



Karaka Road

Private Plan Change Request

Section 32 Assessment Report

16 May 2025

B&A
Urban & Environmental

Prepared for:
Fisher & Paykel Healthcare Properties
Limited

B&A Reference:

19722

Status:

Final Revision

Date:

16 May 2025

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1.0 Applicant and Property Details

To:	Auckland Council
Site Location:	Karaka Road, Drury
Applicant Name:	Fisher & Paykel Healthcare Properties Limited
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Nick Roberts/Cosette Pearson
Plan Change Area:	Approximately 86.5 hectares
Unitary Plan:	Auckland Unitary Plan (Operative in Part) ('AUP')
AUP Zoning:	Future Urban
Locality Diagram:	Refer to Figure 1 .
Brief Description of Proposal:	Private plan change request to rezone approximately 86.5 hectares of land at Karaka Road, Drury to Business – Light Industry.

2.0 Executive Summary

Fisher & Paykel Healthcare Properties Limited (**FPH**) is a leading international designer, manufacturer and marketer of healthcare products and systems for use in respiratory care and obstructive sleep apnea, distributing products globally. FPH designs, manufactures and exports the majority of its products from New Zealand and is seeking to establish a second New Zealand campus in Drury.

FPH is applying for a plan change to the Auckland Unitary Plan (Operative in Part) (**AUP**) to rezone approximately 86.5ha of land on Karaka Road, Drury West (comprising 300, 328, 350, 370 and part of 458 Karaka Road (**the Plan Change area**)). The application is complemented by an Updated Karaka Road Structure Plan. The proposal involves rezoning the Plan Change area from Future Urban zone (**FUZ**) to Business – Light Industry zone (**B-LIZ**), consistent with the proposed Updated Karaka Road Structure Plan. The rezoning proposal provides employment capacity for FPH to develop a second New Zealand campus (within the Plan Change area (**Karaka Campus**)), which will enable significant new employment opportunities in the southern Auckland region. The development of the Karaka Campus will occur over the next 40+ years.

This Plan Change includes a precinct, which details the indicative vehicle accesses, yard and planting (riparian and special landscape area) requirements, stormwater management, provisions to recognise Mana Whenua values, and provisions to ensure that development progresses with the availability of infrastructure. The maximum impervious area for the Plan Change area has been altered in response to manage stormwater runoff and to maintain the vegetated appearance of the Plan Change area.

The AUP and the Auckland Future Development Strategy 2023-2053 (**FDS**) form the package of documents which set the strategic approach for providing for urban growth within the Auckland Region. The FDS identifies a programme to sequence the development of future urban land over the next 30 years (to 2050+), in line with its purpose to promote long-term strategic planning. In relation to the Plan Change area, the FDS signals an indicative sequencing of 2035+ (Drury West Stage 2).

The FDS is a matter to have regard to under s74 of the Resource Management Act 1991 (**RMA**) as a high-level strategic document, within which, change can and should be contemplated as more information comes to light and as specific development proposals come forward. Such matters may be information regarding development capacity, alternative funding approaches for infrastructure solutions or alternate infrastructure technologies that achieve the same or similar outcome.

The more detailed analysis undertaken in this report and its attachments supports an earlier release of the Plan Change area for development than identified in the FDS. The reasons for this are summarised as follows:

- FPH has an established track record in the development of business zoned land as significant employment nodes, as demonstrated through the existing campus in East Tāmaki. FPH is uniquely placed to deliver a significant employment node in south Auckland, close to existing and planned housing, and to a high standard. This is a significant opportunity which, while not anticipated by the current Drury-Opāheke Structure Plan, will provide a major employment hub in the Drury West area to complement an area of significant existing and proposed housing growth.

- The technical analysis undertaken in support of this Plan Change, in particular the Integrated Transport Assessment and Water and Wastewater Servicing Strategy, demonstrates that the land can be developed with targeted infrastructure upgrades in place.
- Rules are included within the Plan Change to coordinate the release of development capacity within the Plan Change area with the delivery of required transport, water supply and wastewater servicing infrastructure. This allows much needed business and employment capacity in Drury West to be made available in the short to medium term.
- Developer-led funding solutions are available to provide the necessary infrastructure in the right place and at the right time, taking into account the long term build out of the site.

For these reasons, and in the context of the staging criteria set out in Appendix 1 of the Regional Policy Statement (**RPS**), the proposal is consistent with sound resource management practice and Part 5 of the RMA.

Further, the Plan Change responds to the specific characteristics of the site and the surrounding area, with reference to the regional context, and gives effect to the relevant planning documents for the following reasons:

- The proposed B-LIZ is located within a walkable distance of both the planned Ngākōroa Railway Station as well as the existing and future planned residential developments within Drury West, and will provide significant employment opportunities for the southern Auckland region (and beyond) where there is limited supply of B-LIZ zoned land;
- The adverse effects of urban development on the natural environment, including the streams and wetlands within and near the Plan Change area, can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced; and
- The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades ensured through the proposed Plan Change provisions.

For these reasons, the proposal is consistent with sound resource management practice and Part 5 of the RMA. Therefore, the Council can accept the Plan Change for processing.

The proposed land use has been assessed to give effect to the relevant objectives of the AUP and the National Policy Statement- Urban Development (**NPS-UD**), in this location. The zoning is also consistent with the Updated Karaka Road Structure Plan (refer to **Appendix 4**) which has been prepared in accordance with the requirements of Appendix 1 of the AUP. The detailed site and context analysis completed as part of this Plan Change demonstrates that the proposed use will be an efficient and effective method for achieving the sustainable management purpose of the RMA.

3.0 Introduction

3.1 Background

FPH is a leading designer, manufacturer and marketer of healthcare products and systems for use in respiratory care and obstructive sleep apnea. FPH currently operates a research, development

and manufacturing campus in East Tāmaki, New Zealand. It also has manufacturing facilities in Mexico and China. Products are distributed globally to over 120 countries.

FPH has acquired landholdings in Drury West and seeks to rezone the Plan Change area from FUZ to B-LIZ, along with associated precinct provisions (as set out in **Appendix 1**).

FPH anticipates that its existing East Tāmaki campus will be at full capacity by approximately 2030. The Plan Change area will facilitate the development of a second New Zealand campus (**the Karaka Campus**) to support FPH’s growth and expansion. FPH envisages the Karaka Campus will become a major employment hub and will be developed with a series of buildings for research, development, and manufacturing over the next 30-40 years.

3.2 Site Location and Description

3.2.1 Site Description

The Plan Change area comprises a total of 86.5 hectares, and comprises the land bound by Karaka Road (State Highway 22 (**SH22**)) to the north and the railway network of the North Island Main Trunk (**NIMT**) Line to the south (comprising 300, 328, 350, 370 and part of 458 Karaka Road).

The Plan Change area is within the FUZ land identified under the Auckland Council Drury-Opāheke Structure Plan (2019) and part of Auckland’s southern growth area. **Figure 1** below shows the Plan Change area in a wider sub-regional context.

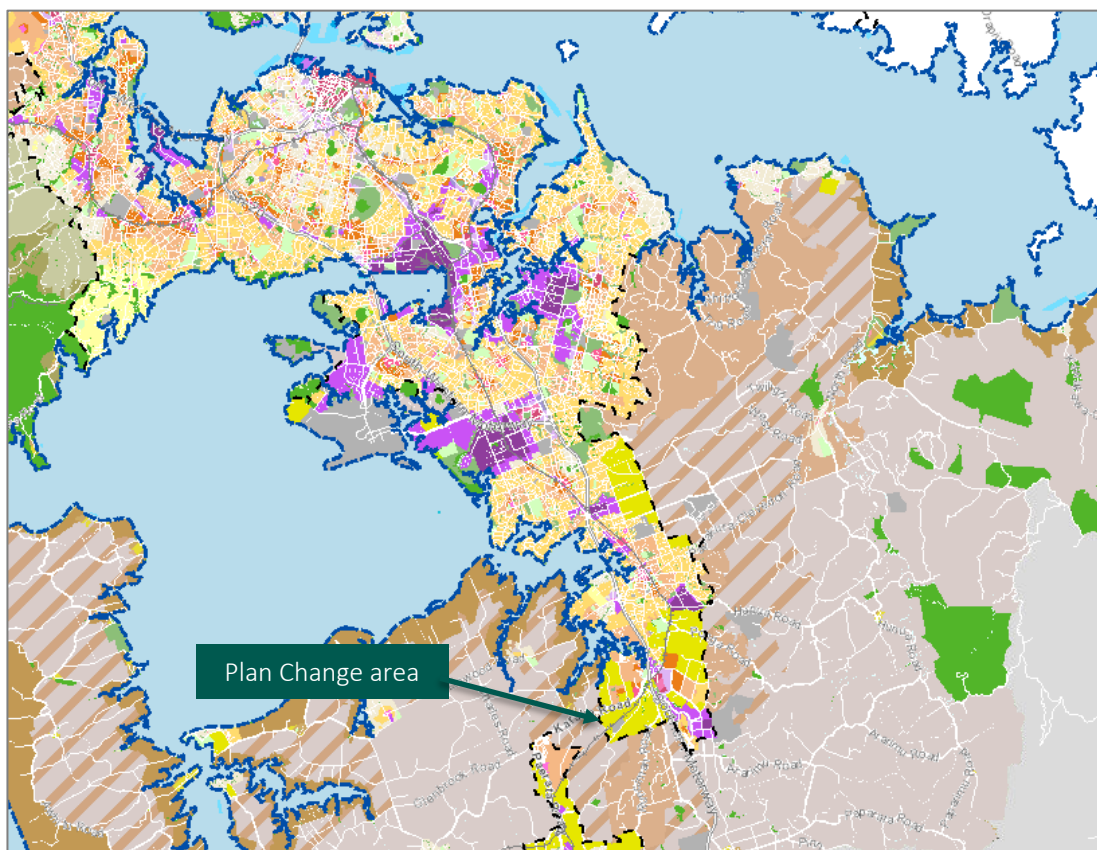


Figure 1: The Plan Change area within the wider southern Auckland Region.

The Plan Change area is currently used for agricultural purposes by a producer of hothouse fresh produce, as well as animal grazing. Two large hothouse buildings are located at the southern end

of the Plan Change 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 slopes down in an east to west direction towards Oiroa awa (Creek). Vegetation within the Plan Change area is highly modified and largely grazed pasture. There are no identified 'Significant Ecological Areas' (SEAs) within the Plan Change area itself or its vicinity. The pasture on the Plan Change area is interspersed with maintained shelterbelt planting, amenity vegetation as well as riparian vegetation.

The Plan Change area includes intermittent streams and one permanent stream, the Oiroa awa (Creek) which is located along part of the western boundary of the Plan Change area. The characteristics of the Oiroa awa (Creek) reflect the current agricultural nature of the catchment and Plan Change area, and its margins contain limited intact riparian vegetation. Where any riparian vegetation is present, this generally forms a thin buffer zone at less than 5m against the stream edge and provides some limited canopy cover. All other streams within the Plan Change area are intermittent or ephemeral and are mapped in **Figure 2** below.

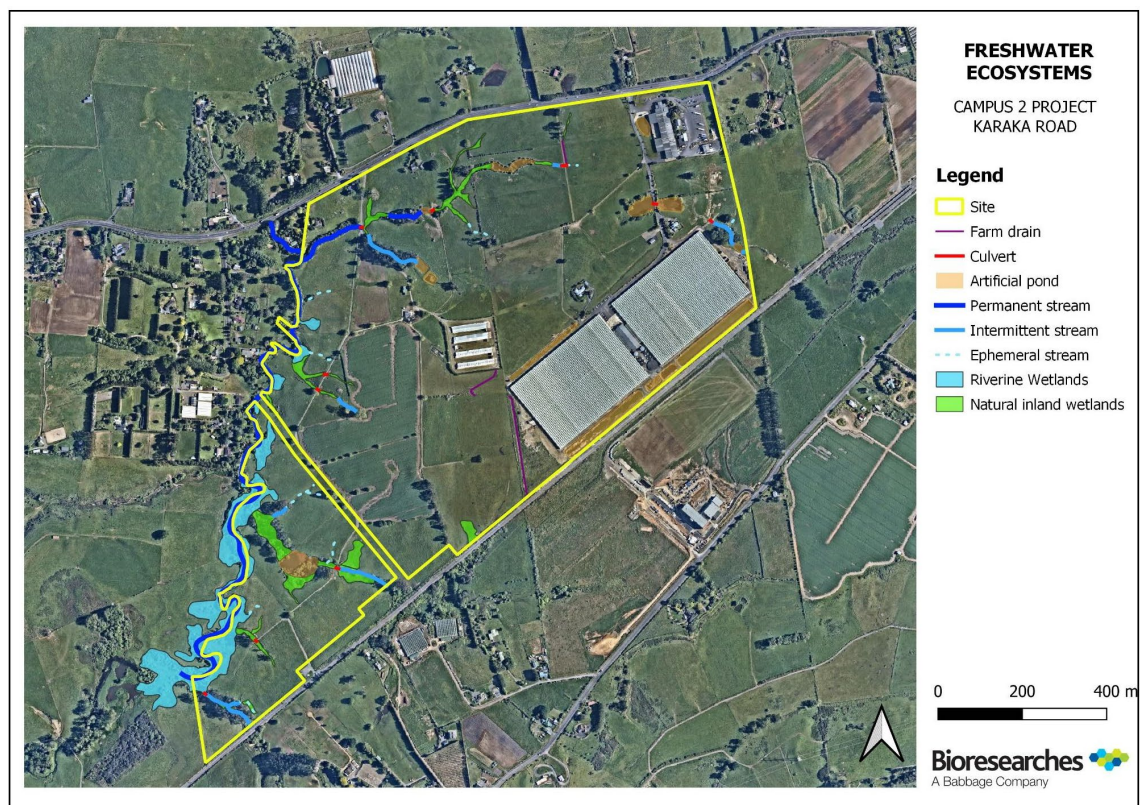


Figure 2 Overview of the freshwater habitats identified within the Plan Change area (source: Bioresearches).

The Plan Change area also features natural inland wetlands that drain to the Oiroa awa (Creek). These are considered to be exotic wetlands due to the dominance of exotic vegetation species (refer **Figure 2** above).

3.2.2 Surrounding Area and Local Context

The Plan Change area forms part of the FUZ area in Drury and Opāheke, and is located within Drury West. South Auckland 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 within the Auckland Region.

Land within Drury West includes both FUZ and urban zoned land as shown in **Figure 3** below.

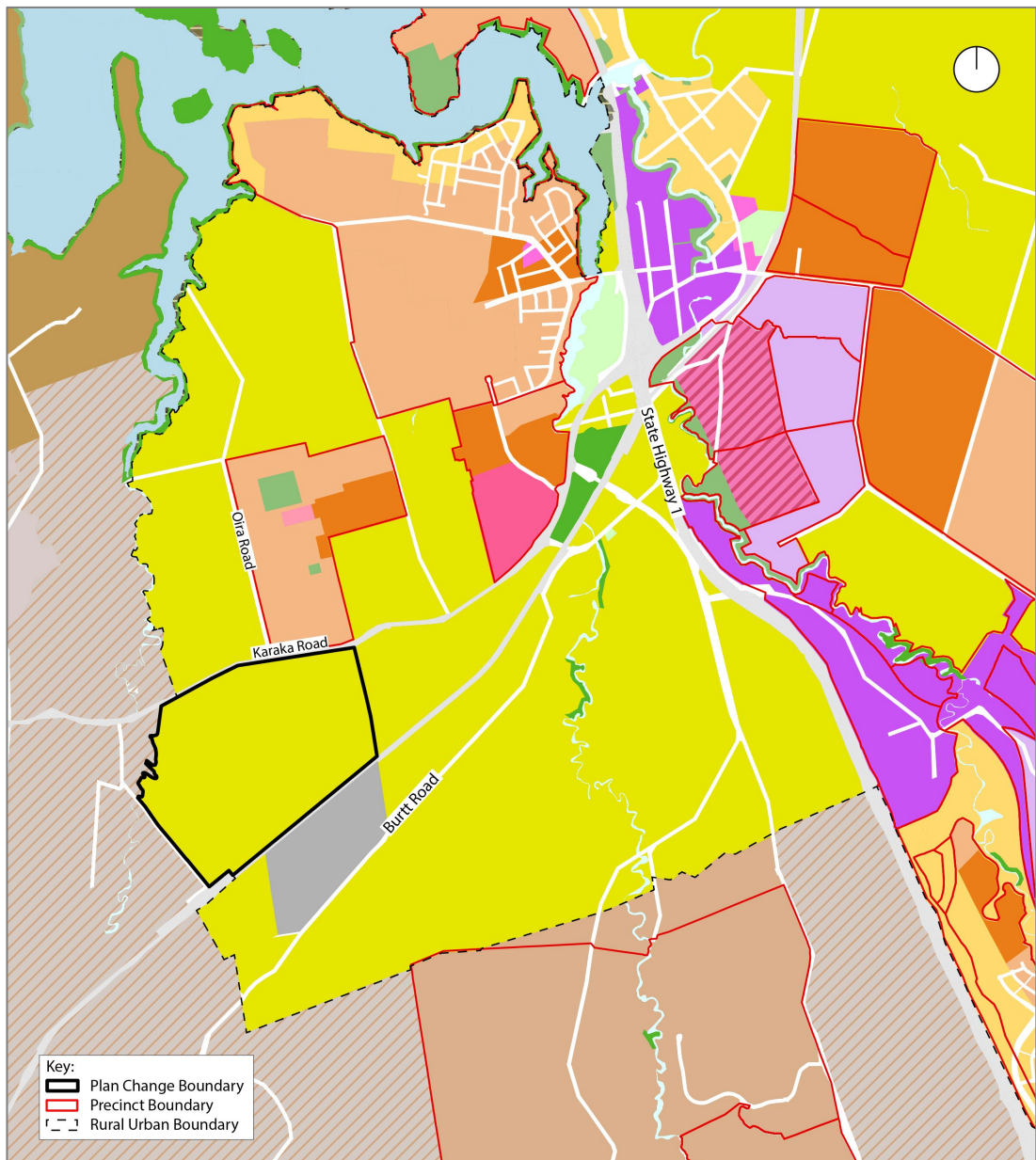


Figure 3 Land in the wider Drury-Opāheke Future Urban area, as zoned under the AUP

Directly north of the Plan Change area on the opposite side of SH22 is approximately 56 hectares of operative 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 north east of the Plan Change area, adjacent to the Pahurehure Inlet, and comprises residential and Town Centre zoned land. The new Drury Metropolitan Centre is located approximately 4 kilometres to the northeast of the Plan Change area. Further west is the Paerata Rise residential subdivision which is currently being developed and seeks to establish some 4,500 homes by 2035.

The Plan Change area is bound by SH22 to the north and the NIMT to the south. SH22 serves as the main access to and from the Plan Change 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 the SH22 roundabout to the west, and Oira Road and Jesmond Road, which intersect with the northern side of SH22. Both the Oira Road and Jesmond Road intersections are required to be upgraded as part of development within the adjacent Waipupuke Precinct.

Significant infrastructure upgrades are also planned for the surrounding area 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 east from the Plan Change area and is funded under the New Zealand Upgrade Programme (**NZUP**). The Ngākōroa Railway Station is designated and planned for completion in 2026 and will include a bus interchange, park and ride facilities and walking and cycling paths and 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;
- Paerata Railway Station and Interchange;
- Papakura to Drury SH1 improvements;
- Papakura to Pukekohe rail electrification; and
- Southern Frequent Transit Network bus routes including Takanini and Great South Road.

The Plan Change area is accessible to a range of social infrastructure including the major subregional healthcare facilities of Pukekohe Hospital, Manukau SuperClinic and Middlemore Hospital, all of which are located within a 14-24km radius. 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, within a 9-13km radius. The new Drury Metropolitan Centre (Drury Centre Precinct), over time, is also expected to provide for the development of additional social infrastructure.

4.0 Description of the Plan Change Request

4.1 Description of the Proposal

4.1.1 Approach to the Planning Framework and Zoning

The Plan Change seeks to rezone approximately 86.5 hectares of FUZ to B-LIZ on Karaka Road, Drury West, as shown at **Appendix 1**, and will rely largely on the underlying B-LIZ zone and Auckland-wide provisions under the AUP to manage the development of the Plan Change area. The Plan Change area and proposed zoning is also shown at **Figure 4** below.

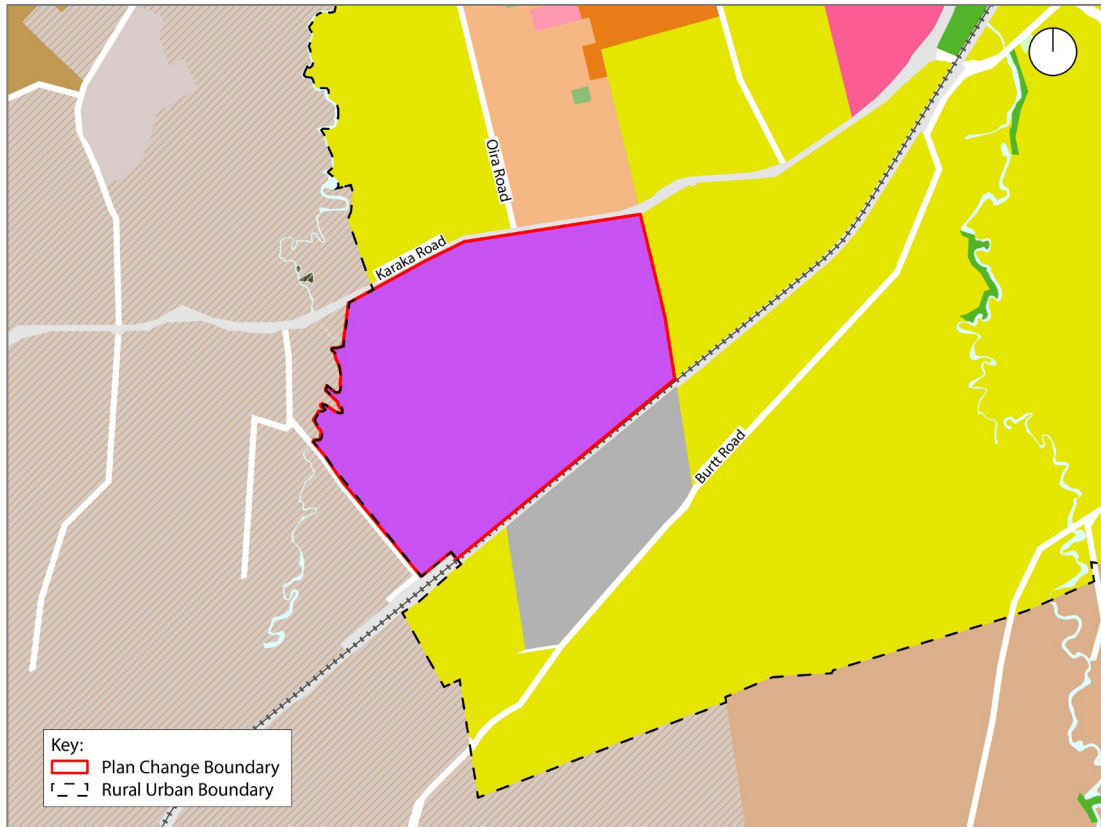


Figure 4: The Plan Change area and proposed B-LIZ zoning

The Karaka Road Precinct is also proposed to include place-based provisions that create a spatial framework for future development to accommodate the particular characteristics of the site and the FPH Karaka Campus. The precinct provisions, included at **Appendix 1**, are appropriately focussed to the layout and form of development necessary to achieve the objectives of the AUP, including in relation to:

- Recognising Mana Whenua values;
- Providing access to the Plan Change area that is integrated with the existing and planned transport network, including active mode connections;
- Enhancing the riparian margins of streams;
- Managing stormwater quality;
- Maintaining the appearance of the Plan Change area and mitigating reverse sensitivity effects; and
- Ensuring development is coordinated with the required infrastructure upgrades (water supply and wastewater) to service the development.

The Precinct provisions enable the Plan Change area to develop to a scale and intensity which is broadly consistent with B-LIZ areas within the region. The precinct will, however, include some variation to the standard Auckland-wide and zone provisions to introduce more tailored standards, matters of discretion and assessment criteria. This will support the development of a quality-built campus style environment within this locality that creates a distinctive sense of place and contributes to a well-functioning urban environment.

4.1.2 Overview of the Proposed Zoning

The intention of the proposed zoning is to provide for the establishment of a second FPH research and development and manufacturing campus in Drury West.

The Plan Change area will be zoned B-LIZ (as shown in **Figure 5** below), enabling FPH to develop a significant employment node within the Plan Change area.

The B-LIZ zone enables the construction of large buildings with a primary light industrial land use, and contains other provisions that enable light industrial activities to operate efficiently and effectively.

It will enable FPH to conduct research and development and manufacturing activities, along with offices co-located in each building, similar to its existing East Tāmaki Campus. It will also provide for employment opportunities and choice close to where people will live now and in the future.

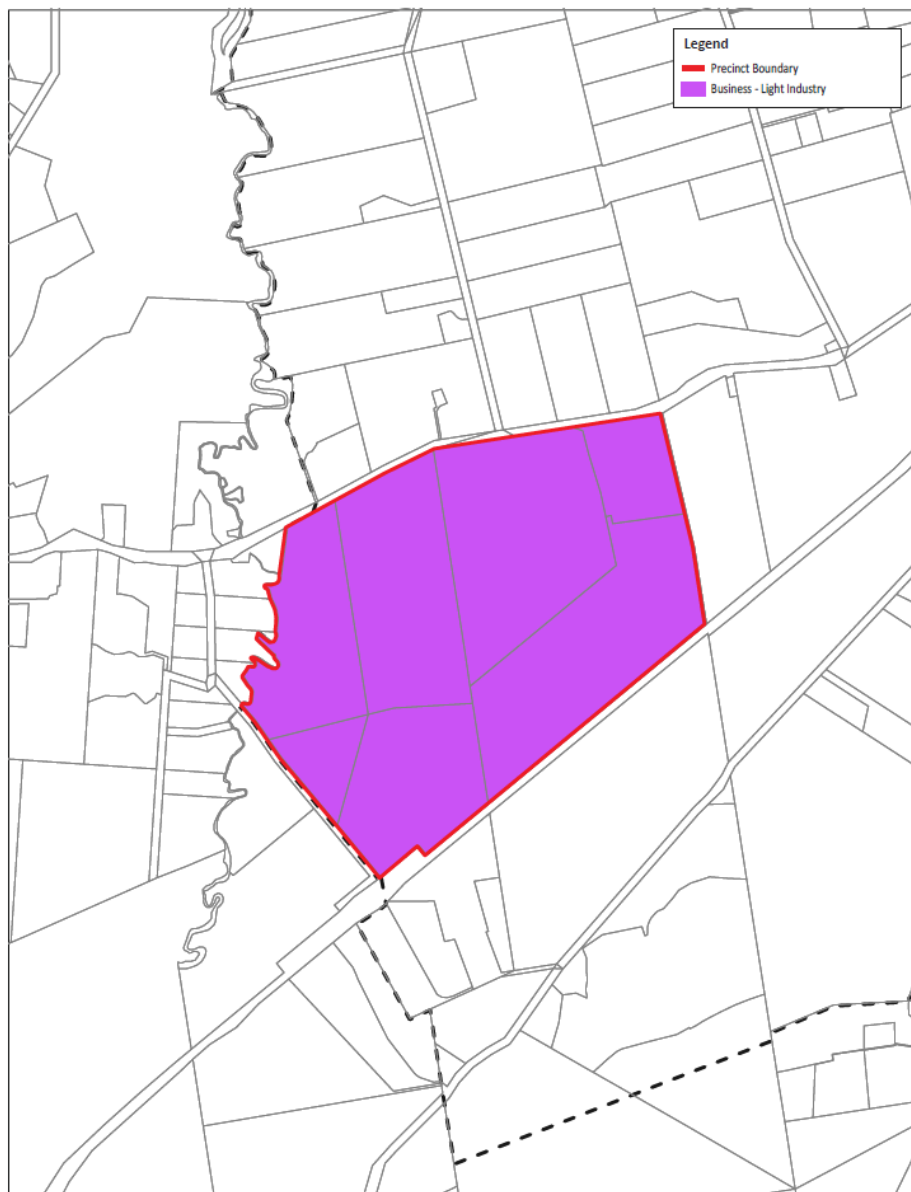


Figure 5 Proposed zoning.

4.1.3 Other Unitary Plan Controls

In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 (SMAF 1) across the entire Plan Change area (as shown in **Figure 6** below) to manage the increase in stormwater discharge associated with development to sensitive stream environments.

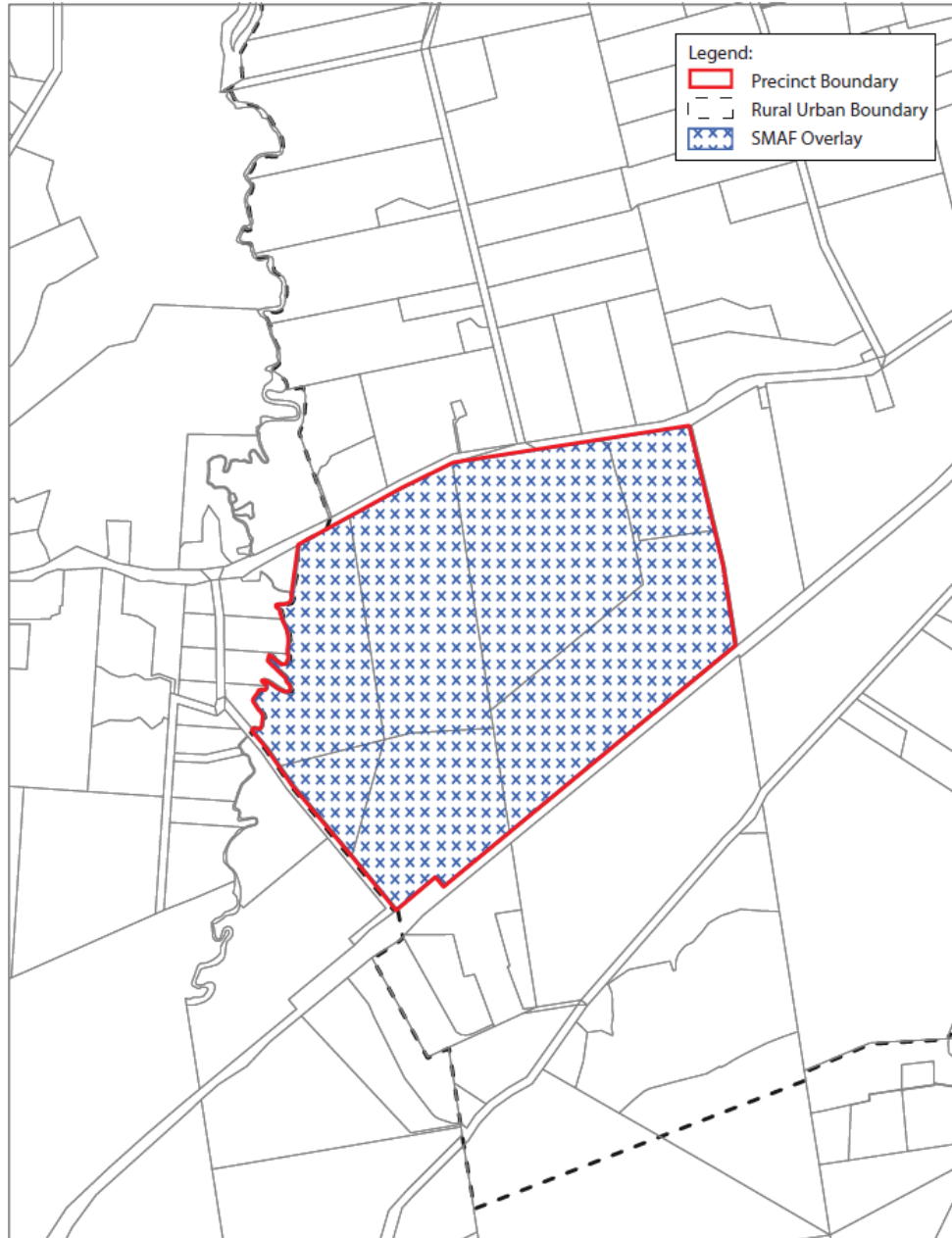


Figure 6 Proposed SMAF 1 control.

All other existing controls and overlays will continue to apply to the Plan Change area, including:

- Overlays: Natural Resources: High-Use Aquifer Management Areas Overlay – Pukekohe Kaawa Aquifer;
- Overlays: Natural Resources: High-Use Stream Management Areas Overlay;
- Controls: Macroinvertebrate Community Index – Urban; and

- Controls: Macroinvertebrate Community Index – Rural.

All relevant Auckland-wide and zone rules would apply to future development in the Plan Change area, in addition to those applying under the overlays and controls noted above.

4.1.4 Proposed Precinct Provisions

As discussed above, the Karaka Road Precinct is proposed to apply to the Plan Change area to accommodate the particular characteristics of the site, manage the specific effects associated with the development of the Karaka Campus, and ensure that a high-quality campus environment is developed within the Plan Change area.

A package of provisions, including objectives, policies, activity standards, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives of the precinct and the AUP. The full set of provisions is set out within **Appendix 1** however a summary is provided below.

4.1.4.1 Objective and Policies

The proposed Precinct objectives and policies address the specific outcomes for the Precinct and the methods by which these outcomes will be achieved. These are summarised below:

- A light-industrial area that integrates with the surrounding area, the natural environment, and respects Mana Whenua values.
- Access to and from the precinct occurs in a safe and effective manner that mitigates adverse effects of traffic generation on the surrounding road network and encourages mode shift to public and active modes of transport.
- Development is coordinated with transport and infrastructure upgrades through the use of triggers and standards.
- Ecological values are recognized and protected and sustainability initiatives are encouraged.
- Mana Whenua values are recognised and provided for.

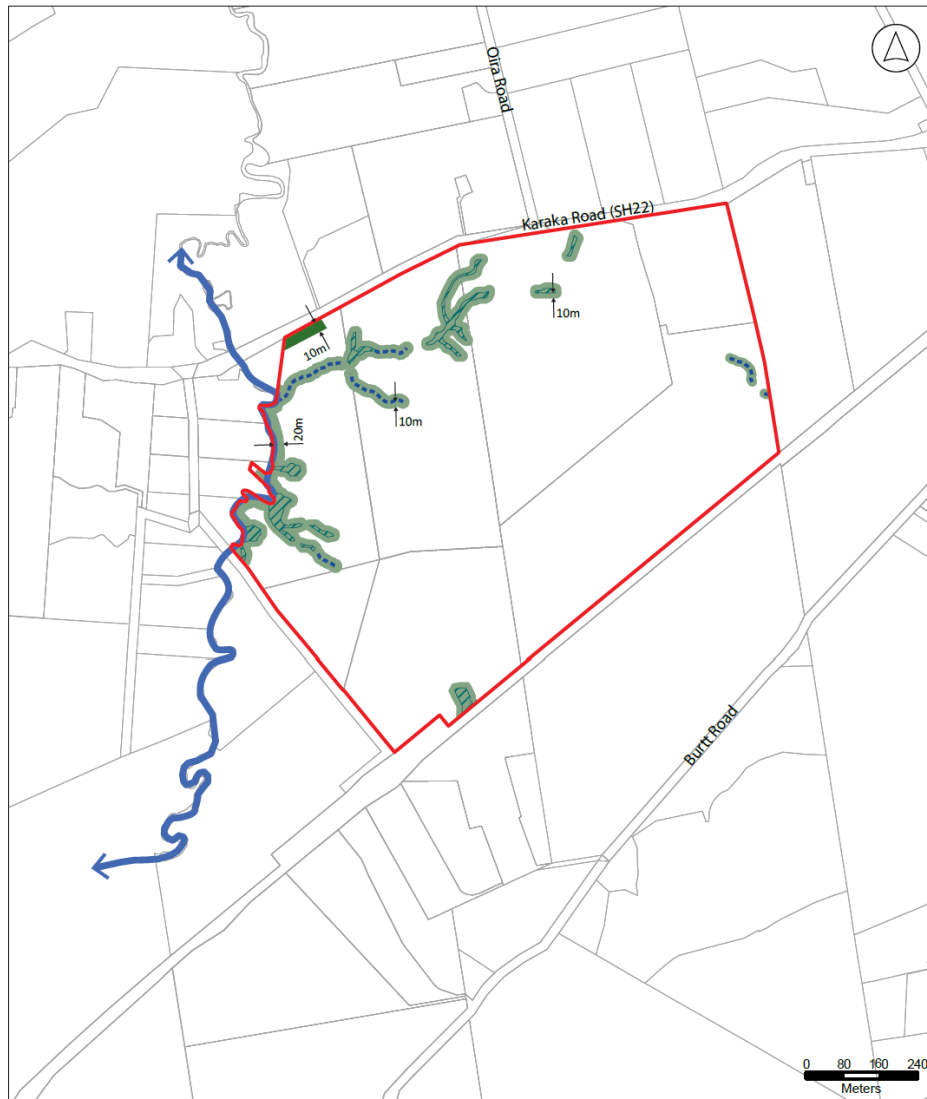
Overall, the objectives and policies result in a comprehensive framework of provisions that provide direction for the precinct standards, matters of discretion and assessment criteria. The following sections summarise how the Plan Change achieves these specific outcomes.

4.1.5 Ecology and Sustainability

A key objective of the Precinct is sustainability and contributing to mitigating the effects of climate change and biodiversity loss. This is achieved by:

- The location and form of the zoning itself – being a major employment zone close to an existing and future significant residential population and railway station. As described in the Carbon Emissions and Vehicle Kilometre Travelled Assessment prepared by Stantec at **Appendix 13**, this will support more sustainable transport patterns, ultimately helping to reduce potential future greenhouse gas emissions.
- Identifying permanent and intermittent streams in Precinct Plan 2 (refer **Figure 7** below) and requiring a 20m riparian margin adjacent to the Oiroa Awa and a 10m vegetation riparian buffer each side of any other permanent or intermittent stream to mitigate the effects of urbanisation on freshwater quality;

- A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff, which is additional to the requirements imposed by the SMAF-1 overlay; and
- A maximum impervious area rule across the precinct, to manage the amount of stormwater runoff generated by development within the Plan Change area.



Karaka Road - Indicative Riparian Margin and Special Landscape Area Plan

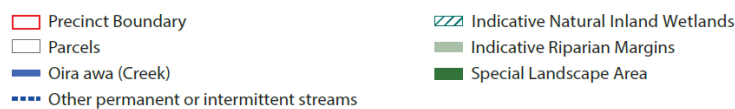
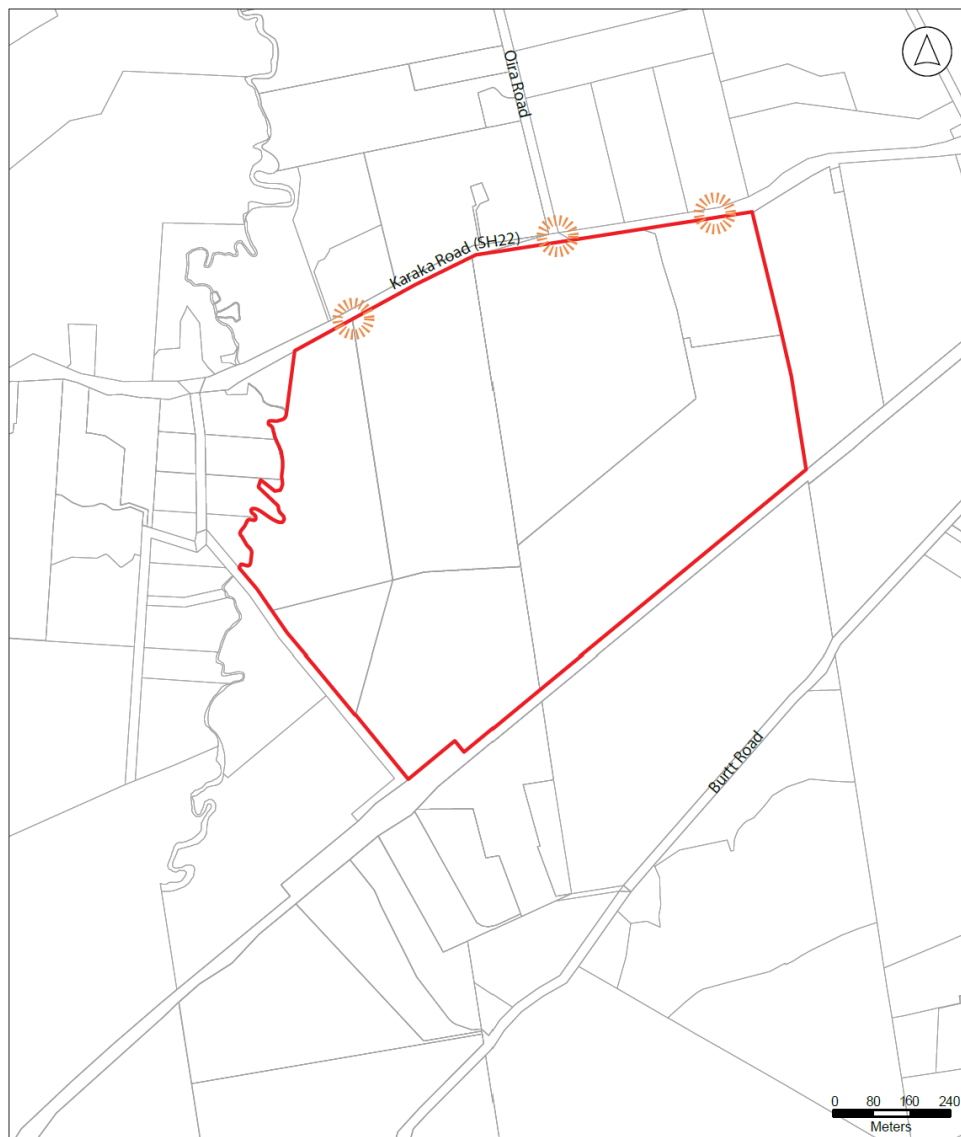


Figure 7 Proposed Precinct Plan 2 – Indicative Riparian Margin and Special Landscape Area.

4.1.6 Transport and Infrastructure

The Precinct includes a number of provisions relating to the provision of infrastructure. These include the following:

- A transport infrastructure staging rule to coordinate the amount of industrial and commercial GFA with the delivery of required infrastructure;
- Vehicle access requirements, to ensure that access to and from the precinct occurs in a safe and efficient manner, generally in the locations identified in Precinct Plan 1 (refer **Figure 8** below); and
- A water supply and wastewater connection rule, to ensure the coordinated delivery of water and wastewater infrastructure, or an alternative on-site solution, to service development.



Karaka Road - Indicative Access Network Plan

- ▬ Precinct Boundary
- Parcels
- ☀ Indicative Access Locations

Figure 8 Precinct Plan 1 - Indicative Access Network Plan

4.1.7 Integrated and High-Quality Development

The Precinct includes a number of provisions which will enable the Plan Change area to be developed in a comprehensive manner and integrate with the surrounding area, whilst ensuring

visual effects of development as experienced from adjacent land uses are appropriately managed and screened. These include the following:

- A yard rule, that requires buildings within the Plan Change area to be set back 5m from the external front, side and rear boundaries. Yard landscaping requirements are also included to provide a visual buffer between buildings within the precinct and adjacent land uses;
- A Special Landscape Area (to be planted to a minimum depth of 10m) has been identified in Precinct Plan 2 (refer **Figure 7** above) to provide for a visual transition between buildings within the precinct and adjacent rural land uses (in the Rural – Mixed Rural zone); and
- The application of a maximum impervious area of 80%, which is a reduction from the underlying B-LIZ, to limit the paved areas within the precinct, to maintain an appropriate level of visual amenity on the site and enable a campus style environment with generous green spaces.

4.2 Purpose and Reasons for the Plan Change

Schedule 1 clause 22(1) of the RMA requires that a Plan Change request explains the purpose of, and reasons for the proposed Plan Change.

The purpose of the Plan Change is to enable the provision of additional light industrial land in Drury West. This will enable the development of a second FPH campus in New Zealand, focussing on research and development, manufacturing and office activities, and provide significant employment opportunities within a walkable distance to the designated Ngākōroa Railway Station.

FPH is the sole landowner of the Plan Change area, and intends to develop the Plan Change area to accommodate projected growth over the long term, which this Plan Change request will enable.

The Plan Change is generally consistent with the objectives of Auckland Council's planning documents, including the AUP and the FDS and the reasons for the Plan Change are justified and consistent with sound resource management practice.

5.0 The Karaka Road Structure Plan

5.1 Structure Planning

In 2019, Auckland Council completed Structure Planning for 1,921 hectares of land within the Drury-Opāheke Structure Plan area (refer **Figure 9** below). The Drury-Opāheke Structure Plan area is part of Auckland's southern growth area and includes the largest proportion of FUZ areas in Auckland at 45%. This includes the large FUZ 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 Auckland Council Drury-Opāheke Structure Plan land use map is shown in **Figure 9**. This land use map shows that residential activity in the form of Mixed Housing Suburban (**MHS**) and Mixed Housing Urban (**MHU**) zoning is proposed over the Plan Change area, including a potential new suburb park and three potential new neighbourhood parks. Additionally, the land use map shows a new centre along the Karaka Road frontage of the Structure Plan, 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.

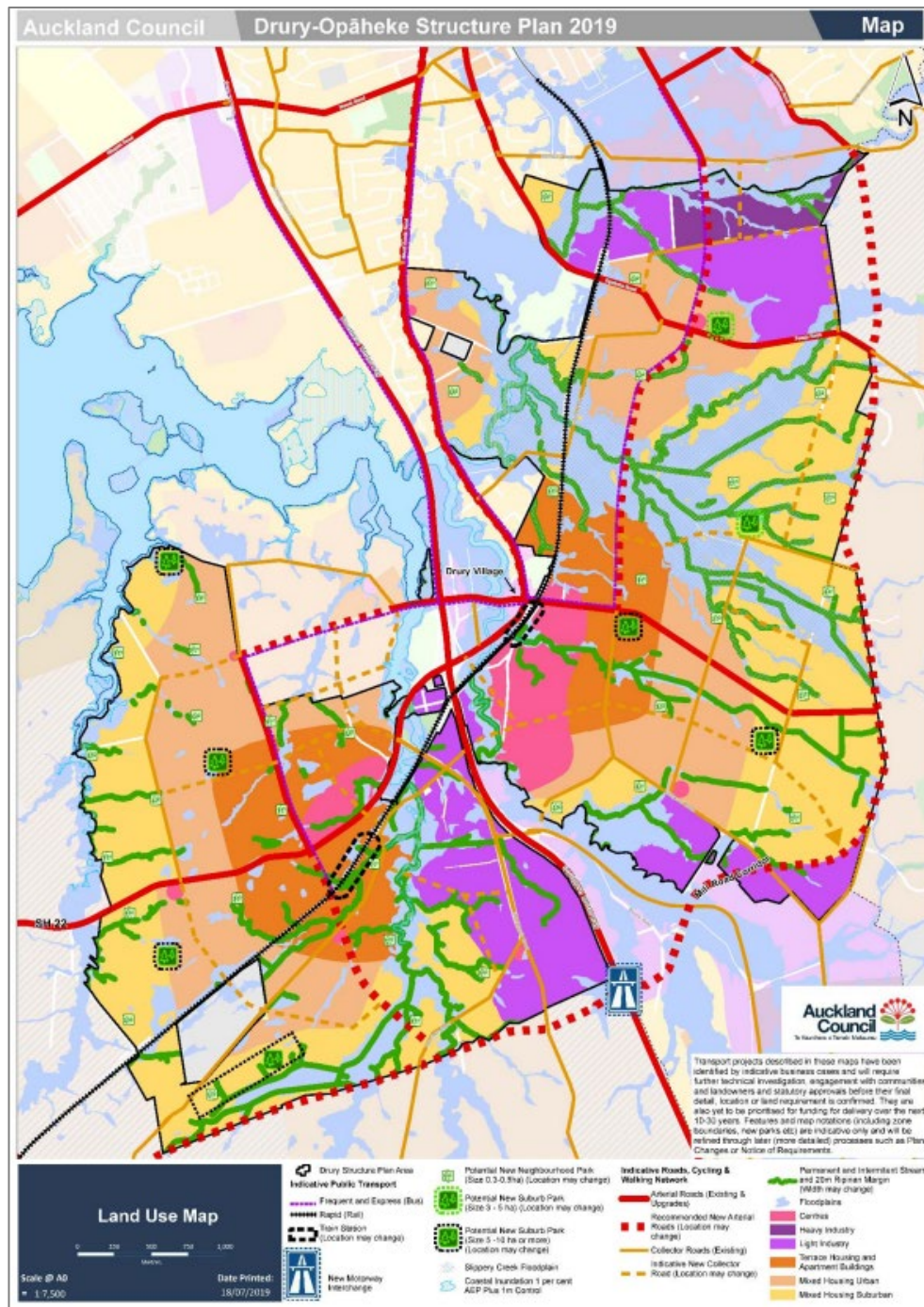


Figure 9: 2019 Auckland Council Drury-Opāheke Structure Plan land use map (source: Auckland Council).

As the Plan Change seeks to rezone the Plan Change area to B-LIZ, FPH has undergone a detailed structure planning process to replace the part of the Auckland Council Drury-Opāheke Structure Plan that applies to the Plan Change area, and some adjacent land, as included at **Appendix 4**.

The proposed Karaka Road Structure Plan (as shown in **Figure 10** below) identifies the Plan Change area for B-LIZ use. It identifies the now designated Ngākōroa Railway Station and associated park and ride facilities, which will be within a walkable distance of the Plan Change area, and a nearby school. A number of transport infrastructure upgrades have been identified to support development of the Structure Plan area to ensure that development will contribute to achieving a well-functioning urban environment. The Karaka Road Structure Plan also integrates the existing

natural features of the Plan Change area and establishes a connected green multipurpose corridor along Oiroa awa (Creek).

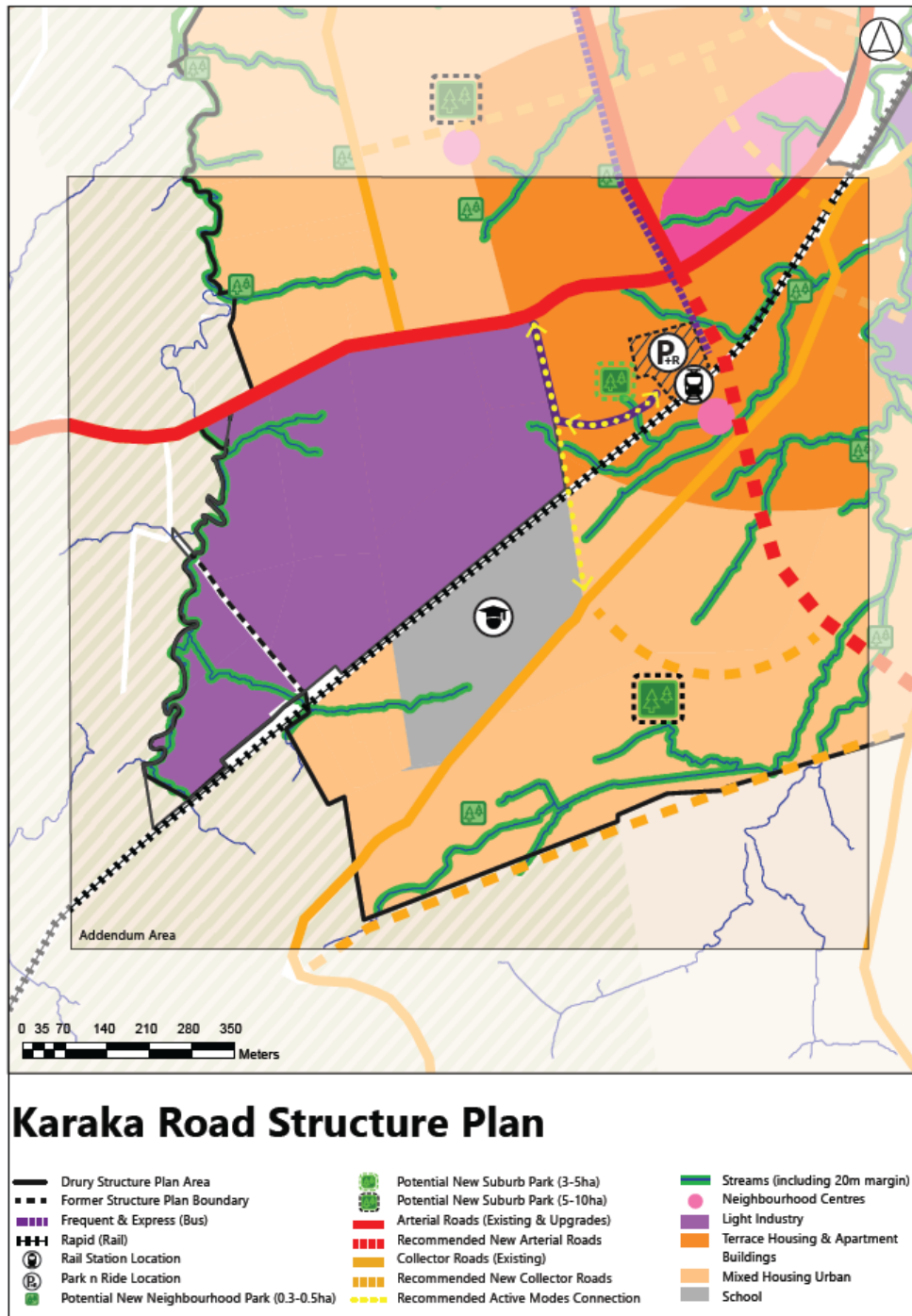


Figure 10 Karaka Road Structure Plan

The structure planning process requires consideration as to whether the land is adequately serviced (or can be serviced) by infrastructure (including transport), and achieves appropriate environmental, social, cultural and economic planning outcomes.

The Karaka Road Structure Plan confirms that there are a number of transportation upgrades that are planned and funded, or have been identified, within the Structure Plan area's immediate and wider surrounds, 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. Up to three new vehicle accesses along the northern boundary of the Structure Plan area intersecting with Karaka Road (SH22) will provide private vehicle access to and from the Structure Plan area, and will be staged as development within the Structure Plan area occurs. The three new intersection upgrades required 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.

The Karaka Road Structure Plan confirms that there are wastewater and potable water supply infrastructure solutions to service the urbanisation of the land for light industry activity. These infrastructure solutions are either existing funded projects, or are localised upgrades which can be developer funded. Wastewater will either be serviced by a new pump station located within the Plan Change area which connects to the transmission network¹ or serviced by way of an on-site wastewater treatment plant. In relation to water supply, the Plan Change area will either be serviced by a new watermain network that will originate from the Flanagan Road bulk supply point (BSP) or an on-site bore and water treatment plant.

The Auckland FDS identifies Drury West as being development ready in 2035+. Investigations into infrastructure availability and demand through the structure plan process however, have confirmed that capacity exists to commence before 2035, subject to sequencing.

The Plan Change includes rules to stage development to ensure future development is coordinated with these required infrastructure upgrades.

5.2 Consultation and Engagement

The Structure Plan and Plan Change were subject to extensive engagement with a number of persons and organisations. These include the following:

- Mana Whenua groups, including Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua;
- Auckland Council and its Controlled Organisations, including Plans and Places, Development Programmes Office (DPO), Healthy Waters, Auckland Transport (AT) and Watercare Services Limited (WSL);
- Waka Kotahi NZ Transport Agency and Te Tupu Ngātahi (the Supporting Growth Alliance);
- KiwiRail; and
- the local community and general public.

A report summarising the comprehensive consultation undertaken to date is included at **Appendix 22**, and the key outcomes of consultation and engagement undertaken with Mana Whenua and the public community is summarised below.

Consultation has been wide ranging and FPH will continue to engage with the relevant stakeholders as the project progresses.

¹ This network includes a public rising main along Karaka Road and Jesmond Road, and a manhole at Jesmond Road.

5.2.1 Mana Whenua

In respect to Mana Whenua, engagement correspondence was sent to 18 Mana Whenua groups identified on Auckland Council's website, in March 2023.

Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua have all expressed interest in the Plan Change and have requested ongoing involvement. Since then, multiple hui have occurred between FPH and the Mana Whenua who are involved in this Plan Change, including focused hui with subject matter experts and hui to work through the Plan Change request and the Precinct provisions included at **Appendix 1**. Engagement with Mana Whenua will be ongoing both throughout the Plan Change process as well as during future masterplanning, detailed design, resource consenting and construction stages. Cultural Values Assessments have been provided by Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua and are included at **Appendices 19-21**.

Further detail on engagement with Mana Whenua is contained in the Consultation Summary Report included at **Appendix 22**.

5.2.2 Local Community

In terms of public consultation, a public open day was held on Saturday 10 February 2024. The purpose of the session was to introduce FPH to the local community, provide an overview of the site and the proposed plans to develop the Karaka Campus, and to seek feedback on the Structure Plan and Plan Change.

Over 100 people attended the open day, with 25 attendees providing their contact details, requesting they be kept informed as the project further develops. Overall, the community was strongly supportive of the proposed approach to the Plan Change and amended Structure Plan. Verbal feedback received at the event, included the following:

- Strong support for providing significant employment opportunities in Drury, especially given the amount of re-zoning through recently approved residential Private Plan Changes in the surrounding area;
- Support for the site to be developed in a campus-style, similar to the existing 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 SH22 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 opposite to the usual peak-flow (moving north in the AM, and south in the PM).

Further detail on the public open day is contained in the Consultation Summary Report included at **Appendix 22**.

5.3 Accepting the Plan Change Request (Clause 25)

The Council has discretion to accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the RMA, subject to the matters set out in Clause 25(4)(a)-(e). Given that the AUP has now been operative for more than two years, and the same (or similar) plan change request has not been considered within the past two years, the Council is able to reject the Plan Change request only on the following grounds:

- The Plan Change request is frivolous or vexatious (clause 25(4)(a));
- The Plan Change request is not in accordance with sound resource management practice (clause 25(4)(c)); or
- The Plan Change request would make the plan inconsistent with Part 5 – Standards, Policy Statements and Plans (clause 25(4)(d)).

In relation to clause 25(4)(a), considerable technical analysis has been undertaken to inform the Plan Change, which is detailed in the report below. For this reason, the proposal cannot be described as frivolous or vexatious.

In relation to clause 25(4)(c), ‘sound resource management practice’ is not a defined term under the RMA, however, case law suggests that this requires consideration of whether the proposal accords with the purpose and principles of the RMA. It also includes consideration of wider issues such as the timing and procedural appropriateness of the Plan Change.

The Plan Change is considered to be in accordance with sound resource management practice for the following reasons:

- The proposed zoning will support a compact urban form and integrated urban development as Drury West is urbanised;
- While the proposed zoning differs from the Auckland Council Drury-Opāheke Structure Plan, which was developed in 2019, the most recent and focused technical analysis undertaken as part of this proposal and as detailed throughout this report demonstrates that the proposed B-LIZ will not adversely affect the supply of housing and that potential landscape and visual amenity effects can be appropriately managed;
- While the proposed timing of the rezoning differs from the Council’s current proposed staging set out in the FDS, the more detailed technical analysis undertaken as part of this proposal and as detailed throughout this report demonstrates that there is no planning reason for preventing development occurring earlier, particularly as all necessary infrastructure can be provided as development progresses;
- All necessary statutory requirements have been met, including an evaluation in accordance with section 32 of the RMA with supporting evidence and assessment of the environmental effects of the plan change. Consultation with interested iwi and other stakeholders has been comprehensive and is on-going; and
- The Plan Change is consistent with the sustainable management purpose of the RMA as discussed in the report below.

On this basis, the merits of the proposal should be allowed to be considered through the standard Schedule 1 process.

6.0 Strategic Planning Framework

A number of strategic and statutory planning documents have informed the Plan Change process. This section provides a summary of those documents relevant to the Plan Change.

6.1 National Direction

Any change to the AUP must be in accordance with any relevant national policy statement, New Zealand coastal policy statement, and national planning standard.

6.1.1 National Policy Statement on Urban Development 2020

The National Policy Statement on Urban Development 2020 (**NPS-UD**) came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD classifies all local authorities within the country 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 RMA on planning for urban environments.

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 Precinct will support include:

- Enabling the development of land within a strategic location to accommodate a particular business sector which provides research, design and manufacturing activities to the international market;
- Providing a significant employment hub within Drury West that will promote good accessibility between the existing and planned residential areas in Drury, including by way of public and active transport via the planned Ngākōroa Railway Station;
- Supporting the competitive operation of land and development markets by increasing industrial land provision for land intensive industries;

- Promoting reductions in greenhouse gas emissions through the development of a new industrial node and employment hub located adjacent to the Drury West Precinct, which will encourage employees and visitors to travel via public transport; and
- Ensuring the Plan Change area is resilient to the effects of climate change.

Development Capacity

Under Policy 2 of the NPS-UD, 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. As identified in the Economic Assessment included at **Appendix 12** there are no available land holdings zoned for industrial use, within Auckland that could accommodate a land intensive (approximately 100 hectares) industrial activity such as the facilities required for the Karaka Campus, with over 83 per cent of industrial land being less than 5 hectares and only four sites sized between 25-40 hectares. The Plan Change will enable the development of the Karaka Campus and make a significant contribution to realisable development capacity for land intensive industries within the Auckland region.

The provision of additional business development capacity at Karaka Road will also support the planned and emerging residential areas in the wider Drury area.

Responsive Planning

Under Objective 6 and Policy 8 of the NPS-UD, local authority decisions are required to ensure development is integrated with infrastructure planning and funding as well as being responsive, particularly in relation to proposals 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.

As discussed above, the urbanisation of the land within the Plan Change area is out of sequence with the FDS and provides for a different zoning pattern to that identified in the Auckland Council Drury-Opāheke Structure Plan. However, there is an identified need to urbanise this land to meet demand for land intensive industrial land uses, and there is funded infrastructure available to service the Plan Change area prior to 2035.

Reduction in Greenhouse Gas Emissions

Objective 8 of the NPS-UD supports a reduction in greenhouse gas emissions and resilience to the current and future effects of climate change. The Plan Change area is currently zoned FUZ and therefore has already been identified by Auckland Council as being appropriate for urbanisation. Therefore, in respect of how the proposed B-LIZ zone and Precinct provisions will facilitate urban development that achieves Objective 8 of the NPS-UD, the following is noted:

- The Plan Change will enable light industrial activities, including the delivery of a comprehensively developed and high-quality light industrial campus style development 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
- The Plan Change provides an opportunity to increase use of public and active modes of transport due to its proximity to the Ngākōroa railway station and the planned future residential development in the Drury area. Walking and cycling connections will also be

provided to the Plan Change area eastern boundary to connect with the surrounding network once constructed, including encouraging a direct connection to the Ngākōroa railway station.

Summary

Overall, it is considered that the Plan Change will give effect to the NPS-UD.

6.1.2 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 Plan Change, as the Manukau Harbour is the ultimate receiving environment for the streams which drain the Structure Plan area.

The Plan Change will give effect to the NZCPS in that all future land use activities within the Plan Change area 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. A stormwater management plan has been developed and further mitigation measures will be considered as part of a future resource consent process via the certification requirements of Auckland Council's regional-wide Network Discharge Consent.

6.1.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (**NPS-FM**) sets a national policy framework for managing freshwater quality and quantity. Relevant to the Plan Change, the NPS-FM seeks to:

- *Manage 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.*
- *Improve degraded water bodies.*
- *Avoid any further loss or degradation of wetlands and streams.*
- *Identify and work towards target outcomes for fish abundance, diversity and passage and address in-stream barriers to fish passage over time.*

It is proposed to apply the Stormwater Management Area Control – Flow 1 (**SMAF-1**) across the Plan Change area as both the Oiroa and Ngākōroa Catchments drain to streams, to manage the increase in stormwater discharge to sensitive stream environments. Accordingly, an integrated stormwater management approach has been proposed and a number of best practicable options have been identified in the Karaka Road Stormwater Management Plan (**SMP**) included at **Appendix 8**. The SMP incorporates a range of measures to manage potential effects on water quality and quantity associated with the proposed change in land use.

The streams and wetlands present within the Plan Change area have been identified by Biosearches (refer **Appendix 10**) and are largely contained within the northern and north western areas of the Plan Change area. The Plan Change will protect and enhance these streams, as riparian enhancement along the identified permanent and intermittent streams is required under the proposed Precinct provisions as identified in **Figure 7** above.

It is considered that the implementation of the Stormwater Management Plan in conjunction with the enhancement of riparian margins will be sufficient to manage the potential effects associated with changes in water quality and as measured by the macroinvertebrate community indices.

Existing waterbodies will also be protected in accordance with the provisions of Chapter E3 Lakes, rivers, streams and wetlands and relevant regulations of the National Environmental Standard for Freshwater Management (**NES-FW**).

6.1.4 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) seeks to improve the way that highly productive land is managed under the RMA. 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. The NPS-HPL does not apply to existing urban areas or land that councils have identified as future urban zones in district plans.

As the Plan Change area is within the FUZ, the NPS-HPL does not apply.

6.1.5 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity 2023 (**NPS-IB**) applies to indigenous biodiversity in the terrestrial environment and seeks to identify, protect, manage, and restore indigenous biodiversity.

The NPS-IB requires every territorial authority to undertake a district-wide assessment to determine if an area is of significant indigenous vegetation and/or significant habitat of indigenous fauna and qualifies as Significant Natural Areas (**SNAs**). The NPS-IB also seeks to manage the effects of subdivision, use, and development on indigenous biodiversity outside of SNAs, and that areas outside SNAs which support specified highly mobile fauna are identified and managed to maintain their populations across their natural range.

The AUP has not been updated to identify SNAs in accordance with assessment approach outlined in Appendix 1 of the NPS-IB. Notwithstanding, the Plan Change area does not contain any identified significant ecological features under the AUP, which are those areas that have been identified to contribute significantly to Auckland's biodiversity. In addition, the ecological assessment undertaken for the Plan Change area and discussed at Section 7 below confirms that the vegetation on site is highly modified and the terrestrial biodiversity value of the Plan Change area is reduced. The Plan Change is aligned with the NPS-IB because it proposes significant native revegetation, in particular along the Oiroa awa, and development of the Plan Change area will be managed so that it does not result in the loss of indigenous biodiversity.

6.1.6 National Environmental Standards

The National Environmental Standards (**NES**) that are relevant to this Plan Change include:

- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (**NESCS**); and
- NES for Freshwater 2020 (**NES-FW**).

These NES documents have been taken into account in the preparation of the relevant technical reports and are further discussed in Section 7 below. Assessments undertaken to date confirm that the NESCS will apply at the time of development to manage contaminated land, to be appropriately addressed as part of future resource consent processes. Significant technical analysis has also been undertaken to appropriately address freshwater habitats within the site including wetland and watercourses. The Plan Change is consistent with the provisions of this national environmental standard and future development activities will need to be assessed against the standards.

6.1.7 National Planning Standards

The National Planning Standards came into effect on 5 April 2019. These codify the structure, mapping, definitions and noise/vibration metrics of District, Regional and Unitary Plans. Auckland Council has 10 years to implement these changes. This Plan Change applies the standard AUP zone and rule framework to the Plan Change area, which is broadly consistent with the planning standards.

6.2 Auckland Council Strategic Plans

6.2.1 Auckland Future Development Strategy

The FDS 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 Plan Change area has an indicative sequencing of 2035+ under the FDS, as shown in **Figure 11** below.

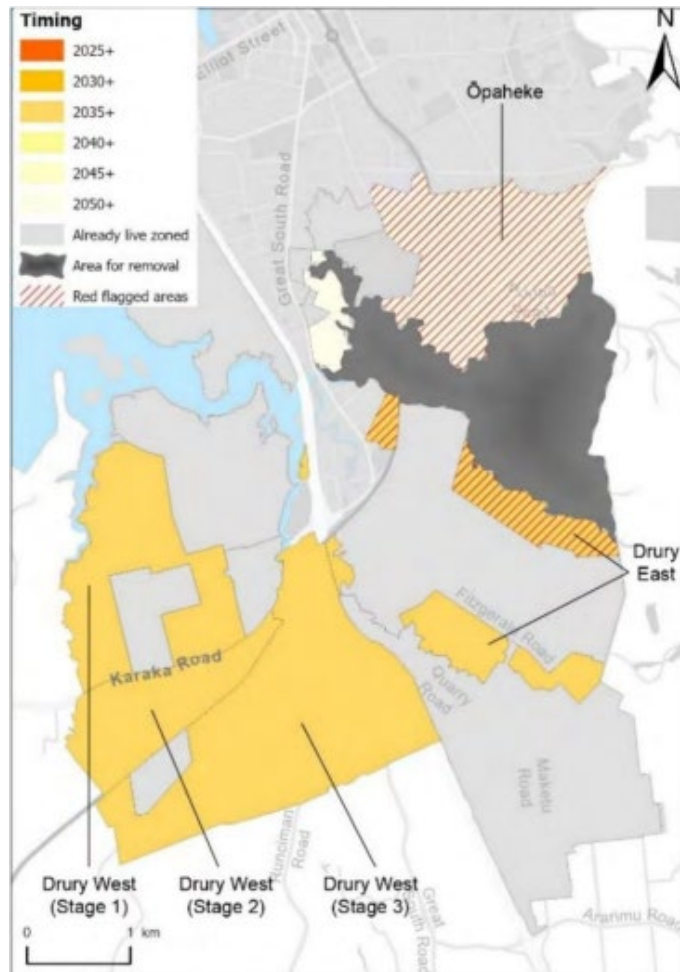


Figure 11: The FDS identifies the Plan Change area (Drury West (Stage 2)) as development ready from 2035+ (source: Auckland Council).

Strategic Spatial Framework

The 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; and
- Principle 5: Enable sufficient capacity for residential and business growth in the right place at the right time.

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

- The Plan Change will enable the development of a significant employment hub within Drury, which will contribute to a reduction in greenhouse gas emissions by locating employment opportunities in close proximity to housing and is accessible by way of public transport;

- The SMP has assessed the potential for natural flood hazards to be exacerbated by climate change using 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 within the Plan Change area, future flooding will be well contained within the stream network and will not pose a risk to development areas;
- The development of the Plan Change area for the Karaka Campus can either be efficiently serviced by bulk infrastructure that is planned for the wider Drury area or serviced by way of privately constructed and operated infrastructure on-site earlier than 2035;
- The Plan Change will protect and restore the natural environment through the planting, protection and restoration of riparian margins and ecological corridors, and the enhancement of the Oiroa awa (Creek); and
- As previously identified, there are limited opportunities within Auckland to accommodate land intensive industrial activities, and in this case, the specific operational and functional needs of the planned campus style facilities. By enabling the establishment of specialised healthcare research, development, and manufacturing activities within a strategic transport location, the Plan Change will enable sufficient capacity for business growth within the Rural Urban Boundary (RUB).

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 falls within the future urban area as it is in the AUP FUZ.

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 roles of Albany, Westgate and Manukau in relation to sub-regional sustainability at a sub-regional level; and
- Facilitate neighbourhoods which offer a wider range of services and non-residential land uses to create greater sustainability at a local scale.

The Plan Change is consistent with the spatial response as it will facilitate business (industrial) growth and employment opportunities within Drury, where significant urban growth is planned, including for residential and commercial activities. Opportunities for people to work locally and access employment via public transport will contribute to achieving greater sustainability at a local scale. The Plan Change will also focus growth within the existing RUB.

Drury West Infrastructure Prerequisites

The FDS identifies a number of infrastructure prerequisites required to support development readiness in FUZ areas, and the following key bulk infrastructure projects necessary to support development in Drury West (Stage 2):

- Drury Arterials;
- SH22 Upgrade;

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

The Plan Change acknowledges the requirement for either the infrastructure projects identified in the FDS or alternate infrastructure technologies that achieve the same or similar outcomes², to support development in the Plan Change area, and identifies the necessary upgrades in the Funding Plan in the Karaka Road Structure Plan (**Appendix 4**).

Both the Integrated Transport Assessment prepared by Stantec (**Appendix 9**) and the Civil Infrastructure report prepared by Crang Civil (**Appendix 11**) confirm that capacity, or an infrastructure solution, is available to enable development within the Plan Change area to commence ahead of 2035.

6.3 Regional Policy Statement and Plans

6.3.1 Auckland Unitary Plan (Operative in Part)

The 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. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. Section 75(3)(c) states that a District Plan must give effect to any RPS and Section 74(2)(a) states that a District Plan must be prepared having regard to a proposed RPS.

The Council's recently released decision on Plan Change 80 (**PC80**) to the RPS represents the Council's up to date policy position on matters relating to well-functioning urban environments, climate change, resilience to the effects of climate change and qualifying matters. PC80 is subject to appeal however, and the amendments from the decision version of PC80 are shown in ~~strike through~~ and underline below³.

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 5**. This demonstrates that the proposed rezoning will give effect to the RPS.

Of particular relevance to this Plan Change is section B2 of the RPS, which identifies the issues, objectives and policies governing urban growth and form within the Auckland Region. In particular, section B2.2 sets out provisions relating to urban growth and B2.5 sets out provisions relating to commercial and industrial growth.

A detailed assessment of these objectives and policies is provided below:

² Auckland Council Future Development Strategy 2023-2053 (page 45)

³ Note, at time of preparing this s32 Assessment, Plan Change 80 is subject to appeal. While under appeal, Plan Change 80 is only a matter to have regard to (rather than give effect to).

Urban Growth and Form

B2.2.1 Objectives

(1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

(1) A well-functioning urban environment with a quality compact urban form that enables all of the following:

- (a) a higher-quality urban environment;*
- (b) greater productivity and economic growth;*
- (c) better use of existing infrastructure and efficient provision of new infrastructure;*
- (d) good accessibility for all people including by improved and more effective public or active transport;*
- (e) greater social and cultural vitality;*
- (f) better maintenance of rural character and rural productivity; and*
- (g) reduced adverse environmental effects; and*
- (h) improved resilience to the effects of climate change.*

(2) Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).

(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.

(4) Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.

(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages:

- (a) is integrated with the provision of appropriate infrastructure; and*
- (b) Improves resilience to the effects of climate change.*

B2.2.2 Policies

Development capacity and supply of land for urban development

(1) Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.

(2) Not applicable.

(3) Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 structure plan guidelines.

Quality compact urban form

(4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns and rural and coastal towns and villages in a way that contributes to a well-functioning urban environment, and avoid urbanisation outside these areas.

- (5) *Not applicable.*
- (6) *Not applicable.*
- (7) *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways contribute to a well- functioning urban environment and that do all of the following:*
 - (a) *support a quality compact urban form;*
 - (b) *provide for a range of housing types and employment choices for the area;*
 - (c) *integrate with the provision of infrastructure; and*
 - (caa) provide good accessibility, including by way of efficient and effective public or active transport.*
 - (ca) incorporate improved resilience to the effects of climate change;*
 - (d) *follow the structure plan guidelines as set out in Appendix 1.*
- (8) *Not applicable.*
- (9) *Not applicable.*

The Plan Change is considered to give effect to the above relevant Urban Growth and Form objectives and policies for the following reasons:

- The Plan Change will support a quality compact urban form, by enabling the urbanisation of land within the RUB and adjacent to greenfield areas that are in the process of being urbanised to accommodate residential and commercial activities.
- That Plan Change will accommodate urban growth which:
 - Enables increased productivity and economic growth;
 - Provides for increased employment choice for Drury and South Auckland; and
 - Provides for the efficient use and integrated development of planned infrastructure within Drury.
- The Plan Change will enable increased productivity and economic growth, ultimately enabling up to approximately 16,000 people to work in the Structure Plan area over the long term. This will enable the efficient use of planned infrastructure within Drury, including the Ngākōroa Railway Station and rail network;
- The Plan Change will provide for sufficient development capacity and land supply to accommodate industrial growth in the Auckland region, and in particular land intensive industrial activities; and
- The Plan Change has been informed by the Karaka Road Structure Plan which has been developed in accordance with the structure plan guidelines set out in Appendix 1 of the AUP.

Commercial and Industrial Growth

B2.5.1 Objectives

- (1) *Employment and commercial and industrial opportunities meet current and future demands.*
- (2) *Not applicable.*

(2A) Commercial and industrial activities are resilient to the effects of climate change.

- (3) *Industrial growth and activities are enabled in a manner that does all of the following:*
- (a) *promotes economic development;*
 - (b) *promotes the efficient use of buildings, land and infrastructure in industrial zones;*
 - (c) *manages conflicts between incompatible activities;*
 - (d) *recognises the particular locational requirements of some industries; and*
 - (e) *enables the development and use of Mana Whenua's resources for their economic well-being.*

B2.5.2 Policies

- (1) *Not applicable.*
- (2) *Not applicable.*
- (3) *Not applicable.*
- (4) *Not applicable.*
- (5) *Not applicable.*
- (6) *Not applicable.*
- (7) *Enable the supply of land for industrial activities, in particular for land-extensive industrial activities and for heavy industry in areas where the character, scale and intensity of the effects from those activities can be appropriately managed.*
- (8) *Enable the supply of industrial land which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports and airports, and can be efficiently served by infrastructure.*
- (9) *Enable the efficient use of industrial land for industrial activities and avoid incompatible activities by all of the following:*
 - (a) *limiting the scale and type of non-industrial activities on land zoned for light industry;*
 - (b) *preventing non-industrial activities (other than accessory activities) from establishing on land zoned for heavy industry;*
 - (c) *promoting co-location of industrial activities to manage adverse effects and to benefit from agglomeration.*
- (10) *Manage reverse sensitivity effects on the efficient operation, use and development of existing industrial activities, including by preventing inappropriate sensitive activities locating or intensifying in or adjacent to heavy industrial zones.*

(10A) Require commercial, retail and industrial activities to be located, designed and developed to improve their resilience to the effects of climate change.

The Plan Change is considered to give effect to the Commercial and Industrial Growth objectives and policies above for the following reasons:

- The provision of B-LIZ land will ensure that there is sufficient land capacity to accommodate the projected growth within this light industry business sector to meet current and future demands;
- The Plan Change will enable industrial growth, specifically a research, development and manufacturing campus which will:

- Promote economic development and employment opportunities; and
- Manage potential conflicts and reverse sensitivity between the adjacent existing and planned residential activities through the precinct provisions which will provide a buffer and visual screening between industrial activities and adjacent land uses, to mitigate adverse visual effects.
- Facilitate the supply of industrial land that is relatively flat, has efficient access to the transport network, and can be efficiently served by planned infrastructure within Drury.

6.4 Other Plans

Section 74(2A) of the RMA requires a council when considering a Plan Change request, to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

6.4.1 Iwi Planning documents

As described in section 5.2 above, engagement correspondence was sent to 18 Mana Whenua groups that were contacted in March 2023. Three iwi groups responded confirming their interest in being involved: Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua. A number of hui and site visits have been held with Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua and all Mana Whenua have prepared Cultural Values Assessments (**Appendices 19-21**) for the Plan Change area. Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua have all confirmed that they will remain engaged and involved in all stages of the Plan Change and the future development of the Plan Change area, on an ongoing basis.

Of the three involved iwi groups, the following iwi management plan has been identified following enquiry to the relevant iwi authorities:

- Ngāti Te Ata Waiohua Tribal Policy Statement 1991

The planning document is assessed below.

6.4.1.2 Ngāti Te Ata Waiohua Tribal Policy Statement 1991

The purpose of this Policy Statement is to lay down the Kaupapa of Ngāti Te Ata, to define procedures for negotiation between Ngāti Te Ata and external agencies, to articulate Ngāti Te Ata tribal policy for external agencies and to identify obligations of external agencies to Ngāti Te Ata.

The 1991 document covers a ten-year planning period which has since passed. However, the key principles and issues that are of importance to Ngāti Te Ata remain relevant.

Section 2 identifies the following kaitiaki objectives:

- (1) Restore the mana of the iwi
- (2) Plan long term usage of taonga
- (3) Protect sensitive features of the environment
- (4) Plan for the provision of kai (including kaimoana) for future generations.

Other key policies of relevance from this document includes that all resource management agencies, shall recognise and provide for the fact that only Ngāti Te Ata Waiohua has the right to

determine what is significant in terms of the Treaty of Waitangi in respect of natural and physical resources and other taonga within its tribal territories.

FPH has held regular hui and invited representatives from Ngāti Te Ata Waiohū to attend regarding the Plan Change, including with technical specialists as requested. Ngāti Te Ata Waiohū have prepared a Cultural Values Assessment (CVA) for the Plan Change and it is included at **Appendix 19**.

Consultation with Mana Whenua is ongoing and will continue throughout the Plan Change process.

7.0 Assessment of Effects

Schedule 1, cl 22 of the RMA requires an application for a Plan Change to describe the effects of the proposal, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the plan change.

7.1 Urban Form

An Urban Design Statement has been prepared by Barker & Associates (refer **Appendix 6**). The built form of the Plan Change 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 Plan Change:

- A built character that enables the establishment of large, low height building footprints to accommodate manufacturing, research and development, offices 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 access points to the Plan Change area on SH22; and
- A built form that is balanced with natural open spaces, including a landscaped area along Oiroa Creek which runs along part of the western boundary of the Plan Change area.

The scale of the Plan Change 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, and access and connectivity between the Ngākōroa Railway Station and the wider existing and future residential developments. Overall, it is considered that the Plan Change 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.

The proposed precinct provisions seek to ensure that the above key features and elements are protected and enhanced during development of the Plan Change area. Overall, it is considered that the Plan Change will enable the development of positive urban form outcomes that contribute to a quality compact urban form and well-functioning urban environment.

7.2 Residential Capacity

The Plan Change seeks to apply the B-LIZ over land that is identified for Residential - MHS and MHU in the Auckland Council Drury-Opāheke Structure Plan. The potential effects associated with the loss of residential land capacity within the Franklin and Papakura local board areas have been considered in the Economic Assessment prepared by Property Economics, included at **Appendix 12**. The key conclusions of their assessment are summarised below:

- Based on demand for anticipated dwellings under a medium and high growth scenario for Franklin and Papakura (refer **Figure 12** below), the zoning of the Plan Change area to B-LIZ is not expected to generate long-term residential capacity shortfalls for the localised area;

Medium Growth Scenario	2023	2028	2033	2038	2043	2048	2053
Population	140,230	157,150	173,260	189,220	205,090	220,960	236,830
Households	47,770	53,690	59,460	65,070	70,500	76,040	81,510
Households Growth		5,920	11,690	17,300	22,730	28,270	33,740
Total Dwellings Required (incl. Unoccupied)		6,440	12,710	18,800	24,710	30,730	36,670
Net Dwellings Required + NPS Buffer		7,730	15,250	21,620	28,420	35,340	42,170
2023 Estimated Urban & Greenfield Capacity	82,500						
Sufficiency of Residential Capacity		74,770	67,250	60,880	54,080	47,160	40,330

High Growth Scenario	2023	2028	2033	2038	2043	2048	2053
Population	145,060	167,580	189,750	212,030	234,700	257,750	280,550
Households	48,910	56,200	63,360	70,440	77,440	84,560	91,500
Households Growth		7,290	14,450	21,530	28,530	35,650	42,590
Total Dwellings Required (incl. Unoccupied)		7,920	15,710	23,400	31,010	38,750	46,290
Net Dwellings Required + NPS Buffer		9,500	18,850	26,910	35,660	44,560	53,230
2023 Estimated Urban & Greenfield Capacity	82,500						
Sufficiency of Residential Capacity		73,000	63,650	55,590	46,840	37,940	29,270

Figure 12: Franklin and Papakura cumulative dwelling capacity sufficiency forecast (source: Auckland Council, Stats NZ, Property Economics).

- There is a high proportion of feasible greenfield development opportunities available within the localised areas relative to other areas in Auckland; and
- The adoption of the Medium Density Residential Standards under PC78 would also further increase residential capacity throughout Auckland.

Having regard to the assessment and findings contained in the Economic Assessment, it is considered that the potential effects of the Plan Change on residential land supply within the Drury-Opāheke Structure Plan area and the Auckland region will be acceptable.

7.3 Landscape and Visual Amenities

A Landscape and Visual Effects Assessment has been undertaken by Barker & Associates to support the Plan Change application and is included as **Appendix 7**.

In the context of the existing rural environment, it is important to note that any urban development will alter the existing landscape. However, this is generally anticipated given that the area has been zoned FUZ, has been identified for an urban land use (albeit residential) through the

Auckland Council Drury-Opāheke Structure Plan (2019), and change has been signalled and foreshadowed for Drury West through the FDS.

The Landscape Assessment identifies a series of principles to underpin land use development within the Plan Change area which have informed the development of the Plan Change provisions and the Riparian Margins and Special Landscape Area Precinct Plan (refer to **Appendix 1**):

- Establish a planted riparian margin to the Oiroa awa (Creek), which provides for stormwater management, ecological networks, cultural values, open space and landscape amenity and serves as a defensible urban boundary;
- Incorporate boundary landscape buffers to provide a visual buffer between buildings within the Plan Change area and adjacent land uses and to ensure that buildings are adequately set back from streams; and
- A Gateway treatment in the northwestern corner of the Plan Change area, requiring a planted Special Landscape area as a transition between the industrial activities within the Plan Change area and adjacent rural land uses, in the Rural – Mixed Rural zone.

The Landscape Assessment concludes that the Plan Change area is well positioned to accommodate the proposed built form enabled by this Plan Change, with the bespoke provisions set out in **Appendix 1**. The proposed provisions will ensure that development consistent with B-LIZ is enabled, while responding to adjacent land users and the natural environment. This sensitive response to the receiving environment will lead to a high-quality urban environment.

7.4 Ecology

An Ecological Assessment prepared by Bioresearches has been undertaken to support the Plan Change and is included at **Appendix 10** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems. A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site.

7.4.1 Terrestrial Ecology

Vegetation within the Plan Change area (as identified in **Figure 13** below) is highly modified and largely grazed pasture, and can be divided into the following categories:

- Exotic vegetation, including two small areas of pine trees;
- Exotic riparian vegetation;
- Mixed native riparian vegetation; and
- Exotic, managed pasture, covering the majority of the Plan Change area.

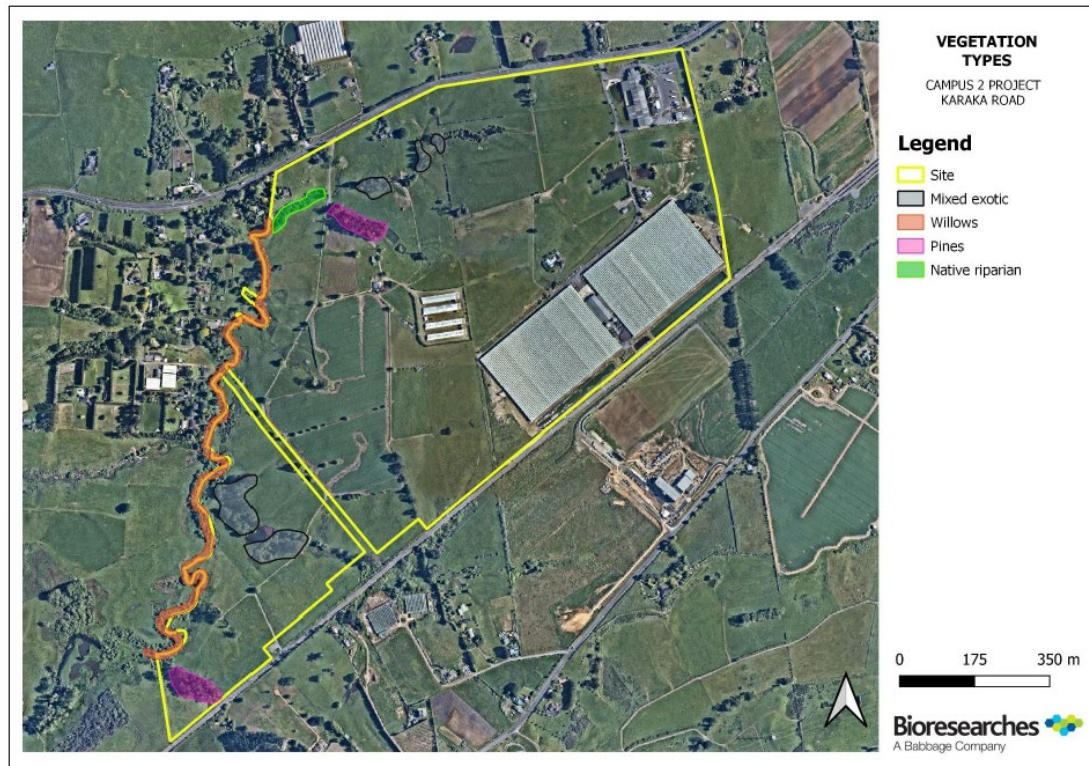


Figure 13 Vegetation map showing composition of larger vegetation stands on the Plan Change area (and the wider Karaka Road Structure Plan area) (source: Bioresearches)

The key terrestrial ecology values within the Plan Change area are associated with potential fauna habitats within or connected with the Oiroa awa (Creek) 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 Plan Change area.

Due to the significantly modified nature of the land form, it is considered that the effects of future development on terrestrial ecology and biodiversity values can be appropriately managed under the existing Auckland wide provisions of the AUP for land disturbance and any modification to or removal of vegetation.

Acoustic bat (pekapeka) monitors surveyed bat movement across the Plan Change area between March-April 2024, and a total of 11 bat passes were recorded, with the majority (six passes) detected at bat recorder 9 in **Figure 14** below. Further bat surveys are anticipated (October to December) to provide a further understanding of bat activity at the site. However, the majority of bat passes recorded are within the part of FPH's landholdings that are not subject to this Plan Change request, or are located within the riparian margin corridor that will be subject to the riparian planting rule in the Precinct.

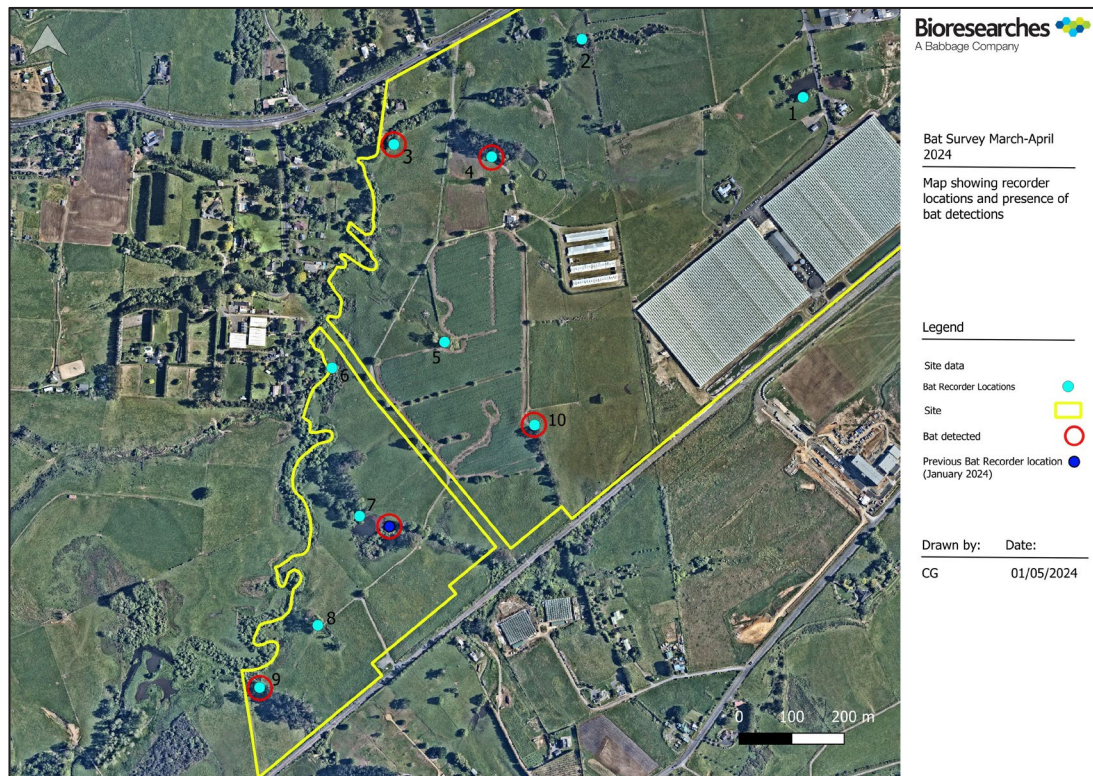


Figure 14 Bats detected (and location of bat detectors) (source: Bioresearches)

The Precinct provisions provide considerable potential to restore habitats within the Plan Change area via the proposed riparian planting standard.

7.4.2 Freshwater Ecology

Bioresearches has undertaken an assessment of potential freshwater ecology effects that may result from future development. The Plan Change area includes a network of streams and wetlands (as shown in **Figure 15** below), including:

- The Oiroa awa (Creek), 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 awa; and
- Other natural inland wetlands, primarily located within the northern and western portion of the Plan Change area.

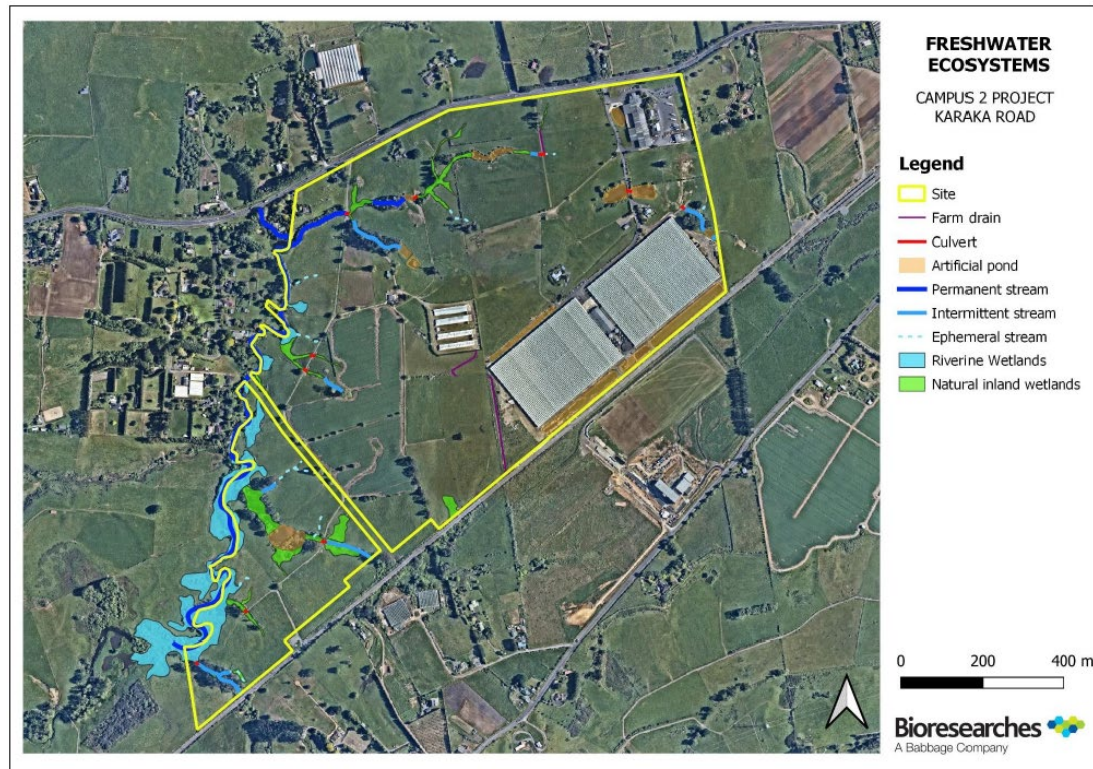


Figure 15 Freshwater habitats identified within the Plan Change area (and the wider Karaka Road Structure Plan area) (source: Bioresearches)

The Plan Change will enhance the existing streams and the habitat that they provide. In particular the proposed riparian planting rule will require 20m of planting adjacent to the Orioa awa (Creek) and 10m of planting either side of other permanent and intermittent streams within the Plan Change area (as shown in Precinct Plan 2 at **Figure 7** above).

Activities in relation to development near intermittent and permanent streams (e.g., riparian yard infringements and riparian vegetations clearance) will require assessment at the resource consent stage. It is considered that the effects management hierarchy will be appropriate for managing adverse effects and mitigating / offsetting where required.

Earthworks within the Plan Change area have the potential to create discharge of sediment laden water which can impact water quality on receiving watercourses. In this case, implementation of an erosion and sediment control plan that is designed and maintained in accordance with Auckland Council GD05 – Guidance for Erosion and Sediment Control will be appropriate to deal with effects of sedimentation from earthworks. This can be dealt with through the resource consent process via the rules in Chapter E11 Land Disturbance – Regional and Chapter E12 Land disturbance – District within the AUP.

The proposed stormwater management approach has been assessed by Bioresearches to be appropriate in terms of maintaining stream and wetland values, improving water quality and managing the quantity and quality of stormwater discharge.

Overall, it is considered that the effects of the urbanisation of land within the Plan Change area can be appropriately managed with regard to the ecological values of freshwater bodies.

7.5 Sustainability

The Plan Change 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 planned reliable and frequent transport network. By locating jobs and homes in close proximity to each other, communities become more resilient and greenhouse gas emissions and Vehicles Kilometres Travelled (**VKTs**) are reduced. Bringing people closer to jobs will also 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 (**Appendix 13**), 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 Plan Change area in line with B-LIZ and with the proposed precinct (**Drury West Zone with Dev.**), compared to both:

- a no development scenario (**Drury West Zone, No Dev.**); and
- developing the site in line with the Auckland Council Drury-Opāheke Structure Plan for medium density residential use (**Drury West Zone, RCSP**).

The carbon emissions assessment concludes that there will be an overall reduction of CO₂ rates in the morning peak, interpeak and evening peak periods (refer to comparison graph at **Figure 16** below), and the VKT assessment concludes that the development enabled by the Plan Change will reduce VKTs per unit in the morning peak, interpeak and evening peak periods (refer to comparison graph at **Figure 17** below), by providing more jobs in Drury West close to homes.

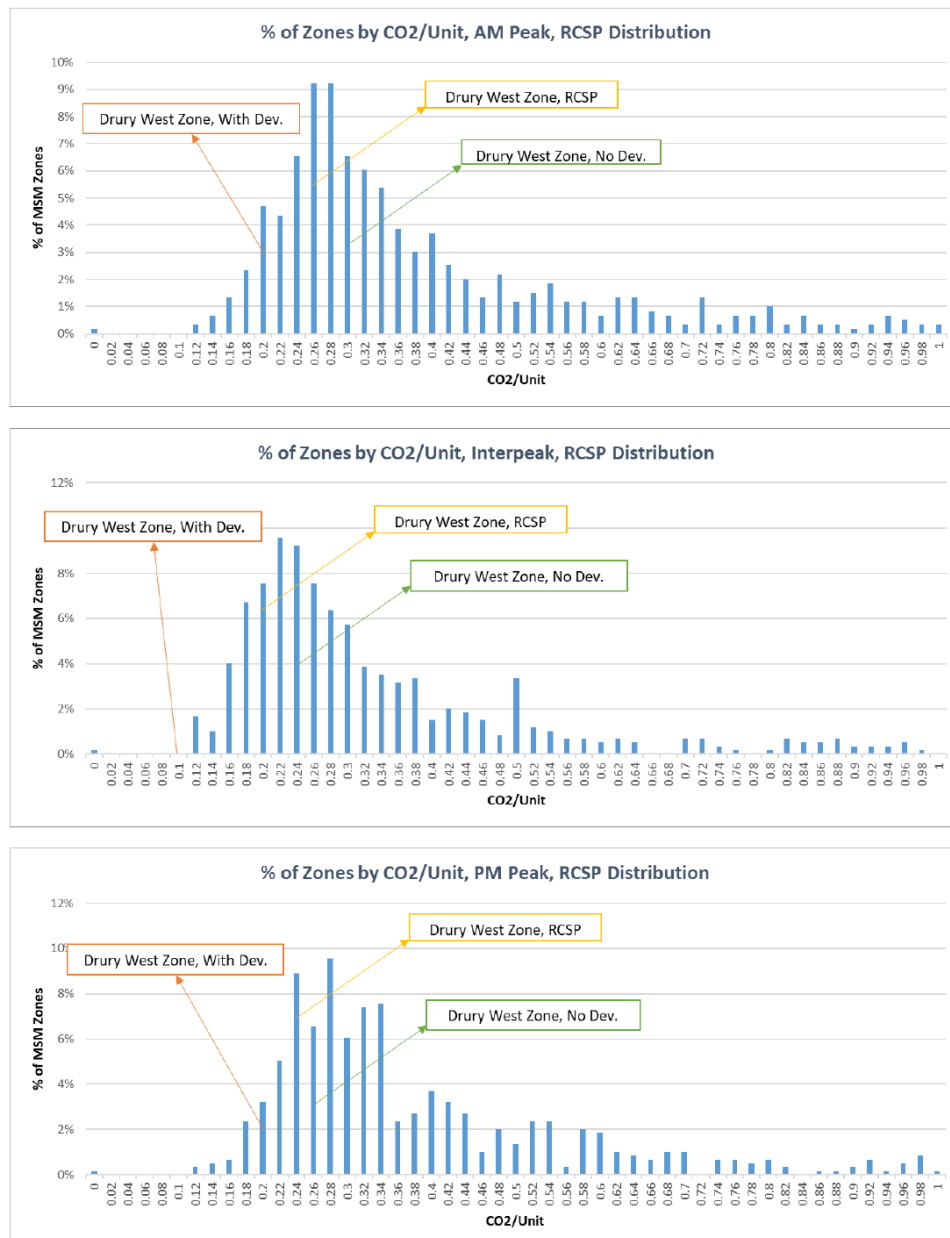


Figure 16 Percentage of MSM Zones by CO2/Unit - AM-, Inter- and PM-peak, comparing the with development, no development and Council Structure Plan Scenarios (source: Stantec)



Figure 17 Percentage of MSM Zones by VKT/Unit - AM-, Inter- and PM-peak, comparing the with development, no development and Council Structure Plan Scenarios (source: Stantec)

In addition to locating more jobs close by to where people live, other sustainable development features of the Plan Change include:

- Restoration, replanting and enhancement of the existing ecological systems, this includes significant regenerative planting around the Oiroa awa, extending habitat for fauna and flora;
- Establishing protective riparian planting buffers along waterbodies;
- Promoting increased levels of walking, cycling and public transport use, by encouraging access to the Ngākōroa Railway Station; and
- A balance of nature and development of the Plan Change area while respecting key landscape features, which is provided for through the planting and landscaping, yard, and impervious area standards.

Having regard to these key areas, the Plan Change will contribute to a highly sustainable urban environment.

7.6 Cultural Values

Engagement has been undertaken with all Mana Whenua groups with known customary interests in the Plan Change area. The consultation report (**Appendix 22**) includes details on the results of this engagement to date.

It is noted that there are no known identified Sites of Significance or Value to Mana Whenua within the Plan Change area, as recorded under the AUP(OP).

As identified above, three iwi groups have confirmed their interest in being involved: Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua, and all three iwi have prepared a Cultural Values Assessment. Discussions between FPH and Ngaati Te Ata Waiohua, Ngāti Tamaoho and Te Ākitai o Waiohua, will be ongoing in particular as FPH commence the master planning of the Plan Change area. Discussions regarding the most appropriate stormwater management approach for the site will also be ongoing and collaborative with mana whenua. FPH seeks the most appropriate stormwater and flooding strategy for the site, which will ensure that flooding hazards during extreme storm events, and water quality are appropriately managed, both for the site and areas downstream of the site.

Ngaati Te Ata Waiohua

Ngaati Te Ata Waiohua have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Plan Change (refer **Appendix 19**):

- 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 Plan Change area, to determine their structural integrity and potential contamination;
- Consider the FPH landholding that is located outside the Plan Change area, 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

Ngāti Tamaoho note in their Cultural Values Assessment that the Plan Change area includes sites of significance, cultural landscapes and traditional lands of Ngāti Tamaoho. These include the

Manukau Harbour via the Hingaia Stream to the north the Oiroa Stream immediately to its west, the Ngakaroa Stream to the east and the Tuhimata blocks to the south. Ngāti Tamaoho express that any effects and impacts of the development enabled by the Plan Change can be managed and mitigated with proper consultation and engagement with the iwi.

Ngāti Tamaoho have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Plan Change (refer **Appendix 20**):

- FPH to 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 significant area within the Plan Changes 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 Plan Change 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 Waiohua

Te Ākitai Waiohua have identified the following key recommendations through their Cultural Values Assessment, that are particularly relevant to the Plan Change (refer **Appendix 21**):

- Respect the holistic nature of Te Ākitai Waiohua cultural values across the precinct and the importance of sustainable and innovative design;
- Protect waterways and their margins, including wetlands, with strengthened blue-green corridors throughout the precinct;
- Consider stormwater management that resembles the natural water system;
- Utilise plant species that reflect the local indigenous vegetation and complement the natural features and landscape of the ecological area; and
- Protect existing archaeology by avoiding development on recorded sites.

FPH confirm that meaningful engagement will be ongoing with Mana Whenua throughout the duration of development within the Plan Change area to address the recommendations identified in the Cultural Values Assessments. Input will be sought from mana whenua at all stages of future

development to manage potential effects on cultural values and heritage sites, and to enhance the natural environment.

These recommendations have been considered and adopted in developing the Plan Change where possible, particularly via the commitment to native planting of the riparian margin, landscaping requirements, the inclusion of an archaeological features alert layer and the standard requiring Te Waiohūa to be informed of all development requiring resource consent within the Precinct. An archaeological and Cultural assessment, developed in partnership with iwi, is required to accompany all applications for land modification, with the goal to protect any identified features, where practicable. The AUP Auckland-wide provisions along with the proposed riparian planting, maximum impervious area and stormwater quality rules will manage freshwater quality. Further, the Plan Change presents an opportunity to restore and enhance the terrestrial, aquatic and freshwater quality values in the Plan Change area.

7.7 Transport

An Integrated Transport Assessment (ITA) has been prepared by Stantec for the Plan Change and is included as **Appendix 9** to this report.

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

- Karaka Road (SH22) is a two-way, two-lane arterial road, which runs along the northern boundary of the Plan Change area. SH22 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 Plan Change area, and is designated under the AUP as an arterial road, with Waka Kotahi as the Road Controlling Authority;
- Oira Road is aligned in a north-south direction, intersecting with Karaka Road (SH22) along the northern boundary of the Plan Change area, 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 Plan Change area (refer to column (a) in the proposed transport upgrade standard below), and is required to be upgraded to a roundabout prior to any development in the Waipupuke Precinct immediately north of the Plan Change area; and
- The NIMT line runs along the southeastern boundary of the Plan Change area.

7.7.1 Access to the Plan Change Area

It is proposed to provide staged accesses to the Plan Change area in response to the rate of development within the Plan Change area.

The ITA indicates that all vehicle accesses to the Plan Change area will be provided off SH22 in the general locations identified in **Figure 8** above.

The ITA recommends that the total GFA of industrial and commercial development should not exceed the thresholds outlined in **Table 1** below, until such time that the identified infrastructure upgrades (site accesses) are constructed.

Table 1 Threshold for Development in the Plan Change area

Column 1 Activities or development enabled by Transport infrastructure in column 2		Column 2 Transport infrastructure required to enable activities or development in column 1
(a)	Prior to the occupation of any building and up to a maximum of 79,750m ² commercial and industrial gross floor area	Provision of an interim upgraded intersection (roundabout with two approach lanes in each direction or equivalent interim traffic signals), including active mode facilities, located generally at the intersection of Karaka Road and Oira Road, as shown on Precinct Plan 1.
(b)	Occupied development greater than 79,750m ² and up to a maximum of 88,000m ² commercial and industrial gross floor area	Provision of an ultimate upgraded intersection (roundabout with three approach lanes from the Precinct or equivalent traffic signals), including active mode facilities, located generally at the intersection of Karaka Road and Oira Road, as shown on Precinct Plan 1.
(c)	Occupied development greater than 88,000m ² and up to a maximum of 128,900m ² commercial and industrial gross floor area	Upgrades in (b) above; and Provision of a second site access, including active mode facilities, located generally at the locations shown on Precinct Plan 1.

Transport Summary

The ITA has demonstrated that the extent of development enabled by the proposed Plan Change can be accommodated within the surrounding road network, subject to the proposed transportation upgrades and vehicle access requirements.

The proposed precinct provisions include specific standards, matters of control and assessment criteria and special information requirements to ensure that the required transportation upgrades and vehicle accesses are provided in an integrated manner at the time of future development of the Plan Change area.

Overall, it is considered that the effects of the proposed Plan Change on the existing and future transportation network will be acceptable.

7.8 Infrastructure and Servicing

The proposed stormwater management strategy and Stormwater Management Plan (**SMP**) is set out in the stormwater management assessment prepared by Woods, included as **Appendix 8** of this report.

The wastewater and water supply servicing strategy within the Plan Change area is set out in the Water Servicing Strategy and Wastewater Servicing Strategy prepared by Crang Civil, included as **Appendix 11** of this report.

7.8.1 Stormwater Management

The SMP has been developed in accordance with the AUP and the requirements in the Network Discharge Consent (**NDC**), and in consultation with Healthy Waters. It is proposed that the SMP will be adopted into the region-wide stormwater Network Discharge Consent and provisional approval for the SMP will be sought during the plan change process.

Stormwater Management - Quality

The findings of the SMP are that the impacts on stormwater management – quality, from the land use change from rural to urban (B-LIZ) (modelling 80% impervious surface as a conservative amount) can be managed through the incorporation of a water sensitive design approach.

The SMP identifies the best practicable options for managing the quality of stormwater runoff as:

- A requirement to avoid high contaminant generating roof and cladding materials for all new buildings; and
- Treatment to be provided for all impervious areas to be provided to GD01/ TP10 treatment levels, consistent with the requirements of the NDC.

The SMP also identifies large wetland devices as the most appropriate means of achieving water quality requirements for the development for the following reasons:

- The Plan Change area has an existing system of natural wetlands and streams. Providing wetlands on-site will allow for better integration with the overall existing freshwater systems. This also aligns with water sensitive design (and with the recommendations of Te Ākitai Waiohū) as it mimics natural systems. Indicative sizing of potential wetland devices have been identified in **Figure 18** below, and the locations of these wetlands are subject to detailed masterplanning;
- All the proposed constructed wetlands will receive pre-treated runoff from either a forebay or a proprietary device for pre-treatment; and
- As mentioned above, treatment will be provided to all the impervious areas, but additionally inert roofing material is also proposed for all the new roof areas which will provide even greater overall water quality benefit to the receiving environment.

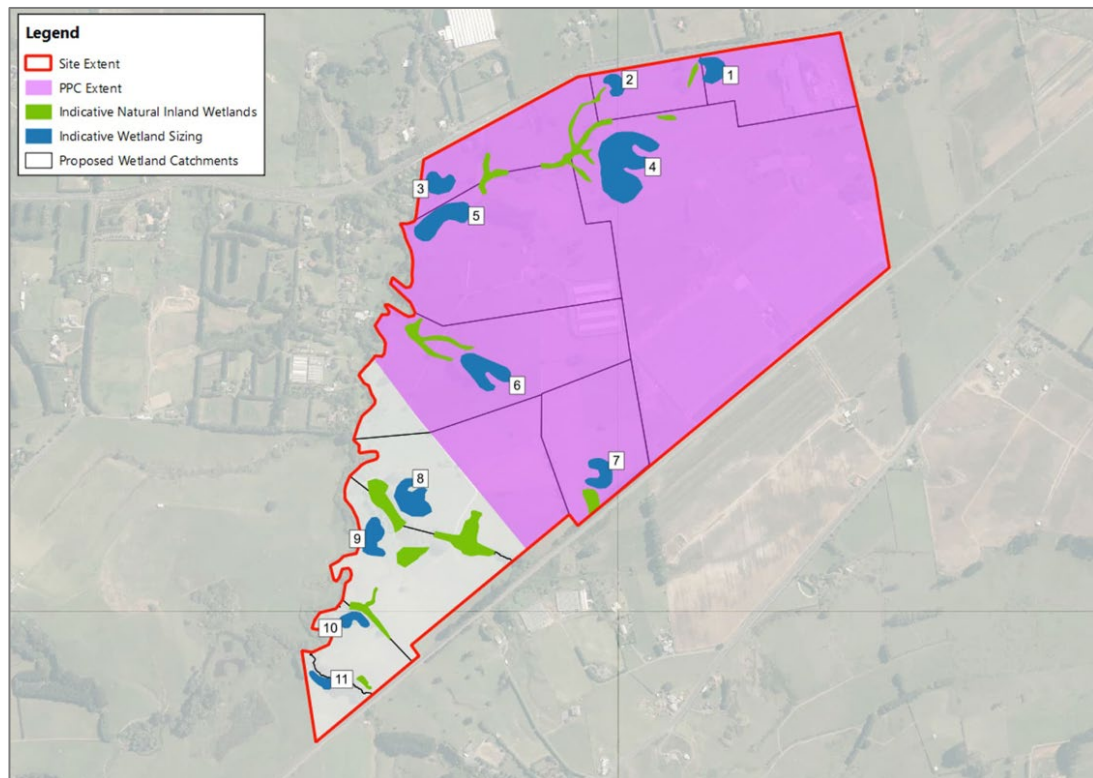


Figure 18 Indicative locations of wetlands within the Plan Change area

The proposed approach to managing stormwater quality will ensure that stormwater runoff from new impervious areas that has the potential to adversely affect waterways will be appropriately managed.

Stormwater Management – Flow

Hydrology mitigation is proposed to be implemented for all impervious areas to mitigate any increased stormwater runoff associated with the proposed development. The development discharges to a stream environment (the Plan Change area is split between the Oiroa Catchment and the Ngākōroa Catchment, as shown in **Figure 19** below), and it is proposed that the development will provide for the 95th percentile rainfall event. It is noted that this is best practice to achieve hydrology mitigation in accordance with the NDC for a ‘Greenfields’ site.

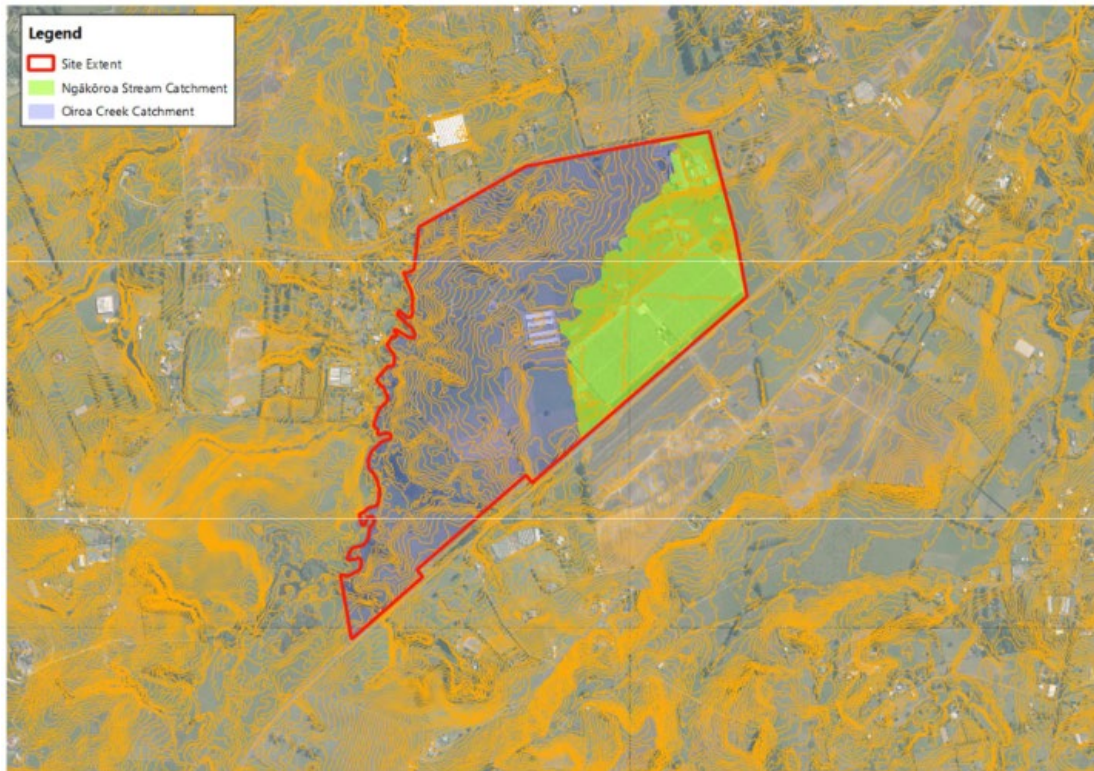


Figure 19 Existing Catchments

The SMP identifies the following devices as the best practicable options for meeting retention and detention requirements:

Retention:

- Retention or re-use will be proposed for roofs via underground or above ground tanks. This volume of water will be used for all non-potable uses
 - If reuse demands are not met, it is noted the roofed areas also discharge to the communal wetlands which provides hydrology mitigation; and
- Retention for roads and other paved areas is proposed to be provided within the detention volume via wetlands.

Detention:

- Detention will be provided by large communal wetlands for all impervious areas. It is noted that the same devices will be used to provide water quality treatment.
- Wetlands are sized for providing hydrology mitigation and water quality treatment.

SMAF-1 hydrology mitigation will be applied across the entire Plan Change area, and the SMAF-1 overlay is proposed through this Plan Change.

The findings of the SMP are that the stormwater management approach outlined above will result in hydrological mitigation that is consistent with Policy E1.3.10. The application of the SMAF-1 Overlay will ensure that specific mitigation measures as set out within the SMP will be considered as part of a future resource consent process. This will enable an assessment of proposed options for managing the quality of stormwater runoff in the context of a particular development proposal.

Overall, it is considered that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas, to ensure aquatic ecosystems remain healthy and are enhanced where possible.

7.8.2 Water Supply

Crang Civil's assessment identifies that a new water supply main is required along SH22, extending from the Bulk Supply Point (**BSP**) on Flanagan Road. 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 Plan Change can be serviced via this new public watermain.

Alternatively, the Plan Change area may be serviced by an on-site bore and water treatment plant.

7.8.3 Wastewater Servicing

Crang Civil's assessment identifies that wastewater will be serviced via a permanent public pumpstation located on the western portion of the Plan Change area which pumps flows via a public rising main along SH22 and Jesmond Road where it connects with the Watercare Services Limited (WSL) transmission network (refer **Figure 20** below).

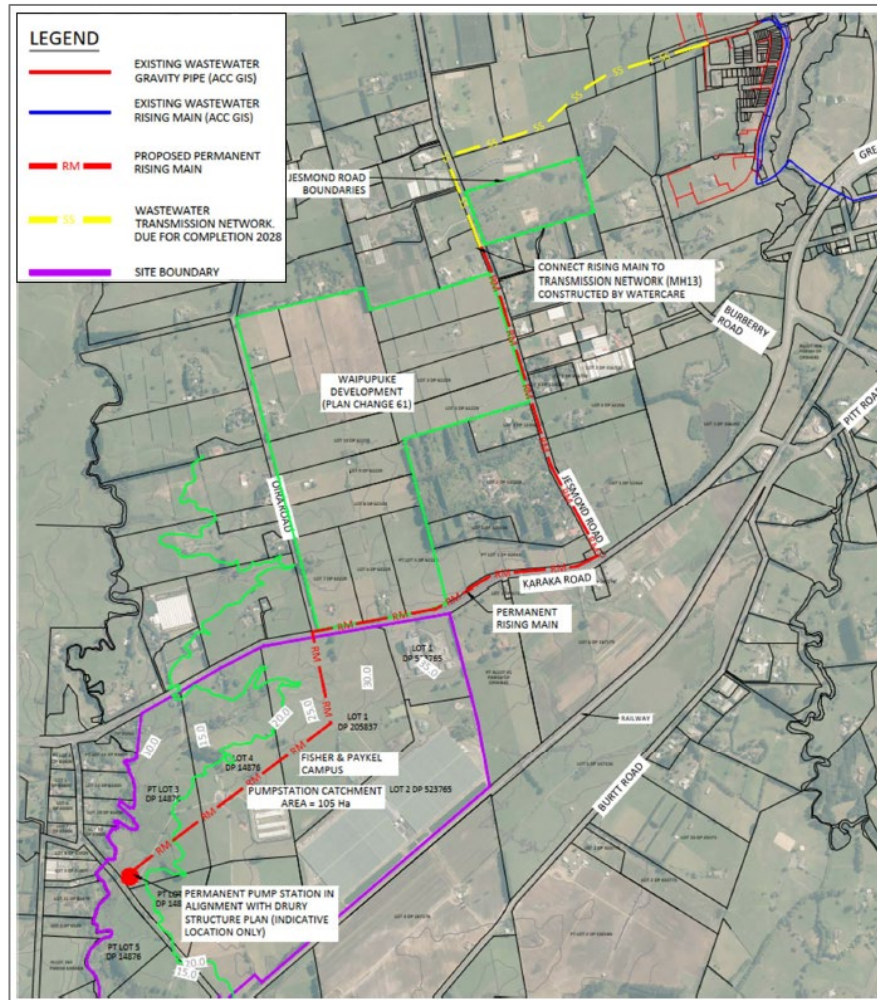


Figure 20 Wastewater Servicing Strategy proposed (Crang Civil, 2024)

Alternatively, the Plan Change area may be serviced by an on-site wastewater treatment plant.

7.8.4 Other Utilities

In terms of telecommunications, the Engineering Assessment prepared by Crang Civil at **Appendix 11** confirms that telecommunications infrastructure is present fronting the Plan Change area along SH22. It is anticipated that upgrades will be required to the network to support the development enabled by this Plan Change, and Chorus will be engaged to provide these designs to ensure adequate telecommunications infrastructure will be able for the Plan Change area.

The Engineering Assessment confirms that power supply is currently available for servicing the Plan Change area in the form of overhead lines along SH22. A letter of support has been received from Counties Energy (attached to the Engineering Assessment at **Appendix 11**) which confirms the power supply in the wider Drury-Opāheke area will meet the growth demand and development enabled by the Plan Change.

It also confirms that gas reticulation is available along SH22.

7.9 Natural Hazards – Flooding

The Plan Change area is identified on Auckland Council's GIS mapping system as being subject to overland flow paths and flood plains, and is within flood prone areas (refer **Figure 2** above). The SMP includes a flood risk assessment of the Plan Change area to identify any flooding effects associated with development of the Plan Change area and whether there is any need to provide flood mitigation measures.

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 post-development flooding of the Plan Change area in this conservative climate changes scenario, can still be contained within the stream network and would not pose a risk to either upstream or downstream development areas. The flood strategy set out in the SMP is for complete diversion of the Plan Change area which currently discharges to the Ngākōroa Stream (25.58ha), and a pass flows forward approach to the Oiroa Creek (as shown in **Figure 21** below).

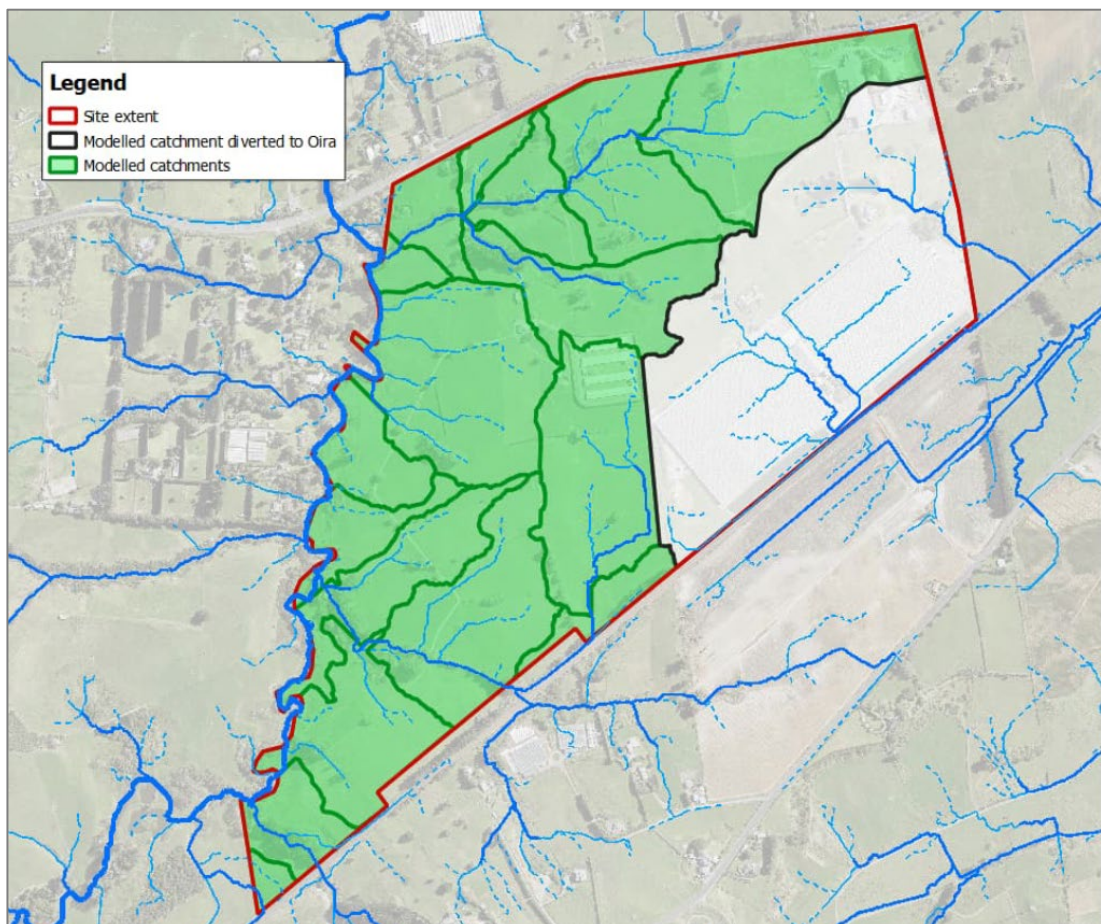


Figure 21 Flood Strategy across the Plan Change area

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 Plan Change area.

The flood assessment and modelling undertaken concludes that development within the Plan Change area will not result in any adverse flood effects upstream or downstream of the Plan Change area nor will it result in any increases or flood impacts as a result of the proposed development with the proposed pass flows forward flood strategy (as shown in the maximum flood depth plot at **Figure 22** below).

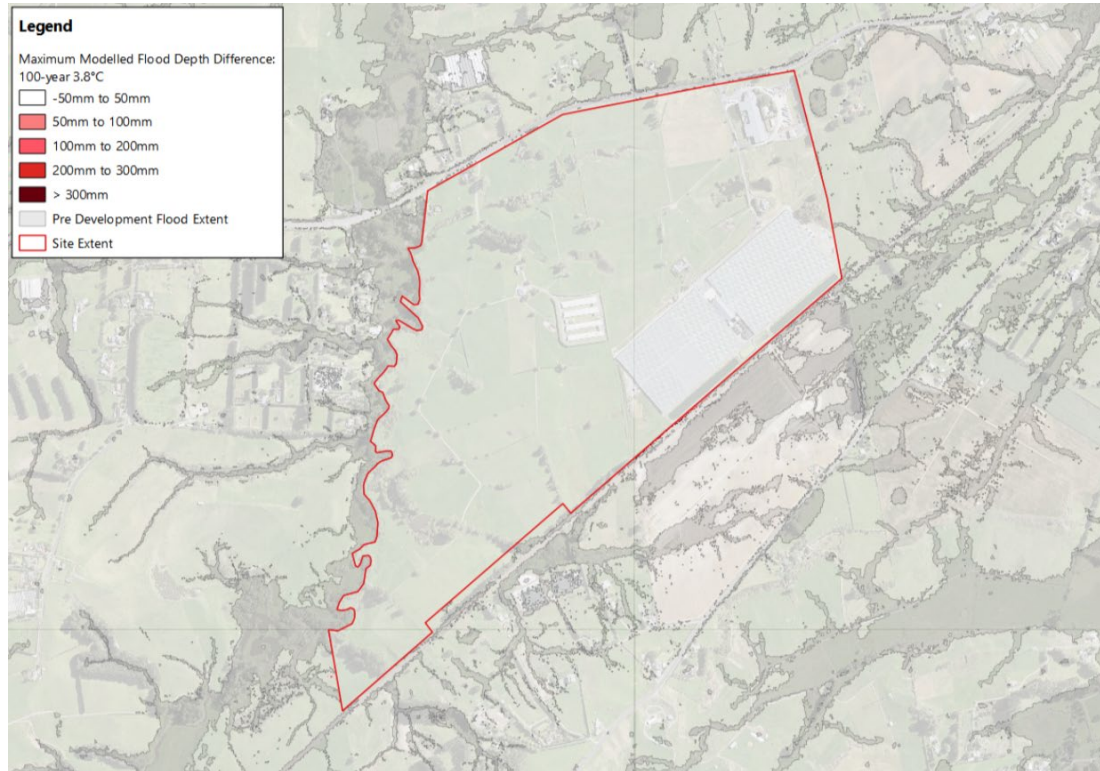


Figure 22 Water level difference plot

7.10 Natural Hazards – Geotechnical

The landform within the Plan Change 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 creek.

A preliminary geotechnical assessment, including field investigation, has been undertaken by CMW Geosciences and their report is included at **Appendix 18**. 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 Plan Change area have been assessed as being suitable for future urban development and stable building platforms, with no areas presenting significant risk. It is therefore considered that any geotechnical constraints can be addressed through future site-specific investigations to inform the detailed design and development of land.

Based on these findings, it is considered that the land conditions are generally suitable for urban development and can be appropriately managed through the resource consent process and the provisions of Chapter E36 Natural Hazards and Flooding of the AUP.

7.11 Land Contamination

A Preliminary Site Investigation (**PSI**) has been undertaken by Williamson Water & Land Advisory and is included at **Appendix 16**. 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.

This is common for rural sites of this nature, and overall, works and development within the Plan Change area can be managed to ensure site conditions are protective of human health and the environment.

Overall, it is considered that there is a high level of confidence that the Plan Change area can be remediated and that the potential adverse effects of land contamination associated with land disturbance and the change of use of the site can be appropriately managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.

7.12 Heritage and Archaeology

An archaeological assessment of the Plan Change area has been prepared by Archaeology Solutions and is included at **Appendix 15**. There are no existing records of archaeological or other historic heritage sites being recorded within the Plan Change area, with the two closest historic sites with archaeological value being located within the adjacent railway corridor (refer **Figure 23**).

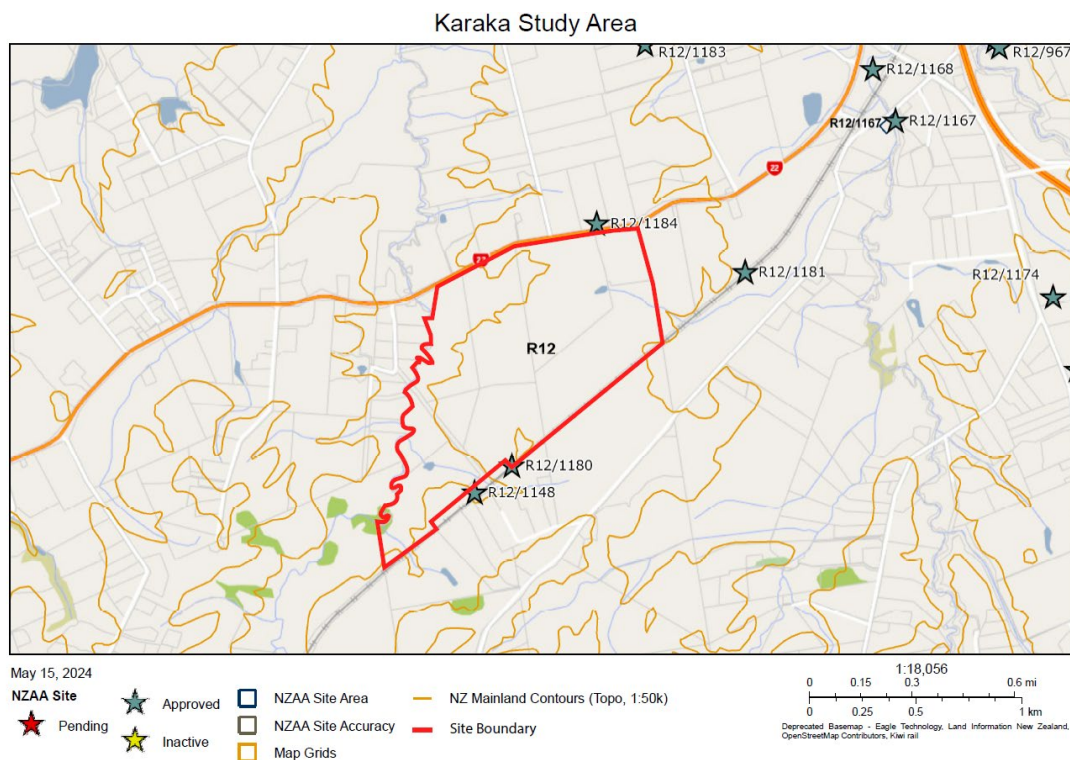
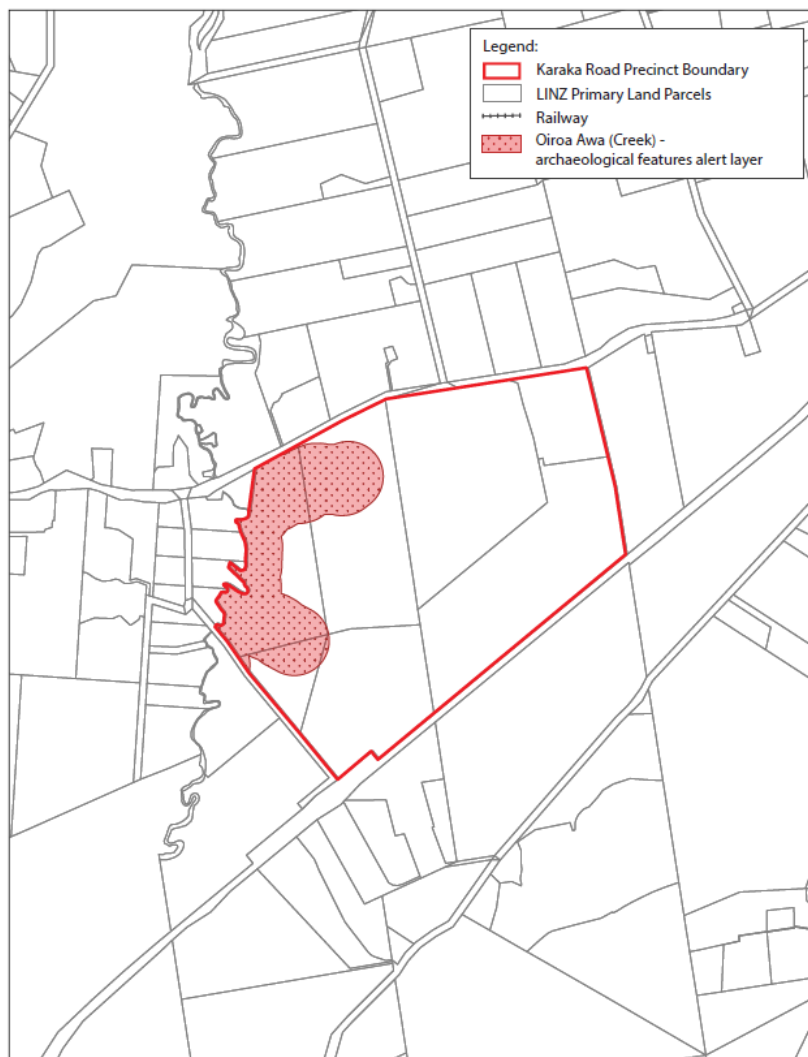


Figure 23: Recorded Archaeology sites within the vicinity of the Structure Plan area (source: ArchSite).

Archaeology Solutions has undertaken a site survey of the Structure Plan area, and no new archaeological sites were discovered. The assessment identifies that land within the Plan Change area within 100m of the Oiroa creek has the highest likelihood of encountering archaeological sites related to the development of Māori horticulture.

It is therefore considered that the potential for encountering archaeological sites and cultural features as part of future earthworks and land disturbance, and any associated adverse effects on archaeological and cultural values can be suitably managed by the accidental discovery protocols contained in the AUP, along with the inclusion of an alert layer as included at **Figure 24** below, identifying the area where there is a higher likelihood of encountering archaeological sites. These measures will ensure that archaeological values within the Plan Change Area are appropriately discovered, identified and acknowledged or recorded.



Karak Road - Archaeological Features Alert Layer

The "Archaeological features alert layer" notation along the Oiroa awa (creek) identifies areas that may encounter archaeological features, in particular relating to Māori horticulture.

0 50 100 200 Meters Scale @ A4 = 1:12,000

Figure 24 Precinct Plan 3 - Archaeological Sites

The assessment prepared by Archaeology Solutions confirms that the measures under the AUP, along with the proposed archaeological sites alert layer within the Precinct are appropriate to

manage and mitigate the potential adverse effects on archaeology and cultural values associated with future development within the Plan Change Area.

7.13 Versatile Soils

As the Plan Change area is zoned FUZ, it is excluded from the definition of Highly Productive Land under the NPS-HPL.

7.14 Acoustic – Noise and Vibration

An assessment of noise and vibration effects has been undertaken for the Plan Change area by Styles Group (**Appendix 14**). This confirms that the B-LIZ is not a noise sensitive land use, and therefore there are no specific rules required to manage potential effects of noise and vibration from the adjacent SH22 or NIMT railway. The assessment concludes that the Plan Change to rezone the Plan Change area for B-LIZ is appropriate from a noise and vibration effects perspective.

7.15 Summary of Effects

The actual and potential effects of the Plan Change have been considered above, based on extensive reporting and analysis undertaken by a wide range of technical experts. On the basis of this analysis, it is considered that the Plan Change area is suitable for light industry development, and that:

- The proposed zoning will result in positive effects on the environment in terms of the social and economic well-being of the community;
- The Plan Change area can be serviced by existing infrastructure together with infrastructure proposed by the Plan Change; and
- Where adverse effects are anticipated, the proposed policies and rules of the Plan Change, in addition to those in the Auckland-wide and zone provisions of the AUP will ensure that they are appropriately avoided, remedied or mitigated.

8.0 Section 32 Analysis

8.1 Appropriateness of the Proposal to Achieve the Purpose of the Act

Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives of the Plan Change are the most appropriate way to achieve the purpose of the RMA.

8.1.1 Objectives of the Plan Change

The purpose of the overarching objectives of the Plan Change is to enable a transition from rural and future urban land uses, and enable the development of light industrial activities, including an industrial campus, in a comprehensive and integrated manner. The proposed precinct provisions will enable primarily light industrial activities, including manufacturing, research and development, and accessory office use within the Plan Change area. Future development is envisaged to achieve a campus-like environment, which will also provide significant employment opportunities in the Auckland region.

The Plan Change area is also strategically located close to existing transport links and future residential and commercial growth within the surrounding FUZ and live zoned urban land. The location of the Plan Change area will ensure that employment opportunities provided by the Karaka Campus close to residential areas, commercial and social amenities, and transport infrastructure, including the Ngākōroa Railway Station. In this regard, the Plan Change will support a reduction in greenhouse gas emissions through promoting public and active modes of transport.

The proposed precinct incorporates objectives to guide development within the Plan Change area to achieve the following outcomes:

- The development of the Plan Change area for light industrial activities is enabled;
- Development of light industrial activities, including a campus environment, is integrated with the surrounding area and, the natural environment;
- Development is coordinated with the provision of infrastructure, including transport, three waters, and other utilities;
- Development contributes to achieving a sustainable, low carbon, urban environment;
- Adverse effects of stormwater runoff are minimised or mitigated; and
- The protection, restoration, enhancement and maintenance of ecological habitats within the Plan Change area including riparian margins is achieved.

8.1.2 Assessment of the Objectives

In accordance with section 32(1)(b), **Table 2** below provides an evaluation of the objectives of the Plan Change.

Table 2: Assessment of objectives against Part 2 of the RMA.

Objective	RMA section 5 Purpose	RMA section 6 Matters of National Importance	RMA section 7 Other Matters	RMA section 8 Treaty of Waitangi
Theme 1:				
(1) The Karaka Road Precinct enables the development of a significant employment node with a primarily light industrial land use.	Through providing for the development of land for light industrial activities, this objective enables people and communities, and future generations, to meet their social and economic well-being by providing significant opportunities for employment in close proximity to housing and public transport.	These objectives do not compromise the recognition of, or the provision of the relevant matters of national importance under section 6 of the RMA. The AUP contains a suite of objectives which will appropriately manage any relevant matters of national importance.	These objectives do not compromise the recognition of, or the provision of other matters under section 7 of the RMA.	These objectives will not be contrary to the principles of the Treaty of Waitangi.
(2) The Karaka Road Precinct contributes to a well-functioning urban environment, integrates with the natural environment and respects Mana Whenua values.	Through seeking high-quality development that contributes to a well-functioning urban environment, these objectives will ensure the quality of the built environment meets the reasonably foreseeable needs of the community and future generations.			
(3) Enable the development of a high-quality campus environment.			Through seeking high-quality development, this objective has regard to the maintenance and enhancement of amenity values in accordance with section 7(c).	
Theme 2: Coordinating development and infrastructure				
(4) Access to and from the precinct occurs in an efficient and safe manner that mitigates adverse effects of traffic generation on the surrounding road network.	Through seeking the provision of safe and efficient access, this objective will ensure that the quality of the built environment meets the reasonably foreseeable needs of the community and future generations	These objectives do not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives which manage any potential conflict between matters of national importance and infrastructure.	This objective does not compromise the recognition of, or the provision of other matters under section 7 of the MRA.	These objectives will not be contrary to the principles of the Treaty of Waitangi.
(6) Development is coordinated with the supply of sufficient three waters infrastructure to service the Precinct.	The coordination of development and infrastructure will ensure that development occurs in a sustainable manner through ensuring that there is adequate infrastructure to service urban development and avoid or mitigate potential adverse effects on the receiving environment.		This objective does not compromise the recognition of, or the provision of other matters under section 7 of the RMA. In particular the alignment of infrastructure and land use planning will ensure development makes efficient use of land as a physical resource in accordance with section 7(b).	
Theme 3: Promoting sustainability and a reduction in greenhouse gas emissions				
(5) The Karaka Road Precinct develops and functions in a way that: (a) Promotes public transport use and active modes of transport including walking and cycling; (b) Encourages the safe and effective active mode movement between the Ngākōroa train station and the Precinct.	The emphasis of the proposed objectives on achieving sustainable, low carbon development and facilitating public and active modes of transport will contribute to the built environment meeting the social well-being requirements of future communities.	These objectives do not compromise the recognition of, or the provision of the relevant matters of national importance under section 6 of the RMA. The AUP contains a suite of objectives which will appropriately manage any relevant matters of national importance.	These objectives have regard to the effects of climate change and reducing greenhouse gas emissions in accordance with section 7(i).	These objectives will not be contrary to the principles of the Treaty of Waitangi.
(7) The Karaka Road Precinct is a sustainable, low carbon, urban environment.				

Theme 4: Natural environment				
(5) Freshwater, sediment quality and biodiversity is improved.	The emphasis of the proposed objective on the improvement of freshwater, sediment quality and biodiversity will ensure that the natural resources within the Plan Change area are sustained for future generations.	The objective recognises and provides for the preservation of the natural character of wetlands and rivers and their margins through ensuring the improvement freshwater and biodiversity in accordance with section 6(a).	Through the improvement freshwater and biodiversity, the objectives have regard to the intrinsic value of ecosystems (section 7(d)) and the maintenance and enhancement of the quality of the environment (section 7(f)).	The Plan Change area is bound by the Oiroa creek at the northern part of the western boundary. This objective recognises the cultural significance of the awa to Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua identified through ongoing engagement on the Plan Change, and seeks to protect freshwater and biodiversity. Consequentially, these objectives are in keeping with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

8.2 Appropriateness of the Provisions to Achieve the Objectives

8.2.1 The Objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions (i.e. policies and methods) of the Plan Change are the most appropriate way to achieve its objectives by:

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the objectives; and
- Summarising the reasons for deciding on the Plan Change.

As the Plan Change is amending the AUP, the above assessment must relate to the provisions and objectives of the Plan Change, and the objectives of the AUP to the extent that they are relevant to the Plan Change and would remain if the Plan Change were to take effect.

In addition to the objectives of the Plan Change which are outlined above, the AUP objectives with particular relevance to this plan change are identified below:

Within the RPS (with amendments proposed under PC80 shown in strikethrough and underline):

- B2.2.1(1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- B2.2.1(1) A well-functioning urban environment with a quality compact urban form that enables all of the following:
 - (a) a higher-quality urban environment;
 - (b) greater productivity and economic growth;
 - (c) better use of existing infrastructure and efficient provision of new infrastructure;
 - (d) good accessibility for all people including by improved and more ~~effective~~ public or active transport;
 - (e) greater social and cultural vitality;
 - (f) better maintenance of rural character and rural productivity; and
 - (g) reduced adverse environmental effects; and
 - (h) improved resilience to the effects of climate change.
- B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.
- B2.2.1(5) The development of land within the Rural Urban Boundary is integrated with the provision of appropriate infrastructure and improves resilience to the effects of climate change.
- B2.3.1(1) A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following:
 - (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;

- (b) reinforce the hierarchy of centres and corridors;
 - (c) contribute to a diverse mix of choice and opportunity for people and communities;
 - (d) maximise resource and infrastructure efficiency;
 - (e) are capable of adapting to changing needs; and
 - (f) ~~respond and adapt~~ has improved resilience to the effects of climate change.
- B2.5.1(1) Employment and commercial and industrial opportunities meet current and future demands.
- B2.5.1(2A) Commercial and industrial activities are resilient to the effects of climate change.
- B2.5.1(3) Industrial growth and activities are enabled in a manner that does all of the following:
 - (a) promotes economic development;
 - (b) promotes the efficient use of buildings, land and infrastructure in industrial zones;
 - (c) manages conflicts between incompatible activities;
 - (d) recognises the particular locational requirements of some industries; and
 - (e) enables the development and use of Mana Whenua's resources for their economic well-being.
- B2.3.1(1) A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following:
 - (a) respond to the intrinsic qualities and physical characteristics of the site and areas, including its setting;
 - (b) reinforce the hierarchy of centres and corridors;
 - (c) contribute to a diverse mix of choice and opportunity for people and communities;
 - (d) maximise resource and infrastructure efficiency;
 - (e) are capable of adapting to changing needs; and
 - (f) ~~responds and adapt~~ has improved resilience to the effects of climate change.
- B3.2.1(5) Infrastructure planning and land use planning are integrated to service growth efficiently.

Within the B-LIZ:

- H17.2(3) Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed.
- H17.2(4) Development avoids, remedies or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones.

Within the Auckland-wide chapters:

- Auckland-wide objectives relating to lakes, rivers, streams and wetland, water quality, stormwater, land disturbance and vegetation management and biodiversity seek to avoid adverse effects where possible but recognise the need to use land identified for future urban land uses efficiently; and

- Auckland-wide objectives relating to transport seek to ensure that an integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA on the basis of the themes identified above.

8.3 Other Reasonably Practicable Options for Achieving the Objectives

8.3.1 Theme 1: Timing of Urbanisation

The existing AUP and proposed precinct objectives which have particular relevance for Theme 1 include:

- B2.2.1(1A): A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future;
- B2.2.1(1): A well-functioning urban environment with quality compact urban form that enables a higher quality environment, greater productivity and economic growth, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects;
- B2.2.1(3): Sufficient development capacity and land supply is provided to accommodate industrial growth;
- B2.2.1(4): Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages;
- B2.2.1(5) The development of land within the Rural Urban Boundary is integrated with the provision of appropriate infrastructure and improves resilience to the effects of climate change;
- B2.3.1(1): A well-functioning urban environment with a quality built environment where use and development respond to the intrinsic qualities and physical characteristics of the site and area, contributes to a diverse mix of choice and opportunity for people and communities, maximises resource and infrastructure efficiency, and is capable of adapting to changing needs;
- B2.5.1(1): Employment and commercial and industrial opportunities meet current and future demands;
- B2.5.1(3): Industrial growth and activities are enabled in a manner that promotes economic development, promotes the efficient use of buildings, land and infrastructure in industrial zones, manages conflicts between incompatible activities, and recognises the particular locational requirements of some industries;

In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Status quo (Retain the FUZ zoning and wait for Council to rezone the land in accordance with the FDS).
- Option 2 – Live zone the FUZ area within the Karaka Road Structure Plan.

Table 3 below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 2.

Table 3: Theme 1 evaluation of options.

Option 1: Status quo – retain the FUZ across the Plan Change area		Option 2: Urbanise the Plan Change area
Description of option	This option involves retaining the FUZ over the Plan Change area.	This option involves urbanising the entire Plan Change area.
Benefits		
<i>Environmental</i>	This option will maintain the existing rural character of the Plan Change area. There is no change to the AUP provisions through this option, and the existing operative provisions will apply to manage potential adverse environmental effects associated with the use and development of land.	This option enables the Plan Change area to be developed for urban industrial land use in an integrated manner, and which responds to the intrinsic qualities of the site, as well as the existing and planned physical characteristics of the surrounding area. As identified in the Carbon Emissions and VKT Assessment included at Appendix 13 , the use and development of the Plan Change area to accommodate light industrial activities and employment opportunities that are accessible by public transport will contribute to a reduction in greenhouse gas emissions. Infrastructure solutions are available and therefore there are no significant constraints to urban development within the Plan Change area.
<i>Economic</i>	This option enables the land to continue being used for its current agricultural purpose, with economic benefits being generated by the productive use of the land. However, as identified in the soils assessment, despite being identified as class 2, the productive capacity of the soils is relatively limited.	This option will enable the use and development of the Plan Change area to accommodate a land intensive industry, which will create a significant number of employment opportunities within the Auckland region. As identified in the Economic Assessment included at Appendix 12 , this can also provide diversification to the local economy and attract talent from other regions, which will in turn further stimulate the local economy. In particular, this option will secure and enable these economic benefits to be realised in the short to medium term.
<i>Social</i>	This option does not facilitate any improved social outcomes.	This option enables the development of an 86.5 hectare land holding that is strategically located in close proximity to live zoned residential and commercial land, future urban zoned land that has been identified for residential development in the Council's Drury-Opāheke Structure Plan, and existing transport infrastructure, including public transport. This scale of development will contribute to the social wellbeing of the community by providing employment opportunities in close proximity to future residents, accessible by public transport.
Cultural	Cultural values are managed by the underlying provisions in the AUP.	The proposed precinct provisions have been developed in consultation with Ngāti Tamaoho, Ngaati Te Ata Waiohū, and Te Ākitai Waiohū. Provisions have been included to recognise and protect cultural values, including the cultural significance of the Oiroa awa within the Plan Change area and potential archaeological sites.
Costs		
<i>Environmental</i>	The existing ecological values of the site are relatively low as a result of historic and current agricultural land use. This option maintains the status quo and is less likely to result in the environmental improvements provided for through the Karaka Road Precinct provisions such as the protection and restoration of riparian margins.	There are potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater intensity than currently provided for within the Plan Change area and under the operative AUP provisions.
<i>Economic</i>	This option does not add to Auckland's business land supply, particularly for land intensive activities where a shortfall has been identified in the short and medium term. There is an opportunity cost as the Plan Change area represents one of the limited suitable site locations within Auckland to accommodate the Karaka Campus, due to the land extensive nature of the development. If suitable land is unavailable, the development needed to accommodate FPH's projected growth within Auckland will be located overseas, resulting in a loss of significant employment opportunities within Auckland and New Zealand, during both the construction phase and post-development of the Karaka Campus.	There are costs associated in undertaking the development and the delivery of infrastructure.
<i>Social</i>	This option does not provide for any additional employment opportunities within Drury or the Auckland region.	The type and scale of development enabled through this option may be considered by some members of the community to be not in keeping with expectations for urbanisation, given the identification of residential land uses in this location under the Council's Drury-Opāheke Structure Plan. However, as identified in the Economic Assessment, there are sufficient greenfield development opportunities elsewhere in the Drury-Opāheke area.
<i>Cultural</i>	There is no change to the cultural environment through this option. However, there is the potential for permitted land use activities in the FUZ and Rural – Rural Production zone to compromise	May result in development of land which has the potential to affect cultural values, however, these values have been recognised through the proposed precinct provisions, including in relation to the Oiroa awa and archaeological sites.

	cultural values. Option 2 includes precinct provisions which recognise cultural values identified through consultation with Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua.	
Efficiency and effectiveness	This option is not effective or efficient at achieving B2.2.1(3) as it will not provide sufficient development capacity and land supply to accommodate land intensive industrial activities and growth in the short and medium term. This option is less effective and efficient in achieving B2.2.1(1A), B2.2.1(1), and B2.3.1(1) as retaining the FUZ within the Plan Change area does not give effect to a well-functioning urban environment within Drury, where analysis has been prepared to demonstrate that the Plan Change area can be urbanised for light industrial land use, consistent with the RPS, including B2.2.1(4) and B2.2.1(5).	This option is efficient and effective at achieving B2.2.1(3), B2.2.1(4), B2.2.1(5), and B2.5.1(1), and B2.5.1(3) within the RPS. In particular, Option 2 will: • Enable sufficient development capacity and land supply to accommodate land intensive industrial activities; • Enable urbanisation to occur within the Rural Urban Boundary; • Enable the urbanisation of land where detailed analysis has confirmed there are infrastructure solutions to service the Plan Change area; • Secure the provision of significant employment opportunities within the Auckland Region; • Provide industrial zoned land to accommodate FPH’s projected growth within Auckland; and • Enable industrial growth that promotes economic development and recognises the land intensive requirements of the Karaka campus.
Summary	Option 2 is the preferred option. The urbanisation of the Plan Change area to accommodate light industry activities is consistent with, and efficient and effective at achieving B2.2.1(3), B2.2.1(4), B2.2.1(5), and B2.5.1(1), and B2.5.1(3). This option will enable the development of the Karaka Campus over an 86.5 hectare land holding that is strategically located within close proximity to residential development and transport infrastructure, and which will enable significant employment opportunities within the Auckland region. In particular, Option 2 will result in significant economic benefits to be realised in relation to employment opportunities in the Auckland region, while ensuring that potential adverse environmental effects, including in relation to infrastructure servicing, can be appropriately managed.	

8.3.2 Theme 2: Zoning

The existing AUP and proposed precinct objectives which have particular relevance for Theme 2 include:

- B2.2.1(1A): A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future;
- B2.2.1(1): A well-functioning urban environment with quality compact urban form that enables a higher quality environment, greater productivity and economic growth, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects;
- B2.3.1(1): A well-functioning urban environment with a quality built environment where use and development respond to the intrinsic qualities and physical characteristics of the site and area, contributes to a diverse mix of choice and opportunity for people and communities, maximises resource and infrastructure efficiency, and is capable of adapting to changing needs;
- B2.5.1(1): Employment and commercial and industrial opportunities meet current and future demands;
- B2.5.1(3): Industrial growth and activities are enabled in a manner that promotes economic development, promotes the efficient use of buildings, land and infrastructure in industrial zones, manages conflicts between incompatible activities, and recognises the particular locational requirements of some industries;
- IX.2(1): The Karaka Road Precinct enables the development of a significant employment node with a primary light industrial land use.
- IX.2(2): The Karaka Road Precinct contributes to a well-functioning urban environment, integrates with the natural environment and respects Mana Whenua values.
- IX.2(3): The development of a high-quality campus environment is enabled.

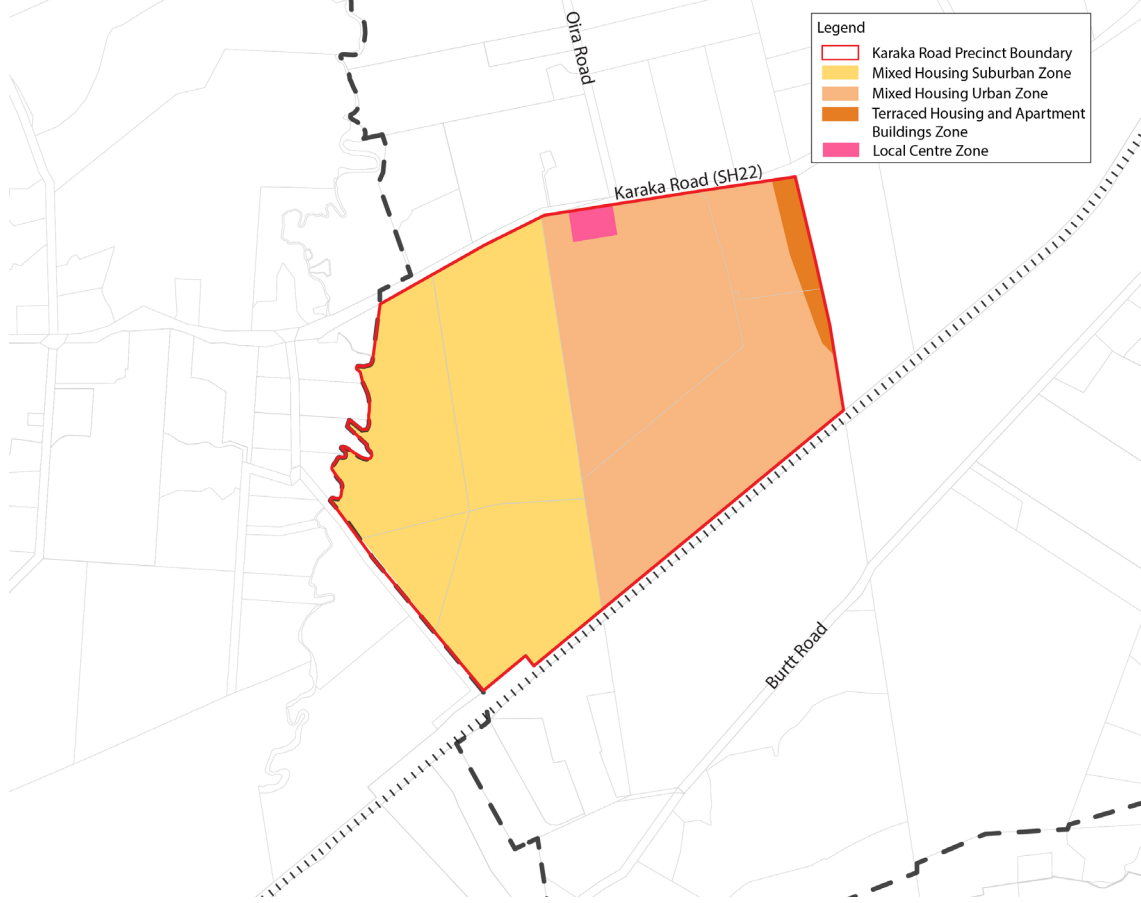
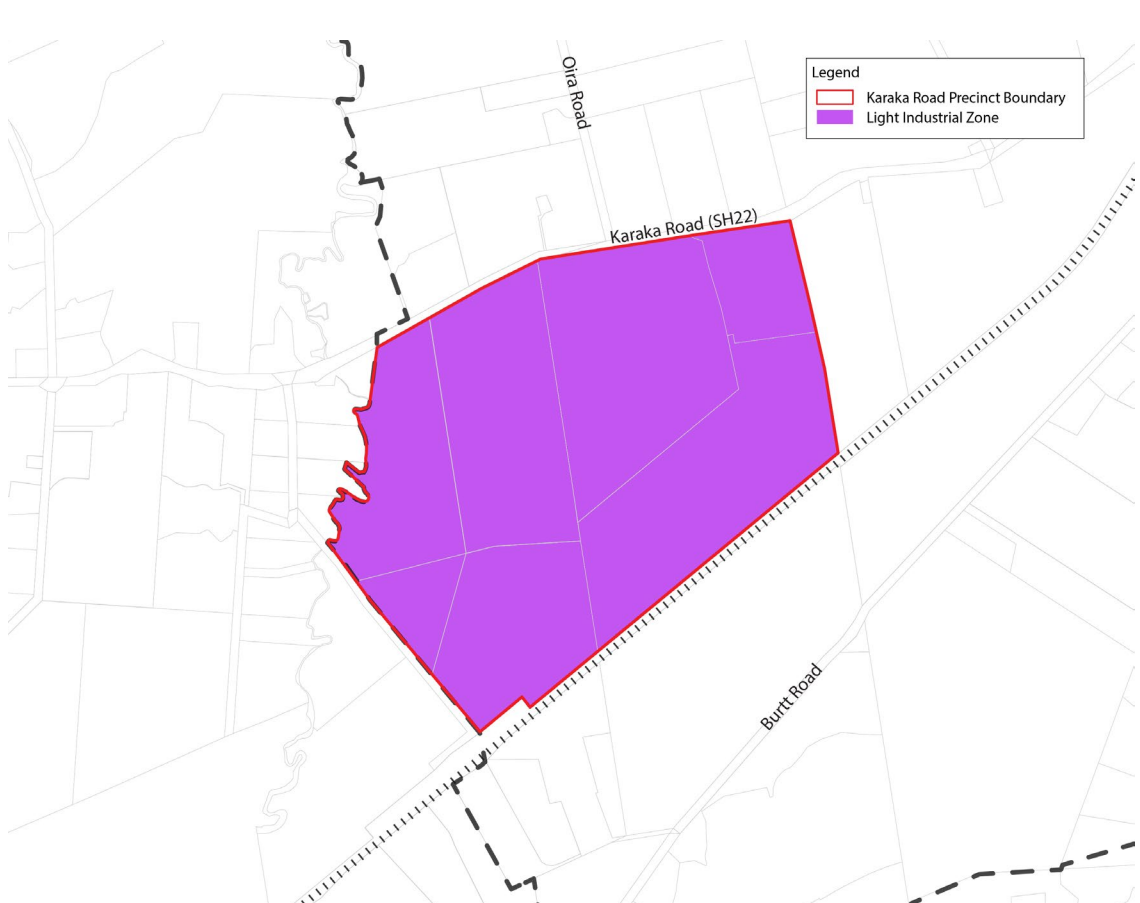
In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Apply the zoning in accordance with the Council’s Drury-Opāheke Structure Plan.
- Option 2 – Apply the B-LIZ.

Table 4 below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 2.

Table 4: Theme 2 evaluation of options.

Option 1: Apply Residential zones and Business – Local Centre zone in accordance with the Council’s Drury-Opāheke Structure Plan		Option 2: Apply Business – Light Industry zone	
Description of option	This option involves applying the urban zoning in accordance with the Council’s Drury-Opāheke Structure Plan, which includes Residential Mixed Housing Suburban, Urban, and Terrace Housing and Apartment zones, and the Business-Local Centre zone in the north eastern side of the Plan Change area. 	This option involves applying the B-LIZ in accordance with the Karaka Road Structure Plan and applies the provisions proposed within the Karaka Road Precinct. 	
Benefits			
Environmental	This option applies a predominant residential land use to the Plan Change area, in accordance with the Council’s Drury-Opāheke Structure Plan. The resulting built form and character associated with residential development and small scale commercial activities as provided for in the Local Centre is in keeping with what is anticipated under with the Drury-Opāheke Structure Plan.	This option will enable opportunities for light industrial activities. Separation of the Plan Change area by SH22 and the NIMT from planned future sensitive receiving environments and the application of the proposed Karaka Road Precinct provisions will ensure that potential adverse effects associated with the B-LIZ can be appropriately managed.	
Economic	This option will provide additional residential capacity within Drury, however, as identified in the Economic Assessment included at Appendix 12, there is sufficient capacity provided in the balance of the Drury-Opāheke area, excluding the Plan Change area.	This option will provide additional and needed capacity for a land intensive industry within the Plan Change area, which is located within a strategic location in relation to transport and surrounding residential land use. This option will also provide for significant employment opportunities.	
Social	The zoning pattern will allow for a variety of housing types, and will contribute to increasing housing supply and choice within Drury. The zoning pattern is in keeping with the community’s expectations in accordance with the Council’s Drury-Opāheke Structure Plan.	The B-LIZ will enable significant employment opportunities in close proximity to future residents, accessible by public transport.	
Cultural	The urbanisation of FUZ land creates opportunities to recognise and provide for cultural values.	The proposed precinct provisions have been developed in consultation with Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua. Provisions have been included to recognise and protect cultural values, including the cultural significance of the Oiroa awa within the Plan Change area and potential archaeological sites.	
Costs			

<i>Environmental</i>	The proposed zoning layout will enable a greater intensity of development, resulting in change within the existing environment, which is characterised by rural land uses. However, the environment is anticipated to change over time give the operative Future Urban zoning.	The proposed zoning layout will enable a greater intensity of development and greater building bulk compared to Option 1, resulting in change within the existing environment and planned future residential environment. However, the environment is anticipated to change over time give the operative Future Urban zoning, and the application of the proposed precinct provisions will ensure that potential adverse effects associated with the B-LIZ can be appropriately managed.
<i>Economic</i>	Costs involved in undertaking the development and delivery of infrastructure. This option does not add to Auckland’s business land supply, particularly for land intensive activities where a shortfall has been identified in the short and medium term. There is an opportunity cost as the Plan Change area represents one of the limited suitable site locations within Auckland to accommodate the Karaka Campus, due to the land extensive nature of the facilities. If suitable land is unavailable, the development needed to accommodate FPH’s projected growth will be located overseas, resulting in a loss of significant employment opportunities within Auckland and New Zealand, during both the construction phase and post-development of the Karaka Campus. Additional resource consenting costs associated with the establishment of manufacturing and research and development facilities, which are not anticipated or provided for in the Residential zones.	Costs involved in undertaking the development and delivery of infrastructure. There is an opportunity cost in relation to residential development capacity.
<i>Social</i>	This option provides for limited additional employment opportunities in the form of potential small scale commercial activities in the Local Centre.	The B-LIZ may be considered by some members of the community to be not in keeping with expectations for urbanisation, given the identification of residential land uses in this location under the Council’s Drury-Opāheke Structure Plan.
<i>Cultural</i>	The urbanisation of FUZ land may create potential effects on cultural values, however can be managed through the structure planning and plan change process.	The urbanisation of FUZ land may create potential effects on cultural values, however can be managed through the structure planning and plan change process.
Efficiency and effectiveness in achieving the objectives	This option is not efficient or effective in achieving B2.5.1(1), B2.5.1(3), IX.2.(1) and IX.2.(3) as the Residential zones do not anticipate or provide for the establishment of light industry activities in a campus-like environment. In addition, a residential land use would not support a significant employment node. This option is efficient and effective in achieving B2.2.1(1A), B2.2.1(1), B2.3.1(1), and IX.2(2). In particular, the location of residential land within Drury West will contribute to additional housing supply and choice in a location that is accessible by planned public transport, and in close proximity to planned amenities in the Drury Metropolitan Centre. These characteristics are in keeping with those identified qualities of a well-functioning urban environment.	This option is efficient and effective in achieving B2.5.1(1) and B2.5.1(3) as it will enable will provide industrial land supply to meet the current and future demands of land intensive industries. The development of the Plan Change area for light industrial activities in accordance with the proposed precinct provisions will ensure that potential conflicts between light industrial activities and more sensitive activities which may establish in the surrounding FUZ can be appropriately managed. This option is efficient and effective in achieving IX.2.(1) and IX.2.(3) as the underlying B-LIZ will enable the establishment of light industry activities, particularly manufacturing and research and development. The additional precinct provisions will also ensure that development is of a high quality. This option is also efficient and effective in achieving B2.2.1(1A), B2.2.1(1), B2.3.1(1), and IX.2(2). In particular, it will enable the location of employment opportunities in close proximity to public transport and existing and planned residential areas will enable good accessibility for people between housing and jobs, which are in keeping with those identified qualities of a well-functioning urban environment.
Summary	Option 2 is the preferred option, and it is considered that application of the Business – Light Industry zoning is the most efficient and effective option in achieving the relevant objectives, particularly in relation to providing for the necessary land capacity to meet demand for land intensive industries, and opportunities for employment in close proximity to housing and public transport. In addition, it is considered the economic benefits associated with the Karaka Campus, as identified in the Economic Assessment included at Appendix 12 , outweigh the potential economic costs associated with the loss of residential capacity within the Plan Change area.	

8.3.3 Theme 3: Coordinating the Development of Infrastructure

The existing AUP and proposed precinct objectives which have particular relevance for Theme 3 include:

- B2.2.1(5) The development of land within the Rural Urban Boundary is integrated with the provision of appropriate infrastructure and improves resilience to the effects of climate change;
- B3.2.1(5) Infrastructure planning and land use planning are integrated to service growth efficiently;
- B3.3.1(1)(b): Effective, efficient and safe transport that integrates with and supports a quality compact urban form;
- E27.2(1): Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed;
- IX.2(4) Access to and from the precinct occurs in an efficient and safe manner that mitigates adverse effects of traffic generation on the surrounding road network; and
- IX.2(6) Development is coordinated with the supply of sufficient three waters, energy and communications infrastructure.

In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Status quo – no staging provisions.
- Option 2 – Precinct provisions which require the coordinated delivery of development and infrastructure.

Table 4 below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 2.

Table 5: Theme 3 evaluation of options.

Option 1: Status quo – no staging provisions		Option 2: Precinct provisions which require the coordinated delivery of development and infrastructure
Description of option	This option involves applying urban zoning and relies on the underlying AUP provisions and other processes and agreements which sit outside the AUP to manage the provision of infrastructure servicing.	This option includes applying the proposed Karaka Road Precinct provisions which include: - Standards which require the staging of development to coordinate the occupation of buildings with the delivery of required transport and three waters infrastructure; and - A standard which requires that development to be adequately serviced by water supply and wastewater infrastructure.
Benefits		
<i>Environmental</i>	This option will manage the provision of infrastructure and the potential adverse environmental effects associated with infrastructure servicing, however will be less efficient than Option 2.	This option will ensure that the potential adverse effects on the environment associated with infrastructure servicing are appropriately managed.
<i>Economic</i>	The administration of this option may be less complex than Option 2, however, relying on existing AUP provisions and processes which sit outside of the AUP may add additional complexities.	This option enables progressive development to occur in staged manner, reducing unnecessary delays and in development process and providing associated economic benefits.
<i>Social</i>	Existing rules and processes are retained and community expectations are maintained.	This option provides certainty to the community in terms of the scale of development that is enabled and the necessary infrastructure that must be in place to ensure that infrastructure servicing effects can be appropriately managed.
Cultural	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
Costs		
<i>Environmental</i>	The lack of specific recognition of the infrastructure needed to support development in the Plan Change area provides less certainty than Option 2 that the potential adverse effects on the environment associated with infrastructure servicing can be appropriately managed.	As progressive development is enabled, there is the potential that servicing the Plan Change area with infrastructure creates adverse environmental effects. However, there are underlying provisions in the AUP that manage the provision of infrastructure, which any future development will be required to comply with.
<i>Economic</i>	This option has the potential to delay development, resulting in associated economic costs, as a result of uncertainty in relation to the infrastructure necessary to service development in the Plan Change area.	There are administration costs associated with the more complex set of provisions proposed under Option 2 and costs associated with implementing the proposed precinct provisions.
<i>Social</i>	This option provides less certainty to the community as there is no transparency in relation to the infrastructure necessary to service intensities of development enabled by an urban zoning.	As progressive development is enabled, there will be an increase in traffic volumes within the local and wider road network. However, traffic modelling contained in the ITA included at Appendix 9 demonstrates that the potential traffic effects on the transport network will be acceptable.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
Efficiency and effectiveness in achieving the objectives	This option is less efficient and effective as there is significantly less certainty under the AUP provisions to manage the effects associated with land use development which cannot be adequately serviced by infrastructure, which would not achieve the relevant policy direction under objectives B2.2.1(5), B3.2.1(5), B3.3.1(1)(b), E27.2(1), and IX.2(6).	This option is the most efficient and effective in achieving the relevant objectives (B2.2.1(5), B3.2.1(5), B3.3.1(1)(b), E27.2(1), IX.2(6)) through proposed provisions which require development to be staged in accordance with necessary infrastructure, particularly transport, which have been identified through detailed technical analysis. This will ensure the coordinated delivery of infrastructure with development in accordance with the relevant policy direction.
Summary	Option 2 is the preferred option. Coordinating the occupation of buildings within the precinct with the delivery of required infrastructure through the inclusion of standards in relation to transport, water supply, and wastewater infrastructure is the most efficient and effective mechanism for achieving the relevant objectives. In particular, there are additional costs associated with Option 1, in relation to increased uncertainty and the potential for adverse environmental effects associated with infrastructure servicing.	

8.3.4 Theme 4: Integrated and High Quality Development

The existing AUP and proposed precinct objectives which have particular relevance for Theme 4 include:

- B2.2.1(1A): A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future;
- B2.3.1(1) A well-functioning urban environment with a quality built environment where use and development respond to the intrinsic qualities and physical characteristics of the site and areas, including its setting, contribute to a diverse mix of choice and opportunity for people and communities, maximise resource and infrastructure efficiency, are capable of adapting to changing needs; and has improved resilience to the effects of climate change;
- H17.2(3) Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed;
- H17.2(4) Development avoids, remedies or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones;
- IX.2(2) The Karaka Road Precinct contributes to a well-functioning urban environment, integrates with the natural environment and respects Mana Whenua values; and
- IX.2(3) The development of a high-quality campus environment is enabled.

In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Status quo – rely on Auckland-wide and B-LIZ provisions under the AUP.
- Option 2 – Karaka Road Precinct provisions.

Table 4 below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 2.

Table 6: Theme 4 evaluation of options.

	Option 1: Status quo – rely on Auckland-wide and B-LIZ provisions	Option 2: Precinct provisions
Description of option	Land use and development, including building bulk and location, the management of stormwater and riparian margins, and the treatment of site boundaries and zoning interfaces are managed by the provisions contained in the Auckland-wide and B-LIZ provisions.	The proposed Karaka Road precinct includes a bespoke set of provisions to guide the development of buildings within the precinct, including: - Objectives and policies which recognise Mana Whenua values and a standard which requires that all development requiring resource consent to be communicated in writing to Ngāti Tamaoho, Ngaati Te Ata Waiohū, and Te Ākitai Waiohū; - A policy that encourages the Karaka Road Precinct to be developed as a sustainable and low-carbon urban environment; - Policies, standards, and associated matters of discretion and assessment criteria which promote stormwater management in accordance with a water sensitive approach and improvements to water quality, ecological habitat, and biodiversity; - More permissive activity statuses for accessory office and food and beverage facilities than contained in the underlying B-LIZ zoning provisions; - A bespoke standard and associated matters of discretion and assessment criteria which manage building setback and landscaping from and adjacent to boundaries; and - A bespoke standard and associated matters of discretion and assessment criteria which manage the interface with the rural environment to the west.
Benefits		
<i>Environmental</i>	Land use and development is managed by the underlying provisions in the AUP.	The bespoke precinct provisions will manage any future land use and development on the Plan Change area, and will support a built form which responds to the qualities and characteristics of the Plan Change area and surrounding environment.
<i>Economic</i>	A less complex set of planning provisions will apply. Plan users are also familiar with the operative portions of the AUP, resulting in cost efficiencies in relation to implementation and monitoring.	The provisions will enable a comprehensive light industrial employment campus, and associated economic benefits.
<i>Social</i>	Existing rules are retained and community expectations are maintained.	Expectations and requirements for future land use and development can be clearly set out for members of the community.
<i>Cultural</i>	Cultural values are managed by the underlying provisions in the AUP.	The proposed precinct provisions have been developed in consultation with Ngāti Tamaoho, Ngaati Te Ata Waiohū, and Te Ākitai Waiohū. Provisions have been included to recognise and protect cultural values, including the cultural significance of the Oiroa awa within the Plan Change area and potential archaeological sites.
Costs		
<i>Environmental</i>	No requirement to manage or deliver the use and development outcomes provided for within the proposed Karaka Road Precinct.	This option will not result in any environmental costs.
<i>Economic</i>	This option will not result in any economic costs.	There are costs associated with implementing the proposed precinct provisions.
<i>Social</i>	This option does not facilitate a quality built environment to the same extent as Option 2, through the inclusion of the proposed precinct provisions, resulting in increased social costs to the community.	This option will not result in any social costs.
<i>Cultural</i>	This option does not recognise cultural values within the Plan Change area to the same extent as Option 2.	This option will not result in any cultural costs.
Efficiency and effectiveness in achieving the objectives	This option is efficient and effective in achieving H17.2(3), H17.2(4), IX.2(2), and IX.2(3) as the underlying provisions of the AUP, particularly the provisions of the LIZ chapter will manage building bulk, location, and intensity within the Plan Change area. This option will still achieve all of the requirements of the RMA, as it will rely on the underlying Auckland-Wide and B-LIZ provisions which are efficient and effective in managing adverse effects on amenity values and the natural environment both within the zone and on adjacent areas, and a high-quality campus environment or industrial development would still be enabled under the standard Auckland-Wide and B-LIZ provisions in the AUP. This option is less efficient and effective in achieving B2.3.1(1) as it does not include area-specific approaches to managing use and development within the Plan Change area.	This option is most efficient and effective in achieving B2.3.1(1), H17.2(3), H17.2(4), IX.2(2), and IX.2(3) as the provisions seek to manage use and development to respond to the qualities and characteristics of the Plan Change area and surrounding environment. In addition, the proposed provisions will contribute to high quality built environment as well as a well-functioning urban environment. This option will be efficient and effective in achieving the aforementioned objectives regardless of whether development of the Plan Change area is for a comprehensive Campus type development or it is for more ad-hoc typical type industrial development.

Summary	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to enable the development of the Karaka Campus will allow for quality built form outcomes that respond to the qualities and characteristics of the Plan Change area and surrounding environment, and goes beyond the underlying Auckland-wide and B-LIZ provisions. Any future development of the site that complies with the proposed provisions, will achieve a high-quality development that integrates with the surrounding area. It is considered that the economic costs associated with implementation of the proposed provisions in addition to the AUP are outweighed by the significant environmental, social, and cultural benefits for any future development within the Plan Change area.
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8.4 Risk of Acting or Not Acting

In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in the report above. For this reason, an assessment of the risk of acting or not acting is not required.

8.5 Section 32 Analysis Conclusion

On the basis of the above analysis, it is concluded that:

- The proposed objectives of the Karaka Road Precinct are the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable urbanisation of the Plan Change area for future industrial development;
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subjective land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed Karaka Road Precinct, having regard to their efficiency and effectiveness and the costs and benefits anticipated from the implementation of the provisions.

9.0 Conclusion

This report has been prepared in support of FPH's request for a Plan Change to the provisions of the AUP to rezone 86.5 hectares of land at Karaka Road for urban industrial activity.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

Based on an assessment of environmental effects and specialist assessments, it is concluded that the Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community as well as the enhancement and protection of waterways. Other potential effects are able to be managed through the proposed precinct provisions and application of the AUP zone and Auckland-wide provisions.

An assessment against the provisions of section 32 of the RMA is provided in section 8.0 of the report. This includes an analysis with respect to the extent to which the objectives of the Plan Change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the plan change are the most appropriate way to achieve the objectives.

For the above reasons, it is considered that the Plan Change accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.