

# Silverdale West Dairy Flat Industrial Area Structure Plan

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*Response to feedback on the Draft Structure Plan*

April 2020

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# 1 Executive Summary

The Silverdale West Dairy Flat Industrial Area Structure Plan is a prerequisite to determining the appropriate urban zoning of land which is currently zoned Future Urban in the Auckland Unitary Plan Operative in part. The structure plan forms part of the solution to Auckland's growth challenge by providing land for additional jobs.

Preparing a structure plan is the first stage to enable and guide urban development. It is a non-statutory high-level plan that shows how an area of land can be urbanised, taking into account constraints and opportunities. It shows the arrangement of various land uses and infrastructure. It also shows how the area connects to adjacent urban areas and wider infrastructure networks. Important natural features and heritage values are identified. The structure plan will then become the basis for council initiated plan changes to achieve operative urban zones.

Overall over 200 submissions were received from consultation on the Draft Silverdale West Dairy Flat Industrial Area Structure Plan 2019 (public feedback was sought 25 March 2019 to 28 April 2019).

The key themes raised in the feedback are as follows:

- Support industry/jobs
- Oppose Staging - keep all of the area development ready by 2022 as in the Future Urban Land Supply Strategy
- Oppose Heavy Industry
- Need a wider range of land uses – commercial/ general business
- Support the transport network
- Support motorway ramps, bring Wilks Road interchange forward / ramps in both directions for all interchanges
- Oppose Rapid Transit Network (RTN) route – feedback refers to RTN as a road
- Support RTN/Public Transport
- Build infrastructure before growth
- Concern about how infrastructure will be funded, find alternative funding sources for infrastructure.

The key responses to the feedback are set out below. This is not a complete list of all the changes to the structure plan. These are set out under the specific topics below.

- Add further explanation of the rationale for industrial land use in the structure plan area.

- Add further explanation of the rationale for heavy industry and add a statement that acknowledges that it is difficult to predict the mix of industrial land needed in 20 years' time and that before a decision is made on the appropriate zoning, the need for land for heavy industry will be reassessed prior to the plan change required to rezone the land in Stage 2 (2038 – 2048). However, it is still important that the structure plan flags the opportunity now for heavy industrial land in the future.
- Further explanation about the need for staging to reflect the likely demand for industrial land and the costs of providing infrastructure and also why the staging differs from the FULSS. Included is a qualification about reviewing staging prior to future plan changes.
- Add clarification that land not zoned in Stage 1 will remain zoned Future Urban.
- Amend the structure plan to reflect the changes to the water and wastewater network and the timing of the construction of parts of the network.
- Add high level infrastructure costs to demonstrate the considerable costs involved.
- Add further explanation about the developability of the land for industrial activity.
- Amend the structure plan map to realign the arterial road connecting Pine Valley Road with Argent Lane currently being constructed.
- Amend the structure plan area boundary, and thus the boundary of the light industry zone, to move it slightly to the east to reflect the realignment of Pine Valley Road.
- Amended the structure plan objectives to recognise the Airport's transport function, its ongoing operation and acknowledge its possible future expansion.

## 2 Introduction

The Silverdale West Industrial Area Structure Plan identifies a land use and infrastructure pattern for part of the Wainui Silverdale Dairy Flat Future Urban zone.

During March and April 2019, a draft version of the plan was released for public feedback. The consultation included two drop-in days at the Dairy Flat Hall. A total of 203 pieces of feedback on the draft plan were received. A summary of the consultation initiatives and the details on the feedback received is covered in a separate report entitled *Engagement Summary on the Draft Structure Plan*". This was released in July 2019.

The purpose of this report is to provide a response to the main themes/requests from the feedback and to explain why the final structure plan has or has not been changed. This report only provides a summary of the relief points sought. Further detail can be found in the Engagement Summary Report.

## 3 Responses to Feedback

This section sets out the council's response organised by the themes raised in feedback.

### 3.1 Land Use

#### 3.1.1 Industrial land

Some feedback suggested that the structure plan should not have just focussed on industrial land and that too much industrial land has been identified.

Other feedback suggested however, that not enough industrial land had been identified and that in the economic analyses for the structure plan the existing vacant industrial land area used was too low.

#### **Response**

Industrial land use is the focus of the structure plan for the following reasons.

The Auckland Plan 2012, the guiding document at the start of the process and through to 2018, indicated that:

*At least 1,400 hectares of additional greenfields land will be provided for business activities. Approximately 1,000 hectares of this will be for business activities that require large tracts of land (e.g. manufacturing, transport and storage, logistics and similar activities),..... A further 400 hectares of land will be provided for commercial activities, such as retail, office and service activities.*

Clearly the Auckland Plan identified a greater need for industrial land than it did for other types of commercial land.

The Auckland Economic Development Strategy 2012 recognised that Auckland will continue to require business land that meets the needs of its industrial and manufacturing base, and that this land needs to be protected from competing uses such as residential and office. The strategy notes that nearly a third of Auckland's industrial land take-up has been for non-industrial uses. It is also noted that some vacant land is not always appropriate for industrial activities due to small lot sizes and ownership structures.

The Auckland Plan 2050, revised in 2018, sets out a Development Strategy and this specifically addresses business land in future urban areas, indicating that approximately 1,400ha of business land is needed in greenfield areas.

The Future Urban Land Supply Strategy 2017 also reiterated this point in the principles applied to underpin sequencing decisions. One of these is:

*“safeguarding enough business land to support residential growth”.*

It then cites the figures mentioned above from the Auckland Plan.

Historically, the former Rodney District Council had identified a shortage of industrial land in the then Rodney District Council area in the early 2000's and subsequently identified part of this structure plan area for industrial development (Draft Silverdale West Structure Plan 2010).

With the addition of a considerable area of Future Urban zoned land to the west of the motorway through the Unitary Plan process, it was logical to continue the consideration of industrial land use in the area. It was also considered important that industrial land be the focus and that a secure future supply of industrial land be identified early due to the more limiting requirements of industrial land, such as slope and proximity to transport infrastructure. It is also extremely difficult, if not impossible, to change to industrial uses once land has been identified for other uses, particularly residential. A recent report prepared for ATEED<sup>1</sup> recognised this and stated:

*Supporting business friendly practices across the Auckland Council group and protecting quality employment land across the city should be a priority because once business land is lost to alternative uses it is unlikely to return to business uses.*

The focus of the work in the north has therefore been the provision of land for industry. This is particularly the case following the decision through the Unitary Plan process to “live” zone a large area at Wainui, now Milldale, and the need to start to provide some employment opportunities and services that the new community will require.

To assess how much industrial land would be required to service the new Future Urban zoned area and the existing North Shore and Hibiscus Coast urban areas, the Council engaged Market Economics to investigate and report on this. This report identified that all of the structure plan area was needed for industry in the long term. Market Economics was asked to review the feedback received on the draft structure plan and provided the following comments.

*Because the Structure Plan would significantly change the supply of industrial land in the catchment, it would increase the opportunity for industrial activities to locate in*

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<sup>1</sup> Auckland Employment Land Research Final Report Onehunga, Wiri and Penrose Employment Precincts, Martin Jenkins, 9 October 2019

*the area. That increased opportunity means that historic growth is a poor indicator of what may happen in the future in terms of industrial activity and employment, and the analysis contained in the feedback that attempts to use historic data as a guide to the future ignores that fact. The feedback therefore significantly understates the potential for industrial activity in the Silverdale West Dairy Flat area. This is especially so in the context that vacant land supply elsewhere in the North Shore-Rodney area is now nearly exhausted, and some step change in supply is required to provide for the large sub-regional demand for industrial land that exists but for which supply is increasingly limited.*

Market Economics also noted the following:

*Anecdotal evidence is that there is currently strong demand for industrial land in North Shore and southern Rodney, and an extant shortage of such land, with only very limited location options available to prospective industrial developers and tenants. Commercial real estate agents active in North Shore and Silverdale have identified that in those areas:*

- *There are very few parcels (low single figures) of industrial zoned land available for development in all of the former North Shore City.*
- *Vacancy rates of existing buildings remain very low and are well under 2% in the North Shore's largest industrial precinct the Albany Basin<sup>2</sup>, reflective of shortage in industrial land supply Auckland-wide.*
- *Much industrial land in Silverdale is owned by relatively few owners, with many owners preferring to retain ownership and lease buildings to tenants, rather than sell land. That significantly constrains options for businesses wishing to enter the area and build their own buildings.*
- *Significant constraints also exist around the availability of large lots for yard-based activities, such as contractor storage, vehicle storage and depots.*
- *There is only a single lot in Highgate that remains to be sold, with all others already sold or to be retained by the developer for lease to tenants.*
- *The shortage of industrial land in the area has had a significant effect on industrial land values. The agents contacted described a number of recent sales for industrial land at values that would not make it economic to construct any but the highest value industrial buildings on them (i.e. with a significant office component). New yard-based or other low intensity industrial uses would in most cases not be able to afford to occupy industrial land in most of North Shore, and large parts of Silverdale.*
- *The shortage of industrial land in the area has affected industrial land occupiers. A number of large, established North Shore businesses seeking to expand have been unable to secure land to construct the purpose-built premises they required, and have had to move away from the North Shore to secure land to build on. The north-west area, around Kumeu, is one area where such occupants have moved to.*

All these observations indicate an immediate and significant need for additional industrial land to supply market needs.

An economic analysis provided by a consortium of landowners in support of their feedback (Economic Analysis of Draft Dairy Flat Silverdale West Industrial Area Structure Plan, Urban Economics, 22 May 2019) considered that Market Economics had underestimated the land need and suggested that the vacant land supply used was too high. Market Economics accepts that the vacant figure used in its report is now low and is in fact approximately 44ha. However, this is little different from the 66ha used in the Market Economics report and part of it is accounted for by the uptake since that report was prepared. Therefore, the difference is even less and is not material in planning for the long-term supply of industrial land.

The study carried out for ATEED referred to above, further reiterated that there was a shortage of industrial land and that vacancy rates for industrial space is at an all-time low and stated:

*Across the city there has been strong demand for commercial and industrial land and supply is constrained, particularly for prime sites.*

The report also recognized that:

*While Auckland can be viewed as a single functional economic area and labour market, there are benefits from there being local employment options for communities as this can reduce commuting and support local wealth creation and circulation.*

#### **Amendments to the structure plan**

- Add further explanation of the rationale for industrial land use in the structure plan area.

### **3.1.2 Range of land uses**

A significant number of comments in the feedback were concerned that the draft structure plan had only considered industrial land use and that there is a need for a wider range of commercial and business land uses and community facilities.

Comments include:

- wanting more employment opportunities outside of industry with higher employment densities (i.e. other business, commercial office),
- land use with greater flexibility which responds to community needs,
- need shops,
- area should be a business and residential mix,
- add neighbourhood centres,
- rezone Pine Valley block to commercial and retail,
- put residential on the western side of Silverdale West and east of Postman Road
- more intensification, including residential activity, close to the RTN route and any future stations



- by providing for a wide range of social infrastructure such as a library and community centre.

Feedback from a large landowner in the Silverdale West area sought that the western part of Silverdale West be residential because of the steepness of the land and to assist with funding infrastructure. It suggested that a large landowner and developer would be able to quickly carry out residential development and would be in a position to kick start and fund infrastructure as there are currently no large industrial developers ready to do this.

### Response

The structure plan area is only a very small part (17%) of the 3,500ha of Future Urban zone stretching from Orewa to Dairy Flat.

It is acknowledged that a broader range of business and commercial activities will be required in the wider Wainui Silverdale Dairy Flat Future Urban zone (see Figure 1) surrounding the structure plan area.

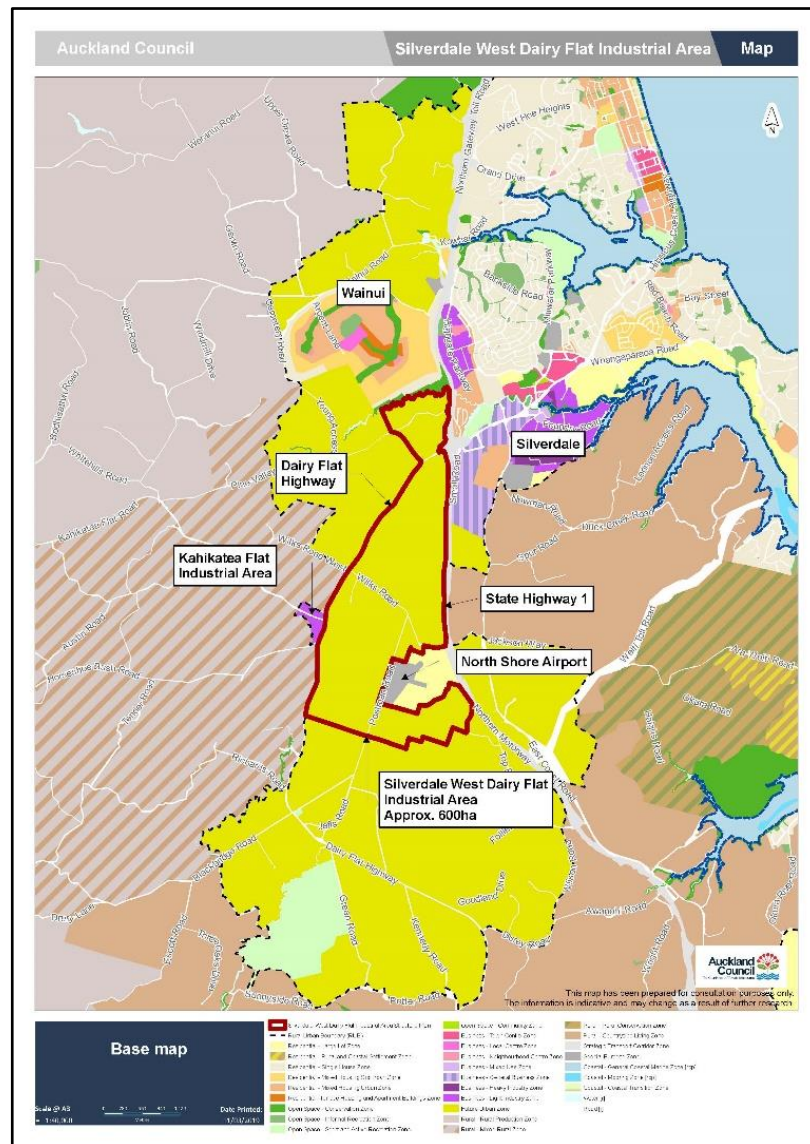


Figure 1 Wainui Silverdale Dairy Flat Future Urban zone

All of these other land uses and activities will be considered through the structure planning for the wider Future Urban zone. The FULSS identifies the wider Future Urban zoned land to be development ready beginning in 2033, so structure planning would start a few years before that. This will include residential areas and other employment and business land. It will include a significant town centre in the southern Dairy Flat area (which will provide opportunities for retail and office development). General business areas (which will allow a wider range of business activity including large format retailing) will also be provided along with local and neighbourhood centres scattered throughout the residential area to provide local day to day needs such as cafes and restaurants etc.

The Light Industry zone proposed for the structure plan area itself already allows for a wide range of activities eg commercial services, cafes, care centres trade suppliers.

The purpose of preparing this structure plan now is to provide land for industrial purposes not residential. There are extensive areas of residential land being developed at present eg Milldale where over 300ha is zoned residential, and much of the remaining Future Urban zone will likely be for residential purposes. As noted above, the north is short of industrial land at present and more is needed to meet the needs of the growing residential community in terms of services and jobs. More residential land in the structure plan area is not what is required at present.

If residential land was provided in the western part of Silverdale West, the industrial land would have to be accessed in the north and the centre through the residential area. This is not a particularly satisfactory outcome for the residential area with industrial traffic having to pass through the residential area. Only to the south at Wilks Road would there be direct road access to the industrial part of the structure plan area.

If the western part of Silverdale West was to become residential, it would leave an awkward /less than optimal long narrow shaped piece of land for industry. Between John Creek and the motorway, it is only 400m wide at its widest and nearly 2km long.

Locating residential activity on the western side of Silverdale West would also create reverse sensitivity effects on the industry that is retained on the eastern side of John Creek. The residential area would also be south east facing and overlook the industrial area which is not an ideal setting for a residential area.

If part of the structure plan area was identified for residential activity, additional land would need to be identified for industry somewhere else because the demand remains. Land to the south of the structure plan area has been suggested as suitable. It is acknowledged that this land is flat and would be suitable for industry, however, there are also several unfavourable factors. It would move industrial land closer to the existing Dairy Flat Primary School. The school already has concerns about the proximity of the current proposed industrial area.

Extending the industrial area to the south west would also increase the distance to a motorway interchange either Silverdale, Wilks Road or Penlink.

The southern future urban area will also have to provide for other large footprint activities, such as bulk retail, and these would also need flat land and to be associated with the new residential areas. For clarity this will be referred to in the structure plan.

In relation to the inclusion of residential activity, the issue of the slope of the land is addressed in section 3.1.16 below.

Residential intensification at Rapid Transit Network stations on the current proposed alignment is not considered appropriate. Comments from the Supporting Growth Alliance include that the recommended option for the RTN in this area is described in the North Indicative Business Case as being a “Higher speed / lower access through the proposed industrial area”

This was considered important to compensate for the longer-distance route for the preferred western alignment of the RTN, relative to use of the SH1 corridor. The lower level of access (via less stations) is intended to both contribute to the faster RTN speeds and to better integrate with the land use.

Residential use along the corridor could conflict with this objective due to the higher sensitivity to severance and smaller block sizes / more road and pedestrian crossings that would likely need to be provided in a residential area. Industrial land use supports this objective through larger lot and block sizes and fewer road crossings. Additionally, significant provision of residential zoning would reduce the opportunity for local employment.

Adding residential in an industrial context is also problematic and would generate reverse sensitivity effects on surrounding industrial activities and could hamper their on-going operation.

As the process of identifying stations progresses through the RTN Detailed Business Case process there could be the opportunity to identify more intensive business activities around stations depending on their location.

#### **Amendments to the structure plan**

- Add reference in the structure plan that there will be additional business areas in the FUZ to the south which will provide a wider range of business opportunities.

### **3.1.3 Heavy Industry**

Many comments were received opposing the Heavy Industry zone. Concerns include that there has been no mention of Heavy Industry through the process, and was not convinced about heavy industry in the area and queried the demand there and whether it warranted excluding the flexibility that the light industry zone allows.

There were also concerns about having a Heavy Industry zone close to a school and day care centre, potential pollution and noise, that the industrial work force would not be able to afford to live close by and opposition to locating heavy industry near streams.

Several comments were received regarding relocating the proposed Heavy Industry area. Comments include that heavy industry should be located north of Wilks Road, between John Creek and SH1.

Feedback was also received accepting the need for and the proposed location of the Heavy Industry and its need for flat land.

## Response

The reference to heavy industry did not just emerge in the Draft Structure Plan. It was referred to in the Structure Plan Background report released for comment in 2017. In this it stated:

*By 2048 the net additional land demand will amount to between 135 and 323ha net of light industry zoned land and up to 133ha net of heavy industry zoned land ... Heavy industry zoned land may not be contemplated in the area given the associated potential reverse sensitivity issues but can be considered through the structure plan process.*

Heavy industry was included in the Draft Structure Plan because a demand was identified in Market Economics' Industrial Land Demand research. Also, the council was aware from other structure plan processes that there was a demand for large sites which the Heavy Industry zone offers. In the Heavy Industrial zone larger sites are required by the subdivision rules. The minimum site size in the Heavy Industry zone is 4,000m<sup>2</sup> compared to 2,000m<sup>2</sup> in the Light Industry zone. This more readily provides large sites for those industries that want a large footprint building.

Apart from the existing Heavy Industrial zone at Silverdale, there is no other area zoned for heavy industry in the north (excludes Warkworth). Including 56ha (net) (16% of the structure plan area) of heavy industrial land provides the opportunity for such industry to be established in the north. This is important because the proposal would provide for economic activities not otherwise provided in this part of Auckland, with the next nearest Heavy Industry zone being on the Auckland isthmus. The heavy industrial area amounts to only 1.6% of the entire Wainui Silverdale Dairy Flat Future Urban zone. This is considered small but a positive contribution to the economic future of northern Auckland. For that reason, it is recommended that the Heavy Industry zone continue to be provided for in the Structure Plan area.

As a comparison of the amount of heavy industrial land being provided, the Warkworth Structure Plan identifies 35ha of heavy industrial land, the East Tamaki heavy industrial area is just over 200ha and the Drury South heavy industrial area is just over 100ha.

There is a negative perception about "heavy Industry", but in reality, there is little difference between the types of industries that can occur in the Heavy Industry zone compared with the Light Industry zone in the AUP.

The main difference between the zones is that in the Light Industry zone a much wider range of non-industrial activities can occur. These extra activities are often more sensitive to the effects of industry (eg childcare centres). In the Heavy Industry zone these extra activities are either excluded or more strongly controlled (for example non-complying in the Heavy Industry zone and permitted in the Light Industry zone). Some of the feedback considered that this was inflexible. However, it means that in the Heavy Industry zone various forms of industry can operate without being constrained by having to avoid adverse effects on more sensitive non-industrial activities (reverse sensitivity effects).

The rules in the Auckland Unitary Plan relating to noise levels allowed in the two zone are slightly different with a higher noise level allowed in the Heavy Industry zone (70dB<sub>L</sub>Aeq)

compared to the Light Industry zone (65 dBL<sub>Aeq</sub>). The rules relating to air discharges and hazardous substances are the same for the two zones.

Regarding the proximity to the Dairy Flat School, the northern boundary of the school is 612m from the southern boundary of the structure plan area and 1.5km from the southern edge of the Heavy Industry zone. This is a considerable distance and with the prevailing winds coming from the west/south west the effects from any discharges on the school would be minimised.

On the relocation of the heavy industry to the John Creek area, the land suggested is not as flat as the area shown in the Structure Plan for the large sites required, and the overall shape and width of the area is limiting for heavy industry. It is also more dissected by streams.

From a transport perspective, the transport modelling does not differentiate between heavy and light industry. Therefore, whether the heavy industry is removed or not would not alter the conclusion of the ITA. As mentioned previously, the objective for the RTN through this area is to be higher speed / lower access. The larger lot sizes of a heavy industrial area would be beneficial in this regard as this is likely to result in fewer vehicle crossings of the RTN.

While there is a preference for the northern part of Auckland to provide for some heavy industry in the future, it is acknowledged that it is difficult to predict the mix of industrial land needed in 20 years' time. Before a decision is made on the appropriate zoning, the need for land for heavy industry will be reassessed prior to the plan change required to rezone the land in Stage 2 (2038 – 2048). However, it is still important that the structure plan flags the opportunity now for heavy industrial land in the future. Therefore, the possibility of a heavy industry zone is retained in the structure plan, but a statement is added stating that the need for land for heavy industry will be reassessed prior to the plan change required to rezone the land in Stage 2.

#### **Amendments to the structure plan**

- Add further explanation of the rationale for heavy industry.
- Add a statement that acknowledges that it is difficult to predict the mix of industrial land needed in 20 years' time and that before a decision is made on the appropriate zoning, the need for land for heavy industry will be reassessed prior to the plan change required to rezone the land in Stage 2 (2038 – 2048). However, it is still important that the structure plan flags the opportunity now for heavy industrial land in the future.

### **3.1.4 National Policy Statement on Urban Development and Capacity (NPSUDC)**

Feedback queried the differences in the Market Economics assessment for Auckland Council's obligations under the NPSUDC and the analysis for the structure plan. It also considered that the structure plan approach was not consistent with NPSUDC in that it did not assess all forms of business.

## Response

The reasons for the differences was explained in the Market Economics background report for the structure plan, Silverdale Business Land Assessment 17 May 2018 in section 3.4. To recap this stated:

*A key characteristic of this modelling is that growth can only be allocated to a location in the NPS assessment if there is adequate zoned vacant capacity available now, and so the model does not attempt to allocate business activity to greenfields (e.g. FUZ) areas. Areas that are intended to be developed for some business activity in the future, in line with regional planning strategies, are effectively excluded from the NPS assessment. That means that the only growth in industrial activity anticipated in Silverdale and elsewhere in the Urban North is on existing zoned land. The creation of more zoned industrial land, such as might be expected in the Silverdale FUZ, would be significant as it would likely result in more regional growth being allocated to Silverdale, and less to other locations (as shown in the NPS modelling).*

The NPSUDC work could not anticipate that there might be industrial land provided for in the Structure Plan area, and therefore did not allocate any of the region's demand to the area. However, because the Structure Plan area would be the only new industrial area of any size in all of North Shore and southern Rodney, the industrial zones would be attractive for potential tenants and would likely result in some reallocation of regional demand and possibly also the stimulation of additional demand in excess of that modelled in the NPSUDC.

While the NPSUDC assessment provided a best possible estimate of the future distribution of industrial land demand around the region based on active zoning, it has limited value in assessing the appropriateness of specific new zoning proposals (such as the current Structure Plan), and specific assessments are instead required to make that assessment (e.g. the Market Economics 2018 report).

In terms of the perceived failure to meet the NPSUDC by the limited scope of the assessment (focusing as it does only on industrial land, not other business land zones), it is not a requirement of the NPSUDC that every zoning change needs to consider all possible alternative land uses. The NPSUDC requires that councils provide enough land for their populations to live and work, and to grow and change in response to changing needs.

The conversion of one part of the Wainui Silverdale Dairy Flat FUZ to industrial zones is one component of how the council is seeking to provide for those needs. Future structure plans will attend to other needs, and overall, the council will aim to coordinate development of the broader FUZ area to adequately provide for the needs of the current and future population and economy.

As discussed above, it remains Market Economics' opinion that the modelled land demand is a robust and reasonable estimate of future industrial land use requirements in the Silverdale West Dairy Flat area. Market Economics disagree with feedback that suggests that the Structure Plan does not give effect to the NPSUDC because it does not identify adequate business land. The feedback does not suggest that there is insufficient

land for the next 10 years, and in fact accepts that there is adequate supply to last until 2038, but not until 2048. That is far beyond the 10-year horizon, referred to in the feedback, required to be planned for and given the NPSUDC requirement on councils to revisit land supply issues every three years.

#### **Amendments to the structure plan**

- No changes.

### **3.1.5 Industrial workforce**

Some of the feedback is concerned that the proposed supply of industrial land in the draft Structure Plan area is excessive given the demographic profile of the catchment, with North Shore identified as being one of the “highest educated catchments in NZ”. The feedback suggests that that profile may have influenced a low demand for industrial land within North Shore City. It is also suggested in the feedback that the price of houses that will developed in the area will be out of reach of industrial workers.

#### **Response**

Market Economics have considered this issue and provide the following comments. Higher socio-demographic cohorts drive demand for industrial land as a natural function of consumption of goods and services across the economy. The fact that the North Shore is perceived to have less industrial land than other parts of Auckland may be due to the absence of large special employment areas such as the port, airport or areas of heavy industry such as Penrose/Otahuhu. However, in terms of employment, North Shore and the Hibiscus Coast have slightly more industrial employment per capita in the light industry sector than other parts of Auckland. When only the Light Industry zone is considered, the North Shore/Hibiscus Coast has 6.86 workers per 100 population living in the area, compared to the rest of Auckland at 6.03.

Given the high ratio within the North Shore/Hibiscus Coast catchment of employment in Light Industry zones to resident population, it is not agreed that the demographics of the population will not support a large amount of Light Industry zone employment. In interpreting this demand, it is important to recognise the broad range of activities permitted in the Light Industry zone and therefore the broad range of occupations, which includes much more than what may have historically been perceived as “blue collar” jobs. Many high-tech type jobs are supported in industrial areas, especially in engineering, as well as employment for administration staff and management.

#### **Amendments to the structure plan**

- No changes.

### 3.1.6 Suitability of Silverdale West area for industry

Feedback suggested that parts of the Silverdale West area are too steep for industrial development and would be too costly to develop for that purpose. It was suggested that residential development is more appropriate, particularly along the western and southern slopes.

#### Response

A review by a council engineer could not see an obvious reason that the land is unsuitable for industrial development. He stated:

*The ground conditions appear to comprise the Northland Allochthon plus more recent alluvial deposits. Relict shear zones/surfaces are known to be present in this material and global stability slopes would likely be below the factor of safety required for land subdivision using the Auckland Council Code of Practice for Land development and subdivision 2013. Whether it is a platform for an industrial site or a slope with a number of houses, the global instability would have to be addressed to adequate factors of safety and by similar means, e.g. earthworks, palisade walls etc.*

In terms of premiums involved with developing one type of land type over another, similar techniques would be employed in either case. A large platform cut into a slope could potentially prove advantageous as it could remove the unstable materials/shear zones, or indeed it may be possible to arrange the building platforms in such a way as to limit earthworks if this is the concern.

It is also noted that the southern part of the industrial area adjoining the eastern section of Wilks Road has a similar slope as the land to the west identified for residential, so it is unclear why this land is suitable for industry, yet the western land isn't.

The council also engaged Candor3, a company experienced in land development, to undertake an assessment of the suitability of the land in the Silverdale West area, ie north of Wilks Road, for light industrial activity. This area is steeper compared to the rest of the structure plan area. Candor3 prepared concept schemes based on the draft Silverdale West Structure Plan. As part of this analysis a 3-dimensional model of the investigation area was developed to enable a better understanding of the gradients of the existing terrain and the interventions required to achieve a layout that is suitable for light industrial land.

The results of this analysis show that, using typical land development techniques, it is possible to achieve acceptable gradients for roading (maximum 8%) with most roads in the 3 - 7% range and that reasonably flat building platforms can be created which are suitable for light industrial activities. Typically, these platforms are within 1 to 3 metres vertically of each other. The height differential between these platforms can easily be managed through retaining walls, batters or combinations thereof which are commonly used in existing industrial areas such as Rosedale Road, Highgate and Highbrook.

Overall, it is considered that the part of Silverdale West Dairy Flat Industrial Area located to the north of Wilks Road can be developed for light industrial activities in a manner consistent with other developments of this nature.



More detail is provided in the Silverdale West Dairy Flat Industrial Area Structure Plan – Land Development Assessment, Candor3, 2020 which is available on the council web site under the Silverdale West Dairy Flat Industrial Area Structure Plan.

### Amendments to the structure plan

- Add further explanation about the developability of the land for industrial activity.

### 3.1.7 Staging

A significant number of comments opposed the proposed staging timeline. The key issue is that the FULSS states that the land is to be development ready in 2022 but the draft structure plan suggests that parts of the land not be developed until beyond 2038. The feedback wanted the FULSS date of 2022 to be retained and that all the land be made development ready from 2022. Comments included wanting clarity around when development would occur (actual staging dates), that the staging was too slow (live zoning needs to occur faster), for staging boundaries to be amended, to leave later staged land as FUZ, to develop the area all at once, and to extend Stage 1 to Wilks Road. Some consider that a three-stage development will only increase land values from land banking, increase the development costs and delay the development time.

#### Response

The FULSS is a high-level assessment of infrastructure needs and specifically indicates that more detailed planning is needed through structure planning and bulk infrastructure planning and states (emphasis added):

*The analysis done for this strategy is of sufficient scale and specificity to broadly determine bulk infrastructure requirements... **more detailed planning of these areas through structure planning, and bulk infrastructure planning** ..... are two parallel and inter-dependent processes to get land ready for development. **This is the approach taken to determine the programme of sequencing and timing.***

The FULSS acknowledges that structure planning will determine what the appropriate staging and time frames of subsequent plan changes will be, having regard to the efficient and logical roll out of infrastructure and states (emphasis added):

*...**structure plans will determine the appropriate staging and timeframes of subsequent plan changes** ....to ensure the efficient and logical roll out of local infrastructure to these areas. Staging .... will generally follow the sequence and timeframes identified in the Future Urban Land Supply Strategy, **unless an alternative staging is considered appropriate through the structure planning process** [emphasis added].*

The Structure Plan staging takes account of the direction given in the Auckland Regional Policy Statement which seeks to ensure that sufficient land is zoned to accommodate a

minimum of seven years projected growth in terms of industrial land demand (Policy B2.2.2 (1)). Stage 1 of the structure plan identifies 80ha of land which is 18 years projected growth (2020 to 2038).

The Structure Plan guidelines in Appendix 1 of the Auckland Unitary Plan also set out several matters to identify, investigate and address relating to staging including:

- (2) *The phases and timing for the staged release of greenfield land..., in coordination with infrastructure.*

The Structure Plan contains a more refined programme for the rezoning of the land than the Future Urban Land Supply Strategy (FULSS) and looks in more detail at the timing of providing infrastructure. Section 4.13 of the structure plan sets out the more refined staging plan and explains the demand for industrial land and the infrastructure required to service the stages.

There are significant financial constraints that will influence when land in the area becomes development ready, including servicing for waters and transport infrastructure.

The assessment contained in the Market Economics 2018 report finds that it will take many years, in fact in the order of three decades, for the entire area of industrial land identified in the Structure Plan to be developed and occupied. That means it would not make sense to provide for a large amount of very expensive infrastructure now to supply the whole area, when much of the area will not be developed immediately. For example, the Wilks Road interchange is a significant piece of infrastructure that is not required until the Stage 2 (2038-2048) land is needed. To service Stages 2 and 3 now would require an additional 3km of water and sewer line to that required for Stage 1 alone. This is expenditure that could be delayed until nearer the time it is needed.

The scale of the cost of infrastructure required is huge. High level infrastructure costs are of the order of \$829,000,000 – \$989,000,000 to provide water, wastewater, stormwater and transport infrastructure. This does not include local infrastructure that would be funded by developers. This shows the scale of the costs involved and therefore the need to stage the development of the land and the provision of infrastructure as this cannot all be funded immediately. To rezone the land there has to be certainty that the land can be serviced.

Market Economics reviewed the feedback on staging and stated:

*It makes more sense to stage development within the Structure Plan area so that development is influenced to occur at a similar time in each geographic area, limiting when infrastructure provision to other areas is required, and resulting in significant cost savings overall.*

*While there is demand for industrial land now, there is not sufficient demand to occupy the entire Structure Plan area in the short or medium term. If the rate of development is substantially different to that currently anticipated, it would be appropriate to review staging timeframes at a later date.*

Market Economics also acknowledged that:

*It is true that the quantum of land identified for industrial in the Structure Plan would provide for around three decades of projected industrial land demand. The motivation for identifying a quantity of land beyond the current planning horizon (say 6- 10 years until the Auckland Unitary Plan revision is undertaken) is to ensure that adequate provision is made for future industrial land. The recent trend in many places in Auckland has been for industrial activities to be “squeezed out” of industrial areas by quasi-industrial or even non-industrial activities as land values rise. Industrial land values are generally lower than those for centres or residential zones, and so the latter tend to be preferred by developers. In the case of the structure plan area, higher value alternatives would likely be sought on FUZ land if that FUZ were retained, and if alternative zones were applied future industrial activity on the land would be precluded.*

There is merit in identifying the land as industrial to ensure that there is adequate provision of it in the long term and to as far as is possible, keep the land from having alternative uses established on it. Existing uses (mainly rural and lifestyle blocks) can continue to operate as they do now, with minimal change in their productivity as industrial activity may not occur for some time (in line with staging plans).

Market Economics noted that inefficiencies could arise if:

- *Infrastructure is developed far in excess of new activities establishing. The provision of infrastructure should be linked to the likely timing of growth. That is the reason for the staging shown in the Structure Plan.*
- *New activities are precluded from establishing in the area because there is no land available and it is all locked away for industrial activities. However, in this instance there will be large areas made available for other urban activities which are to be progressed through future structure plans. The council is cognisant of demand for multiple different zone types in the wider Wainui Silverdale Dairy Flat area and will seek to provide for a broad range of activities, not just the industrial activity that is the subject of this Structure Plan. For that reason, new activities are expected to be provided in the Wainui Silverdale Dairy Flat area, and provision of a large amount of industrial land will be efficient.*
- *Existing activities (e.g. rural/lifestyle block) were prevented from continuing their current operations. This is unlikely, because all activities will have existing use rights, even if the zoning changes to industrial.*

The argument that the land values will rise due to land banking may or not be the case. As discussed above, it is unrealistic to expect that all of the new infrastructure required to enable land anywhere in the structure plan area to be developed, be funded now.

Overall it would be inefficient to zone land to accommodate several decades of industrial land growth now. However, there is significant strategic value in protecting the land for

future industrial use, when suitable industrial land is difficult to find in established urban areas.

Land within the structure plan area that is not rezoned industrial will retain its Future Urban zone, as is suggested by some of the feedback. Only Stage 1 will initially be rezoned for industrial use. The future plan change will include provisions to indicate that the remaining stages will be rezoned for industrial purposes at the appropriate time.

A minor amendment has been made to the southern boundary of Stage 1. In the draft Structure Plan the Stage 1 boundary was located along the northern boundary of the first indicative road to the north of Wilks Road. To more readily facilitate the construction of the indicative road, the Stage 1 boundary is moved to the south of the indicative road. This means that there is developable land on both sides of the road which will more easily facilitate the construction of the road.

#### **Amendments to the structure plan**

- Add further explanation about the need for staging and add a qualification about reviewing staging prior to future plan changes.
- Add sections on funding and urban form in the staging section.
- Amend the boundary of Stage 1 to apply to both sides of the adjoining indicative road.
- Add clarification that land not zoned in Stage 1 will remain zoned Future Urban.

### **3.1.8 Transport**

The feedback raised several concerns relating to the transport network. The themes are discussed below.

#### **Motorway ramps**

Several comments were made around the phasing of the construction of motorway ramps and that on and off ramp upgrades should occur before development (as congestion is already an issue for the area). Many comments sought that the construction of the Wilks Road interchange be brought forward. Comments also suggested that all interchanges should have north and south facing ramps.

#### **Response**

The current Supporting Growth proposal has south facing ramps at Wilks Road and a full interchange at Penlink. Various combinations of ramps were considered in the Supporting Growth Indicative Business Case. Vehicles entering / exiting the motorway from the north can do so at Silverdale. The arrangement is based on analysis of the traffic demands and distributing trade-offs between providing access to the motorway and maintaining safety and efficiency for strategic motorway users. It is also noted that a full interchange at Wilks Road is likely to add increased congestion and complexity for east-west travel across SH1, increasing local severance and making public transport and active mode use more difficult to achieve. Additional north facing ramps at Wilks Road are not part of the preferred network on this basis.

## **Park and Rides**

Comments about park and rides stated the need to address current parking issues as well as ensure that there are adequate park and rides in the future.

## **Response**

It is agreed that park and ride facilities can improve access to public transport, however, they can also result in inefficient use of land at high-amenity stations. There would also be no advantage in having park and rides within the industrial area as it is not a source of public transport users but rather it is a destination. Therefore, these would be considered carefully as part of the planning and design of the RTN through this area.

## **RTN Route**

Many comments expressed opposition to the proposed Rapid Transit Network (RTN) route, and some thought it should follow the motorway.

## **Response**

It appears that the RTN was interpreted as being a road rather than an RTN route. The RTN route is not a road accessible to private traffic but will be a dedicated public transport facility such as a busway. The RTN route passes through the structure plan area as it has been aligned to pass through the centre of the large future urban zone area to the south and then continue north to the Milldale area. The alignment is designed to ensure that stations that will be located on the route will be accessible to the significant population and destinations developed in the southern Dairy Flat future urban zone. An alignment along the motorway would not capture this future population as effectively.

As an interim solution, bus lanes along the motorway are a key component of the Supporting Growth Indicative Business Case (IBC) recommended network with the long term RTN alignment to the west of the motorway.

The next stage of the business case process will continue to assess bus lane staging as well as the RTN alignment and form.

## **Other transport**

Some of the feedback sought that access to Dairy Flat Highway be limited.

## **Response**

Access to Dairy Flat Highway will be limited (through existing Unitary Plan provisions) because it is an arterial road and property access via local roads will be preferred. The structure plan already refers to the need to minimise the number of intersections on Dairy Flat Highway, whilst still distributing trips appropriately.

## **Amendments to the structure plan**

- Further explain the rationale for only having south facing ramps at the proposed Wilks Road interchange.
- Clarify the text and structure plan map to explain that the RTN route is a dedicated public transport facility such as a busway.

### 3.1.9 Infrastructure

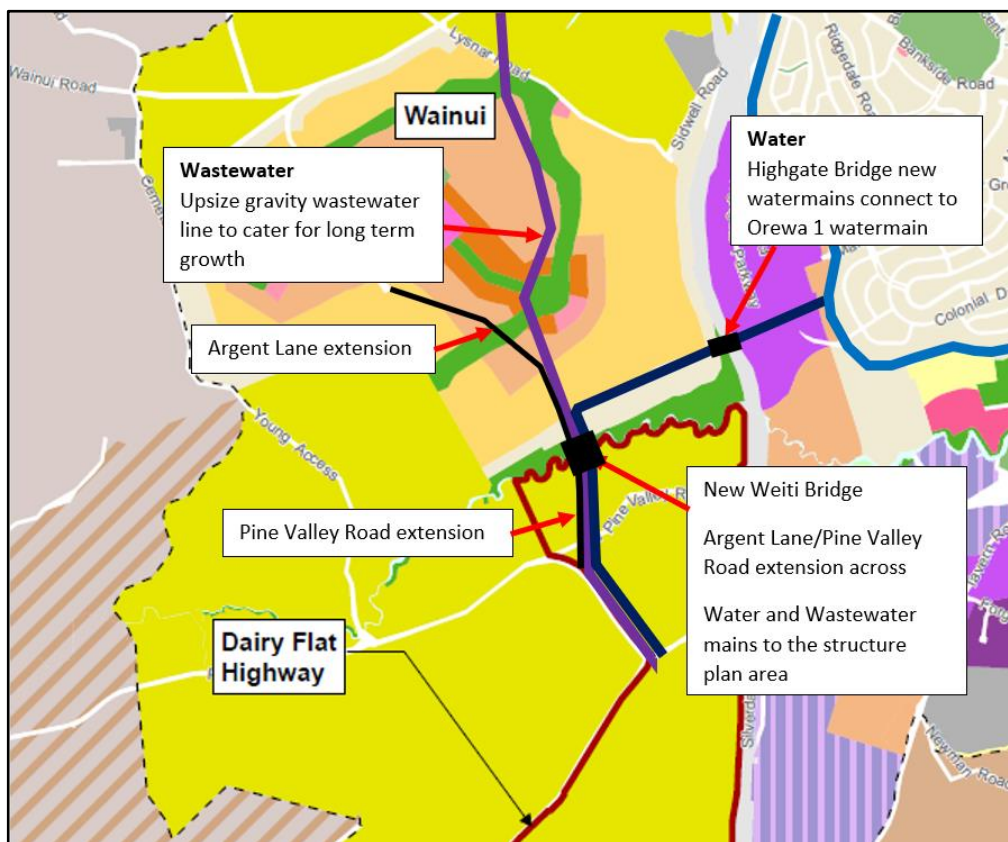
#### *Timing of Infrastructure provision*

Comments related to requiring infrastructure to be in place before development occurs particularly transport infrastructure. Comments referred to roads already being congested and/or unsafe, and park and rides being busy.

#### **Response**

Staging the development of the area is the key way to ensure that the necessary infrastructure is in place as development occurs.

In terms of water and wastewater, the approach to delivering these to the structure plan area has changed from what was identified in the draft structure plan. The water and wastewater pipes are being constructed in association with the Argent Lane /Pine Valley Road connection (see Figure 1). Water is also now being provided by a new water main from the Orewa 1 water main in Millwater across the proposed new Highgate Bridge between the Highgate Business Park and Milldale, through Milldale and across the new Weiti Bridge and onto Dairy Flat Highway within the alignment of the Argent Lane/Pine Valley Road extension. This means that these services are now directly accessible to the structure plan area.



**Figure 2** New Water and Wastewater Option

Watercare also notes that infrastructure investment in some areas is being staged as this helps to manage uncertainty in the rate of development and has operational benefits. For example, larger wastewater pipelines sized for ultimate development means long residence times for the waste in the pipes in the initial stages of development heading to septicity, odour and corrosion issues. For the treated water network, long retention times can also reduce water quality so has a similar issue.

#### **Amendments to the structure plan**

- Amend the structure plan to reflect the changes to the water and wastewater network and the timing of the construction of parts of the network.
- See also amendments to the staging section.

### **3.1.10 Funding Infrastructure**

The funding of infrastructure was a common topic raised in the feedback. Comments included:

- that long term investors may be reluctant to develop the land
- fund the infrastructure, that a staging delay adds to costs
- to review funding mechanisms (i.e. explore alternate sources such as targeted rates)
- to investigate alternative ways to deliver infrastructure, such as existing private landowner consortiums
- use non-Council funding options such as Public Private Partnerships (PPP) or Build, Own, Operate and Transfer (BOOT) or other funding mechanisms.

Some feedback suggested that in terms of private funding contributions toward infrastructure, it was more likely to be available if residential development was provided.

#### **Response**

Section 4.14 of the structure plan and the accompanying supporting Infrastructure Funding Plan, explains how infrastructure is currently funded and all possibilities will be investigated as development proceeds.

In considering the funding issue it is important to note the scale of the costs involved to service the area. High level infrastructure costs to provide water, wastewater, stormwater and transport infrastructure are of the order of \$829 million – \$989 million (2019) (this does not include local infrastructure that would be funded by developers). These figures also do not include the cost of the Rapid Transit Network which is estimated to be in the range of \$1.03 billion to \$1.29 billion to construct to the whole of the Wainui Silverdale Dairy Flat Future Urban zone.

The scale of the cost of providing infrastructure means that even consortiums of existing landowners would seem unlikely to be able to fund the infrastructure required. Professional land developers are therefore needed.

#### **Amendments to the structure plan**

- Add reference to additional funding options.
- Add high level infrastructure costs.

### 3.1.11 Infrastructure Other

Other feedback relating to infrastructure included wanting to see the alignment of Orewa 3 watermain along roads, a water reservoir at East Coast Road/Wilks Road, and for the consideration of energy and telecom provisions.

#### **Response**

The proposed water network will include additional reservoir storage to supplement future localised growth and trunk operation, however, the location of these will be established as part of development and are not needed initially.

The alignment of any new local water and wastewater infrastructure will be determined at a later date and will take into account the ability to utilise road corridors.

Power and telecommunication will be critical for the development of the area. Such companies were sent copies of the Structure Plan however, no response was received. Detailed discussions with power and telecommunication companies can occur at the plan change stage.

#### **Amendments to the structure plan**

- Acknowledge that this infrastructure is important and can be addressed in detail at the plan change stage.

### 3.1.12 Open Space/Landscape

#### ***Landscape buffers***

Two comments were received opposing the proposed landscape buffers along the motorway as it was considered to be too wide and virtually rendered some small sites unusable.

NZTA queried how the motorway buffer integrates with the motorway and the proposed cycle route adjoining it.

#### **Response**

The proposed 40m landscape buffer along the motorway frontage has been reviewed by council's landscape architect and it is recommended that it be retained. However, it is acknowledged that it could be reduced where existing protected vegetation or consented landscape planting provides an effective visual screen to industrial development when viewed from the motorway. Reference is added to the structure plan to this effect.

It is intended that the buffers along the motorway will be provided by private landowners and would not be on the motorway designation corridor. However, it is recognised that there may be opportunities to integrate the cycleway with the landscape buffer subject to operational and maintenance implications for the motorway designation.



## **Amendments to the structure plan**

- Add reference that the 40m landscape buffer along the motorway interface can be amended where existing unmodified landform features, existing protected vegetation on private land, or consented landscape planting, provides an effective visual screen which would mitigate visual effects of industrial development from views from the motorway.

## ***Supply of open space***

A few comments were received seeking more open space. Comments generally stated that the structure plan should maximise the amount of green area, with some comments seeking more areas for horse riding.

Two comments were received stating that green space was not a priority in the area.

## **Response**

It is noted in the structure plan, in line with the council's Parks Policy, that:

*With respect to business zones and as a general statement, green infrastructure, conservation or connection open space may offer some recreational opportunities which may include esplanade reserves, stormwater related open space assets, and walking and cycling pathways. However, the provision of suburb and neighbourhood parks normally provided for within residential areas that serve a sport and recreational function is not anticipated.*

Therefore, the open space identified in association with the riparian margins is considered appropriate and adequate for an industrial area.

In the surrounding Future Urban zone when it is structure planned for residential and other uses, there will definitely be much greater provision of areas of open space to meet the recreational needs of the people that will live in those areas.

It is not considered that there is too much open space. Some open space is desirable in an industrial area to provide some amenity for eg lunch breaks etc, in a pleasant environment. Also, the open space provided by riparian margins is required to protect the stream values as its primary purpose.

## **Amendments to the structure plan**

No changes.

### **3.1.13 Streams, stormwater and flooding**

Comments on streams, stormwater and flooding include:

- review the catchment analysis and classify streams properly and ensure man made grass swales are not added on to the structure plan map
- establish and enhance riparian margins, ensure a 20 metre riparian buffer

- seeking clarity on the extent of the floodplains, whether floodplains are unavailable for development and reduce the extent of flooding and implement flood plain reduction measures including engineering solutions
- zone the land to protect stream water quality
- specific requests for site specific stormwater attenuation options including at a wetland and a preference for the use of wetlands rather than ponds.

## **Response**

The council's Healthy Waters team have provided the following responses to the issues raised in the feedback.

### ***Catchment analysis and stream classification***

Since the initial Stormwater Management Plan (SMP) was prepared in November 2018, detailed watercourse assessments have been conducted in the three stormwater catchments within the structure plan area between November 2018 and January 2019. These assessments provide up to date baseline information on the existing condition of waterways in the survey area. This includes the assessment of both environmental components such as stream state and infrastructure such as pipe outfalls.

Further information to that set out in the draft Structure Plan, includes recognition that in the Silverdale South, Pine Valley and Dairy Flat catchments there is low shading and poor temperature regulation of the watercourses due to the clearance of riparian vegetation. The assessments also identified public and private stormwater assets, many of which are in poor condition.

### ***Riparian margins***

The 20m riparian margin along all streams is continued in the final structure plan. The 20m riparian width requirement, and timing of riparian planting, will be addressed at the plan change stage and implemented by subdivision/land use consent conditions.

### ***Flooding***

The floodplain shown on the structure plan is for high level information purposes. The accuracy of the floodplain mapped around the watercourses is considered appropriate for the structure planning stage. The extent of the floodplain, and where any development restrictions should therefore apply, will be refined at plan change stage. It can be addressed again at the subdivision application stage and consider any topography changes when more detailed survey information is available and engineering solutions are developed.

In accordance with the AUP, the floodplain should be protected, and development avoided within it.

The SMP identifies engineered solutions to flooding as one option only. Engineered solutions that control the floodplain are not generally favoured, however can be considered if the benefits – social, cultural, environmental and economic - outweigh the

costs. Auckland Council does not usually undertake these works and they are the responsibility of the landowner or developer. Potential engineering solutions are not considered at the structure plan stage but will be assessed further through the process, usually at the earthworks consent stage. If any are considered appropriate, then the floodplain extent can be updated accordingly.

The flooding effects from the development of the structure plan area, including any increase in downstream flooding, will be subject to full technical assessment as part of the subsequent plan change process, including identifying appropriate mitigation.

### ***Stream water quality***

From a stormwater quality perspective, there is little difference between light and heavy industry zones given there are rules, overlays and controls in the Auckland Unitary Plan applying to both zones which manage the potential effects on water quality. As noted in section 3.1 above, the difference between industrial activities allowed in each zone is not significant, and a 20m riparian margin will apply in respect of both zones as shown on the structure plan.

### ***Stormwater***

A comprehensive approach to managing stormwater is favoured rather than each site managing stormwater on a piecemeal basis. However, the SMP prepared for the structure plan stage contains a high-level assessment, stormwater management principles and guidelines. Subsequent SMPs will be prepared for later stages and key communal stormwater management assets will be identified at the plan change stage, which may include a wetland.

The Council's Healthy Waters department generally agree with these submission points. The AUP already contains stormwater attenuation and treatment requirements. The plan change to come will consider whether any additional provisions are required over and above these, and whether an overlay for stormwater management - flow should apply.

### **Amendments to the structure plan**

- Stormwater, Water Quality and Flood Management sections are updated to reflect additional information acquired from ongoing work.

### **3.1.14 Heritage**

Feedback was received supporting the identification of the portage route Te Taruna in the structure plan and that it be more clearly defined and scheduled in the Auckland Unitary Plan. It also sought that it be extended beyond the structure plan area.

Feedback was received seeking that the Kelly Homestead be formally evaluated, further work be done regarding Wade Junction Hotel, that the rest of the area be assessed and notable tree research be undertaken.

It was also suggested that there should be a survey to identify trees or plantings of historic or notable significance.

## **Response**

The council's heritage team considered the feedback relating to heritage and have the following comments.

It is considered unlikely that there is any tangible evidence of the use of the Te Taruna route or any historical evidence that would allow the precise location on the ground to be determined or defined. Scheduling in the AUPOP is not likely therefore to be an appropriate option. Alternative options are recommended in the structure plan that provide for the recognition of the portage route and future opportunities for public walking/cycling access along the stream valley which broadly follows what is understood to be the route.

It is considered that given the portage and route originally extended beyond the structure plan boundaries, this is best suited to being flagged as part of the region wide "Sites of Significance to Mana Whenua" programme. Through this programme, the relevant iwi could determine if they wish to nominate this as a place of significance for possible scheduling through that programme in the future.

In relation to Maurice Kelly's homestead and associated buildings, it is not recommended that formal evaluation of the site be carried out. While the place would likely meet the criteria for inclusion in the Schedule of historic heritage, scheduling of the site is unlikely to provide reasonable use of the land for the purpose for which it is shown in the Structure Plan.

The option of zoning or acquisition of the place as public open space has been explored and is not considered to be appropriate due to the location of the place within an industrial zone between an indicative arterial road, rapid transit corridor and a new collector road. It is not realistic to expect Auckland Council to acquire the land, and no new public parks are planned within the structure plan area.

The Heritage New Zealand legislation provides the main management regime for pre-1900 archaeological sites and protects archaeological sites wherever possible and where they are to be destroyed, damaged or modified, ensures that significant information is retained and documented first.

It is considered that the site of the Wade Junction hotel would not meet the criteria for inclusion in the schedule of historic heritage in the AUP, so it has not been recommended for evaluation. The responsibility for managing the site lies with Heritage New Zealand and the owner/developer.

On other buildings in the structure plan area, baseline research has been undertaken, including reviewing certificates of title for the small number of properties of potential heritage interest or value. As Figure 13 of the Historic Heritage Topic Report (Updated June 2019) demonstrates there was only a limited number of buildings situated within the structure plan area as of the 1920s. No built heritage places within the study area have been identified which warrant further research or are considered likely to meet the threshold for scheduling. These are considered to be of some local historical significance but are otherwise typical rural dwellings.

It is accepted that further work is required on the identification of potential notable trees and further investigation into notable trees can occur prior to preparing a plan change.

### Amendments to the structure plan

- Amend the discussion on Maurice Kelly's homestead and associated buildings.

### 3.1.15 Site Specific within SP Area

A few comments were received seeking site specific changes within the structure plan area. This included realigning the proposed Pine Valley/Argent Lane arterial link to Milldale and reassessing land use adjoining it.

The comments also include a request to realign the proposed greenway in the south west corner of the structure plan area to align with the stream to the east.

### Response

The alignment of the proposed arterial road connection through the Pine Valley area to Milldale has been moved east to align with the proposed arterial road connecting Pine Valley Road with Argent Lane being constructed in the Milldale residential area to the north (see Figure 2). Auckland Transport is currently working on an alignment with a view to designating the new route.

To reflect this, the structure plan area boundary, and thus the boundary of the light industry zone, has been moved to the east. This means a small area of industrial land identified in the Structure Plan will remain zoned Future Urban and not become industrial. This piece of land (1.3ha) is too small to retain as industrial and has no clear south western boundary and would be disconnected from the rest of the industrial area.

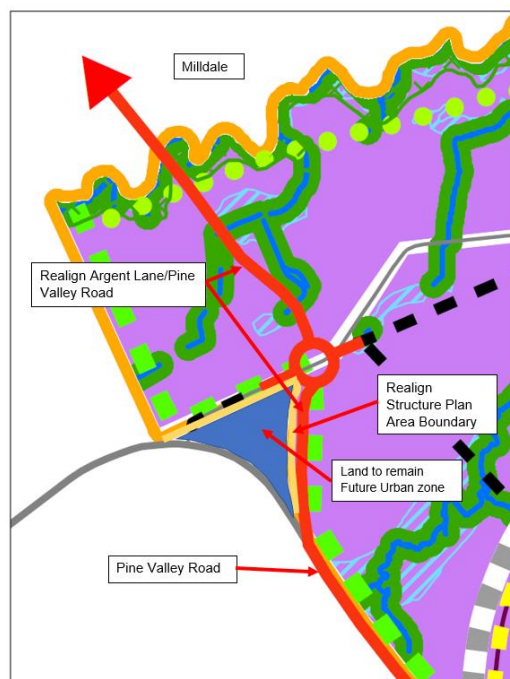


Figure 3 Structure Plan Area Boundary Adjustment

The greenway in the south west has been realigned to follow the adjoining stream network. This will then connect to the open space network which will be developed to the south when that land is structure planned in the future.

#### **Amendments to the structure plan**

- Amend the structure plan map to realign the arterial road connection through the Pine Valley area to the east to align with the new arterial road connecting Pine Valley Road with Argent Lane in the Milldale area to the north.
- Amend the structure plan area boundary, and thus the boundary of the light industry zone, to move it to the east to reflect the realignment of Pine Valley Road.
- Amend the structure plan map to realign the greenway in the south west to follow the adjoining stream.

#### **3.1.16 Airport**

Comments on the airport either requested that the structure plan be more supportive of the airport's expansion plans or opposed the airport and its expansion plans.

Comments received sought that there be more consideration of the protection and expansion of the airport in the structure plan. The key issues raised include:

- The impact of road upgrades on the current and future operation of the airport, particularly Postman Road and the proposed Wilks Road Interchange
- The lack of recognition of the airport's runway expansion plans and the need for runway end safety areas
- The lack of recognition of the airport as a destination and a piece of regional infrastructure
- Effects from the heavy industry zone, such as air discharges, on aircraft operation
- Concern about the effects of landscaping and stormwater management devices on aircraft operation.

Comments received opposing the airport wanted it moved, or for no expansion.

Comments included that without any business case study, nor knowing of any land purchase for the purpose of a runway extension, or any private plan changes applied for by the aeroclub, the idea appears wishful thinking and purely suggestive and there was concern about the strategic protection of a privately owned aeroclub. There was also concern expressed about existing noise effects from the Airport.

#### **Response**

The identification of the land for industrial activity recognises the location of the airport and enables its ongoing operation and development. The industrial use means that the reverse sensitivity effects of noise from the airport are minimised as noise sensitive activities are managed in the industrial zones.

The structure plan also relies on the existing provisions in the AUPOP to manage airport noise through the Aircraft Noise Overlay and the height of buildings and structures in the industrial area through the Airport Approach Surface Overlay.

The feedback seeking the removal of the airport is outside of the scope of the structure plan.

On the issue of the structure plan offering greater protection of the Airport's expansion plans, it is considered that there is too much uncertainty at this time (2020) for the structure plan to address this spatially. The council understands that at present the North Shore Airport is non-certified and the club is not an airport authority or a requiring authority able to designate land and does not own the land it seeks to expand into. The structure plan acknowledges the Aero Club's desire to expand the airport and this is discussed further below. It is noted that the land adjoining the Airport where expansion is suggested, is within Stage 3 of the structure plan (2048+) thus there are unlikely to be any changes in the area for some time. The opportunity for Airport expansion can be further developed and confirmed, or otherwise, prior to any plan change to rezone the land in the future. The structure plan objectives have been amended to recognise the Airport and its ongoing operation and acknowledge its possible future expansion, but the structure plan does not actually provide for it.

On the transport issues, the ITA notes that the Airport "potentially provides a facility that could reduce the need to travel to the existing Auckland Airport and thus may have some network benefits". The ITA includes analysis of an Airport expansion scenario that shows indicatively how Postman Road and the east-west collector road south of the Airport could be realigned to accommodate an Airport expansion. The RTN is also deliberately aligned outside the possible Airport extension area to not preclude expansion in the long term. The alignment of the RTN will be considered further in the subsequent Detailed Business Case process.

The decision to upgrade Postman Road on its current alignment is because it is an existing road providing access to property in the area, so it would be less costly and have impact to upgrade. There is little certainty about the likelihood and timeframe for any Airport expansion. Realigning Postman Road in the structure plan is not considered warranted at this time on this basis. The effect of detailed matters such as the height of lighting on the Aero Club operation would need to be assessed and mitigated as part of the future design development for the road. With regard to Wilks Road interchange, the Supporting Growth Detailed Business Case will take the concerns raised by the Aero Club (lighting, alignment, signage etc) into account when progressing the design of the interchange.

On the issue of identifying emergency landing areas at either end of the runway which should be clear of structures including trees in landscaping, the existing Airport Approach Surface Overlay addresses this for the existing airport. For the reasons already referred to above, it is premature to go further than this in the structure plan at this time. There is the opportunity before the affected land would be subject to a plan change to address the matter at that time.

#### **Amendments to the structure plan**

- Amended structure plan objectives to recognise the airport's transport function, its ongoing operation and acknowledge its possible future expansion.
- Further explanation of the effects of trees and stormwater ponds on airport operations.

- Additional discussion of the airport expansion plans.

### 3.1.17 Changes outside SP Area

A few comments were received seeking changes relating to land outside of the structure plan area. Comments include seeking a change from the Mixed Rural zone to Countryside Living zone for the land to the west of the structure plan area, for the rest of the FUZ to be subject to structure planning, and for industrial land to be shown adjoining the existing Kahikatea Flat Road industrial area. Comments also seek that 146 Pine Valley Road and the balance of 10 Old Pine Valley Road be included in the structure plan area.

#### **Response**

The comments seeking the rezoning of rural land outside the structure plan area are outside of the scope of the structure plan. Similarly, the land requested to be rezoned industrial at Kahikatea Flat Road, is not only outside of the structure plan area and the land identified in FULSS, it is also outside of the Rural Urban Boundary. Moving the RUB is not something the council would contemplate at this time. The request to prepare a structure plan for the rest of the Future Urban Zoned land now, is out of sequence with the Future Urban Land Supply Strategy which identifies the land to be development ready in 2033 to 2037.

The requests to rezone the land at 146 Pine Valley Road and the balance of 10 Old Pine Valley Road are not supported. The structure plan area boundary north of Pine Valley Road was determined to align with the north south alignment of Pine Valley Road and the anticipated alignment of the connection with Argent Lane in Milldale. With the finalisation of the Argent Lane/ Pine Valley Road route further to the east, (see section 3.1.15 above) it is now even less appropriate to move the structure plan area and the industrial zoning further to the west. The realignment of Argent Lane/Pine Valley Road to the east is also a reason for not including the balance of 10 Old Pine Valley Road within the structure plan area. The realignment of the road, as discussed above, means that a small part of the site (1.3ha) is to be removed from the structure plan area and therefore not be zoned industrial.

#### **Amendments to the structure plan**

- No changes.

### 3.1.18 Miscellaneous

#### ***Landuse other***

Some feedback said that the area should be retained for farming and lifestyle. There were also comments also relating to wanting more bridle paths.



## **Response**

Issues raised that the land should remain rural or be used for lifestyle, have been overtaken by the council's decision and the recommendations of the Independent Hearing Panel through the Auckland Unitary Plan process to include the land within the Rural Urban Boundary and to zone it Future Urban to meet the projected growth for the Auckland Region.

## ***Air Quality***

The Auckland Unitary Plan air quality guidelines allow for emissions such as sulphur dioxide at higher levels than the World Health Organisation recommend, therefore there should be a massive buffer zone between any industry and residential housing.

Some feedback also suggested that there be change to the air quality rules to make them more stringent.

## **Response**

The air quality rules in the Auckland Unitary Plan have only recently been reviewed and were accepted by the Independent Hearing Panel and the Council with some issues being resolved through the appeals process.

The structure plan partly addresses the issue of air quality by locating heavy industry in the centre of the area surrounded by light industry. Industrial discharges may also require resource consents depending on the processes.

## **Amendments to the structure plan**

- No changes.

## 4 Next steps

Feedback received during March – April 2019 on the Structure Plan was the final phase of public feedback on the structure plan.

This *Response to Feedback on the Draft Silverdale West Dairy Flat Industrial Area Structure Plan*, and the final *Silverdale West Dairy Flat Industrial Area Structure Plan* will be communicated to stakeholders and be available on the council's web site.

The adopted structure plan will be implemented through plan changes to the Auckland Unitary Plan, involving public submissions and hearings under the Resource Management Act 1991 and through projects going into organisational budgets (e.g. council's 10-year budget long-term plan) including NZTA through the Supporting Growth process.

Find out more:  
visit [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)