinforced by the requirement for local authorities in major urban centres to set a bottom line in their plans, for the total development capacity needed to meet estimates for demand and additional margins as calculated in the Housing and Business Development Capacity Assessments (Policy 7). The term ‘bottom line’ replaces the previous use of ‘target’ under the NPS - Urban Development Capacity 2016, to reflect that this is a minimum amount, and that more is better.

The Auckland Future Development Strategy 2023-2053 (‘FDS’) and the AUP form the package of documents which set the strategic approach for providing for urban growth within the Auckland Region.

The FDS sets the strategic direction for how growth will be accommodated in Auckland to achieve a quality compact urban form. The FDS signals that approximately 1,500-1,700 hectares of vacant business land is needed over the long-term, and that the exact location and quantity of vacant business zoned land will be confirmed through changes to the AUP through the Plan Change process. As a precursor to this, the Karaka Road Structure Plan identifies a significant area of business zoned land in Drury-Opāheke, to support and accommodate a future FPH Campus which is a land extensive manufacturing and research and development business.

The AUP currently identifies approximately 9,500 hectares² of rural land for urbanisation. This land is zoned Future Urban zone (‘FUZ’). There are four key geographic areas for greenfield growth in the Auckland Region, including the North West FUZ, Silverdale FUZ, Warkworth FUZ and the southern Auckland FUZ. Future urban land forms an important component of the overall growth strategy for enabling Auckland’s growth.

The lack of progress being made to live zone business land outside of privately initiated plan changes, in addition to the demand for 1,500-1,700 hectares of business land in greenfield areas is creating a growth challenge. The Karaka Road Structure Plan provides an opportunity to contribute to resolving the growth challenge within Auckland’s South through enabling the delivery of approximately 105 hectares of business land that can be serviced by infrastructure. The propensity for this development to occur is markedly higher because it is being planned, managed and implemented by an internationally recognised and credible developer who has a track record of delivering high-quality developments at the national and international scale. Therefore, development of the Structure Plan area will make a significant contribution to realisable development capacity for business land.

¹ Auckland Future Development Strategy 2023-2053 (page 2).

² Auckland Future Development Strategy 2023-2053 (page 16).

2.4.1 Business Demand in Drury

Demand for business land in Drury will inherently increase through the rezoning of land to residential which will result in the emergence of new residential communities that will need to be supported by business zoned land to provide local employment opportunities and amenities to support local convenience needs. It is proposed to provide employment opportunities for the wider Drury-Opāheke area within the Structure Plan area with the proposed Business - Light Industry zoning. The scale of the Structure Plan area is such that it will contribute 7.5% of the demand for 1,400 hectares of business in greenfield areas.

It is acknowledged that the proposed Light Industry zoning will replace what would otherwise have been residentially zoned land under the Drury-Opāheke Structure Plan. The Economic Assessment identifies that this change is unlikely to create a shortfall in residential land within the Franklin and Papakura Local Board areas. Projections for residential demand under both the medium and high growth scenarios, and available land capacity, indicate there is sufficient remaining residential land within the local market to meet residential housing needs.

3.0 Strategic Planning Context

This section sets out the relevant statutory and non-statutory plans and strategies that must be considered in the development of structure plans, in accordance with Appendix 1 of the AUP.

3.1 Auckland Future Development Strategy 2023-2053

The Auckland Future Development Strategy 2023-2053 ('FDS') forms part of the Auckland Plan and provides a long-term growth strategy for Auckland looking ahead to 2053. The FDS shows **how** and **where** future development will be provided, promoting a quality-compact, multi-nodal growth model, with a strong focus on adaptation to the effects of climate change, and responding to funding constraints.

The Structure Plan area has an indicative sequencing of 2035+, as shown in **Figure 13** below.

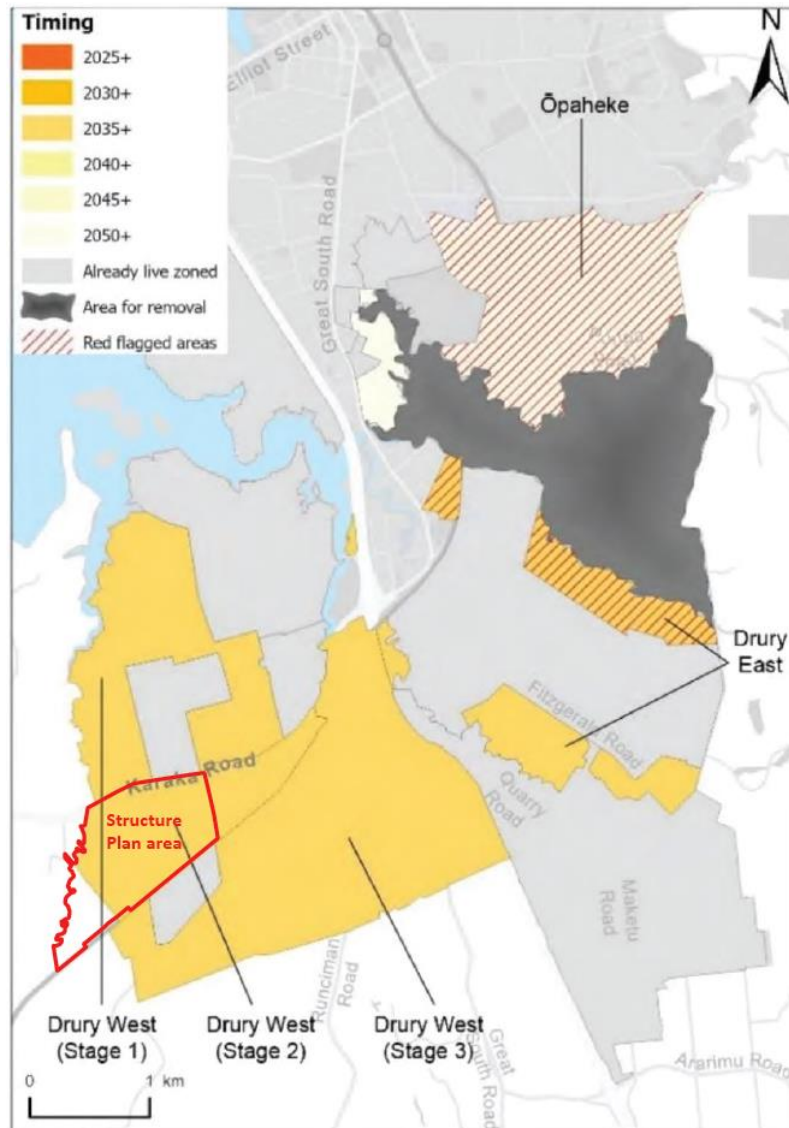


Figure 13 Auckland's FDS identifies the Structure Plan area as ready for development from 2035+.

FDS – Strategic Spatial Framework

The Council's FDS incorporates a strategic framework which identifies spatial outcomes and principles for growth and change which underpin and inform the spatial response. To achieve a well-functioning urban environment with a quality compact urban form, the following principles are identified:

- Principle 1: Reduce greenhouse gas emissions
- Principle 2: Adapt to the impacts of climate change
- Principle 3: Make efficient and equitable infrastructure investments
- Principle 4: Protect and restore the natural environment
- Principle 5: Enable sufficient capacity for residential and business growth in the right place at the right time

The Structure Plan is consistent with the spatial principles. In particular:

- (a) The Structure Plan proposes a development that will contribute to a reduction in greenhouse gas ('GHG') emissions and VKT across the Auckland region, by enabling a significant, comprehensively masterplanned new employment hub in and adjacent to the Drury-Opāheke Future Urban area, locating employment within extremely close proximity to where people live and where future residential development is planned. The development of the new FPH Campus along Karaka Road will enable more people to live close by to their workplace, as well as provide employment opportunities close by to the Ngākōroa Railway Station. Active mode facilities will link the Structure Plan area with the train station, resulting in an overall reduction in GHG emissions and VKT's in comparison with if the site remained vacant Future Urban zoned land, or was rezoned and developed in line with the Council's Drury-Opāheke Structure Plan (2019) as primarily medium density residential use.
- (b) The Stormwater and Flooding Assessment prepared by Woods has assessed the potential for natural hazards which will be exacerbated by climate change. The flood modelling has confirmed that any flooding will not be exacerbated by the proposed campus development, will be well contained within the Oiroa Creek stream extent, running along the western boundary of the Structure Plan area. The flood modelling that has been undertaken uses a conservative 3.8°C climate change assumption (exceeding the current Auckland Council Stormwater Code of Practice requirement of 2.1°C) to ensure flood resilience. The results of the flood model confirm that for the Structure Plan, flooding can be contained within the stream network, and will not pose a risk to development areas both within the Structure Plan area, nor to those future development areas upstream or downstream.
- (c) As outlined in Section 8.2, future employment growth enabled by the Structure Plan can be efficiently serviced by infrastructure with funding arrangements such as development contributions or use of the Infrastructure Funding and Financing legislation.
- (d) The Structure Plan will protect and restore the natural environment through the planting, protection and restoration of riparian margins and ecological corridors, in particular the Oiroa Creek that forms the western boundary of the Structure Plan area.
- (e) There are limited opportunities for business growth in the Drury-Opāheke Future Urban area, despite there being significant market demand for an increase in employment opportunities and business zoned land in Drury-Opāheke. To support the additional 257,000 new jobs required over the next 30 years in the Auckland region, there is a strong rationale to support change within the Karaka Road Structure Plan area which will deliver a significant number of future jobs, in a highly accessible location via planned public transport and active modes, and located in close proximity to an existing and future planned residential growth area.

The FDS acknowledges the uncertainty in relation to predicting development capacity and states that:

Rather than viewing capacity as a target to meet, it is helpful to recognise that relatively more capacity means more development opportunities, and more competition to respond to demand....the capacity requirements of the NPS-UD have been exceeded (including that enabled by Plan Change 78 to the Auckland Unitary Plan), however, Auckland would benefit from more capacity for growthCreating

more capacity for growth, particularly in good locations of high demand, good accessibility with low hazard risk, is likely to improve overall wellbeing for Aucklanders...

FDS – Spatial Response

The FDS spatial response is underpinned by a continuation of the quality compact approach to accommodate growth as set out in the principles for growth and change discussed above. The FDS identifies four main spatial environments being existing urban, future urban, rural and business areas. The Plan Change area, which comprises the part of the Structure Plan area that is located inside the RUB and is zoned Future Urban, falls within the future urban area as it is zoned Future Urban in the AUP.

The spatial response seeks to:

- Focus growth within the existing urban area at a regional level;
- Move towards a multi-nodal model which grows the nodes of Albany, Westgate and Manukau in relation to sub-regional sustainability at a sub-regional level; and
- Neighborhoods will offer a wider range of services and non-residential land uses to create greater sustainability at a local scale.

The Structure Plan is consistent with the spatial response at a regional, sub-regional and local level for the following reasons:

- The regional focus for growth seeks to phase growth in Future Urban areas over an extended timeframe. The Structure Plan area has infrastructure solutions to enable the urbanization and development of a new FPH Campus, many of which have already been developed or are in the pipeline to service the urbanization of the wider Drury-Opāheke Future Urban area.
- The Structure Plan area will be well connected to both the City Centre and the Manukau Centre nodes via public transport and these nodes will support in servicing future Drury-Opāheke Future Urban zone area residents and employees, in relation to employment opportunities supporting sub-regional sustainability. The Structure Plan will support the growth of the Manukau node, through providing additional employment opportunities within 15 minutes of Manukau Centre.
- The Structure Plan will also support the development of the wider Drury-Opāheke Future Urban growth area, through the provision of significant business zoned land, ensuring much greater sustainability at a local scale, helping service existing and future residents with employment opportunities.

Drury West FUZ and Infrastructure Triggers

The FDS identifies a number of *infrastructure prerequisites*, required to support development readiness in areas zoned Future Urban. The FDS identifies the following key bulk infrastructure projects as necessary to support development in Drury West (specifically Drury West Stage 2):

- Drury Arterials;
- SH22 upgrade;
- Ngākōroa Railway Station;

- Hingaia Rising Main; and
- Southern Auckland Wastewater Service Scheme.

The Structure Plan acknowledges the requirement for the infrastructure projects listed in the FDS to support development in the Drury West Future Urban zone area, in the Funding Plan at section 8.2 below.

Both the Integrated Transport Assessment, prepared by Stantec, and the Water and Wastewater Servicing Strategy prepared by Crang Civil have confirmed that capacity, or an infrastructure solution, exists to enable development to commence ahead of 2035 sequencing, and that live-zoning of the Plan Change area is possible. The Structure Plan also contributes to the response to the significant ongoing demand for business zoned land and employment within the area. In summary, there are infrastructure solutions available to service the Structure Plan area.

The Structure Plan will contribute to a quality compact approach to accommodating employment growth by enabling business zoned development in an area already zoned Future Urban, with the wider Future Urban area subject to significant development and urbanisation, in particular for residential capacity, and having infrastructure solutions to enable that urbanisation.

4.0 National Policy Statements and National Environmental Standards

4.1 National Policy Statement on Urban Development 2020

The NPS-UD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD has assessed all the local authorities within the country and classified them as either Tier 1, Tier 2 or Tier 3, with Tier 1 referencing the largest local authorities in New Zealand (including Auckland Council). The NPS-UD provides direction to decision-makers under the Resource Management Act 1991 (**RMA**) on planning for urban environments, with particular focus on:

All local authorities that have all or part of an urban environment within their district or region (Tier 1, 2 and 3 local authorities)- Auckland is a Tier 1 Authority; and

Planning decisions by any local authorities that affect an urban environment;

4.1.1 Objectives and Policies

Well-Functioning Urban Environment

Under Policy 1 of the NPS-UD, planning decisions must contribute to well-functioning urban environments. Policy 1 defines this as follows (emphasis added):

(a) have or enable a variety of homes that:

- (i) meet the needs, in terms of type, price, and location, of different households; and*
- (ii) enable Māori to express their cultural traditions and norms; and*

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

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

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

(e) support reductions in greenhouse gas emissions; and

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

The components of a well-functioning urban environment that the Karaka Road Structure Plan will support include:

- Respecting mana whenua values associated with the awa and whenua;
- Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to work in accessible locations close to public and active transport, which also supports a reduction in greenhouse gas emissions through reduced car dependence;
- Supporting the competitive operation of land and development markets by providing a broadly enabling zone framework and providing flexibility for the market to take up those opportunities; and
- Being resilient to the likely current and future effects of climate change through promoting a compact and efficient urban form.

Development Capacity

Under Policy 2, Tier 1 authorities are required to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. The Structure Plan will enable the development of an additional FPH campus with the capability of providing up to approximately 16,000 jobs at full build out, significantly adding to Auckland's business development capacity within Drury. Therefore, the Structure Plan will make a significant contribution to realisable development capacity and competitive land markets. This will better enable the Council to meet Policy 2 to provide at least sufficient development capacity to meet expected demand for business land over the short, medium and long term. The provision of additional business development capacity at Karaka Road will also support the planned and emerging residential areas in the wider Drury area.

Planned Urban Form and Amenity Values

Objectives 4 and 6 state that New Zealand's urban environments develop and change over time in response to diverse and changing needs of people, communities and future generations. Further, local authority decisions are integrated with infrastructure planning and funding as well as being responsive, particularly in relation to proposals that would supply significant development capacity. Given the current rural use, the urbanisation of the Structure Plan area will result in a significant change and sense of amenity enjoyed by some residents. This change however, is not unanticipated given the Future Urban zoning of the Structure Plan area. It will also enable increased commercial capacity in a significant growth node of South Auckland.

Reduction in Greenhouse Gas Emissions

Objective 8 supports a reduction in greenhouse gas emissions and resilience to the current and future effects of climate change. The Structure Plan area is currently zoned Future Urban and therefore has already been identified by Council as being appropriate for urbanisation through its

Future Urban zoning. Therefore, in respect of how the proposed zone and precinct provisions will facilitate urban development that achieve Objective 8 of the NPS-UD, the following is noted:

- The Structure Plan will enable a light industrial development to establish over a large land holding adjacent to live zoned land for urban development. This scale of development will enable opportunities for local residents to live and work closer to home, thereby reducing the need for travel further afar; and
- There is currently little transport choice in the vicinity of the Structure Plan area as roads are rural arterials with no provision for footpaths and cycling. The Structure Plan provides an opportunity to increase use of public and active modes of transport as urbanisation of the Structure Plan will support the road upgrades in the area that are planned for and funded, to provide for walking and cycling infrastructure and generates more public transport demand from residents and employees; and
- The Structure Plan provides an opportunity to mitigate and improve the resilience of the Structure Plan area to the effects of flooding, including as exacerbated by climate change.

Responsive Planning

Policy 8 further supports local authority decisions affecting urban environments to be responsive to plan changes that would add significantly to development capacity and add to well-functioning urban environments even if the development capacity is unanticipated by RMA planning documents or is out of sequence with planned land release. The urbanisation of the Future Urban zoned land within the Structure Plan area is anticipated. The proposed rezoning is out of sequence with the FDS however there is a need to urbanise this land now to overcome growth challenges and there are infrastructure solutions available to service the Structure Plan area.

Overall, it is considered that the Karaka Road Structure Plan gives effect to the NPS-UD.

4.2 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement 2010 ('NZCPS') contains objectives and policies relating to the coastal environment to achieve the purpose of the RMA. The NZCPS is applicable to this Structure Plan as the Manukau Harbour is the ultimate receiving environment for the streams which drain the Structure Plan area.

This Structure Plan and development of the area for urban land uses will give effect to the NZCPS in that any future land use activities will need to comply with the Auckland-wide stormwater quality and stormwater management provisions which will manage sediment and contaminant runoff, which could make its way into the coastal receiving environment. Further mitigation measures will be considered as part of a future resource consent process via the certification requirements of the Council's regional-wide Network Discharge Consent.

The Structure Plan also responds to the NZCPS by promoting water sensitive design and riparian buffers along stream edges.

4.3 National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') contains requirements for local authorities, including:

- *Managing freshwater in a way that gives effect to Te Mana o te Wai through involving tangata whenua, and prioritising the health and wellbeing of water bodies, then the essential needs of people, followed by other uses.*
- *Improving the health and well-being of degraded water bodies.*
- *An expanded national objectives framework.*
- *Avoid any further loss of natural inland wetlands and rivers.*
- *Identify and work towards target outcomes for fish abundance, diversity and passage and address in-stream barriers to fish passage over time.*
- *Set an aquatic life objective for fish and address in stream barriers for fish over time.*
- *Monitoring and reporting requirements.*

This Structure Plan's consistency with the NPS-FM has been considered in detail as part of the ecological, stormwater and flooding assessments undertaken for the land within the Structure Plan area. The Structure Plan will result in the enhancement of ecological corridors and habitats. Future land use activities will need to comply with the relevant standards under the NPS-FM and AUP with respect to streams, wetlands and discharges to these environments, which will ensure that the effects of activities on water quality and water quantity are appropriately managed in accordance with the NPS-FM.

4.4 National Policy Statement - Highly Productive Land 2022

The National Policy Statement for Highly Productive Land ('NPS-HPL') came into force on 17 October 2022.

The NPS-HPL contains objectives and policies which guide the management, use and development of highly productive land. It does not provide absolute protection of highly productive land, but rather it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production.

A soils assessment has been undertaken for the Structure Plan area by Landsystems which confirms that the soils over the Future Urban zoned land are either LUC Class 2 or 3 and therefore contain prime soils but no LUC Class 1 or elite soils. In any event, the NPS-HPL does not apply to land that councils have already identified as future urban zones in their district plans at the NPS-HPL's commencement date.

Within the Mixed Rural zoned land, the soils are either LUC Classes 2, 3 and 4, some of which qualify as prime soils, but there are no LUC class 1 or elite soils either. At the time that this land is proposed to be rezoned, subdivided or otherwise developed, an assessment of the proposal against the NPS-HPL will be required.

4.5 National Policy Statement - Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity ('NPS-IB') came into force on 4 August 2023, and sets out the objectives and policies to identify, protect, manage and restore indigenous biodiversity under the RMA.

The objective of the NPS-IB is to maintain indigenous biodiversity so that there is at least no overall loss in indigenous biodiversity nationally.

In broad terms, the NPS-IB requires every territorial authority to undertake a district wide assessment in accordance with Appendix 1 of the NPS-IB to determine if an area contains significant indigenous vegetation and/or significant habitat of indigenous fauna; and, if it is:

- Classify areas of significant indigenous vegetation and/or significant habitat of indigenous fauna as either High or Medium, in accordance with Appendix 2 of the NPS-IB;
- Local authorities are required to avoid the loss of significant natural areas and manage all adverse effects of a new subdivision, use or development on significant natural areas;
- A Biodiversity Strategy is also required to be developed by local authorities in addition to a monitoring programme.

For indigenous biodiversity that is not protected as significant, the NPS-IB requires that this is managed by applying the effects management hierarchy where those effects are significant, and managed to give effect to its objective and policies where those effects are not significant.

Vegetation within the Structure Plan area is highly modified and largely grazed pasture. There are no Significant Ecological Area overlays ('SEAs') within the Structure Plan area itself or within the immediate vicinity. Due to the modified nature of the existing Structure Plan area, vegetation present is predominantly dominated by exotic vegetation species and considered to be of a low botanic value.

In terms of enabling future development, the Structure Plan is aligned with the NPS-IB, including Policy 13 which seeks to promote and provide for the restoration of indigenous biodiversity, because it will provide for the enhancement of the Oiroa Creek ecological corridor through native revegetation.

4.6 National Policy Statement on Electricity Transmission 2008

This NPS provides a policy framework to address the need to develop, operate, maintain and upgrade renewable electricity generation activities throughout New Zealand and acknowledge the benefits of renewable electricity generation.

The AUP gives effect to the National Policy Statement on Electricity Transmission through the National Grid Corridor overlay provisions in the AUP.

4.7 National Environmental Standard - Freshwater Management 2020

The National Environmental Standards for Freshwater ('NES-FM') came into force on 3 September 2020 and set requirements for carrying out certain activities that pose risks to freshwater ecosystems. Anyone carrying out these activities will need to comply with the regulations and be subject to the resource consent requirements of the NES-FM.

Significant technical analysis has been undertaken to appropriately identify freshwater habitats within the site including wetlands and watercourses. The Structure Plan does not contravene the provisions of this national environmental standard and future development activities will need to be assessed against the standards and regulations of the NES-FM.

4.8 National Environmental Standard - Assessing and Managing Contaminants in Soil to Protect Human Health 2011

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ('NESCS') came into effect on 1 January 2012. The NESCS is a national set of planning controls for assessing and mitigating soil contamination. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is subdivided or developed, and if necessary, the land is remediated or the contaminants contained to make the land safe for human use.

A preliminary site investigation for land within the Structure Plan area has been undertaken as part of the structure plan process and has identified several potential sources of contamination largely related to rural production activities. At the time of future development of the Structure Plan area, a detailed site investigation and soil sampling will be required as part of the resource consent process to inform the Site Management Plan and to determine if remediation is required. However, the Structure Plan area overall is suitable for urbanisation.

4.9 National Environmental Standard - Sources of Drinking Water 2008

Water supply to the Structure Plan area will be from an extension to the Bulk Supply Point ('BSP') on Flanagan Road to the site along the Karaka Road frontage. A loop back to the Flanagan Road BSP through Bremner Road and Jesmond Road is also required to be completed as part of the water supply network to provide resilience. The Structure Plan does not compromise the outcomes sought to be achieved by this NES.

4.10 National Environmental Standards – Air Quality

The NES for Air Quality is implemented through the air quality provisions in the AUP. There are no known air quality standard issues in the Structure Plan area.

5.0 Regional Policy Statement and Other Plans

5.1 Auckland Unitary Plan (Operative in Part)

The Auckland Unitary Plan Operative in Part ('AUP') is the primary statutory planning document for Auckland. It is comprised of the Regional Policy Statement ('RPS'), Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland's natural and physical resources while enabling growth and development and protecting matters of national importance. The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. It includes objectives, policies and methods to achieve a quality compact urban form through the implementation of a RUB to define the extent of urban growth to 2040.

The majority of land within the Structure Plan area is zoned as Future Urban, a transitional zone which is applied to greenfield land suitable for urbanisation, as shown in **Figure 14** below. Land may be used for a range of general rural and other existing activities but cannot be used for urban activities until the site is rezoned for urban purposes through a plan change process. The rezoning of Future Urban land to accommodate urban growth must give effect to RPS Policy B2.2.2(7). This is discussed further in Section 5.2 below.

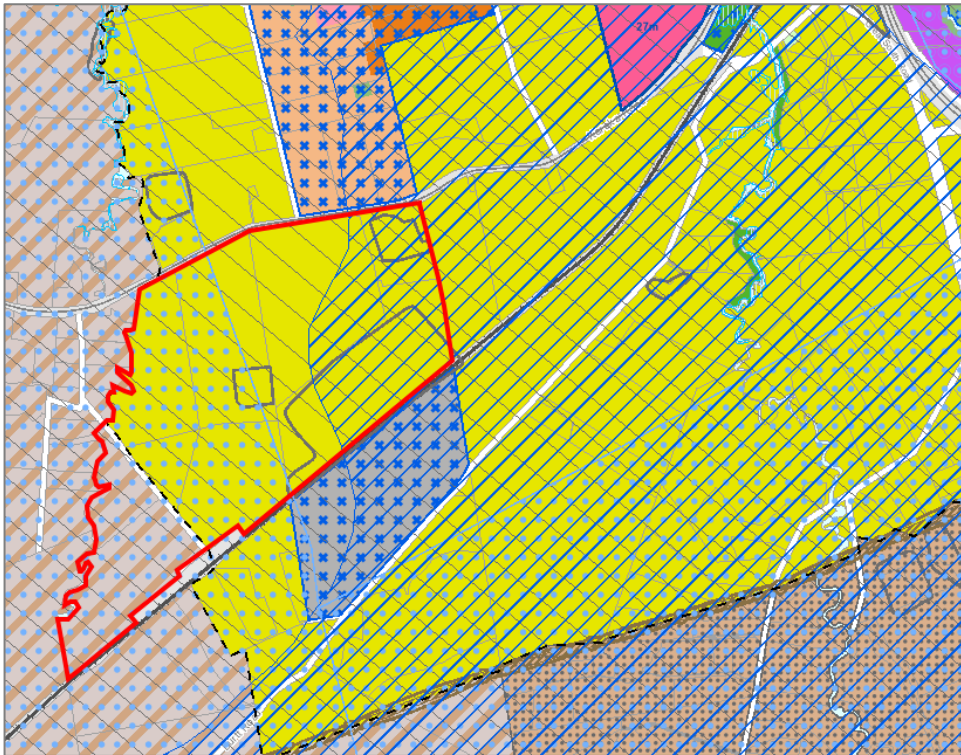


Figure 155 Overlays, Controls and Designations.

5.2 Auckland Regional Policy Statement

RPS Policy B2.2.2(7) enables the rezoning of Future Urban land to accommodate urban growth where the proposed rezoning:

- Supports a quality compact urban form;
- Provides for a range of housing types and **employment choices** for the area;
- Integrates with the provision of infrastructure; and
- Follows the structure plan guidelines as set out in Appendix 1 of the AUP.

The land use pattern proposed within the Structure Plan area identifies business – light industry land use within the Structure Plan area, with a combination of medium and higher density residential development surrounding the future Ngākōroa Railway Station. This proposed land use pattern will enable significant employment opportunities within Drury-Opāheke and encourage efficient use of greenfield land to promote a quality compact urban form.

As outlined in Sections 7 and 8 below, the urbanisation of the Structure Plan area can be coordinated with the necessary infrastructure upgrades or through alternative out of sequence upgrades to the network.

Appendix 1 to the AUP forms part of the regional policy statement and provides guidance on the matters to be addressed in preparing Structure Plans, which are promoted through the policy framework, as precursors to a Council initiated or a private plan change application. This Structure Plan has followed the framework directed through Appendix 1 to the Auckland Unitary Plan – Structure Plan Guidelines.

5.3 Auckland Council Long Term Plan 2024-2034

Auckland Council's Draft Long-Term Plan ('Draft LTP') 2024-2034 provides a ten-year budget, which if adopted, will replace the 10-year Budget 2021-2031 in June 2024, and is a key strategic document outlining the Council's activities and how they are managed, delivered and funded.

The Draft LTP highlights that Auckland's population continues to grow and the demand for new infrastructure is rising. The Draft LTP identifies Drury as a **priority growth area** and specifies that infrastructure to support growth in Drury will be prioritised, including the Southern Auckland wastewater servicing scheme for Hingaia Peninsula, Opāheke and Drury.

The Council's 2021-2031 Recovery Budget provided a ten-year budget that responded to the uncertainty and revenue loss created by the Covid-19 pandemic.

The 2021-2031 Recovery Budget identifies Drury as one of four key focus areas to support growth. Drury was listed in the Recovery Budget as a new community providing housing and employment opportunities close to the NIMT line, with \$475 million Council investment to help support growth in line with 4,000 new homes, and 1,500 new jobs over the next 10 years.

5.4 Franklin Local Board Plan 2023

The Structure Plan area is located within the Franklin Local Board area. The proposed development of the land for Business use and future employment opportunities has been discussed with local board members previously, and a strong support for the updated Structure Plan has been indicated throughout these discussions.

One of the key objectives of the Franklin Local Board Plan is to '**Facilitate local economic development opportunities**' and to enable access to jobs and business opportunities that will support local prosperity.

The Structure Plan, which identifies the area as appropriate for Business – Light Industry land use will support local business and employment opportunities, and will generate a significant number of employment opportunities for local Franklin Local Board residents, as well as enhancing future prosperity for the Franklin Local Board area as more people travel to the area for work.

5.5 Infrastructure Strategies and Plans

5.5.1 Supporting Growth – Delivering Transport Networks

The Supporting Growth – Delivering Transport Networks document identifies South Auckland as the largest future urban growth area in Auckland, with around 5,300 hectares of land identified for urban development. This could result in 42,000 homes and 19,000 jobs over 30 years.

A number of transport projects to support growth in South Auckland have been identified, and are shown below in **Figure 16**. At the heart of the network for the south, is a well-connected Rapid Transport Network with electric trains extended to Pukekohe, extra rail capacity as well as new stations due for completion in 2025 at Drury Centre and Paerātā and closely followed by Ngākōroa, immediately east of the Structure Plan area. A number of new road and public transport corridors have been identified, including the Drury – Pukekohe Link (see layout plan at **Figure 17** below), for which the Notice of Requirement has been notified, and is due to be heard.

[illegible]

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5.5.2 Regional Land Transport Plan 2021-2031

The Auckland Regional Land Transport Plan (2021-2031) ('**RLTP**') sets out the funding programme for Auckland's transport services and activities over a 10-year period. Planned transport activities for the next three years are provided in detail while proposed activities for the following seven years are outlined. The RLTP is jointly delivered by Auckland Transport, Waka Kotahi and KiwiRail, and forms part of the National Land Transport Programme.

The key directions of the RLTP include to:

- Better connect people, places, goods and services;
- Increase genuine travel choices for a healthy, vibrant and equitable Auckland; and
- Maximise safety and environmental protection.

With respect to the Structure Plan area and the surrounding area, the key committed projects identified in the RLTP include:

- Mill Road safety improvements and local infrastructure investment in Drury, including targeted safety improvements between Alfriston and Papakura;
- SH1 improvements between Papakura and Drury South, including the widening of SH1 to three lanes and the inclusion of a shared path;
- SH1 improvements between Drury South and Bombay, including route protection south of Drury;
- Drury local road upgrades and improvements; and
- the Ngākōroa Railway Station.

The key themes of the RLTP are prioritising high frequency public transport, improving the customer experience, and optimising the existing network. The Structure Plan is well aligned to these strategic themes, in particular through the integration of business land, employment opportunities, and public and active modes of transport, the Structure Plan will enable alternative modes to be prioritised.

5.5.3 Regional Public Transport Plan 2023-2031

The Regional Public Transport Plan 2023-2031 ('**RPTP**') guides the design and delivery of public transport services and infrastructure over the short, medium, and long terms. The RPTP identifies the public transport network proposed for the Auckland region. The goals of the RPTP are identified as:

1. Services providing an excellent customer experience;
2. Enhancing the environment and tackling the climate emergency;
3. Safe and accessible transport for everyone;
4. Integrating public transport into a growing Auckland; and
5. Funding and delivering public transport transparently.

The public transport network identified under the RPTP includes the '40 bus' route with bus stops along Karaka Road and connection to Papakura, and the southern rail network, which will connect to the Auckland CBD via the planned Ngākōroa Railway Station. In particular, the Structure Plan,

through the integration of land use and provision of public transport, is in keeping with goals 2, 4, and 5 of the RPTP.

5.5.4 Catchment Management Plans and Network Discharge Consent

A draft Stormwater Management Plan ('SMP') has been prepared for this Structure Plan and will be finalised and submitted as part of the private plan change application. The SMP has been prepared in accordance with requirements of the regional Network Discharge Consent. It is proposed that provisional approval be sought for the SMP at the same time the plan change is being progressed.

5.5.5 Watercare Asset Management Plan 2021-2041

Watercare's Asset Management Plan (2021-2041) shows how it will operate, maintain and renew existing water and wastewater assets, and provide new assets to meet future demand as Auckland grows. The location, size and timing of new development directly influence the infrastructure required to service that development.

The Watercare Asset Management Plan identifies the following upgrades relevant to servicing development in the Structure Plan:

- Southern Interceptor augmentation, the Hingaia Pump Station and initial network upgrades timed to service growth (2021-2031);
- A new pump station at Bremner Road, to allow Drury West servicing, is currently underway, allowing continued growth in the southern areas of the region (2021-2031); and
- Further augmentation to the Southern Interceptor, including upgrade of the Bremner Road Pump Station and duplication of the pump station's rising mains (2031-2041).

5.6 Iwi Planning Documents

Iwi management plans may express environmental, cultural, economic, spiritual aspirations and values, areas of cultural significance and outline how the iwi / hāpu expects to be involved in resource management practices.

The Council's structure planning process provides for any iwi management plan that an iwi authority has lodged with the Council, where it is relevant to the region / district / rohe, to be taken into account. Not all mana whenua involved in the Structure Plan area have an iwi management plan prepared at this stage.

Three iwi groups responded confirming their interest in being involved: Ngāti Tamaoho, Ngāti te Ata Waiohua, and Te Ākitai Waiohua. Several hui have been held with the respective iwi groups and of these three interested iwi, Ngāti te Ata Waiohua has a publicly available iwi management plan. Notwithstanding this, the feedback received during the consultation process with all three iwi groups has been taken into account in the development of the Structure Plan, as detailed in section 7.0.

5.7 Treaty Settlement Legislation

Treaty settlements acknowledge the agreements reached between the Crown and iwi to recognise some of the cumulative effects of breaches to the Treaty of Waitangi and its principles on the economic, social, physical, cultural and spiritual wellbeing of mana whenua. Treaty settlement

legislation enacts the deed of settlement between the Crown and iwi that contains relationship, cultural and commercial redress relevant to iwi. Statutory acknowledgements and deeds of recognition are part of cultural redress relevant to the iwi who are represented by their settlement bodies.

Structure planning provides for the Council to take into account Treaty settlements. The relevant Treaty settlement legislation has been taken into account, as set out below, and the Structure Plan area is not affected by these processes.

5.7.1 Ngāti Tamaoho Settlement Act 2018

The purpose of the Ngāti Tamaoho Settlement Act 2018 is:

- (a) to record in English and te reo Māori the acknowledgements and apology given by the Crown to Ngāti Tamaoho in the deed of settlement; and*
- (b) to give effect to certain provisions of the deed of settlement that settles the historical claims of Ngāti Tamaoho.*

Section 31 sets out that the relevant consent authority “must have regard to the statutory acknowledgement relating to the statutory area in deciding, under section 95E of the Resource Management Act 1991, whether the trustees are affected persons in relation to the activity”.

Schedule 1 of the Ngāti Tamaoho Settlement Act 2018 contains a list of areas subject to statutory acknowledgement, which is also recorded at Appendix 21 of the AUP (OP). The Structure Plan area is located within the statutory acknowledgement areas for ‘Ngākōroa Stream and its tributaries’ and ‘Oiroa Creek and its tributaries’.

Future development in the Structure Plan area requiring resource consent will be subject to the relevant assessments in accordance with section 95E of the RMA.

5.8 Other Auckland Council Plans and Strategies

5.8.1 Te Tāruke-ā-Tāwhiri: Auckland’s Climate Plan

The purpose of Auckland’s Climate Plan is to deliver the Auckland Plan’s high-level vision on climate change and to deliver a low carbon and resilient Auckland.

The key elements of Auckland’s Climate Plan are:

- An overarching Tāmaki Makaurau response – an approach that reflects the uniqueness of Tāmaki Makaurau;
- A focus on clear greenhouse gas emissions reduction targets – including halving emissions by 2030 and reaching net zero emissions by 2050; and
- Preparing Auckland for the impacts of climate change – including how we will adapt to climate change, preparing for our current emissions pathway and the prospect of a 3.5 degrees warmer region.

The Structure Plan is cognisant of the outcomes sought in Auckland’s Climate Plan, noting the proposed Business land use will enable a quality compact urban form, opportunities to increase use of public and active modes of transport as urbanisation of the Structure Plan area occurs, and accessibility to SH1, as well as delivering a significant employment area close to future residential growth areas in the wider Drury- Opāheke Future Urban zoned area which in turn results in a

reduction in both VKT and GHG emissions when considered at a regional scale. Also flood modelling and stormwater assessments have been completed with climate change factored in demonstrate no barrier to development of the Structure Plan area.

5.8.2 Auckland Urban Ngahere (Forest) Strategy 2018

Auckland's urban ngahere is defined as the network of all trees, other vegetation and green roofs – both native and naturalised – in existing and future urban areas. It includes trees and shrubs in road corridors, parks and open spaces, green assets used for stormwater management, community gardens, green walls and roofs, and trees and plants in the gardens of private properties.

The strategy is a comprehensive regulatory and non-regulatory approach to enhancing our urban forest and green infrastructure by increasing the tree canopy cover around the city.

A key target of the strategy is to increase canopy cover across Auckland's urban area up to 30%, with no local board areas less than 15%.

The Structure Plan responds to the strategy by providing opportunities for ecological corridor revegetation and enhancement along the Oiroa Creek and other natural freshwater features within the Structure Plan area.

6.0 Consultation and Engagement

Consultation and engagement on the future development of the Structure Plan area has been undertaken with a number of persons and organisations, including:

- Auckland Council and its Controlled Organisations, including Plans and Places, Auckland Transport, Healthy Waters, and Watercare Services Limited;
- Waka Kotahi New Zealand Transport Agency and Te Tupu Ngātahi (the Supporting Growth Alliance);
- KiwiRail;
- Veolia;
- Mana whenua groups: Ngāti Tamaoho, Te Ākitai Waiohū and Ngāti Te Ata Waiohū; and
- the local community and general public.

In particular, a public drop-in session (referred to as a 'community day') was held at the Drury Town Hall on 10 February 2024. The purpose of the session was to provide information about the Structure Plan and to gain feedback on the proposed structuring elements, infrastructure and transport initiatives, development concepts, and to provide opportunities to better understand views of the local community. A series of information boards were displayed on the day, which set out key information for the public. Attendees were able to view the display posters and discuss any issues or aspects of the project with FPH and key consultants, including planning, transport, ecology and stormwater specialists.

The session was attended by approximately 100 people, with 25 attendees providing their contact details, requesting they be kept informed as the project further develops.

Feedback forms were available to the attendees on the day. The key matters identified in the feedback included:

- Strong support for providing significant employment opportunities in Drury, especially given the amount of re-zoning through recently approved Private Plan Changes for residential use and development in the surrounding area;
- Support for the site to be developed in a campus-style, similar to the FPH East Tāmaki Campus, with no public roads through the site;
- Support for providing an employment hub in a location within proximity to high density housing, the Ngākōroa Railway Station, SH1 and a future Metropolitan Centre in Drury East;
- Concerns were raised about the upgrades necessary to the existing rural road network, as well as the cost of the infrastructure upgrades required, in particular Karaka Road which the community expressed is currently unsafe and heavily congested;
- Support for the provision of an active modes connection along the NIMT line that forms the southern boundary of the site; and
- A need for more employment opportunities in South Auckland, with support for more people being able to live and work locally, as well as providing employment that will encourage traffic to move in the opposite peak-flow direction that is usually experienced (moving north in the AM, and south in the PM).

7.0 Matters to Identify, Investigate, and Address

The Structure Plan guidelines in Appendix 1 of the AUP specify matters to identify, investigate and address as part of the development of a Structure Plan. The Karaka Road Structure Plan has been informed by a series of technical reports. A detailed assessment of the matters set out in Appendix 1 and the technical advice is provided below.

7.1 Urban Form

An Urban Design Statement has been prepared by Barker & Associates. The built form of the Karaka Road Structure Plan area will be very similar to that of the existing FPH East Tāmaki Campus, where large, low height building footprints are separated by green infrastructure including integrated stormwater management devices as well as useable open spaces.

The following built form elements underpin the Structure Plan:

- A built character that enables the establishment of large, low height building footprints to accommodate manufacturing and distribution operations in keeping with a campus style facility;
- Directing activities that can be accommodated within smaller building footprints towards areas with steeper topography;
- Inclusion of “gateway” built form and landscape treatments at main site access points on State Highway 22 and near the Ngākōroa Railway Station; and

- A built form that is balanced with natural open spaces, including a landscaped area along Oiroa Creek which forms the southwestern boundary of the Structure Plan area.

The scale of the Structure Plan area presents an opportunity to ensure that the future urban form delivers positive outcomes in relation to provision of business activities and employment choice and opportunities, integrated open space and stormwater management, access and connectivity in particular through the provision of active mode connections between the Ngākōroa Railway Station and the wider Structure Plan area in particular existing and future residential developments. Overall, it is considered that the Structure Plan area promotes positive urban form outcomes which integrate with the existing wider urban area as well as the future planned Drury-Opāheke area, and surrounding rural land uses.

7.2 Urban Growth, Use, and Activity

An Economic Assessment has been undertaken by Property Economics, and considers the proposal to urbanise the Structure Plan area to accommodate light industry activities.

The Economic Assessment identifies that the change in land use within the Structure Plan area from the residential activities identified under the Council's Drury-Opāheke Structure Plan, to light industry, is unlikely to create a shortfall in residential land within the Franklin and Papakura Local Board areas. Projections for residential demand under both the medium and high growth scenarios, and available land capacity, indicate there is sufficient remaining residential land within the local market to meet residential housing needs.

The FDS identifies sub-regional growth projections. The business assessment model includes significant employment growth in three new centres at the edge of the existing urban area (in greenfield areas), in Drury, Red Hills, and Whenuapai. These three centres combined are projected to see 6,000 additional jobs over the medium term and nearly 12,000 additional jobs over the long term³. Approximately 1,500-1,700 hectares of vacant business land is needed over the long-term⁴. The FDS notes that to address Business land demand identified through the growth projections, additional business-zoned land will need to be live-zoned, in the medium to long-term. This Structure Plan will significantly contribute to the shortfall of business zoned land that provides employment opportunities, as identified through the FDS.

Overall, the provision for light industry zoning to facilitate and enable a comprehensive and land extensive industry is considered to create positive economic effects as it will:

- Create a significant number of highly skilled jobs in the local area that may otherwise be located offshore. This can also provide diversification to the local economy and attract talent from other regions, which will in turn further stimulate the local economy;
- Increase industrial land provision for land extensive industries; and
- Create a new industrial node located adjacent to the planned Ngākōroa Railway Station, which will encourage employees and visitors to travel via public transport.

The Economic Assessment also considers alternative urban locations that would be suitable for the operational requirements for the new FPH Campus, which will require approximately 100 hectares of land to accommodate the full set of research and development, administrative, manufacturing,

³ Auckland Councils Future Development Strategy 2023-2053 page 39.

⁴ Auckland Councils Future Development Strategy 2023-2053 page 59.

and distribution facilities. Over 83 per cent of industrial land within Auckland has a land area of less than 5 hectares, and only four sites were sized between 25-40 hectares.

The proposed Structure Plan identifies the land for future business light industry activities. This zoning presents an opportunity to enable the establishment of land extensive industries, and to provide increased and diversified employment options in a location that is close to future housing and accessible by public transport. These are factors which will contribute to creating a well-functioning urban environment within Drury.

7.3 Connectivity and Layout

The Structure Plan identifies an indicative active modes connection with frequent and express bus services along the eastern boundary of the site, which will provide a direct connection between the site and the Ngākōroa Railway Station for future employees. This indicative active modes connection extends south of the Structure Plan area across the NIMT line to connect with the Special Purpose School zone immediately south of the Structure Plan area, as well as the future planned residential development area south of the NIMT line.

The Structure Plan area will be comprehensively masterplanned, and will be accessed via three main entry points along SH22 which will be coordinated with the staged development of the site, along with access via the indicative active modes connection at the eastern boundary. One of the key design principles for the Structure Plan is developing a secure environment, and as a result, the internal road network will be subject to a future comprehensive master planning process. The creation of a secure environment which helps to foster innovation and protects intellectual property is paramount, and as a result there are no publicly accessible roads proposed through the Structure Plan, however the site will be well-connected with the immediate and wider surrounding area via the sites key access points.

7.4 Natural Character, Landscape and Visual

The Structure Plan area generally comprises low-lying, gently undulating land interspersed with a network of streams and wetlands that drain to the north. A Landscape Visual Assessment ('LVA') has been prepared by Barker & Associates and considers the change in land use from the Council's Drury-Opāheke Structure Plan and existing rural zone in the context of the existing environment as well as the planned future residential environment.

The key existing natural features and landscape values within the Structure Plan area and its immediate surroundings include:

- The Oiroa Stream located at the periphery of the western boundary of the Structure Plan area, including views from within the Structure Plan area to the Oiroa Stream and views along the stream corridor;
- A network of intermittent streams and wetlands, dispersed within the northern portion of the Structure Plan area; and
- Existing settlement patterns, including rural and rural lifestyle properties throughout the rural zoned area to the west and southwest.

The LVA identifies that application of the Business – Light Industry zone will result in a visual change to the landscape character, particularly as a result of the difference in scale and character of

buildings associated with light industry activities. This can be addressed at the time of future development through the application of design principles, for example:

- Delineation of an edge to any new urban development along Oiroa Stream to prevent development creep, and an opportunity to manage the transition at this boundary. This is further discussed at section 7.5 below;
- Requiring the native restoration of the margins of existing waterbodies;
- Aligning green space networks along planted stormwater management areas, gullies, and stream corridors where practicable to create a cohesive blue green network;
- Incorporating boundary landscape buffers; and
- Consideration of specific landscape controls.

Having regard to opportunities to implement the above measures to support any future development and enhance existing natural character, and the future planned environment in the surrounding area, it is considered that the potential built form outcomes that will be enabled within the Structure Plan area will be appropriate in terms of any resulting visual change within the site and surrounding locality.

7.5 Interface and Edge Conditions

The edges of the Structure Plan area provide opportunities in terms of integrating land zoned for light industry activities with the surrounding rural area outside of the RUB and future residential development in the existing Future Urban zone, and facilitating an appropriate transition between zones. Future built form at these interfaces will require particular consideration to ensure that potential matters relating to amenity can be appropriately managed as a result of urban development and business land use within the Structure Plan area.

The LVA identifies a number of key principles to underpin future development:

- Native restoration of wetland and stream corridors, in particular along Oiroa Stream;
- Incorporating a boundary landscape buffer at the northern-western boundary to provide a gateway between the urban and rural interface; and
- Incorporating boundary landscape buffers at the eastern and southern boundaries adjacent to future urban activities.

7.6 Sustainability

The Structure Plan supports a quality compact urban form by enabling significant employment opportunities within close proximity of a significant existing and future residential growth area, as well as a reliable and frequent transport network. As a result of locating jobs and homes in close proximity to each other, communities become more resilient and GHG emissions and VKTs are reduced. Bringing people closer to jobs will result in sustainable methods of mobility including walking and cycling, being the preferred mode of choice.

A Carbon Emissions and VKT Assessment has been prepared by Stantec, which concludes that by having more jobs in Drury West, the CO₂ emissions per unit and VKT per unit (which are the total CO₂ emission or total VKT divided by the land use analysis unit) will **decrease** with the development of the Structure Plan area for business use, as opposed to no development or developing the site

in line with the Auckland Council Drury-Opāheke Structure Plan for medium density residential use. The carbon emissions assessment concluded an overall reduction of CO₂ rates in the morning peak, interpeak and evening peak periods, as well as the VKT assessment concluding that with the Structure Plan in place, the VKT per unit will reduce in the morning peak, interpeak and evening peak periods, as a result of providing more jobs in Drury West close to homes.

7.7 Transportation Networks

An Integrated Transport Assessment ('ITA') has been prepared by Stantec to inform the development of the Structure Plan.

The existing road and transport environment of the Structure Plan is characterised by:

- Karaka Road (SH22), which is a two-way, two-lane arterial road, which runs along the northern boundary of the Structure Plan area. Karaka Road provides an east-west link between SH1 at the Drury Interchange and areas to the south/west of the Structure Plan area including Pukekohe, Waiuku and Paerata. Karaka Road will accommodate all vehicular traffic related to development within the Structure Plan area, and is designated under the AUP as an arterial road, with Waka Kotahi as the Road Controlling Authority;
- Oira Road, which is aligned in a north-south direction, intersecting with Karaka Road (SH22) along the northern boundary of the Structure Plan, via a stop-controlled T-intersection. Oira Road is currently a rural two-way two-lane unmarked road, however a future roundabout at Oira Road and Karaka Road will form the first access point to the Structure Plan area (refer to Access Road 2 below), and is required to be upgraded to a roundabout prior to any development in the Waipupuke Precinct immediately north of the Structure Plan area; and
- The NIMT line, which runs along the southeastern boundary of the Structure Plan area.

A number of rail and roading upgrades are planned within the surrounding area, which will create benefits for the Structure Plan area, in terms of improving road safety, alleviating congestion, and increasing mode choice to and from the Structure Plan area. Work Programs relevant to the Structure Plan area include:

- Electrification works across the 19km section of the southern railway line between Papakura and Pukekohe, including level crossing improvements – the South Auckland NZ Upgrade ('NZUP') package – under construction and due for completion 2024;
- Three new train stations between Papakura and Pukekohe, at Ngākōroa (Drury West), Drury Central, and Paerata – due for completion 2025 (included in NZUP);
- SH22 Drury Upgrade improving travel choice, travel time reliability and safety to support planned growth in the area – 2km section between Mercer Street and Jesmond Road – (previously funded under NZUP, funding to be allocated in near future);
- SH22/SH1 to Paerata – Safe Networks Programme – safety related upgrades to SH22 – investigations underway;

- Upgrades to Jesmond Road, Bremner Road and Waihoehoe Road for improved safety and efficiency as part of the Drury Arterials Notices of Requirement – approved and confirmed with designations under the AUP;
- Strategic walking and cycling corridor to connect to SH1 Strategic Cycleway, along the southeastern boundary of the site running parallel to the NIMT line– out for consultation mid-2024;
- New Pukekohe Arterial network connecting Pukekohe to SH1 and arterial road connections to SH22 at Jesmond Road and west of Blackridge Road; and
- Safety improvements along several local roads adjoining SH22.

The following transport works have been identified as required to accommodate the urbanisation and development of the Structure Plan area:

- Up to three new access roads along the northern boundary of the Structure Plan area which will be implemented through a staged approach over the course of the development of the Structure Plan area, intersecting with Karaka Road (SH22), providing private vehicle access to and from the Structure Plan area (see **Figure 18** below). The three new intersection upgrades along Karaka Road will provide safe and efficient movement of traffic and active modes to and from the Structure Plan area, including separated cycling and walking infrastructure that will integrate with current and future links along Karaka Road:
 - **Access Road 1 (Karaka Road / Oira Road)** - to be upgraded to a four-arm double roundabout with associated widening of SH22 approaches, to accommodate a large portion of development traffic from all directions including the adjacent Waipupuke Precinct, north of the Structure Plan area;
 - **Access Road 2 (east)** - to be upgraded to a signalised T-intersection to accommodate traffic to and from the east of the Structure Plan area, including SH1 and the wider South Auckland area; and
 - **Access Road 3 (west)** - to be upgraded to a signalised T-intersection with the appropriate provisions to allow development traffic to access the site without significantly affecting the major through traffic movements.

The internal roading network within the Structure Plan area will be designed to accommodate the level of traffic and vehicle types expected for each access point described above, and will feature on and off-road walking and cycling paths.

The provision of a private shuttle, between the nearby Ngākōroa Railway Station and the Structure Plan area will be investigated. This shuttle service could operate as a means of transferring FPH staff / visitors at regular intervals during the peak hour periods, further reducing VKTs and greenhouse gas emissions associated with the campus development.

Provision of an active modes corridor between the Ngākōroa Railway Station and the Structure Plan area, as identified in the Structure Plan at **Figure 1** above, will enable efficient movement between the train station and the site via active modes.

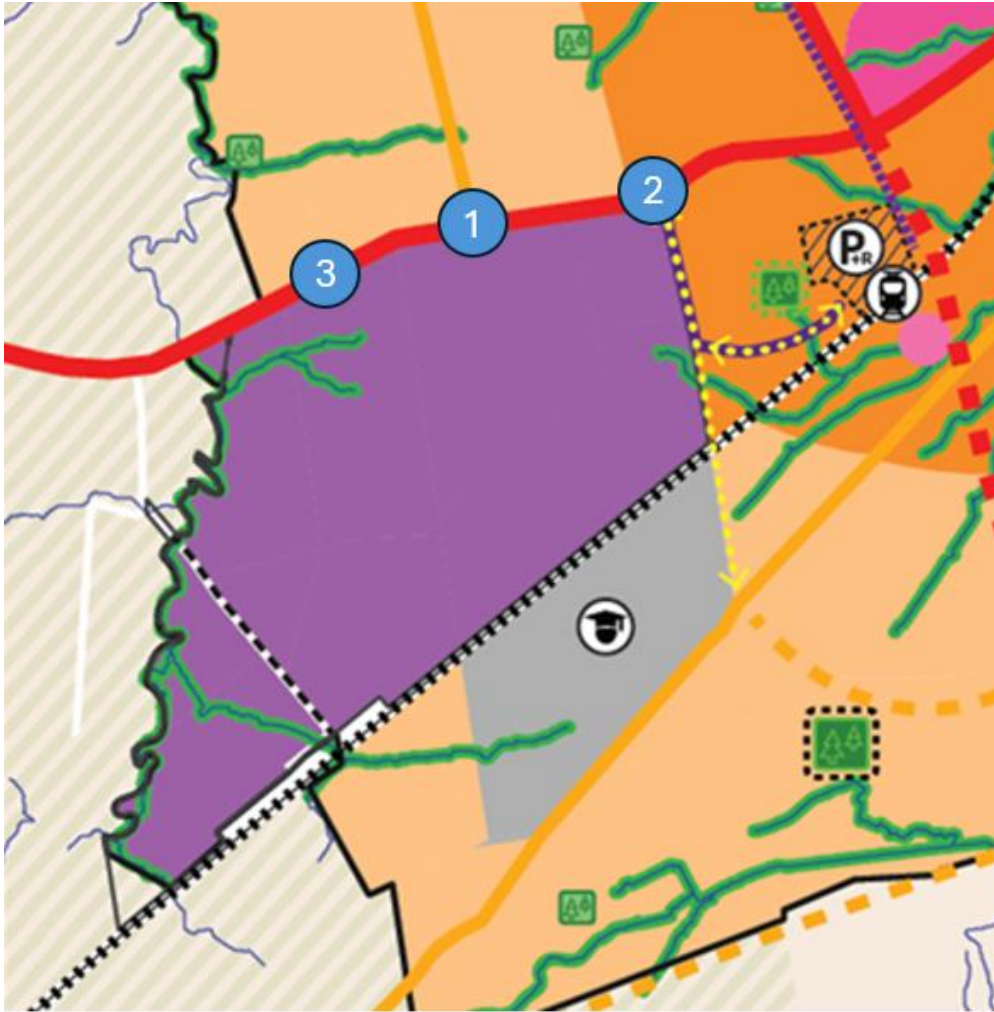


Figure 18 Indicative locations of vehicle accesses required off SH22 into the site

Overall, there are a number of transportation upgrades that are planned and funded, or have been identified within the wider surrounding area as well as immediately adjacent to the Structure Plan area, along with opportunities for out of sequence upgrades to the network, such that future development of the Structure Plan area will result in safe and efficient access and operation of the wider transport network, and improve accessibility for future FPH employees within the Structure Plan area for all transport modes.

7.8 Stormwater

A SMP has been prepared by Woods to support development within the Structure Plan area. The findings of the SMP are that the impacts of urbanisation on stormwater quality and hydrology can be managed to meet the objectives of Auckland Council's Regionwide Network Discharge Consent ('NDC'). Of note, the SMP prepared by Woods is in keeping with the wider SMP prepared for Auckland Council's Drury-Opāheke Structure Plan, and conservatively assumes the impervious coverage for the site will be 80% to account for the change in land use activity from residential to light industry.

The SMP for the Structure Plan area finds that stormwater can be effectively managed through installation of new piped networks, hydrological mitigation and the incorporation of a water sensitive design approach. In particular the SMP identifies that there are a number of key best

practicable stormwater management options within the Structure Plan area to address water quality, hydrological mitigation, flood attenuation, and stormwater conveyance.

7.9 Water Supply and Wastewater

A water and wastewater capacity review has been carried out by Crang Civil. The Crang Civil assessment confirms that to service land in the Structure Plan area, the following planned water supply upgrade is required:

- A new water supply main along Karaka Road, extended from the Bulk Supply Point (BSP) on Flanagan Road (refer **Figure 5** above).

A loop back to the BSP on Flanagan Road via Bremner Road and Jesmond Road is also required to be completed, as part of the network to provide resilience.

The internal reticulation network within the site will be designed in accordance with the Watercare Code of Practice for Land Development and Subdivision as part of future resource consent and engineering plan approval stages.

The Auckland Council Drury-Opāheke Structure Plan anticipates medium density residential development in this area. Water demand calculations for a Business – Light Industrial use of the Karaka Road Structure Plan area has confirmed that the business land use proposed through this updated Structure Plan will generate a peak water supply demand of approximately 74 L/s based on the forecast build out, which is less water demand than the residential land use previously identified for the site.

For the wastewater servicing, following ongoing consultation with WSL, the latest wastewater design for the Auckland Council Drury- Opāheke Structure Plan area has since been revised, and the preference is a gravity transmission line (to be delivered in stages) to service the wider Drury West area. The first stage has been completed and links the Bremner Road pumpstation with the live zoned Auranga development, northeast of the Structure Plan area. The second stage traverses north through the live zoned land associated with the Auranga development and south along Jesmond Road, before terminating in Manhole 13 at the frontage of 221 Jesmond Road. This stage is due for completion in 2028. The third stage proposed, runs east of the Waipupuke site north of the Structure Plan area, and will provide connection to this Structure Plan area.

This Structure Plan area will be serviced for wastewater via a permanent public pumpstation located on the western portion of the site which pumps flows via a public rising main along Karaka Road and Jesmond Road to Manhole 13 where it connects with the WSL transmission network (refer **Figure 19** below). This wastewater servicing strategy aligns with the Auckland Council Drury-Opāheke Structure Plan, and WSL has confirmed capacity for the Structure Plan area within the transmission network downstream of Manhole 13.

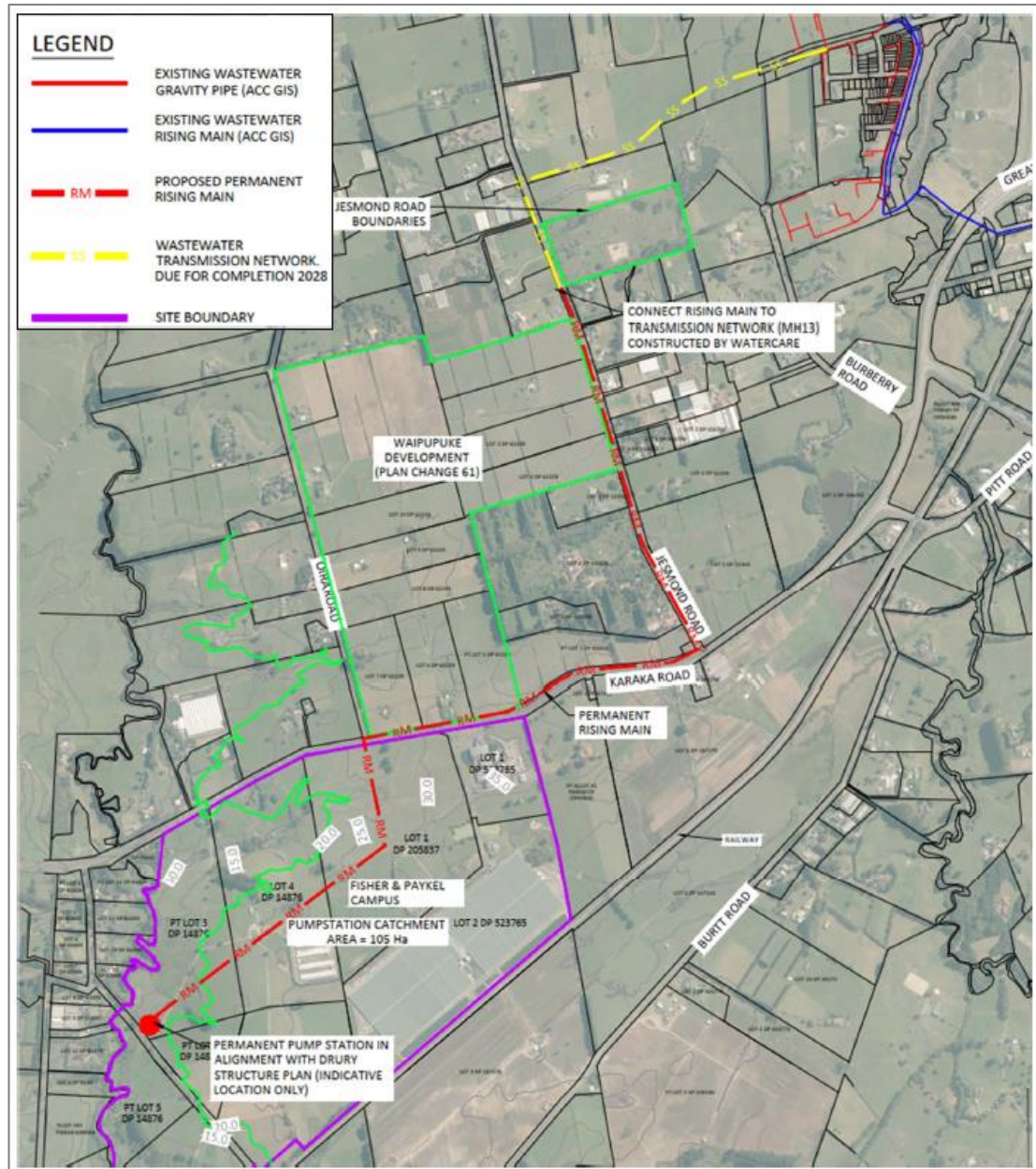


Figure 19 Wastewater Servicing Strategy proposed (Crang Civil, 2024)

Wastewater demand calculations undertaken demonstrate that the wastewater demands for residential (identified through the Auckland Council Drury-Opāheke Structure Plan) and industrial (proposed through this updated Structure Plan for the site) are similar, with the demand for residential land use being slightly higher. The capacity of the proposed wastewater transmission pipeline and existing downstream pumpstation proposed by WSL will therefore, have sufficient capacity to support the development of the Structure Plan area for Business – Light Industry use.

In summary, the Structure Plan area can be serviced via a new public watermain along Karaka Road for water supply, and wastewater servicing will be provided via a new permanent rising main originating from a pump station located in the western portion of the Structure Plan area, which will connect to WSL’s transmission network.

7.10 Ecology

Bioresearches has completed an assessment of ecological values of freshwater and terrestrial ecosystems within the Structure Plan area. A combination of assessments and site visits were carried out, during which key terrestrial and aquatic habitat features were identified.

7.10.1 Terrestrial Ecology

Vegetation within the Structure Plan area is highly modified and largely grazed pasture, and can be divided into the following categories:

- Exotic vegetation, including pine tree land;
- Exotic riparian vegetation;
- Mixed native riparian vegetation; and
- Exotic, managed pasture, covering the majority of the site.

The key terrestrial ecology values within the Structure Plan area are associated with potential fauna habitats within or connected with the Oiroa Stream riparian vegetation. The ecological assessment does not identify any existing vegetation that would qualify as threatened or at risk, and there are also no SEAs within the Structure Plan area.

7.10.2 Freshwater Ecology

Bioresearches has undertaken an assessment of potential freshwater ecology effects that may result from future development. The Structure Plan area includes a network of streams and wetlands, including:

- The Oiroa Stream, a permanent stream located at the western boundary;
- Several intermittent streams, predominantly consisting of single runs with shallow water and very slow water flow;
- Riverine wetlands associated with the Oiroa Stream; and
- Other natural inland wetlands, primarily located within the northern and western portion of the Structure Plan area.

The presence of freshwater bodies present constraints for development and these areas would need to be carefully considered at the time of future development. There is also the opportunity to incorporate freshwater features into a blue green corridor network, and to carry out an integrated approach to the restoration and enhancement through the planting and protection of riparian margins. The extent and values associated with these waterbodies will be managed by the provisions of the AUP(OP), NPS-FM, and NESFM.

7.11 Versatile Soils

A Soil and Land Use Capability ('LUC') Assessment has been undertaken by Landsystems which has assessed the soils in the Structure Plan area.

A desktop assessment of the Future Urban zoned part of the Structure Plan area identified that the soils over the Future Urban zoned land are either LUC Class 2 or 3, and therefore contain prime soils, but no LUC Class 1 or elite soils are identified on this part of the Structure Plan area.

An on-site assessment of the part of the Structure Plan area that is zoned Rural – Mixed Rural zone and is located outside the RUB, identified soils that are LUC Classes 2, 3 and 4, some of which qualify as prime soils, but there are no LUC class 1 or elite soils within this part of the Structure Plan either.

Of the portion of the Structure Plan area that is proposed to be rezoned through the PPC process, the assessment has confirmed that the soils are largely LUC 2. There is a pocket of LUC 3 land along the southwestern boundary of the Future Urban zoned land (6.7 hectares). As this land is zoned Future Urban it is excluded from the definition of Highly Productive Land under the NPS HPL. Therefore, the urban extent of the Structure Plan area does not contain any soils which meet the interim definition of highly productive land under the NPS-HPL.

The portion of the Structure Plan area that is located outside the RUB and is currently zoned Rural – Mixed Rural zone contains a mixture of LUC 2, LUC 3 (highly productive land), LUC 4, and non-productive land (not highly productive land). For this part of the Structure Plan area, applying the NPS-HPL, it is estimated that highly productive land occupies 52% of the Rural – Mixed Rural zone area, albeit this is highly fragmented by the balance of the land (48%) which is either not highly productive land or non-productive land (refer to **Figure 20** below). The identification of this part of the site as future Business land use is considered appropriate as there are areas of poorly drained soils, and an improvement would be achieved in water quality from development, stormwater management and riparian works as well as the use of this site being preferred over rezoning other locations within the Auckland region which have higher productivity capacity than this site.



Figure 20 Distribution of NPS-HPL land identified within the Rural - Mixed Rural zoned portion of the Structure Plan area

7.12 Natural Hazards – Hydrological Hazards

Hydrological hazards in the form of flood plains, flood prone areas and overland flow paths are dispersed throughout the Structure Plan area, as shown in **Figure 21** below.

Woods has undertaken flood modelling as part of the Karaka Road Stormwater Management Plan, with respect to the stream network and development layout proposed within the Structure Plan. As per Auckland Council's GeoMaps, the Structure Plan area is located within two stormwater catchments; approximately 72% falls within the Oiroa Creek catchment, and the remaining 28% of the Structure Plan area falls within the Ngākōroa Stream catchment.

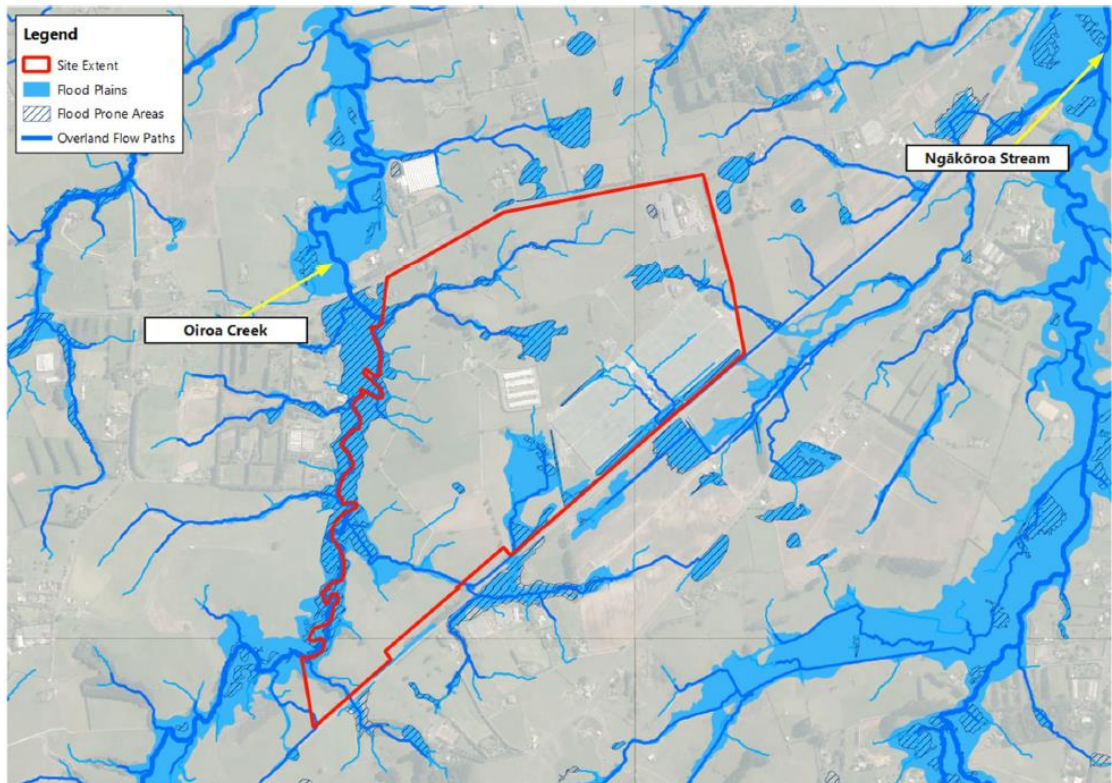


Figure 21 Overland flow path, flood plain and flood prone areas (Karaka Road SMP, Woods)

The flood modelling undertaken uses the 3.8°C climate change assumptions to ensure flood resilience, which exceeds the current Auckland Council Stormwater Code of Practice requirement of 2.1°C. The model results show that for development of the Structure Plan area, flooding can be contained within the stream network and would not pose a risk to either upstream or downstream development areas.

As the key model assumptions such as land use (80% impervious post development, being a conservative approach), with pass flows forward and diversion, is consistent with the Drury-Opāheke Structure Plan SMP there are no expected effects upstream or downstream of the Structure Plan area.

There is a very small area towards the south of the Structure Plan area (identified in yellow in **Figure 22** below), showing flood increase in the 2-year 3.8°C post development with pass flows forward and diversion. Woods has considered this to be acceptable as:

- The maximum increase noted here is approximately 215mm. The pre-development flood depth is approximately 1.2m around at area. Much of the increase is within the plan change area, however, a small section of the flood increase is observed on the channel present adjacent to the railway line.

- This increase results from the greater discharge flowing into the existing topography. However, during the earthworks stage of development, changes to the landform within the site will mitigate this increase. This will be addressed as part of detail design.
- Therefore, this flood increase is determined to have less than minor flood effects on areas outside the site.

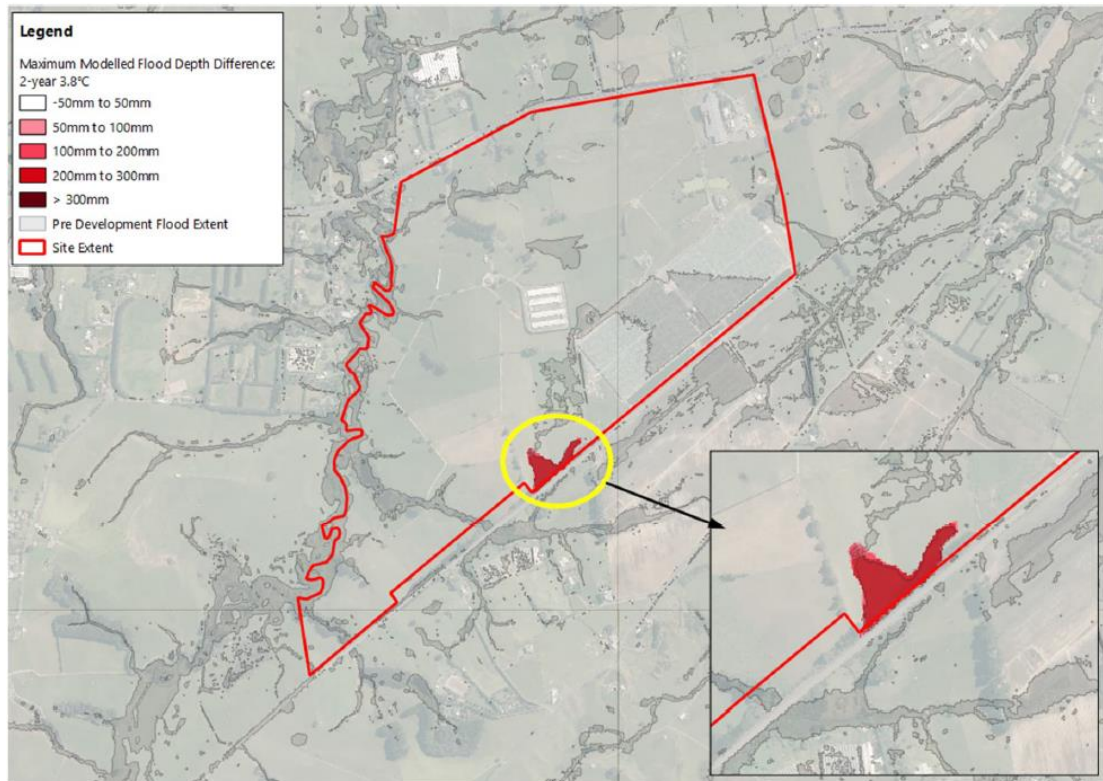


Figure 22 Post development with flood mitigation option - pass flows forward and diversion minus pre-development (2-year 3.8°C) (Karaka Road SMP, Woods)

As per the Auckland Council Drury-Opāheke (2019) Structure Plan SMP, the general flood management approach for the Drury West area and this Structure Plan area is to pass flows forward which is in line with the flood management option recommended by Woods.

7.13 Natural Hazards – Geotechnical Hazards

The landform within the Structure Plan area typically comprises very gently to gently sloping farmland, falling from the east towards the west. There are several natural depressions comprising defined, tree-lined gullies. In the western portion, the land falls gently to the Oiroa Stream.

A preliminary geotechnical assessment, including field investigation, has been undertaken by CMW Geosciences. Their assessment identifies a number of instability features, primarily in the proximity of existing waterbodies. Notwithstanding, CMW confirms that these areas can be remediated following specific investigation.

Overall, the ground conditions within the Structure Plan area have been assessed as being suitable for future urban development, with no areas presenting significant risk. Any geotechnical

constraints can be addressed through future site-specific investigations to inform the detailed design and development of land.

7.14 Contamination

A Preliminary Site Investigation ('PSI') has been undertaken by Williamson Water & Land Advisory. This PSI identifies that based on historic land uses, there is potential for contamination associated with site activities classified under the Hazardous Activities or Industries List ('HAIL'). The Regulations of the NES for Assessing and Managing Contaminants in Soil to Protect Human Health therefore apply to localised areas.

The PSI also confirms that the levels of contamination in some locations may exceed the criteria under the AUP such that resource consents would be required. At the time of resource consent, a Site Management Plan and Remedial Action Plan would be prepared. Overall, potential for contamination is moderate, but highly localised, with large areas of the site not subject to HAIL activities.

This is common for rural sites of this nature, and overall, works and development within the Structure Plan area can be managed to ensure site conditions are protective of human health and the environment. Overall, Williamson Water & Land Advisory confirm that no contamination-related constraints to use of the Structure Plan area for urban commercial purposes have been identified.

7.15 Heritage and Archaeology

An archaeological assessment of the Structure Plan area has been prepared by Archaeology Solutions. There are no existing records of archaeological or other historic heritage sites being recorded within the Structure Plan area, with the two closest historic sites with archaeological value being located within the adjacent railway corridor (refer **Figure 23**).

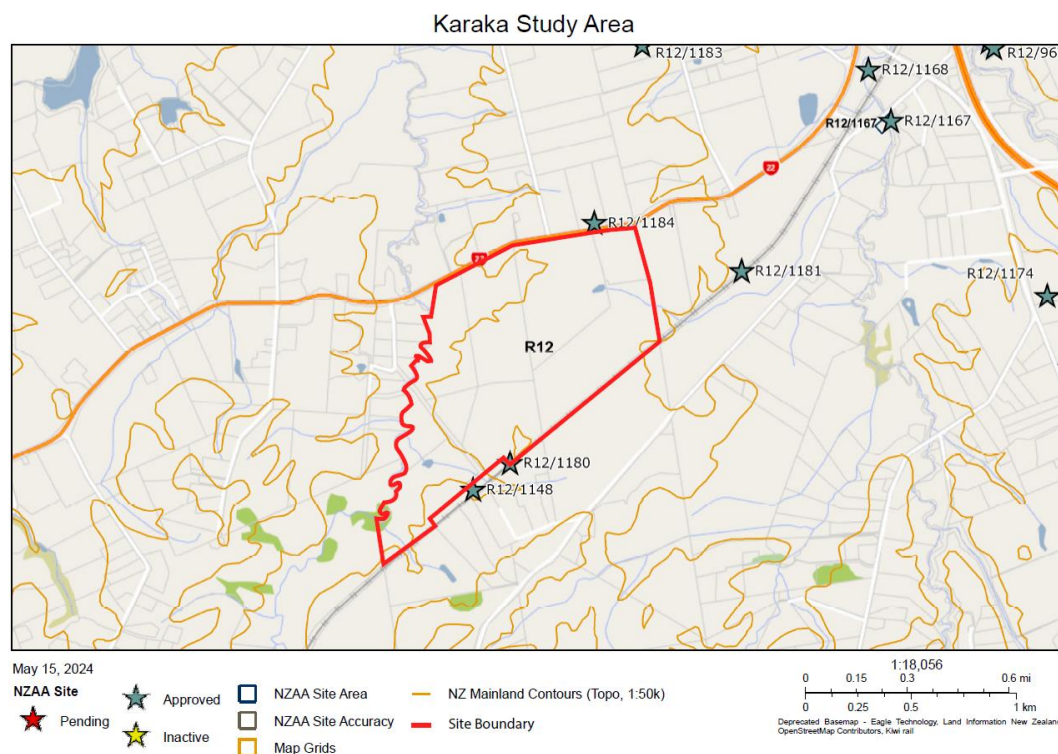


Figure 23: Recorded Archaeology sites within the vicinity of the Structure Plan area (source: ArchSite).

Archaeology Solutions has undertaken a site survey of the Structure Plan area, and no new archaeological sites were discovered. Their assessment identifies that land within the Structure Plan area within 100m of the Oiroa Stream has the highest likelihood of encountering archaeological sites related to the development of Māori horticulture and recommends a 100m buffer is applied from the Stream to manage this risk.

It is therefore considered that potential for encountering archaeological sites as part of future earthworks can be suitably managed under the requirements of the Heritage New Zealand Pouhere Taonga Act and the accidental discovery protocols contained in the AUP. This includes an authority to modify the land adjacent to the Oiroa awa. These measures will ensure that archaeological values within the Structure Plan Area are appropriately discovered, identified and acknowledged or recorded.

7.16 Cultural Values

Correspondence was sent to 18 Mana Whenua groups identified on Auckland Council's website, in March 2023, outlining the details of the proposal and inviting further engagement.

Ngāti Tamaoho, Ngaati Te Ata Waiohū, and Te Ākitai Waiohū all confirmed an interest in being involved in the project.

Since then, multiple hui and site visits have occurred between FPH and the mana whenua who are involved in the project, including focused hui with subject matter experts and iwi to work through the proposal. Engagement with Mana Whenua will be ongoing.

Ngaati Te Ata Waiohū have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Structure Plan area:

- Protect and enhance the natural and cultural landscapes in and around Drury through good management and design, and the provision and long-term operation of appropriate infrastructure;
- Provide Ngaati Te Ata Waiohua with access to the Oiroa awa, to enable Ngaati Te Ata Waiohua to undertake customary activities around the Oiroa awa and its margins;
- Consider on-site attenuation for stormwater management, rather than the proposed pass flows forward approach, which is not supported by Ngaati Te Ata Waiohua;
- Involve Ngaati Te Ata Waiohua in the masterplanning of the site, to ensure that flood containment and management is sufficient for the site and the region;
- Investigate the existing farm ponds and drains within the Structure Plan area, to determine their structural integrity and potential contamination;
- Consider southwestern quadrant currently zoned Rural – Mixed Rural zone adjacent to the Oiroa awa, for a future conservation area;
- Rehabilitate and enhance the Oiroa awa;
- Undertake further mokomoko (lizard) and pekapeka (bat) surveys to determine their habitat and to ensure appropriate protection (if required); and
- Name the development the 'Oiroa Precinct' after the waterway that runs along the western boundary of the Plan Change area.

Ngāti Tamaoho have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Structure Plan area:

- Ngāti Tamaoho request FPH meaningfully engage with Ngāti Tamaoho governance, to provide for outcomes sought through the CVA, in particular through a Memorandum of Understanding which sets environmental, cultural, social and economic outcomes working towards better outcomes;
- Consider area within the Structure Plan area for reserve of parkland as well as development of Weed and Pest Management Strategy;
- Restoration and protection of the Manukau Harbour via the Hingaia Stream to the north, and the Oiroa Stream immediately to the west, the Ngakaroa Stream to the east, the Tuhimata blocks to the south and the Pukekohe Block and Te Maro O Hinewai;
- Opportunities for mahi-toi a Tamaoho (artworks) and ingoa tūwāhi (place names) throughout the Structure Plan area, as well as Cultural input into Design form;
- Cultural Induction and Cultural Monitoring when pre-earthworks commences;
- Overland flow paths to remain, Ngāti Tamaoho do not support piping of intermittent streams;
- Stormwater management that uses low impact green infrastructure, incorporates re-use of roof water for non-potable reuse, applies a treatment train approach and as few pipes as possible used only to convey stormwater under a road or path; and
- Agreement from FPH to work together with Ngāti Tamaoho on water quality and species testing for the site.

Te Ākitai Waiohūa have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Structure Plan area:

- Protecting waterways and their margins, including wetlands, with strengthened blue-green corridors throughout the precinct;
- Stormwater management that resembles the natural water system;
- Utilising plant species that reflect the local indigenous vegetation and complement the natural features and landscape of the ecological area; and
- Protecting existing archaeology by avoiding development on recorded sites.

The Structure Plan presents an opportunity to continue to work with Mana Whenua to reach agreement on how to best reflect or incorporate these features and approaches into the urban form and layout and open space and green corridor networks.

With regard to the AUP provisions, there are no Sites and Places of Significance to Mana Whenua within the Structure Plan area currently recorded under the AUP.

8.0 Staging, Funding, and Implementation

8.1 Staging

As discussed above, the FDS sequences Drury West for development from 2035+. However, investigations into infrastructure availability and development have confirmed that capacity exists to commence development in advance of 2035. The detailed analysis carried out as part of the preparation of this Structure Plan supports the release of the Structure Plan area for development and use of business zoned land from 2030. This proposed sequencing responds to the significant ongoing demand for jobs and employment zoned land within the Drury-Opāheke area, to support the significant residential and commercial growth that is underway in southern Auckland. In particular:

- The Integrated Transport Assessment demonstrates that the site can be developed with planned upgrades to the wider road network and targeted site-specific upgrades to be carried out at the time of development;
- The engineering assessment demonstrates that the site can be developed with targeted local upgrades in place; and
- Development contributions and Infrastructure Growth Charges⁵ will be utilised to fund the targeted local transport, wastewater and water supply upgrades and provisions will be included within the private plan change application to coordinate the release of development capacity within the Plan Change area with the delivery of required infrastructure. This allows much needed employment capacity to be available in the short to medium term. It also allows for consenting and development for preliminary works to proceed without creating any additional demand on infrastructure.

⁵ Charged by Watercare Services Ltd

The staging of development of the Structure Plan area will be driven by the readiness and commitment of FPH to develop the land, and the completion of localised infrastructure upgrades to service development.

8.2 Funding

In terms of funding and implementation, infrastructure funding arrangements such as development contributions, or use of the Infrastructure Funding and Financing legislation, can be put in place to enable the urbanisation of the Structure Plan area. The identified upgrades are being driven by development of the wider Drury West area.

Table 1 below provides a detailed breakdown of the infrastructure requirements to service development within the Structure Plan area, source of funding, and timeframes for delivery.

Table 1 Infrastructure requirements to service the Structure Plan area

Infrastructure	Funding	Timeframe
Transport		
NOR 1 and NOR 2 “Pukekohe Arterial Network”	Waka Kotahi / Auckland Transport	As development occurs
Oira Road intersection roundabout	Waka Kotahi / Developer Funded	As development occurs
Wastewater / Water Supply		
Southern Auckland Wastewater Service Scheme	Watercare	As development occurs
Public watermain along Karaka Road connected to Flanagan Road BSP	Watercare	As development occurs
Permanent pump station in western portion of the site to connect to the wastewater transmission network	Developer Funded	As development occurs
Alternative interim on-site servicing	Developer Funded	As development occurs