Future Development Strategy

Local Board Not Supplied

WRITTEN FEEDBACK
Volume 14

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Future Development Plan 2023 #8640

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Submission of Civic Trust Auckland

Future Development Strategy

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Introduction

Civic Trust Auckland (CTA) is pleased to have been invited by the Future Development Strategy Team to submit as a regional stakeholder on the strategy, as well as being invited to present directly to the Planning, Environment and Parks Committee on 28 July.

We have read the following consultation documents for the FDS and have used the abbreviations indicated, with quotes from these documents in *italics:*

- Overview Document (OD)
- Consultation Draft (CD)
- Summary Document
- Future Urban Areas Evidence Report (FUAER)
- Growth Scenarios Evidence Report
- Overall Evidence Report (OER)

CTA has made submissions over the 5 decades since our establishment, most recently through the amalgamation of Auckland and subsequent planning initiatives initiated at both local and central government levels. Our past submissions have included the Auckland Unitary Plan, Plan Change 78, the government's Emissions Reduction Plan, the Government Policy Statement on Housing and Urban Development, the National Policy Statement for Freshwater Management, and Auckland's Climate Action Framework.

In this submission, we answer the consultation questions 1-4 and then submit other feedback (5A-E).

We made an oral presentation to the Planning, Environment and Parks Committee at 2.30pm on 28 July, 2023 at the Organisation / Interest Group Have Your Say Event. A record of that presentation follows our submitted answers to the consultation questions.

FOCUSING GROWTH

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

We agree.

Quality intensification with sufficient green space and trees

1 CTA considers it is essential to concentrate most, if not all, of the growth in the existing urban areas. We support intensification within the existing urban area and the development of townhouses, units and apartments, as long as these are of good quality and there are sufficient green spaces and trees allowed for.

Concentrated development

2 CTA supports the multi-nodal approach, for the reasons stated in the FDS: this will generate an increasing number of jobs, bring housing and jobs together, and reduce the need to travel. We support the following: *"We will prioritise growth and infrastructure investment closer to the city centre and subregional nodes within the existing urban area, to assist the council's financial management and value for money for Aucklanders, while also addressing disparities in infrastructure and service provision…. Development in the existing urban area supports the most efficient use of infrastructure for the least monetary cost over time* (CD, pg 19).

3 Future urban areas, defined as *"new greenfield areas to be established on the fringe of the existing urban area, and in rural and coastal settlements"* (CD, pg 6) would seem to pose a challenge to the rural-urban boundary and conflict with the statement on page 39 (CD) that *"The intention, however, is not to expand further into rural land."* Furthermore, coastal settlements are subject to hazards due to climate change and therefore not suitable for development. We do not support development on the fringes of the existing urban area and in rural and coastal settlements.

4 Rather than the less growth and slower growth the FDS proposes in future urban areas and limited growth in rural areas, we submit there should be no greenfield areas provided for at this stage. As noted in the FDS, providing infrastructure in greenfield areas is costly and Council does not currently have the funding capacity for this.

Irreversible loss of productive land

5 The FUAER states on page 3: *"2021-22 monitoring showed that 60% of the dwellings consented in future urban areas were for standalone houses (Auckland Council, 2022)."* This does not provide good dwelling capacity and at the same time poses the risk of removing valuable fertile land from productive use, irreversibly.

6 As expressed on page 102 of the OER, the NPS-HPL is concerned to maintain the availability of highly productive land for primary production for future generations and protect it from inappropriate subdivision, use and development. Long-term planning is needed to ensure food, water and natural resources are available for future generations.

7 CTA submits that Auckland cannot afford to lose any more productive soil. Recreation, tourism and residential growth must happen in areas that do not have soil that is good for growing food. We submit that "countryside living" (CD, pg 43) can be provided for in other parts of New Zealand rather than in even moderately environmentally sensitive and economically productive areas in Auckland.

8 CTA submits that productive land in Pukekohe that has not already been built on should not be built on. As stated on page 42 of the CD, *"The southern rural area has a unique combination of temperate climate and frost-free fertile land, which enables a wider range of vegetables to be grown for longer periods than other parts of the country. This makes a significant contribution to the food supply for Tāmaki Makaurau and New Zealand."*

9 We support the intention of *"Protecting rural production by minimising land fragmentation and reverse sensitivity effects to safeguard highly productive land"*

10 The 7-8% of Auckland's highly productive land should be preserved for agriculture only and re-zoned as a rural production zone. CTA is opposed to new businesses being established on productive land, particularly land extensive businesses. Our future planning should give consideration as to whether they will support human and ecological wellbeing, will not produce things that are not needed, will focus on local consumption of their products, and become part of a circular economy.

Emissions / adaptive re-use

11 We strongly support the reduction of greenhouse gas emissions through a compact urban form with greater density, mixed-use and limited urban expansion. Urban expansion uses up productive land, leads to species loss, and results in commuters using private transport over long distances. We note the concern expressed in the OD on page 3 about *"the ongoing degradation of the natural environment"* and the importance of addressing that concern.

12 We concur that locating homes and jobs in close proximity is important, to reduce emissions and the cost of travelling. Free public transport can also address these issues.

13 CTA submits that greater consideration should also be given to adaptively reusing existing buildings rather than demolishing and building anew. This is more sustainable both in terms of minimising the city's carbon footprint and also to preserve neighbourhood character. The character and quality of the environment has both social and economic benefits. .. contribute to a well-functioning urban environment

Quality compact urban form

14 The compact urban form means more high-rise, and, in our view, this is what is needed. However, such development needs to be good quality, both aesthetically and in the quality of materials and construction. Many housing developments from the last few decades are currently undergoing costly remediation works, due to poor quality design and workmanship as well as inadequate inspection by Council.

15 Urban design has a significant impact on how people live in cities, as well as on the economic performance of cities. Poor quality urban planning can result in isolated communities, underperforming and underused transport networks, and low-quality public

spaces that are later upgraded (in some cases, repeatedly) at a high cost. On the other hand, we do not support redesigning public spaces that currently work well, especially in these times when we can ill afford to do so.

16 Good design includes not just the structure of a building but the landscaping – including provision for vegetation, which reduces heat island effects – and the interface with the street and nearby buildings. Good design adds to the amenity of a neighbourhood, and new buildings should be designed to be in keeping with or sympathetic to the streetscape values including: views, viewshafts of important buildings and landscapes, architectural style and unity of form and scale. Design controls relating to such aspects as sunlight, privacy, and outdoor living space can either be life-enhancing or not.

17 The CD (pg 32) states that *"There is also a renewed focus on aspects of quality."* CTA is of the view that the quality of our built environment and current public open spaces can be greatly improved. We submit that the Urban Design Manual should be referenced in the FDS, and that consideration be given to the appointment of a City Architect.

18 As per the key considerations on page 36 in the CD, we endorse the importance of good environmental outcomes and the well-being of the inhabitants of housing developments. We know of people who are stressed by noise, both external and internal (the latter from neighbours in the same complex), lack of privacy, lack of sunlight and poor heating, among other matters. We are of the view that there is more scope in developments for people to be encouraged to share spaces and utility items with neighbours, such as gardening tools and Council rubbish bins. We also submit that developers' names be inscribed on an outside wall of their developments so the good ones and the bad ones become more widely known.

19 We support the inclusion of "reverse sensitivity effects" in the key considerations on page 10 (OD). In our experience to date, the complaints of residents in urban areas about the effects of noise, air pollution and disturbances from light pollution, e.g., from electronic billboards, as well as the location of liquor stores in their communities, are minimised in decision making.

Quality - heritage and character

20 Page 73 of the FUAER says:*"Appendix 1 of the AUP requires a structure plan to identify, investigate and address the following matters … natural and built heritage (the existence of natural and physical resources that have been scheduled in the AUP in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character)."*

21 CTA maintains that Council has not fully identified historic heritage and that there are many items that are not yet on the schedule that should be.

22 We are aware that some of the *"single house developments on large sites that are making way for more intense developments"* (CD, pg 35) are historic heritage or special character buildings. These properties are valued by the communities in which they are sited and each one should be assessed on its merits rather than demolished for the sake of intensification.

23 We also submit that the potential of existing historic/special character areas to provide the required density has not been adequately considered.

24 CTA submits that growth and development have already altered or destroyed much of Auckland's historic heritage and places of cultural importance instead of integrating them. We further submit that the integrity of already established areas should be preserved where possible in order to maintain their amenity values. There are good examples of how new and larger dwellings have been well integrated, e.g., Middleton Rd in Newmarket and in Westmere.

ACCESSIBLE LOCAL CENTRES

2. What do you think of our approach to focus development near local centres?

We agree.

25 We agree that neighbourhoods need to be more sustainable (OD, pg 6).

26 CTA agrees with the logic of intensifying development within walkable catchments. However, we are of the view that addressing car dependency requires more than providing work opportunities that are nearby and better walking and cycling infrastructure.

AVOIDING HAZARDS

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

We agree.

27 We support the approach that *"Areas at higher risk of natural hazards are avoided, and infrastructure investment is focused on resilient solutions"* (OD, pg 4) and agree that it is important to develop adaptation responses in already developed areas that are at higher risk of natural hazards.

28 We strongly support principle *2(a): "Avoid further growth in areas exposed to hazards and promote resilient design solutions"* (CD, pg 17).

RESILIENT INFRASTRUCTURE

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

We agree.

29 As we said in our submission on the Annual Budget 2023/2024 at 4(b) under Storm Response: "CTA would support the incorporation of nature-based solutions, including the protection of mature trees and increasing Auckland's urban ngahere." In addition, in the same submission we said: "Council should consider purchasing properties adjacent to

flood zones, converting them to parks, and/or planting them with native trees to stabilise the land and soak up stormwater. Council should plan to restore wetlands and forests in vulnerable areas."

30 We strongly support Principles: *2(b): Prioritise integrated, naturebased, regenerative and resilient infrastructure; and 2(c): Support communities to develop appropriate adaptation responses in high-risk areas"* (CD, pp 17-18).

OTHER FEEDBACK

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Yes, as follows.

A. UNCERTAINTIES - capacity, staged targeted growth and food security

31 On page 13 of the CD it is said: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years"* (pg 13).

32 On page 23 of the CD, some of the difficulties of planning for long-term growth are outlined. And on page 25, it is stated: *"The future is uncertain. There will be many changes in the global and local political, environmental, social, economic and cultural landscapes that will influence how we grow and will impact on the success of Tāmaki Makaurau."*

33 Although we recognise the importance of infrastructure planning, CTA is unsure about the growth predictions that the FDS is based on. Some of Auckland's population will move overseas, primarily for jobs, and there is migration within the country, often due to people seeking a less busy, healthier or cheaper lifestyle elsewhere.

34 Furthermore, we are aware that growth at the rate that Auckland, Aotearoa-New Zealand and the world has been experiencing over the last few decades is often described as unsustainable. This is acknowledged by climate change actions in the FDS. We feel that limiting growth, including particular kinds of growth, should be a strong consideration for the FDS.

35 CTA supports principle 5: *"Enable sufficient capacity for growth in the right place and at the right time"* (OD, pg 5) and suggests that the right time needs to be informed by population trends and work trends, among other factors.

36 We agreed with Council's submission to government that there was no need to create further theoretical capacity beyond the 900,000 potential development sites available under the provisions of the Unitary Plan, which were intentionally and logically planned for around infrastructure provision across the region, including along transport corridors. The Unitary Plan provisions were purposefully calculated within the context of the Auckland Spatial Plan's projected growth of one million people by 2040.

37 Our view is that Auckland has enough capacity for growth for the next 30 years and we don't know how much growth is needed after that. We submit that flexibility in planning and the use of spaces is important. Further, it is our view that staging of intensification can provide for the required or projected capacity now, and more when it is needed, with a review of intensification at 10-year intervals.

38 CTA supports the principle to *"Align growth to committed infrastructure (funded in 2021 Long-term Plan) and minimise the expansion of existing infrastructure networks as much as practicable to reduce costs of new infrastructure"* (OER, pg 17).

39 We further submit that areas with low heritage and landscape values should be where intensification should be prioritised, alongside other considerations such as near transport nodes. Such areas may include current poor developments and thus allow for improvements to these areas.

40 On page 10 of the OD, it is suggested that *"Over the next 30 years around 282,600 new jobs may be needed."* This guessimate does not take into account the changes acknowledged on the same page, brought about, not only by COVID-19, but by advances and changes in working and trading over the last couple of decades. Many businesses have an online presence only and have no need for physical premises. Many people work purely in a digital world, using their home as their workspace. This is stated in the CD (pg 46): "*Remote working and flexible working hours have become the norm in many sectors, with the resultant change in where and when people work. Online working and trading have similarly become normal parts of business practice*."

41 Further, the type of business that might move into a dedicated space cannot always be predicted. An example is opposite the town hall, where, for several decades, there has sat empty a series of small retail/business spaces, which apparently do not suit potential businesses. During the pandemic, many retail and office spaces in the city centre were left empty because people were working either entirely or partly from home. We understand that some of these spaces are now being converted to residential use.

42 As stated on page 75 of the OER, *"Auckland is moving towards a more service-based economy (i.e., more demand for jobs such as public administration, financial and insurance services, rental hiring and real estate industries). In the short term, this will influence business land demand."*

43 As for studying closer to home, many university students are no longer attending lectures in person but instead, listen to lectures online, and also forgo attending tutorials. This suggests that the universities may not need to expand anymore.

44 It is noted on page 64 of the OER that *"Consumer habits are evolving, including a movement towards less red meat in diets, more plant-based diets and a niche but significant trend towards buying local produce to support local economies and support climate change goals ("low food miles"). Such changes in consumption habits may have an influence in the future on food systems in Auckland – what food production occurs in Auckland, where it is produced and how it is produced."* This is part of the uncertainty or change that occurs in communities, and suggests that local production (such as in Pukekohe) will in the future be relied on more.

B. INEQUITIES

45 CTA supports the intention of the FDS to address inequities across the region by prioritising investments in the parts of the region that need it most (OD, pg 4), rather than *"Prioritisation needs to be based on what provides the most benefit for the whole region, rather than considering outcomes in isolation or in separate geographic area"* (OD, pg 8), which seems to be a contradiction.

46 As mentioned earlier, a way to *"improve equity of access to and enable a greater distribution of jobs"* (OD, pg 17) would be to make public transport free, a co-benefit being to help reduce the city's carbon emissions.

47 *"Development must provide broader outcomes for all Aucklanders. Food sovereignty is critical and development must enable spaces for whānau to grow their own food and provide safe places for tamariki to play and socialise particularly in higher density areas"* (CD, pg 11). CTA strongly supports food sovereignty but we observe that there is no room for growing food or playing outside in some consented developments, due to the rules enabling the rear and side boundaries to be as close as 1 metre from the house. This lack of space also does not enable landowners and communities *"to create urban ngahere and grow the canopy across the city [to] mitigate the impacts of climate change"* (CD, pg 11).

48 CTA supports enabling the development of Māori and Treaty settlement land, subject to any overarching legislative constraints.

49 We have suggested in earlier submissions that accessing the reportedly 40,000 "ghost houses" in Auckland might usefully contribute to increasing the availability of housing. So would investing in more co-housing models, such as the one at Abbeyfield in Sandringham, not just for older people but for all ages.

C. PUBLIC OPEN SPACE AND THE NATURAL ENVIRONMENT

50 CTA strongly supports principle 4: *"Protect and restore the natural environment"* (CD, pg 21) and notes that in addition to the observation that *"Development and intensification can put pressure on the natural environment"* (CD, pg 21) it also puts pressure on the built environment that already exists, and which, when it is a historic and/or quality environment, is valued by the people who currently live/work/play in that environment.

51 We strongly support principle 4(a): *"Protect ecosystems and integrate the natural and built environment"* (CD, pg 21). Much biodiversity has been lost due to developments that are insensitive to the ecosystems into which they are incorporated. Obvious examples are trees being removed so that more floor space can be obtained.

52 We recognise that partnering with mana whenua and drawing from mātauranga Māori can enable greater outcomes (OD, pg 5). However, the intention of the Tūpuna Maunga Authority to remove exotic trees on various maunga, against the strongly expressed wishes of some of the people of Auckland other than mana whenua who also value the maunga and appreciate the value of those trees indicates that consultation needs to be more inclusive.

53 On page 12 in the CD, it is observed that *"Unprotected urban ngahere are declining on private land, particularly mature trees that would otherwise provide irreplaceable ecosystem services."* CTA submits that if the general tree protection rules were reinstated, some loss of the urban ngahere would be prevented. In the face of tree loss, adaptive re-use should be considered by means of tree transplanting ?

54 The importance of public open space and its multiple functions is acknowledged (CD, pg 21): *"Enabling community uses of public land, such as gardens and urban farming provides another way to increase biodiversity and connect ecosystems. This contributes to climate mitigation (through localised food production), fostering a sense of community, minimising urban waste and contributing to circular economies."*

55 This enabling should involve supporting groups such as The Love Of Bees, which proposed an urban farm on the Bowen Ave part of Albert Park. This group was informed by the Waitematā Local Board that getting approval would be difficult and that a resource consent would be needed. The Love Of Bees is a small charitable trust with very limited resources, working to transform Aotearoa's food system so that it is safer for our pollinators, people and planet through regenerative organic horticulture. It deserves assistance rather than resistance from Auckland Council, in line with Council's own principles, including those on page 21 quoted above, and the following statement in the appendix (CD, pg 58), under Advocacy, research and non-statutory approaches: *"Investigate ways to encourage multiple uses for open space, greater planting of roadside berms and use of vacant council sites for community gardens/urban farming and local composting."*

56 We also submit that Council should further support the planting of fruit and nut trees throughout the city, as we understand is happening in some eco-neighbourhoods, and also support the establishment of Pātaka Kai and community fridges, infrastructure initiated by the community that addresses both food waste and food security: mini infrastructure that is cheap and easy to install that has a big impact on people's wellbeing. (CTA is pleased that the roll-out of food scraps service bins and community recycling centres is underway.)

57 We support *"investment in infrastructure, public spaces and streets to create better environments for both people and nature"* (CD, pg 34).

58 CTA supports the provision and extension of parks and green spaces to provide amenity for the local community and the local biodiversity, as well as all the other benefits that accrue from green space.

59 We particularly support the guidelines on page 34 (CD) for local growth of the green-blue network: "*Protect and grow sensitive environments including natural and cultural heritage."*

60 CTA supports tree protection and plantings (OER, pg 28) and we support the *"implementation action to change the AUP to strengthen protection of existing vegetation and encourage or require new planting and ecological connections"* (OER, pg 30). However, if bigger developments on smaller sites continue to be enabled, tree protection and the planting of new trees is often difficult.

61 We would also like our Auckland beaches to be swimmable.

D. TRANSPORT

Light rail

62 We question introducing light rail to replace some of Auckland's most heavily used bus routes (CD, pg 36). Electric buses are replacing diesel buses and more buses could be added in, including smaller buses. The infrastructure for buses is already in place. Building new infrastructure runs counter to the principle of using infrastructure that is already in place and not building new infrastructure unnecessarily: "*Principle 3(b): Make the best use of existing infrastructure"* (CD, pg 19).

63 We also suggest that in 2023, if buses have not succeeded in getting enough cars off the road, despite low fares and other incentives or improvements, we cannot be certain that light rail will convert car-driving commuters into public transport commuters. The current bus/train system already provides capacity for tens of thousands of Aucklanders to use it for commuting and other purposes. In addition, the community that it is suggested will be regenerated by light rail may be resistant to the potential disruption and segmentation of their area.

64 Furthermore, we do not think it would be fair for properties to be compulsorily acquired along the light rail corridor when there are other options for public transport.

65 The "convenience, reliability, safety and comfort" that is argued for light rail as a highly attractive public transport option (www.lightrail.co.nz) could equally be argued for many of the current bus and train options. The fact that rail is permanent is sometimes a positive but it is a negative if the line needs upgrading or maintenance work, as is the case with the Eastern line between Britomart and Ōtāhuhu from 20 March 2023 until (at least) January 2024. It would also be a negative if the line is subjected to damage or impassability from flooding/subsidence/earthquake etc. or businesses don't want to set up near a particular station. Bus routes, on the other hand, can be redirected. Bus transport has more resilience than rail in some aspects.

66 The description on page 50 in the Consultation Draft appendix states: *"Auckland Light Rail (ALR) The City Centre to Māngere light rail (ALR) is a planned rapid transit line that will provide a fast and efficient connection between the city centre and Auckland Airport and have up to 18 stations. The route alignment has not been confirmed at this time."* CTA suggests that, in line with the principle to use the existing infrastructure and the uncertainty and lack of funding, that the already existing city centre to airport link be better used and there be no new link constructed.

Network flexibility and extension

67 CTA is very much in support of a train line going further north, to serve not just the North Shore but the communities beyond the Auckland region.

68 CTA also supports the rapid transit corridor from Red Hills North to Kumeū-Huapai and the walking and cycling corridor adjacent to the Rapid Transit Corridor, as well as the rapid transit corridor from Westgate to Albany or Constellation Drive to provide for direct public transport between the North Shore and West Auckland.

69 CTA submits that there needs to be less focus on future train stations and more on future bus stops. Bus stops can be easily moved to serve locations where growth actually takes place and passengers can easily change buses to travel on a different route. Integration

of more than one mode of transport works well for many people and should be encouraged.

Proximity to work

70 The target to achieve net zero emissions by 2050 needs work by all of central and local government and all citizens, and the FDS does its part to address that by enabling housing near employment, extending mixed-use areas to centres and transport corridors so people can easily access services, employment, recreation and education by walking, cycling or public transport. However, CTA is of the view that simply providing transport corridors does not necessarily mean that people will walk, cycle or use public transport.

71 One of the criteria for the four growth scenarios presented in the OER is the *"Extent to which household living costs can be reduced by increasing proximity to employment opportunities"* (pg 14). Another approach, with many co-benefits for many sectors and across the city (e.g., retail, and community physical and mental health) would be free public transport. This would also help with carbon emission reduction. Free or heavily subsidised and frequent public transport is an ongoing campaign in NZ/Aotearoa as well as other places, and its other benefits are listed here. If people can travel for free and can be usefully occupied while travelling, e.g., accessing their smartphones, then travelling time becomes work time (rather than the (mostly) downtime when travelling in a private vehicle) and there is less pressure on having employment provided near to where people live.

Transport user flexibility

72 With regard to: *"As priorities change, trade-offs need to be made (and re-made) to ensure Aucklanders are getting the best value for money from infrastructure investment"* (CD, pg 13), we submit that light rail to the airport should be reconsidered. There is already an integrated public transport system in place, with a bus to Puhinui Station and a train to Britomart and elsewhere from that station. This station is an important part of the city's infrastructure. As Puhinui Station connects to the wider public transport network, you can travel to and from Auckland Airport from anywhere in the city. The bus operates every 10 minutes from 4.30am to 12.40am, 7 days a week and there is a train from Puhinui Station to Britomart every 15 minutes. However, this AirportLink service is not clearly signposted at the airport and we understand that it is used very little. The facility to use public transport without needing a HOP card, as planned within the next 12 months, should help in this regard, but the AirportLink service needs more publicity. For example, the staff at the airport who monitor cars that arrive at the domestic terminal to pick up incoming passengers could hand drivers brochures that describe this service, so people can use it next time.
https://at.govt.nz/bus-train-ferry/bus-services/airport-services/

Bridge and bikes

73 The Waitematā Harbour Connection project investigating multi-modal solutions for future options to cross the Waitematā Harbour should include making a lane available for cyclists. It should also consider including bike racks on all buses going over the bridge. Greater mode choice and accessibility for crossing the harbour should include walking and cycling. In Wellington, many buses have bike racks, and, as stated on the Metlink website they will be " Introducing bike racks on the entire fleet of new buses."

74 A lane for cyclist and pedestrian use on the Auckland Harbour Bridge and/or bike racks on buses would not involve the *"significant investment"* or *"complex construction"*

mentioned on page 50 of the appendix, instead, it would be a quick and cost-effective solution to provide more transport choice.

E. DEFINITIONS

75 CTA is of the view that it would be helpful to include early in the FDS an explanation of what "infrastructure" means, what "bulk infrastructure," means, what "infrastructure-ready" means and what "social infrastructure" means.

76 The list in Appendix 6 on page 25 of the CD is helpful, viz: wastewater projects, water supply projects, rapid transit projects and other transport projects. The "infrastructure" definition can be further informed by Figure 18 on page 42 of the OER as well as the following, on page 19 of the CD: *"The council is responsible for providing regional transport, three water services, parks and community facilities, waste, arts, culture and urban regeneration. Ports (both sea and air) state highways, telecommunications, electricity, gas and petroleum suppliers, health and education providers all provide infrastructure for Aucklanders."*

77 Page 45 in the OER has this further information: *"The definition of infrastructure is broadened to include investment in ecological infrastructure such as urban ngahere forests, blue and green networks to absorb extreme events and hyper-accessible local transport that prioritises non-private vehicle movements."*

78 "Reverse sensitivity" should also be defined, perhaps using this entry from Wikipedia.

CONCLUSION

79 CTA supports the Future Development Strategy Strategic Spatial Framework (OD, pg 8). The compact urban form for Auckland and the four-nodes approach seems the best future for Tāmaki Makaurau to aim for, at the same time, protecting our natural resources, striving for a healthy environment and improving our public transport system.

80 Scenario A in the Overall Evidence Report does seem to be the best performing (pg 12).

81 CTA supports making the best use of existing infrastructure and investment decisions that deliver on multiple outcomes. It would seem to be good practice that *"The infrastructure triggers will be reviewed regularly to ensure they reflect latest information"* (Appendix 6 of the CD, pg 25).

82 There is acknowledgement in the documentation that development is not only about the creation of roads, buildings, civic or industrial infrastructure but includes ecology and the green areas of a neighbourhood. These different aspects are all important for the future of a city that caters for a range of needs of the citizens who choose to live there.

83 What is not acknowledged is that there has been too much growth on our planet as a whole and we are still heading down the path of having more people than the planet can comfortably cater for, at least, if we continue building hard infrastructure, if we continue polluting and if we continue using up the resources of the land. We are now living in a time when we all need to be aware of what impact our actions are having on our planet. We cannot have infinite growth, unsustainable resource consumption and harmful

pollution on a finite planet. Not only where growth takes place and what sort, but how much growth should be a prime consideration of the Future Development Strategy.

We include below a record of our presentation to the Planning, Environment and Parks Committee on 28 July, 2023.

Date of submission: 31 July, 2023 Signature:

[redacted]

On behalf of Civic Trust Auckland, presentation by Allan Matson (President) and Audrey van Ryn (Secretary) to Auckland Council's Planning, Environment and Parks Committee on 28 July 2023

Allan Matson:

Thank you everybody for having us. We are pleased to be here. Just by way of introduction, Civic Trust Auckland is a community-based group largely with a focus on the environment and good planning, and we've been in existence for 55 years.

We've come here to endorse in general the approach Council is taking with its Future Development Strategy. We support in general your initiatives in response to the questions that you have asked. Going to questions 3 and 4 about the environmental hazards, and the need for nature-based responses in light of what has happened at the beginning of the year, that seems eminently prudent, and so there will be equity issues in how that's dealt with, potential purchases of land that have been developed, that presents a challenge for Council and whoever might pay for it, but there is some community support for that.

In terms of the concentration of intensification, that seems quite logical and sensible as well. We don't support greenfield developments. We support the compact urban form in existing areas, which we contend supports Council's climate change targets, and with regard to that, we think there should be greater consideration given to notion of 'adaptive reuse' of the resources that we've got in further development of the city, and that applies to not only the built environment, but it may also involve trees.

Appendix 1 of the AUP refers to structure plans where you would identify the existence of natural and physical resources having been scheduled in AUP, and that covers matters of interest to Mana Whenua, natural resources, and physical resources. That is one of the key things Civic Trust wish to convey. There seems to be a longstanding difficulty in dealing with the environment to the extent that there is a persistent misunderstanding the environment is comprised of only the natural environment. Until the Resource Management Act is changed, the environment does include physical resources, and CTA considers there has been a longstanding lack of appreciation of some of those aspects of the environment which will contribute to the quality built form that we are all pursuing. We don't want to live in Pyonyang. There are a great many quality aspects of our built environment and we would like to see them retained. That will involve properly assessing some of the built heritage and aspects of the natural environment that we value.

We'll cover off in our written submission points in relation to your questions, but just to raise several other things.

There is a great deal of uncertainty, it would appear these days, about what is going to happen with climate change, and the population projections. The Unitary Plan did have, we think quite rightly, provision for growth for many years, and that provided by the Unitary Plan did seem to be usurped somewhat by Government's moves in relation to the NPS and MDRS. We would support the further intensification envisaged under the NPS, i.e., further intensification around 'walkable catchments' seems sensible, although the 'at least six stories' does not necessarily present a problem, but it's an unquantified thing, because it does sound like it's high density development if it just says 'at least.' So I think there's some merit in putting parameters around that, given that 900,000 was enough for decades anyway, and we don't think that the reduction of any development capacity that arises as a result of the Infrastructure Review should necessarily be transferred to areas that weren't impacted, once again, because we think there's enough capacity. Intensification should be a staged thing because we really don't know the environment in 10 years' time.

We also have concerns around the natural environment, and transport, and I'll hand over to our Secretary Audrey van Ryn, who'll speak to those.

Audrey van Ryn:

We were pleased to see that amongst the documents, trees were included in infrastructure, and we've got a section in our 12-page submission that talks about 'definitions' and felt that maybe 'infrastructure' needs to be defined so that everybody knows what we're talking about.

We are concerned that the urban ngahere has been diminished, and we know that Council wants to increase it, but as part of that, it has been suggested individuals can plant their own trees on their property. However, if you have a very large development on a small site, there isn't much room to plant your trees, so I think that needs to be taken into consideration. And in terms of encouraging community groups to use public open space, empty Council land is mentioned for community gardens and we support this. Rather than Council just saying it is a good idea, we think there needs to be a bit more support, such as the Waitematā Local Board supporting Organic Market Garden, who wanted to build an urban farm on the far end of Albert Park, on the northern side of Bowen Avenue, and they we're told that it was just too difficult. But it seems that that sort of thing should be supported, also more planting of fruit trees and nut trees around the city. I know some of it happens. I think there are four eco-neighbourhoods that are doing that, but more of that is useful not only for the tree canopy but also for food for people.

There's a bit in our submission about what I call mini-infrastructure, the pātaka kai, community pantries around the city. There are not many in the central city, but there are ways that the community can support other people who are short of food, plus reducing food waste, because if there's something you don't need to use, you can put it in your pantry for someone else to use.

Moving on to transport, the public transport infrastructure is often criticized but I think we've already got a very good transport network. Thousands of people use it satisfactorily, thousands more, we feel, could use it, with encouragement. In previous submissions, we've talked about the Council having a Public Transport Champion who could tell the good stories about public transport to people who never think of getting on a bus or train or a ferry. People I've spoken to have said, “Well, I couldn’t possibly get up the stairs to the bus.” That's the way it used to be, but now there's only one step and you can ask the bus driver to make the bus kneel. You probably all know this but many people don't. They don't know how easy it is. They don't know if they walk out their door and down the road, they're likely to find a bus stop and the bus won't take that long. So more encouragement to use it, I think would give people that wider choice of when to use public transport and what is available.

I'd like to make a plug for the City-to-Airport Link, and I have used it back in June. I spent a night with a friend at the Ibis Hotel at the airport and then I took the bus to Puhunui Station. There's a bus every 10 minutes practically every hour of the day. Then caught the train into the city, and that Puhuni Station is a wonderful part of our infrastructure which has recently been done up, so that was a good experience for me which I hadn’t known about. It's not very well-advertised at the airport. In fact, I didn't know where to catch the bus. I had to find the bus stop.

Allan Matson:

So, there’s a glimpse of what will be in our submission .. the quality compact form - but don't forget about the quality, and even a bit of compulsion as benign dictators wouldn't go amiss.

Councillor Richard Hills:

Thanks for those points … very clear, and we’ll look forward to reading your full submission. I was about to say what many of us, including our Transport and Infrastructure Chair, Councillor Watson, talk about is some of the best spending on infrastructure we could do is promoting the good services we have. But I won't take his turn because I see he's asking a question .. Councillor Watson

Councillor John Watson:

Thank you, Mr. Chair. Allan, a question to you about that quality compact form that you referred to initially in your presentation, and I'm thinking particularly of international examples where it's done well, which you also just referred to at the end there. Do you have any view yourself about what type of height and/or structures retain that human element that you see done so well in a number of the European cities where a lot of buildings are at a certain height? That development is compact and obviously intensive but it retains a human scale. I don't necessarily see that evident in some of the current plans that are getting advanced now. There doesn't seem to be much recognition or thought goes into that. Do you have any comment on that?

Allan Matson:

I recall with the proposed development of the Seafarers Building at Britomart, there was some objection to that and the scale of it. The case advanced was breaking it down architecturally into more human-scaled elements. With good design, that quality should be achievable. It's important that the design outcome is viewed not just from the site but from a number of vantage points so that it is viewed in context. I think one of the big failings perhaps is at ground level where the community have the strongest interface with the building and too often we just see the cheap aluminium joinery and the nasty asphalt going up to it. That's really where there should be additional focus on quality at the planning stage in those buildings,

So as Audrey said, perhaps there is a need for a Public Transport Champion. There has in the past been an Urban Design Champion, and I think there should be a champion in the realm of the built environment. Perhaps Council could once again create the position of City Architect.. Architecture and beauty are not things that come up in planning documents too often. Beauty is a nebulous concept but I want to live in a beautiful city and so do the members of Civic Trust and I dare say so do all the members here. Thank you.

Mr Hill, I would just like to make one point in passing. I should declare an interest by saying that I am on the Waitematā Local Board, but that the board did not make a submission on the Future Development Strategy, and nor did Civic Trust have any interest affected by the FDS.

Councillor Richard Hills:

Yes, thank you, Allan. I wondered if you were going to mention that, but you didn't need to because you were very clearly here on behalf of Civic Trust Auckland, so thank you very much. Thank you both for coming in.

Future Development Plan 2023 #8642

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

Please see attached submission

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why
Please see attached submission

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why
Please see attached submission

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please see attached submission

FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY [redacted].

31 July 2023

1. Summary of Submission

The property owners are [redacted]

This is a submission by [redacted] (submitter) to Auckland Council's 'Auckland Future Development Strategy 2023-2053' Consultation Draft (draft **FDS**). The FDS was released for public consultation on 6 June 2023.

The submitter strongly oppose the FDS. In it's view, the FDS:

a. Fails to take into account key planning infrastructure and financial matters relating to Auckland growth;

b. Takes an overly cautious approach to potential natural hazards that does not allow for projects to demonstrate they can avoid, remedy or mitigate the risks from natural hazards;

c. Substantially over-estimates the capacity of Auckland's existing urban areas on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development to meet Auckland's projected population over the next 30 years; and

d. Has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPSUD).

e. Sets a planning framework which will constrain land supply, thus raising land costs, and ultimately undermining the community drive for affordable housing.

f. Fails to realise the long standing Council commitment to live zoning in the Huapai area.

g. Fails to realise the contribution Huapai can make to the demand for housing including affordable housing, in the north west

The submitter supports the Councils general approach to urban consolidation. The issue is the current Council "balanced approach" is the correct strategy. The major shift signalled in the draft FDS is a wrong and retrograde step that will trigger a number of negative consequences.

The submitter's requested relief is detailed at the end of this submission. In this submission requests the Council undertake a more robust analysis in developing a FDS and work with the development sector and others to provide for Auckland's growth and find meaningful ways of funding infrastructure.

2. Connelly and Scully Family Trust

[redacted]

The family trust has owned the land since 2004.

The Trust purchased the land as its primary residence, but also as an investment to set the family up financially for the future. The Trust looked at the "future urban " zoning of the site and the Council programme for live zoning of Huapai as set out in the Future Urban Land Supply Strategy 2017. This was a key factor in the Trust purchasing this land. The Trust since 2004 has made investment decisions based on the Council long standing strategies for urban development of Huapai.

The Trusts land is currently identified as development ready 2028-2032. The draft FDS fundamentally changes tis and sets Huapai as being "recommended for further investigation". This total reversal of the Council position if confirmed will have a fundamental impact on our and our communities future. This has been done without any consultation with our community.

B GENERAL SUBMISSIONS

3. Proposed Future Development Strategy

The FDS sets out a proposed framework for urban development of Auckland. This reflects a fundamental change in the direction initially chartered through the Auckland Plan and subsequently reinforced through the Auckland Unitary Plan (AUP), the FULSS and in certain areas a Structure Plan.

The effect of the FDS is to fundamentally slow down, defer or remove future greenfield development in some manner suggesting that, at least until the 2030s, Auckland's growth can be successfully managed solely within the existing urban area. This includes the Trust's land being deferred and set down for further investigation. Given that a 2050+ timeframe would mean our property being held as future urban for 50+ years This is totally unreasonable. There is justification for such a significant change particularly without working those issues through with our community.

This strategy stems from a series of assumptions which the submitter thinks are based on a flawed and incomplete evidence base. For example, the FDS assumes that:

- there is sufficient capacity for Auckland's projected population growth within the existing metropolitan area and the two rural towns of Pukekohe and Warkworth North, including through proposed Plan Change 78;
- the future expansion of the rural urban boundary (RUB) should only be managed by the Council through a public plan change process;
- there are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas;
- the Council's predicament on budgetary constraints and infrastructure funding; and
- the view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore any new greenfield developments should be deferred given the current financial predicament.

In addition, the FDS is not based on an adequate and up-to-date Housing and Business Development Capacity Assessment (HBA). It has drawn on a 2021 HBA however this document does not include any assessment of business land capacity, and contains different capacity assumptions to those used in the FDS. This is in contrast to the requirements of the National Policy Statement on Urban Development 2020 (NPSUD).

All these matters are addressed in the remainder of this submission.

4. Support for the concept of a Future Development Strategy (FDS)

(a) The submitter accept that a FDS is required under the NPSUD, but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base.

(b) Having a blueprint for how Auckland will grow and where and how growth will be managed is an essential informant of the market. Done right, it will direct the market to locate housing and business in the locations that work best from a social, environmental and economic perspective.

(c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it.

(d) Before the FULSS is updated in the form of an FDS, a comprehensive and robust assessment of business and residential capacity and demand is needed (in the form of an HBA) which meets the requirements of the NPSUD. This means assessing business land capacity (which has not been done) and realistic residential capacity including likelihood that plan enabled capacity will be taken up. Capacity figures need to include competitiveness margins. This work will need to incorporate the findings of the Council's natural hazard and flooding work and the outcomes of PC78.

5. General Comments on the FDS

(a) The NPSUD requires the Council to prepare an FDS that provides "at least" sufficient development capacity over the next 30 years to meet expected demand. This is to provide for both residential growth and business growth.

(b) The Council, since 2011, has been promoting a balanced growth strategy for Auckland targeting both residential growth and employment/business land supply through urban consolidation, targeted greenfield expansion, and growth of Townships including Kumeu / Huapai.

(c) This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and various Structure Plans

(d) The Council has not implemented any public plan changes to give effect to the structure plans. The private sector, through private plan changes, has funded and provided for these developments.

(e) A number of these areas have been successfully developed following private plan changes. To the best of the applicants knowledge, none of these areas have exhibited any issues through the recent extreme weather events, i.e. no geotechnical or flooding issues. The inference is the current provisions and required assessments are managing environmental risk.

(f) The submitter supports the review and updating of the FULSS. The legislative imperatives require, and sound practises demand, a well-considered, thought out, tested 'future development strategy'.

(g) The primary concern with the draft FDS is that this is being rushed through seemingly due to the combined factors of infrastructural funding constraint, flooding and geotechnical issues, and the requirement to update the Long Term Plan in 2024. The impact of what is proposed in the FDS is too critical to be treated in this rushed manner.

(h) If the FDS is pursued in its current form, then it will trigger the unintended consequences of:

- Further constraining residential and employment land supply.
- Further exacerbating congestion issues in Auckland by not locating employment land close to where people live.
- Significantly and negatively impacting housing affordability through land supply constraint.
- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

(i) It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop greenfield development for a decade. If the problem is funding infrastructure, then the solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Financing and Funding Act 2020.

(j) It seems Council is working off a scenario that only the Council can fund infrastructure, rather than using other mechanisms to assist in the sustainable funding and delivery of infrastructure.

(k) In terms of capacity assumptions, the FDS is based on extreme, theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPSUD). This is a fundamental oversight and completely undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed Plan Change 78 may free up more development) has been in place for the last ten years.

(l) Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer. It simply does not produce enough housing; because not everybody wants to maximise the development potential of their own property. Nor does it provide the NPS UD required competitiveness margins of 20% excess capacity in the short and medium term and 15% in the long term.

(m) In addition, the FDS is based on assumptions that there will be a large uplift in capacity in urban areas from PC78. However, PC78 has been paused to allow time for Council to complete flooding and natural hazard assessments. These assessments will inevitably lead to a reduction in capacity provided for through PC78 in the existing urban area. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on assumptions that are way beyond reality. It is poor public policy practise to place so much reliance on managing such a critical factor as Auckland's growth on an untested plan change

(n) Past experience has shown that when flawed data is relied on, but the market does not deliver to those levels, it constrains housing supply which escalates price, which, for a significant portion of the community, make housing simply unaffordable. This is exactly what the NPS UD is trying to avoid. It seeks to ensure an oversupply of land so the cost of land and housing reduces.

(o) The only way to solve infrastructure is through partnership with the development community. A more agile rather than restrictive strategy is called for.

(p) The draft FDS is based on a medium growth scenario. It should be stress tested against a high growth scenario and should be tested against actual development including brownfields and greenfield development.

(q) The FDS has been prepared in isolation without adequate consultation with the development community, mana whenua, infrastructure delivery partners and funding providers.

(r) What this shows is that:

(i) Since 2011, there has been a long-established strategic policy direction on the growth for Auckland based on urban consolidation and some greenfield expansion where that is well-thought out and appropriate.

(ii) This has been embraced by the community including the development community.

(iii) Very substantial investment decisions have been made based on this Council commitment.

(iv) The implementation of this strategy has solely relied on the private sector through the development community to rezone FUZ land through private plan changes.

(v) This has delivered additional growth for Auckland.

(vi) To the best of the submitter's knowledge, none of these developed private plan change areas experienced any issues with extreme flooding events or geotechnical problems. The system worked and is working. In contrast, there has been widespread flooding throughout urban areas as a result of insufficient infrastructure.

(vii) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this is addressed below.

This complete reversal of the long-established work through the Auckland Plan, AUP, FULSS and the 5 Structure Plans, has a very significant and fundamental impact on the property owners who have invested to support the Council in its long established growth strategy. The draft FDS will fail to deliver the necessary housing and other planning outcomes for the region.

This complete reversal has been done with very limited consultation

6. Constraining land supply directly impacts housing affordability

(a) The key lesson of the 2000s and mid-2010s is that constraining land supply raises land value expectations in the current owners, which in turn raise the price developers need to pay for the land, which, when passed on to the end resident, significantly raises house cost. Under supply of land distorts normal market operations.

(b) It is also important to note that the build cost for 2-3 storey attached housing typologies and 3-5 storey apartments contemplated in brownfields environments under this policy are significantly more than traditional detached 1 & 2 Storey homes commonly found in greenfield developments. Therefore,

eliminating greenfield will only lead to negative impacts on housing supply and affordability will only get worse.

(c) One of the key unintended consequences of the FDS is that it will significantly constrain land supply, which will have a further negative impact on housing affordability.

(d) This is completely at odds with direction from central government through the NPSUD which directs Councils to provide "at least" sufficient capacity and aims to improve housing affordability.

7. A better way to solve infrastructure

(a) The FDS effectively identifies the significant budget constraints the Council is facing and their inability to solve infrastructure. The reaction to this is to offer up only one technique which is to slow down or stop growth until the Council's financial position catches up and infrastructure can be funded. Only then does the draft FDS contemplate the release of land for growth.

(b) The fundamental flaw in this draft approach; is that the population does not stop growing and the need for employment land and housing land does not cease until the Council's financial position rectifies itself.

(c) If the problem is the provision of infrastructure, then the FDS should focus on the problem and find alternative ways of working with the private sector to solve infrastructure.

(d) Managing the pace of growth is but one tool available. It is a tool that distorts the market and undermines housing affordability, as proven over the last decade. There are other examples where private sector funding have delivered necessary infrastructure to facilitate growth.

(e) Infrastructure is fundamentally a cost to the government (and its related agencies), the Council (and its CCOs), the private development sector, and the private investment sector.

(f) Rather than constrain the entire Auckland greenfield and satellite township land release programme, a better solution is to analyse on an area by area basis and find innovative ways of funding the infrastructure to enable the release of some or all of that land.

(g) The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth (Silverdale West is a strong example of where this can and should happen);

(ii) the option of partnership arrangements between private and public sector to fund infrastructure over time;

(iii) infrastructure funding agreements and the opportunity to up front pay development contributions and build in mechanisms to fund that work as others benefit from the early infrastructure investment;

(iv) Exploring how it can utilise the tools in the Infrastructure Funding and Financing Act 2020.

The FDS seems to assume none of these are applicable or workable. Equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

8. Natural Hazards are Already Adequately Controlled

(a) The FDS states that delaying development is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

(b) There is no debate that land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards, and can demonstrate that any identified natural hazard risks can be avoided, remedied or mitigated.

(c) In this regard, the RMA, RPS and Auckland-wide provisions in the AUP including the approach of 'Future Urban' zoning (which requires a plan change before an area can be development) and assessment criteria that apply to any subdivision or development consent, already give the Council full ability to prevent development occurring in high risk natural hazard areas where risk cannot be successfully avoided or mitigated.

(d) There is no urgency to hurry through this draft FDS. The existing legislative regime and AUP provisions provide all the safeguards needed. There is no need to rush anything through to plug some perceived existing gap.

(e) The existing controls are working well. The vast majority of issues that occurred in the January/February weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were relatively unimpacted by the storm events.

(f) In terms of flood management, there are multiple engineering solutions that work well and have proved successful on land that can be flood prone if not managed. As long as new development is accompanied by appropriately designed and tested engineering solutions paid for by the developer, then it is not necessary, nor is it appropriate, to constrain development based on a perception of a flood risk or geotechnical risk. The right approach is to ensure the natural hazard risk is successfully managed or removed through robust engineering design and investment.

(g) Neither our property or our neighbouring properties have experienced any flooding or inundation issues in recent major weather events. The large section of the land on the southern side of SH16, which is zoned 'Future Urban' has no history of flooding. While urbanisation will have more runoff in peak events, the current planning controls will ensure this is successfully managed in any urban subdivision.

9. Vehicle Kilometres Travelled

The argument is put forward in the draft FDS that continued greenfield development is contrary to climate change policies because it forces people to commute to the metropolitan area for jobs. Issues over vehicle kilometre trip emissions are raised. This fails to take account of:

(a) Masterplanned greenfield development is inevitably accompanied by local retail services, open space and community facilities. Kumeu Huapai for example is a well developed community with full range of services in terms of retail, housing, open space and a level of employment.

(b) The 'work from home' approach new technology in running business. The use of Teams/Zoom and other mediums and their acceptance as a normal business method is having a significant impact in the work environment and in VKT.

(c) The fundamental change in work habits that is part of the post-Covid area where working from home is a key factor.

(d) The high number of people who are looking for either retirement lifestyle, or a slower lifestyle and work/life balance; where they are looking for a greenfield or provincial township lifestyle rather than a more intensive urban lifestyle.

(e) The significant employment in places like Warkworth and Pukekohe from the rural sector, tourism, and simply servicing the area.

10. Kumeu / Huapai Transport

The transport solutions for the Kumeu corridor can be addressed progressively and in stages

The final solution will see the proposed Huapai Rapid Transit Station and Bypass in close vicinity to our land and within the walkable catchment.

Interim measures such as the temporary shoulder running transit lane and intersection upgrades provide capacity.

The change in work practices with remote offices and work from home technologies gives a different opportunity

The Kumeu / Huapai development includes employment land.

While transport is an issue to be addressed it is not a reason to fundamentally reverse this current committed growth strategy for Huapai.

11. Understanding the Timeframes to Achieve Development Ready land

In identifying the timing for land to be development ready, the Council needs to take a realistic understanding of the timeframes involved. Even on optimistic timeframes, it is a five-year process between commencement of the work to create the housing opportunity. Often this can extend out to closer to eight – ten years.

The process typically includes:

(a) Development consultation and adoption of a structure plan – One year. The five structure plans the Council have done each took on average 2 years .

(b) Taking this structure plan, preparing, notifying, processing, hearing and determining a plan change – two years. The Council plan change on Whenuapai, which was ultimately withdrawn, took 4 years 8 months. The private plan change on Warkworth North took 2.5 years and on Drury took 2 years.

(c) Preparing, lodging and obtaining the necessary resource consents and engineering plan approval – one year.

(d) The physical land development works involving procurement, establishment, bulk earthworks, infrastructure, subdivision and titling; is typically an 18-month process, even for a relatively confined stage. That does then achieve development ready sites.

(e) The actual design, construction and completion of housing can be a further 18-month to 2 year process.

These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at <u>every</u> stage.

The key point is that if the Council is to achieve the 'development ready' timeframes it seeks, then the commencement of structure planning work and other aspects needs to start a minimum of five years prior and more likely eight years. This signals two issues:

(i) The importance of creating resource up front to get the enabling provisions in place.

(ii) The infrastructure cost when services are actually required will come at occupation of the residential land. There is an inherent extended timeframe, i.e. a commitment to a certain area now does not equate to when the infrastructure rolls out. The operational demand for infrastructure is at least five years later. Obviously planning, consenting and construction needs to be timed accordingly. But housing and infrastructure can advance concurrently.

(iii) Furthermore, because development is staged, there is a scaling up of demand for infrastructure even once the first portions of the development are occupied.

D. WIDER IMPLICATIONS OF FDS

12. The impact of reversing longstanding Council commitments to growth management

The role and expansion of greenfield development within the region has been signalled and reinforced through the Auckland Plan, AUP, FULSS and the5 Structure Plans. These are highly important strategic documents for Auckland and have been subject to significant public consultation and in the case of the AUP, substantial amounts of expert evidence and hearings before an Independent Hearing Panel before it was confirmed.

This has driven the Trusts investment in our land, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents. To be blunt, such a stark departure from a long-standing Council policy severally shakes confidence in all of the Council's long term strategy and planning documents. Aucklanders, including business owners, developers, individual land owners and not for profits cannot be sure which of the strategies are here to stay and should be followed, and which are merely temporary (despite stating they are long term). This has huge implications for the future development of Auckland, which relies of private developers to meet housing demand.

These aspects are clearly contrary to the Council's stated commitment to consultation and contrary to the requirements imposed on the Council under the Local Government Act for good faith consultation on policy changes of material significance. It also appears to be contrary to the requirement under the NPSUD that the Council engage with the development sector to "identify significant future development opportunities and infrastructure requirements" when preparing the draft FDS i.e. prior to the Special Consultative Process (Clause 3.15.2(f) of the NPSUD).

The FDS will set in place a 30-year growth strategy for the Auckland region. This proposed FDS involves a fundamental change from the long-established growth pattern that has been in existence since 2011. This major change to existing long-established policy is being done with very limited public consultation prior to the proposal being published. Despite the Council's extension of the consultation timeframe, this process is of questionable legality as outlined in the attached opinion and certainly contrary to democratic processes of consultation.

13. Changes to the Rural Urban Boundary (RUB) should remain a district plan level control (as opposed to a regional control as proposed within the FDS)

(a) The suggestion that the RUB should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change, is demonstrably a retrograde step.

(b) This approach was tested through the Auckland Unitary Plan process. That process found that a plan change to the RUB should remain a *district* matter and that it was inconsistent with the RMA to do otherwise:[1]

> *"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs.*
> *The Panel considers that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances."*

For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person.

(c) The reasons why the Council's suggestion of a regional rule were rejected in 2016, are equally valid today. No modification is justified. As noted by the Panel in its Recommendation Report to the Council on the Auckland Unitary Plan

(d) The Council's track record in implementing greenfields development through plan changes under the FULSS is effectively zero. The only public plan change that the Council promoted giving effect to the FULSS was Whenuapai. Even then, the Council ended up withdrawing that plan change. <u>No public plan changes have been promoted</u> that would give effect to the current growth strategy. <u>Every</u> greenfields development has relied on a private sector initiative and a private plan change.

(e) Being able to deliver these critical plan changes to provide for growth, is essential. Since 2017, the Council has relied on the private sector to do this. In a time where the Council is signalling severe financial constraints, what confidence can the community or the sector have that the Council can and will deliver on these changes.

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[1] Report to Auckland Council, Overview of recommendations on the proposed Auckland Unitary Plan, 22 July 206, page 67.

E. REQUESTED DECISION

14. The submitter requests

(a) the Council pause the current programme on the FDS;

(b) there be meaningful consultation with the community including the development sector;

(c) some key principles be agreed including:

(i) sufficient land must be released at the appropriate time to cater for growth;

(ii) this will continue the combination of urban consolidation, greenfield development, and the expansion of satellite townships;

(iii) growth needs to be serviced by adequate infrastructure;

(iv) that infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(v) stormwater and flood plain management are important factors and need to be considered in the release of land, but recognising different appropriate methods to manage such land.

(i) apply those principles on an area by area basis to identify the release of land;

(d) ensure there is sufficient continuous release of employment and residential land to cater for growth;

(e) enable the private sector to deliver the range and quality of urban growth that is good for the community and which the NPSUD and RPS aspire to;

(f) retain changes to the RUB as a district control matter.

(g) Retain Huapai in the current 2028 – 2032 time period.

Future Development Plan 2023 #8644

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

FUTURE DEVELOPMENT STRATEGY

COSGRAVE ROAD BLOCK

SUMMARY STATEMENT

21 JULY COUNCIL PRESENTATION

17 JULY 2023

1. Thank you for the opportunity to present this brief overview to the Council meeting.

2. Winton Land Limited ('Winton') is the owner of the Cosgrave Road Block (the 'Cosgrave Block'). Winton will lodge a full submission on the draft FDS. That will cover both comments that would apply Auckland-wide and comments that are specific to Cosgrave Block. This presentation focuses on the comments relating to the Cosgrove Road Block.

Cosgrave Block

3. There are a number of features that distinguish Cosgrave Block from some other Future Urban zoned blocks in Auckland.

4. Diagram 1 below shows the Cosgrave Block.



Diagram 1: The Cosgrave Road Block

5. The Cosgrave Block is effectively fully owned by Winton. Winton is a publicly listed New Zealand company with significant experience and expertise in achieving rezonings and undertaking land development.

6. Winton have been in pre-lodgement discussions with Council and Healthy Waters over the conveyance channel, and with the Plans & Places Department.

7. Diagram 2 is a draft masterplan of the plan change area. It will deliver approximately 1,550 new homes together with a neighbourhood centre for local retail development and parkland.

8. All development is within the Rural Urban Boundary.



Diagram 2 The Cosgrave Road Masterplan

Delivering the Cosgrave Road Block

9. Development of Cosgrave Block is a longstanding commitment by the Council. The effect of the draft FDS for Cosgrave Block is to reverse that commitment with no consultation with the affected landowners.

10. The Auckland Plan, Auckland Unitary Plan and the Future Urban Land Supply Strategy all identified Cosgrave Block as a key growth area. The FULSS identified it to be development ready by 2023-2027.

11. The landowner has invested in Cosgrave Block and developed a plan change including a funded proposal for infrastructure (addressed below).

12. This complete reversal of the long-established work undertaken through the Auckland Plan, AUP and FULSS' has a very significant and fundamental impact on Winton who have invested to support the Council, including its timing to have this land development ready.

Draft FDS rationale for the proposed change

13. The draft FDS identifies three reasons for this revisiting:

    - Mill Road connections;
    - frequent transit network; and
    - timing issues.

    These issues are addressed below.

Stormwater Infrastructure funding

14. The FDS signals a change to the Council infrastructure priorities and means that it cannot fund the Cosgrove Block in the next two decades.

15. Winton has the capital to fund the necessary infrastructure upgrades required to develop the Cosgrave Block.

16. The key issue is managing stormwater for which there is a known solution.

17. Auckland Council already owns a portion of land which bisects the Cosgrave Block. This land is intended to be stage 3 of the Awateri wetlands and the conveyance channel for stormwater management through the Cosgrave Block and the adjacent land.

18. Auckland Council has put significant investment into this conveyance channel and stage 1 of the Awateri wetlands located to the west of the Cosgrave Block is operational.

19. The Awateri wetlands was the infrastructure solution developed by Council to solve flood management issues within this area.. The primary function was as a conveyance channel to

store water and prevent inundation of local homes. The creation of the wetlands is partly stormwater treatment, partly ecological enhancement and partly amenity.

20. Through the January storm events, the conveyance channel demonstrably worked. There was no local flooding.

21. For the Cosgrave Block, the same infrastructure solution which has proven successful in the west will be deployed.

22. Winton has been in discussions with Council's Healthy Waters department and is committing to build this conveyance channel and wetlands to Council's specification at Winton's cost. Healthy Waters has this work programmed for 2028. Winton and Healthy Waters have agreed in principle that Winton will fund and commission the detailed design to Healthy Waters standards and sign off. Winton will then fund and implement the works under Healthy Waters oversight. This will happen within the current 2023 -2028 time period.

23. This will solve all stormwater management and flood plan risk for the Cosgrave Block.

Transport Infrastructure funding

The other infrastructure in terms of transport, wastewater and potable water can all be provided within the existing network surrounding the Cosgrave Block.

24. In terms of transport, this development will trigger local intersection improvements to give sufficient capacity for the additional growth. This additional work is all covered in the assessment by Commute as part of the private plan change request. Those upgrades are all within the existing road corridor. No additional private land is required.

25. Those upgrades are funded by Winton as part of the plan change request.

26. The area is serviced by local bus routes connecting to the rail network.

27. Cycling infrastructure will be provided through the Cosgrove Block and help create a network connecting through to the train stations.

Request

28. That the FDS show the Cosgrave Block remaining in the 2023-2027 time period, subject to the Winton being able to fund the conveyance channel upgrade, and localised roading improvements on Mills Road.

29. All these matters can and should be addressed through the private plan change request, after the Council has considered the technical information demonstrating that the land is suitable for housing and the necessary infrastructure can be funded.

Future Development Plan 2023 #8645

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Your feedback

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Tell us why

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3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future Development Strategy

Additional Submission / Notes from Friends of Regional Parks for presentation on 28 July 2023

Auckland Friends of Regional Parks (FOR Parks) was formed by residents as a non-profit organization in 2010, to work alongside Auckland Council and volunteer groups in our regional parks. We act as supporters and guardians of the regional park network in Auckland, providing vision and education, continuity, protection and a citizen's voice for the regional parks. Our formation recognizes the importance of the regional park network in defining the quality of Auckland and the role regional parks have in providing essential recreation for people in Auckland and protecting our biodiversity and heritage.

The regional parks cover a complex asset of 28 parks, "some 41,000ha of public open space" and "more than 225km of coastline providing public access to some of the region's best beaches. There are 20 "farms" within the parks network as part of the complex land management for conservation, recreation, landscape protection and health.

1. We believe parks and open space are an important part of essential infrastructure.

2. All parks provide many functions however they are often secondary / forgotten to other forms of infrastructure E.g.

- Water catchment - the Hunua and Waitakere Ranges water catchment are regional parks with long term leases granted to Watercare for the provision of the regional water supply. It is unsure with changes in legislation if these assets will be transferred to the new water entities and if the regional parks' status remains.

- Many small parks and sport fields are water retention areas for runoff from roads and building intensification. They also form novel biodiversity parks as a secondary use.

- Parks with large trees and forest can cool and shelter a more intensive city as the climate warms therefore saving energy.

- Regional parks link us with nature and provide education opportunities of the rural sector that provides food for the urban people.

- Parks are a solution to set aside and manage hazard areas such as flood prone areas and eroding cliff tops.

3. A visionary policy is needed in the Strategy to highlight the future of parks and open space in the coming decades and century. FoR Parks suggests the 3-30-300-3000 proposal [see below], or similar be used.
Urgency is also needed to establish new regional parks for the coming decades. In the meantime, all areas of open space such as golf courses should be kept as open space until comprehensive planning is done, and the Parks and Open Space Strategy has been completed.

4 The Council's new Regional Park Management Plan says they are an *"aspiration to be one of the leading regional park systems in the world, that Auckland is proud of."*
However, this needs to be expanded and further explained in the Future Development Strategy. By what standards and who judges it? Do IUCN guidelines need to be adopted?

5. There have been recent community groups fighting to protect parks and the way they are managed E.g, the memorial in Dove Myer Robison Park, The mass fell trees on the maunga;

The sale of parks or green space and the slowness in opening /maintaining tracks following closures due to KDB. Far more education and citizen involvement is needed on Council plans, operations, priorities and reasons. The lack a meaningful Parks and Open Space Strategy could be one way to address this community dissatisfaction.

6. Urgency is needed to review the Parks and Open Space Strategy to enable the community to have a clearer understanding of the types, standards and governance of all public green space at the national [DoC], regional and local levels.

7. Governance. There needs to be a separate committee / agency for public parks and the open space system in Auckland. There are billions of assets involved and a more business-like approach is needed. Many complex high-level policies in management plans are left to staff in various sections of Council to interpret, implement and contract out. Accountability eventually rests with elected officials and those appointed as governors.

8. July 31st is International Rangers Day. Rangers are the front line and the contact with the community and volunteers. They need greater recognition and support especially as they are the frontline in implementing the 30x30 Global Biodiversity Framework which calls for 30% of the world's terrestrial, inland water, and of coastal and marine areas, to be in effective protection and management by 2030. The concept of novel and rural biodiversity also needs inclusion.
NZ has adopted this agreement. Kunming-Montreal Global Biodiversity Framework.
https://www.internationalrangers.org/world-ranger-day/

9 Funding. There is limited public funding for parks yet the community want more green space and access to all types of parks for many purposes. It will be hard to get the massive funding needed and new approaches are needed. Council needs to encourage government to develop a national wide parks and open space plan centred on funding - Review the Reserves Act – Have parks and open space at a high level in the Local Government Act reform. - A more business-like and operationally based structures are needed to replace siloed remote management - More use of private open space e.g. QE2 Trust structures - greater encouragement for donations and gifting of land in line with long term designation for public parks. Regional Parks were started that way and that model needs to be brought back to the acquisition of parks. Development contributions need to be focused more on acquisition and not on expensive built park infrastructure. This can be built later through targeted rates as communities mature and settle around their areas of open space. Lastly far greater use could be made of volunteers including honorary rangers.

Thank you, nga mihi

Kit Howden for Friends of Regional Parks 25 July 2023

3 -30 -300 -3000 rule for a Parks Revolution

4 simple rules or guidelines for the health, well being and environment for a growing city. Ratios may vary but it's important a principle is adopted and followed.

1 Every citizen should be able to see at least 3 trees (of a decent size) from their home. b]

2 Every citizen lives in a neighbourhood where there is a tree canopy of 30 percent. b]

3 Every citizen has easily access within 300 metres of the nearest park or green space. b]

4 Every citizen using public transport can easily access a large area of countryside or large natural type open space within 3000 seconds of their home.
a]
NOTES
a] From a public transport / walk trail to Mutukaroa Hamlins Hill trial by Friends of Regional Parks 11, 07, 21
b] From Professor Cecil Konijnendijk van den Bosch the Director of Nature Based Solutions Institute and Program Director (Urban Forestry Leadership) at the University of British Columbia.
https://iucnurbanalliance.org/promoting-health-and-wellbeing-through-urban-forests-introducing-the-3-30-300-rule/
https://www.newsroom.co.nz/ideasroom/new-housing-policy-runs-risk-of-urban-slums
https://www.newsroom.co.nz/first-learn-to-walk
https://www.yardstickglobal.org/projects/parks

Future Development Plan 2023 #8646

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4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

DRAFT FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY THE WARKWORTH SOUTH COLLABORATING LANDOWNERS

27 July 2023

1. Summary of Submission

This is a submission by the Warkworth South private plan change co-applicants (submitters) to Auckland Council's 'Auckland Future Development Strategy 2023-2053' Consultation Draft (**FDS**). The FDS was released for public consultation on 6 June 2023.

The submitters strongly oppose the FDS, both in general and particularly as it relates to the Warkworth South area. In the submitters' view, the FDS:

a. Fails to take into account key planning infrastructure and financial matters relating to the Warkworth South area;

b. Takes an overly cautious approach to potential natural hazards that does not allow for projects to demonstrate they can avoid, remedy or mitigate the risks from natural hazards;

c. Is unlawful, as it has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPS-UD), nor has been subject to adequate consultation as required by the NPS-UD;

d. Substantially overestimates the capacity of Auckland's existing urban areas on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development to meet Auckland's projected population over the next 30 years; and

e. Sets a planning framework which will constrain land supply, thus raising land costs, and ultimately undermining the community drive for affordable housing.

The Warkworth South area is zoned Future Urban in the Auckland Unitary Plan (AUP) and has long been identified as a key strategic growth area for Auckland. The submitters have significantly invested in the future development of this land based on Council's planning documents including the Auckland Plan, the AUP, the Future Urban Land Supply Strategy 2017 (FULSS) which directs Warkworth South to be 'development ready' by 2028-2032, and the Warkworth Structure Plan 2019.

A private plan change to give effect to these planning documents is currently before the Council. This includes a funded proposition to provide necessary infrastructure and the avoidance or mitigation of any potential risks from natural hazards. This private plan change will deliver the outcomes sought through the Warkworth Structure Plan.

The Warkworth South area is suitable, appropriate, and ready for development.

The submitters' requested relief is detailed at the end of this submission. In short, they seek that the FDS be amended to include Warkworth South as a strategic growth area to be development ready in the 2023-2030 period.

The structure of this submission is as follows:

a. Summary of the submitters, Warkworth South and the proposed Warkworth South private plan change;
b. The unlawfulness of the current draft FDS;
c. Submissions on the FDS generally;
d. Submissions on the FDS's approach to Warkworth South:
    i. Transport
    ii. Infrastructure Funding
    iii. Natural Hazards
    iv. Stormwater
    v. Climate Change
e. Impacts of changing Auckland's growth strategy including approach to the Rural Urban Boundary
f. Requested decision

A SUBMITTERS AND WARKWORTH SOUTH

2. Submitters

This submission is by the Warkworth South private plan change co-applicants.

The co-applicants are:

(a) KA Waimanawa Limited Partnership: A wholly owned subsidiary of Kaha Ake, a joint venture between the New Zealand Super Fund and Classic Group. KA Waimanawa LP are a landowner and developer.

(b) Classic Developments NZ Limited: Development managers for KA Waimanawa LP.

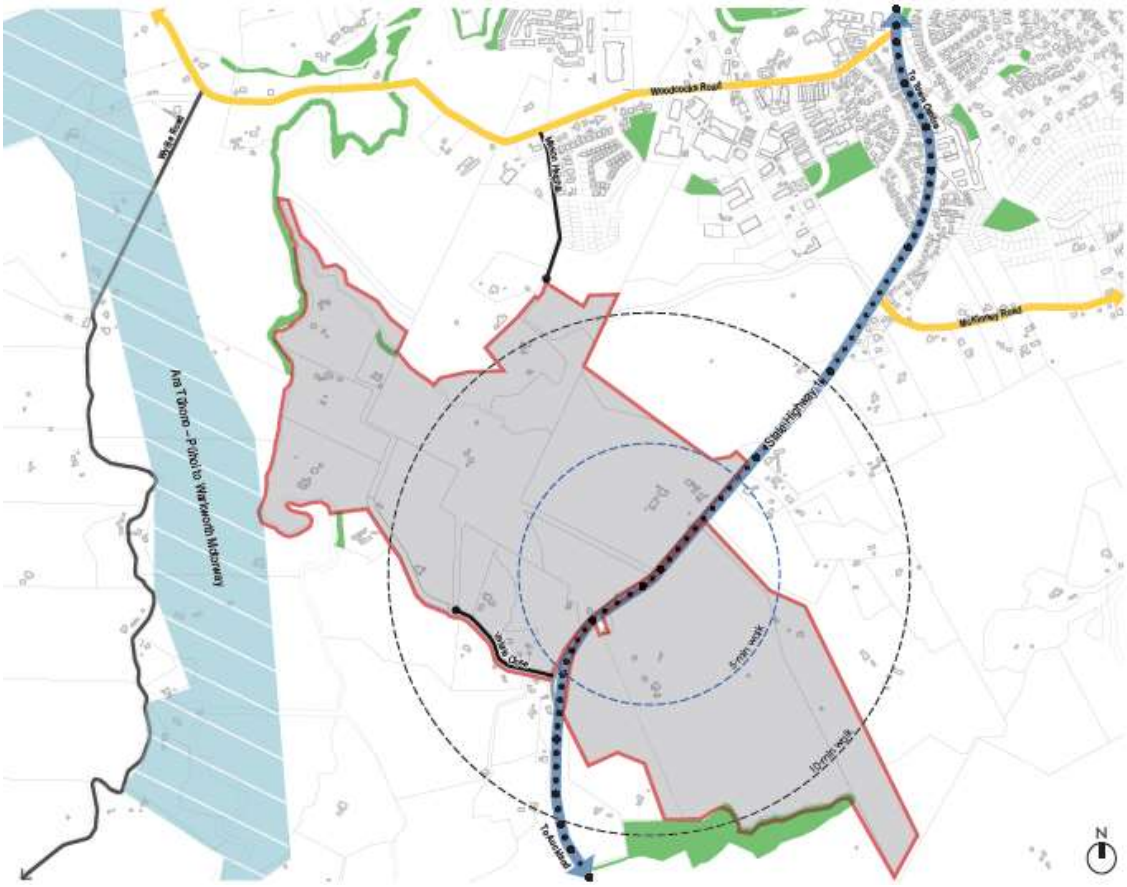
(c) Thriving Development Limited: A current landowner.

(d) Stepping Towards Far Limited: A land developer.

This plan change is supported by several other landowners.

The map below in Diagram 1 shows the land subject to the private plan change request.

Diagram 1: Warkworth South



3. Warkworth South

Warkworth South is zoned Future Urban in the AUP. It is included in the Warkworth Structure Plan and the FULSS as being 'development ready' by 2028-2032.

The FDS delays this timing to 2045+ and recommends it for "further investigation" on the basis of having "moderate exposure to hazards, and [the need] to consider other factors such as infrastructure delays and/or VKT reduction..."

4. Warkworth South Private Plan Change Request

KA Waimanawa LP and Stepping Towards Far Limited have lodged a private plan change request for live zoning of a substantial portion of the Warkworth South area. This plan change is largely consistent with the Warkworth Structure Plan. It will be development ready by the timeframes identified in the current Future Urban Land Supply Strategy (FULSS). The proposal includes funding of necessary infrastructure.

The full plan change and the technical assessments that support it (including planning, ecology, geotechnical, infrastructure, engineering, stormwater, a full Stormwater Management Plan, and transportation) are lodged with the Council. Consequently, that information is not repeated here.

Soft lodgement of the full plan change package was provided to Council in October 2022. Following Council feedback, the updated plan change was formally lodged with the Council in January 2023. The applicant has responded to all clause 23 responses. The Council officers and consultants are now preparing the report for the Council Committee consideration.

Suffice to say that it is a comprehensive proposal involving rezoning of the land as shown on Diagram 2 below, and the introduction of precinct plans addressing the overall planning aspects of the precinct and ecological, stormwater and transport aspects. The Precinct Plan is shown in Diagram 3 below.

Diagram 2: Proposed Rezoning Plan

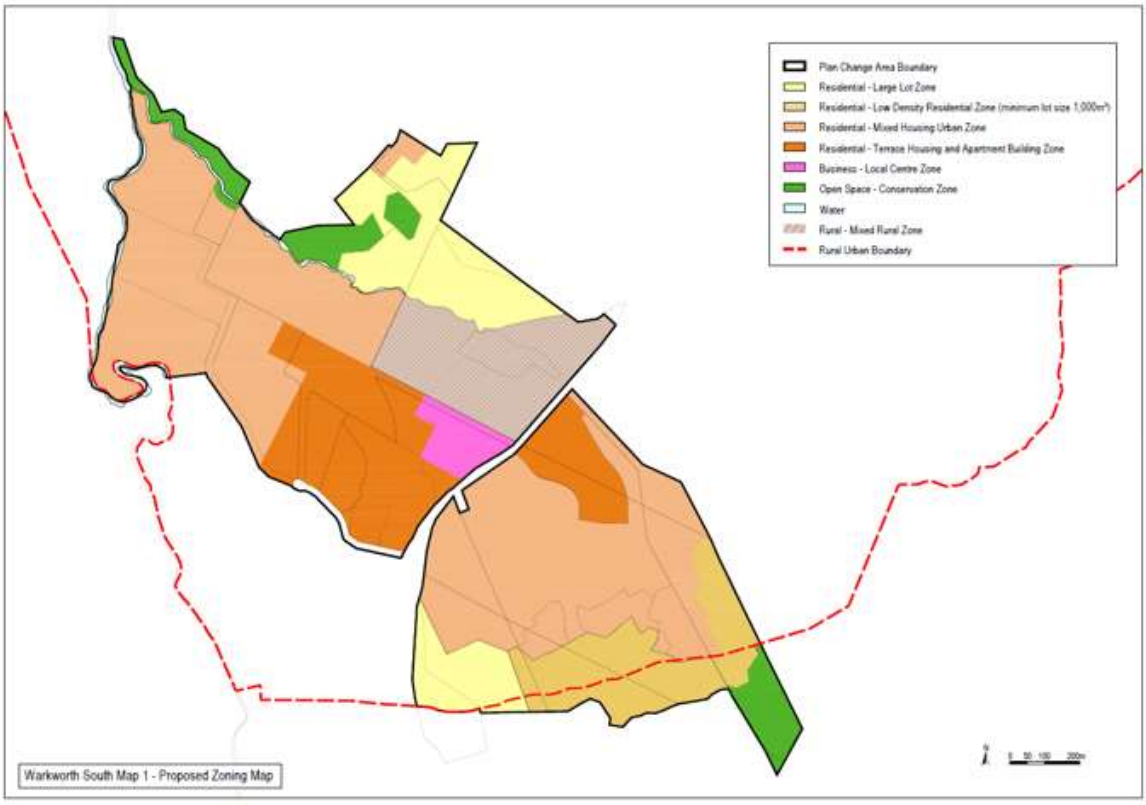
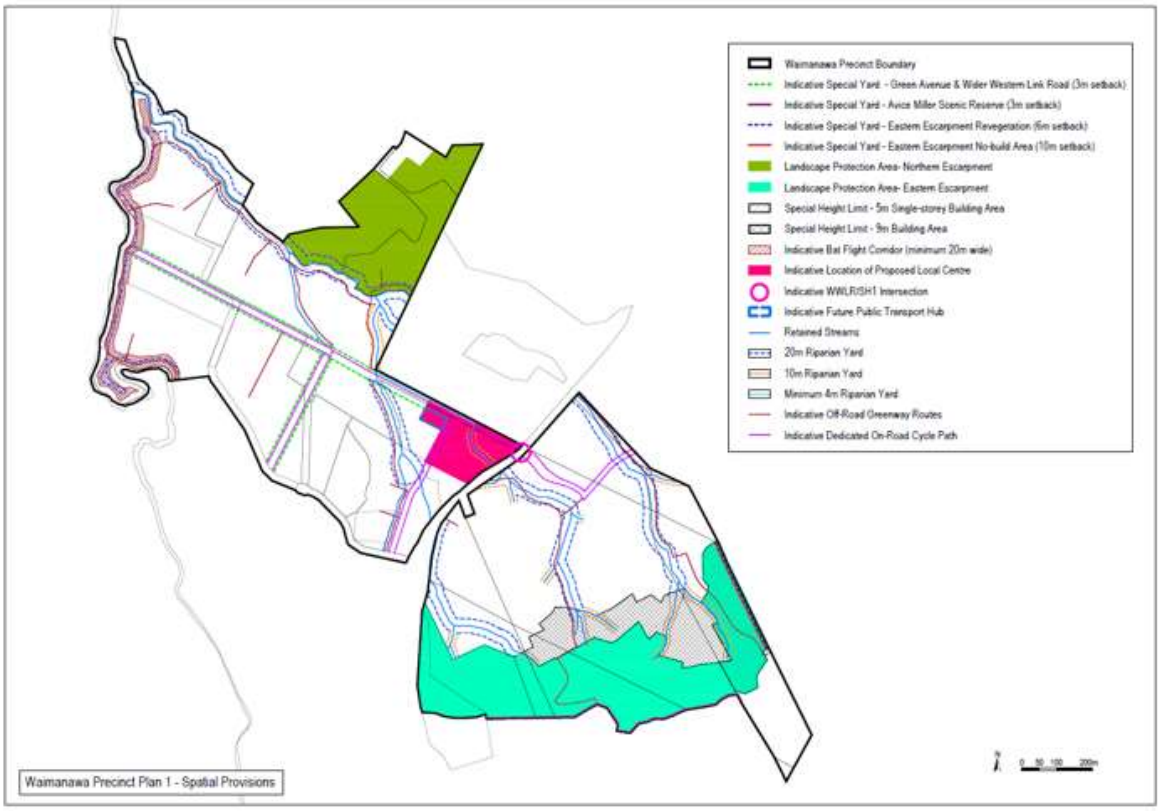


Diagram 3: Proposed Precinct Plan



Critically, this plan change includes a funded programme to provide the necessary infrastructure to service this plan change area. Key infrastructure is futureproofed to service future expansion of Warkworth South. This aspect is more particularly addressed in the submission below.

B GENERAL SUBMISSIONS

5. Proposed Future Development Strategy

The FDS sets out a proposed framework for urban development of Auckland. This reflects a fundamental change in the direction initially charted through the Auckland Plan and subsequently reinforced through the Auckland Unitary Plan (AUP), the FULSS and the Warkworth Structure Plan.

The effect of the FDS is to fundamentally slow down, defer or remove future greenfield development in some manner suggesting that, at least until the 2030s, Auckland's growth can be successfully managed solely within the existing urban area.

This strategy stems from a series of assumptions which the submitters think are based on a flawed and incomplete evidence base. For example, the FDS assumes that:

- there is sufficient capacity for Auckland's projected population growth within the existing metropolitan area and the two rural towns of Pukekohe and Warkworth North, including through proposed Plan Change 78;
- the future expansion of the rural urban boundary (RUB) should only be managed by the Council through a public plan change process;
- there are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas;
- the Council's predicament on budgetary constraints and infrastructure funding; and
- the view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore, any new greenfield developments should be deferred given the current financial predicament.

In addition, the FDS is not based on an adequate and up-to-date Housing and Business Development Capacity Assessment (HBA). It has drawn on a 2021 HBA, however this document does not include any assessment of business land capacity and contains different capacity assumptions to those used in the FDS. This contrasts with the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD).

In terms of Warkworth South, the FDS and its supporting documentation signals "further investigation" is required and a deferral of the rezoning of the area until 2045+ as well as a review of the classification as Future Urban Zone. The FDS gives the reasons for this as:

- lack of or poor transport connections including no rapid transit network and lower opportunities for mode shift;
- "moderate" natural hazard constraints including approximately 25% of the FUA within the 1% AEP flood plain and small to moderate areas of the FUA containing some risks of settlement, liquefaction and slop instability;
- urban form: further consideration needed to understand the role of Warkworth as a rural node and the impact of any changes on business land capacity;
- climate change implications of a settlement removed from the Auckland metropolitan area including potential for higher vehicle kilometres travelled (VKT) and CO_2 emissions;
- lack of infrastructure and funding for infrastructure.

All these matters are addressed in the remainder of this submission.

6. Support for the Concept of a Future Development Strategy (FDS)

(a) The submitters accept that a FDS is required under the NPS-UD, but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base.

(b) Having a blueprint for how Auckland will grow and where and how growth will be managed is an essential informant of the market. Done right, it will direct the market to locate housing and business in the locations that work best from a social, environmental, and economic perspective.

(c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it.

(d) Before the FULSS is updated in the form of an FDS, a comprehensive and robust assessment of business and residential capacity and demand is needed (in the form of an HBA) which meets the requirements of the NPS-UD. This means assessing business land capacity (which has not been done) and realistic residential capacity including likelihood that plan-enabled capacity will be taken up. Capacity figures need to include competitiveness margins. This work will need to incorporate the findings of the Council's natural hazard and flooding work and the outcomes of PC78.

7. General Comments on the FDS – Process in Preparing the FDS is Unlawful

(a) The NPS-UD requires a well-considered, thought out, tested 'future development strategy'. Several steps that are required by the NPS-UD have not been followed in preparation of the FDS. The Council is required to comply with these steps under section 55(3) of the RMA. It is unlawful to do otherwise.

(b) The NPS-UD requires the Council to prepare an FDS that provides "at least" sufficient development capacity over the next 30 years to meet expected demand (3.13(1)(a)(ii)). For residential land, the capacity must be (3.2(2)):

i. Plan enabled; and
ii. Infrastructure ready; and
iii. Feasible and reasonably expected to be realised; and
iv. Meet the expected demand plus the appropriate competitiveness margin.

For business land, the capacity must be (3.3(2)):

i. Plan enabled; and
ii. Infrastructure ready; and
iii. Suitable to meet the demands of different business sectors; and
iv. Meet the expected demand plus the appropriate competitiveness margin.

(c) To do so, it must be informed by the most recent applicable HBA (3.14(1)(a)). The HBA must quantify the region's capacity needs, again complying with the above criteria ("at least sufficient capacity", plan enabled, infrastructure ready, feasible, reasonably expected to be realised, including a competitiveness margin) (3.20(1)(c)).

(d) The FDS has failed to comply with these requirements in several fatal ways:

a. There is no HBA in existence that assesses business land requirements. In an LGOIA response we have been given a copy of (dated July 2023) the Council advised that "*The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published. However, information and data informing the preparation of the assessment has been used to inform the draft FDS*." This raises serious questions:

i. How can a long-term strategy draw conclusions on Auckland's business land requirements before the capacity is understood?

ii. Will the public have the opportunity to review the business HBA through a further consultation period?

iii. Given the Council's focus on people living and working in close proximity, how have decisions been made on residential capacity in the absence of evidence on business land capacity?

b. In terms of residential land, the FDS's conclusions on capacity:

i. Do not demonstrate "at least" sufficient capacity is provided for;

ii. Rely heavily on 'plan-enabled' capacity with little focus on what is actually feasible;

iii. Do not assess what percentage of total plan enabled capacity is reasonably expected to be realised (which could assess realised capacity under the AUP compared to plan enabled and modelled capacity, and take lessons from this process);

iv. Do not assess 'infrastructure ready' development capacity;

v. Do not incorporate the required competitiveness margin;

vi. Are based on a medium growth scenario, with no assessment of a high growth scenario;

vii. Rely heavily on the section 32 report prepared for Plan Change 78 and the assumed capacity that this plan change will provide, despite:

1. PC78 being paused for one year while the Council undertakes a comprehensive natural hazard and flooding assessment;

2. The inevitability that this flooding assessment will result in a reduction in feasible capacity. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on assumptions that are way beyond reality. It is poor public policy practise to place so much reliance on managing such a critical factor as Auckland's growth on an untested plan change;

3. Furthermore, once PC78 is re-published taking into account the outcome of this flooding work, it will be subject to public submissions, expert evidence, hearings before an Independent Hearings Panel, recommendations, decisions, and possibly appeals;

4. Given this process still to come, at this point PC78 is very uncertain and cannot be relied on; and

5. Both major political parties have announced they will either review or revoke the Medium Density Residential Standards, meaning reliance on PC78 for the FDS is even more dubious.

(e) Council has acknowledged these failings in its LGOIA response, dated July 2023. It has advised that infrastructure-ready development figures will be available by late July, that there will be a business capacity assessment published in August and an updated HBA will be available "later in the year". It has acknowledged that the FDS is based on the "best information available at the time" and that the FDS could be updated over time as better information becomes available. This response alone raises serious questions as to the adequacy of the current proposed FDS and the extent that it can be relied on. How can the FDS make findings on when and where growth can occur to meet projected population, before the assessment on infrastructure ready capacity is completed? This on its own is sufficient to show how the analysis behind the FDS is inadequate and ignores the need to also assess feasibility and whether it will actually be realised.

(f) Finally, the NPS-UD also requires the Council to consult with the development sector when preparing the draft FDS (prior to the public consultation process) (3.15(2)(f)). The purpose of this is to identify significant future development opportunities and infrastructure requirements. The Council's two meetings with the Property Council were insufficient to meet this requirement:

a. There is no evidence that the Council sought or took on board any input from the Property Council on development opportunities. In fact, these meetings were not consultation at all but rather a presentation of results of a survey;

b. It was unlawful for the Council to rely solely on one entity to represent such a large and diverse sector. It is unclear what assurances the Council made that this body was in fact able to provide all the information Council needed to prepare the FDS;

c. The submitter is the proponent of one of the larger private plan change applications brought under the AUP. It is very peculiar that it was not included in consultation given it clearly has insights on "future development opportunities" that would have been helpful to the Council when preparing the AUP.

(g) The Council also appears to have fallen short in its involvement of iwi when preparing the draft FDS. Reviewing previous engagement with iwi from other processes is severely lacking in the circumstances where a complete reversal in approach to development is being pursued, which will have major implications on the ability that Maori will have to develop Maori land for economic and social wellbeing.

8. Implications of Flawed Process

(a) The implications of this flawed process are significant.

(b) The submitter is deeply troubled that the FDS has used a starting point that is not founded in a proper evidence base to make the very significant decision to reverse the long term approach to growth and change of building "up and out". This approach has been consistently applied in planning documents since 2012. The Council has used this flawed evidence base to make the bold conclusion that existing urban areas contain sufficient development capacity and that no greenfield development is required over the long-term.

(c) In reality, it has:

a. Substantially over-estimated the capacity of existing urban areas;

b. Under-estimated the greenfield land that will be required to meet population growth;

c. Constrained land supply to the point that there will be a severe increase in land prices over the medium and long terms.

(d) This issue is not new. Through the AUP process, a significant volume of evidence was considered on whether the Rural Urban Boundary (**RUB**) should be contained in the RPS or whether it should sit in the District Plan, where private developers could submit private plan change requests to move the location of the RUB in accordance with the structure planning process when criteria were met.

(e) The Council sought to include the RUB within the RPS as a tool to restrict land supply and force intensification within the existing urban areas (the approach being taken in the FDS). However, the Independent Hearings Panel found that this would lead to adverse and severe consequences for land affordability. It stated in its recommendation reports (emphasis added):

> ***The Panel was not convinced that the location of the Rural Urban Boundary of itself is an appropriate planning tool to support development of a compact urban form in the existing metropolitan area****. The Panel considers the planning tool to best achieve that form of development is the appropriate zoning to enable intensification in and around centres and transport corridors (the Centres and Corridors strategy). It appears to the Panel the only meaningful way in which the Rural Urban Boundary could be used to support compact urban development is to signal a tight and firm restriction on the supply of future urban land, with a view to forcing more intensive use of the existing metropolitan areas than otherwise would be the case.* ***Mr Thompson and Mr Norgrove provided evidence that such an approach would drive urban land prices higher than otherwise***

would be the case and would be contrary to the objective of promoting more affordable access to appropriately zoned land for housing, commercial and industrial use. The Panel agrees.

The Panel was also not convinced by the related proposition that the Rural Urban Boundary should be located so as to attempt to match the supply of future urban land with estimated demand (and no more) over the next thirty years. The Panel simply does not have available to it the necessary information or a recognised method to attempt to match with any confidence the supply of urban land with its estimated demand across the Auckland region over the next ten years (let alone for thirty years). ***The Panel also received evidence, which it accepts, that the costs to people and communities of under-enabling supply are much more severe than those arising from over-enabling supply.***

(f) The FDS reverses these decisions.

(g) This approach of tightly restricting development is in direct conflict with the IHP's findings that under-enabled supply could lead to severe affordability impacts and in direct conflict with the purpose of the NPS-UD. The IHP's findings were based on extensive evidence from a broad cross section of parties (including the Council) parties and extensive comprehensive modelling. This contrasts with what is now proposed which is based on flawed and incomplete analysis that would not withstand any judicial scrutiny.

(h) Furthermore, past experience has shown that when flawed data is relied on, but the market does not deliver to those levels, it constrains housing supply which escalates price, which, for a significant portion of the community, make housing simply unaffordable. This is exactly what the NPS-UD is trying to avoid. It seeks to ensure an oversupply of land so the cost of land and housing reduces.

(i) General Comments on the FDS

(a) The Council, since 2011, has been promoting a balanced growth strategy for Auckland targeting both residential growth and employment/business land supply through urban consolidation, targeted greenfield expansion, and growth of Townships including Warkworth.

(b) This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and various Structure Plans including the Warkworth Structure Plan.

(c) The Council has not implemented any public plan changes to give effect to the structure plans. The private sector, through private plan changes, has funded and provided for these developments.

(d) A number of these areas have been successfully developed following private plan changes. To the best of the applicants knowledge, none of these areas have exhibited any issues through the recent extreme weather events, i.e. no geotechnical or flooding issues. The inference is the current provisions and required assessments are managing environmental risk.

(e) The primary concern with the draft FDS is that this is being rushed through seemingly due to the combined factors of infrastructural funding constraint, flooding and geotechnical issues, and the requirement to update the Long Term Plan in 2024. The impact of what is proposed in the FDS is too critical to be treated in this rushed manner.

(f) If the FDS is pursued in its current form, then it will trigger the unintended consequences of:

- Further constraining residential and employment land supply.
- Further exacerbating congestion issues in Auckland by not locating employment land close to where people live.
- Significantly and negatively impacting housing affordability through land supply constraint.
- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

(g) It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop greenfield development for a decade. If the problem is funding infrastructure, then the solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Funding and Financing Act 2020.

(h) It seems Council is working off a scenario that only the Council can fund infrastructure, rather than using other mechanisms to assist in the sustainable funding and delivery of infrastructure.

(i) In terms of capacity assumptions, the FDS is based on extreme, theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPS-UD). This is a fundamental oversight and completely undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed Plan Change 78 may free up more development) has been in place for the last ten years.

(j) Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer. It simply does not produce enough housing; because not everybody wants to maximise the development potential of their own property. Nor does it provide the NPS-UD required competitiveness margins of 20% excess capacity in the short and medium term and 15% in the long term.

(k) The only way to solve infrastructure is through partnership with the development community. A more agile rather than restrictive strategy is called for.

(l) The draft FDS is based on a medium growth scenario. It should be stress tested against a high growth scenario and should be tested against actual development including brownfields and greenfield development.

(m) What this shows is that:

(i) Since 2011, there has been a long-established strategic policy direction on the growth for Auckland based on urban consolidation and some greenfield expansion where that is well-thought out and appropriate.

(ii) This has been embraced by the community including the development community.

(iii) Very substantial investment decisions have been made based on this Council commitment.

(iv) The implementation of this strategy has solely relied on the private sector through the development community to rezone FUZ land through private plan changes.

(v) This has delivered additional growth for Auckland.

(vi) To the best of the submitters' knowledge, none of these developed private plan change areas experienced any issues with extreme flooding events or geotechnical problems. The system worked and is working. In contrast, there has been widespread flooding throughout urban areas as a result of insufficient infrastructure.

(vii) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this is addressed below.

This complete reversal of the long-established work through the Auckland Plan, AUP, FULSS and Warkworth Structure Plan, has a very significant and fundamental impact on the property owners who have invested to support the Council in its Structure Plan, and will fail to deliver the necessary housing and other planning outcomes for Warkworth and the region.

This complete reversal has been done without any consultation in the circumstance where the Council has been processing a private plan change soft lodged in October 2022. The land owners had no knowledge of this prior to the Council meeting to adopt the draft FDS.

(j) Constraining Land Supply Directly Impacts Housing Affordability

(a) The key lesson of the 2000s and mid-2010s is that constraining land supply raises land value expectations in the current owners, which in turn raises the price developers need to pay for the land, which, when passed on to the end resident, significantly raises house cost. Under supply of land distorts normal market operations.

(b) It is not the developer who is making the significant value uplift. Developer margins have been reasonably constant. It is the distortion in the market that raises hope value amongst existing rural and urban landowners because there is a critical land supply shortage. A healthy over zoning is an important method to ensure these distortions do not occur.

(c) It is also important to note that the build cost for 2 to 3 storey attached housing typologies and 3 to 5 storey apartments contemplated in brownfields environments under this policy are significantly more than traditional detached 1 and 2 storey homes commonly found in greenfield developments. Therefore, eliminating greenfield will only lead to negative impacts on housing supply and affordability will only get worse.

(d) One of the key unintended consequences of the FDS is that it will significantly constrain land supply, which will have a further negative impact on housing affordability.

(e) This is completely at odds with direction from central government through the NPS-UD which directs Councils to provide "at least" sufficient capacity and aims to improve housing affordability.

C. SUBMISSIONS SPECIFIC TO WARKWORTH SOUTH

(k) Warkworth South Transport Infrastructure

The Council's background report raises issues with the transport infrastructure as it relates to Warkworth South.

Warkworth generally benefits from a recently improved transport network. The network has fundamentally changed on 19 June with the opening of the Puhoi-Warkworth Expressway (Ara Tūhono) and the Matakana Link Road (MLR).

That has had the effect of:

(i) Substantially moving traffic travelling between Auckland and Northland and the Mahurangi Peninsula/Matakana area, away from the current State Highway 1 through Warkworth South and the Hill Street intersection, to a new high quality, high-capacity roads which effectively skirt the western and northern side of Warkworth, being largely west and north of the Warkworth urban area.

(ii) The new road linkage is now open and fully operational and have resolved capacity issues.

(iii) The effect of this is to remove significant traffic volumes from the Warkworth street network. It delivers s a substantial decrease in the Hill Street intersection which was the bottle neck and a key constraint on transport linkages within Warkworth.

(iv) That has brought significant capacity to the old State Highway 1 between Warkworth South and the town centre and on to the entrance to the expressway. The detailed transport assessment by TPC in support of the plan change clearly demonstrates that there is full capacity to move north form the Warkworth South plan change area.

(v) Auckland Transport and the Supporting Growth Alliance have in June 2023 commenced notice of requirement procedures to create the necessary intersections for the Warkworth Western Link Road (WWLR).

(vi) The submitters are supportive of this road including its general location. They want to move the roundabout 50m further north to better align with lot boundaries and to avoid a wetland; and introduce designation boundaries that distinguish the required construction area from the permanent alignment. With these minor adjustments, the submitters will support the notice of requirement and are a willing seller of land.

(vii) KA Waimanawa LP will also effectively fund the WWLR through to close to the boundary of the Mahurangi River headwaters as part of development of the plan change. The WWLR will be put into strategic arterial road standards including limitations on access. This will include walkways, cycleways, a two-lane road and agreed intersection points to give access to the Waimanawa Valley development.

(viii) KA Waimanawa LP / Stepping Towards Far will also fund a walkway and cycleway connection from the WWLR through to the existing footpath and cycle connections at McKinney Road.

(ix) The concerns leading to deferment, or review, of Warkworth South because of transport access and infrastructure funding problems, are unfounded.

(x) The former State Highway 1 provides good roading access north to the township, the surrounding employment and recreational district of Warkworth/Mahurangi, and connections on State Highway 1 south to Silverdale, Albany and Auckland, and north to Whangarei and Northland.

(xi) The plan change provides for the bus hub to enhance public transport when population growth warrants the service. The local centre provides terminal facilities for bus based public transport.

10 Vehicle Kilometres Travelled (VKT)

The argument is put forward in the draft FDS that continued development of Warkworth is contrary to climate change policies because it provides a satellite township forcing people to commute to the metropolitan area for jobs. Issues over vehicle kilometre trip emissions are raised. This fails to take account of:

(a) The significant employment in Warkworth generated by the rural sector, tourism, and simply servicing the Warkworth / Mahurangi / Matakana area.

(b) The 'work from home' approach new technology in running business. The use of Teams/Zoom and other mediums and their acceptance as a normal business method is having a significant impact in the work environment and in VKT.

(c) The fundamental change in work habits that is part of the post-Covid era, where working from home is a key factor.

(d) The high number of people who are looking for either retirement lifestyle, or a slower lifestyle and work/life balance; where they are looking for a provincial township lifestyle rather than a more intensive urban lifestyle.

It is too simplistic and incorrect to characterise this area as a commuter suburb for Auckland metropolitan area. It is a social and economic community in its own right. There will be some commuting back to metropolitan Auckland, but there will also be a substantial amount of activity which warrants the opportunity for both expanded residential and employment land.

The compact size of Warkworth and the dedicated walking and cycling link to McKinney Road through this plan change, provides alternative travel modes for residents. The local centre part of the development ensures a walkable opportunity for base services / retail.

11 A Better Way to Solve Infrastructure

(a) The FDS effectively identifies the significant budget constraints the Council is facing and their inability to solve infrastructure. The reaction to this is to offer up only one technique which is to slow down or stop growth until the Council's financial position catches up and infrastructure can be funded. Only then does the draft FDS contemplate the release of land for growth.

(b) The fundamental flaw in this draft approach; is that the population does not stop growing and the need for employment land and housing land does not cease until the Council's financial position rectifies itself.

(c) If the problem is the provision of infrastructure, then the FDS should focus on the problem and find alternative ways of working with the private sector to solve infrastructure.

(d) Managing the pace of growth is but one tool available. It is a tool that distorts the market and undermines housing affordability, as proven over the last decade. There are other examples where private sector funding have delivered necessary infrastructure to facilitate growth.

(e) Infrastructure is fundamentally a cost to the government (and its related agencies), the Council (and its CCOs), the private development sector, and the private investment sector.

(f) Rather than constrain the entire Auckland greenfield and satellite township land release programme, a better solution is to analyse on an area by area basis and find innovative ways of funding the infrastructure to enable the release of some or all of that land.

(g) The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth (Warkworth South is a strong example of where this can and should happen);

(ii) the option of partnership arrangements between private and public sector to fund infrastructure over time;

(iii) infrastructure funding agreements and the opportunity to up front pay development contributions and build in mechanisms to fund that work as others benefit from the early infrastructure investment;

(iv) Exploring how it can utilise the tools in the Infrastructure Funding and Financing Act 2020.

The FDS seems to assume none of these are applicable or workable. Equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

(l) Warkworth South Infrastructure

The Warkworth South plan change and implementation programme resolves and funds all infrastructure for the plan change area and futureproofs infrastructure for wider area.

In particular, the proposal funds:

(i) All local infrastructure within Warkworth South in the normal manner;

(ii) Upgrading the existing SH1 through the plan change area to urban road standards;

(iii) Building a dedicated shared path walkway and cycleway from the plan change area to McKinney Road;

(iv) The construction of the roundabout at WWLR;

(v) A two-lane strategic arterial road on the WWLR through the KA Waimanawa LP land;

(vi) The potable water supply line from Warkworth to Warkworth South;

(vii) Vesting the land for the necessary water reservoir to service Warkworth South. Securing this land will futureproof either an extension or a duplicate reservoir for the rest of Warkworth South;

(viii) Vesting the land necessary for the wastewater pump station necessary to service the plan change area;

(ix) Construction of the pump station to service the plan change area;

(x) Construction of a rising main from the pump station to the top of McKinney Road, with the opportunity to place a second pipe in the trench to service other parts of Warkworth South if developed in the future;

(xi) Construction of a gravity line, futureproofed for all of Warkworth South, from McKinney Road to the prime Warkworth pump station;

(xii) Setting aside land for the transport hub identified in the Strategic Growth Alliance programme and in the Structure Plan;

(xiii) Other core sub regional infrastructure, which is either complete or well underway include:

- rising main from Warkworth to the Mahurangi Treatment Plant;
- upgrade of the treatment plant;
- ocean outfall from the treatment plant;
- upgrade of the water supply;
- completion of the Puhoi to Warkworth Expressway;
- completion of the Matakana Link Road

Warkworth and particularly Warkworth South is uniquely placed to deliver the need for growth in a project where:

- all regional infrastructure is either in place or physically in construction, and
- all Warkworth South infrastructure will be funded by the developer.

Obviously, it is inappropriate for the Council to have the developer provide this necessary core infrastructure, and then charge development contributions and IGCs on top of that. The submitters will look for an infrastructure funding agreement which reflects that it is providing infrastructure upgrades and should not therefore have to pay DCs and IGCs.

(m) Natural Hazards are Already Adequately Controlled

(a) The FDS states that delaying development of Warkworth South is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

(b) There is no debate that land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards and can demonstrate that any identified natural hazard risks can be avoided, remedied or mitigated.

(c) In this regard, the RMA, RPS and Auckland-wide provisions in the AUP including the approach of 'Future Urban' zoning (which requires a plan change before an area can be development) and assessment criteria that apply to any subdivision or development consent, already give the Council full ability to prevent development occurring in high-risk natural hazard areas where risk cannot be successfully avoided or mitigated.

(d) There is no urgency to hurry through this draft FDS. The existing legislative regime and AUP provisions provide all the safeguards needed. There is no need to rush anything through to plug some perceived existing gap.

(e) The existing controls are working well. The vast majority of issues that occurred in the January/February weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were relatively unimpacted by the storm events.

(f) In terms of flood management, there are multiple engineering solutions that work well and have proved successful on land that can be flood prone if not managed. As long as new development is accompanied by appropriately designed and tested engineering solutions paid for by the developer, then it is not necessary, nor is it appropriate, to constrain development based on a perception of a flood risk or geotechnical risk. The right approach is to ensure the natural hazard risk is successfully managed or removed through robust engineering design and investment.

(n) Stormwater Management in Warkworth South

As part of this plan change for Warkworth South, there has been detailed modelling of the flood plains, flood prone area, and overland flow paths at different event scenarios for the entire Warkworth South plan change area.

This work has been undertaken by Maven as part of the private plan change request. It includes a detailed analysis of flood levels and risk. Maven has also produced a detailed SMP for the area.

The extent of the flood plain is defined through this process and is based on a detailed site evaluation (rather than the generic assessment that must inevitably occur in a region-wide exercise).

While there are parts of the Warkworth South plan change area that are within flood prone areas, the development of housing is <u>not</u> located within these areas. All house sites sit <u>outside the flood area</u> as identified on the Maven plan. The plan change is the correct process to work through the precise details of the Precinct provisions.

The key point is there is agreement over the principle of ensuring homes don't flood. The Auckland-wide provisions have proven to deliver this outcome. The plan change gives the method to set these levels for this specific area. The Council has appropriate control through the plan change process. This matter does not need to and should not be pre-determined now. That is better dealt with through the scrutiny and targeted assessment of the plan change.

The Maven report identifies a best practice approach to stormwater and overland flow management within the plan change area. The collaborating landowners are committed to this, and the plan change provisions require it.

Overland flow is managed in streams and on roads.

The AUP includes all the tools (objectives, policies, standards and assessment criteria) to ensure that in future subdivision and development, housing and business is kept clear of land subject to natural hazards including flooding.

There is no basis on which rezoning of this land should be deferred or reviewed because of stormwater and flood management issues.

The FDS statement that 'further investigation' is required to determine whether Warkworth South can be developed is entirely unfounded. This investigative work has been done by the developer already. Furthermore, it will be subject to thorough and robust scrutiny through the plan change submission, evidence and hearing process before an Independent Hearing Panel.

D. WIDER IMPLICATIONS OF FDS

(o) The Impact of Reversing Longstanding Council Commitments to Growth Management

The role and expansion of Warkworth as a provincial centre within the region has been signalled and reinforced through the Auckland Plan, AUP, FULSS and the Warkworth Structure Plan. These are highly important strategic documents for Auckland and have been subject to significant public consultation and in the case of the AUP, substantial amounts of expert evidence and hearings before an Independent Hearing Panel before it was confirmed.

Significant investment has been made by multiple landowners, including the submitters, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents. To be blunt, such a stark departure from a long-standing Council policy severely shakes confidence in all the Council's long-term strategy and planning documents. Aucklanders, including business owners, developers and not-for-profits cannot be sure which of the strategies are here to stay and should be followed, and which are merely temporary (despite stating they are long term). This has huge implications for the future development of Auckland, which relies of private developers to meet housing demand.

In the case of Warkworth South, the FDS either reverses or substantially defers that long standing Council commitment. This is done notwithstanding the Council:

- has seen such urgency in serving a notice of requirement for the WWLR;
- has two landowners who have clearly indicated their desire to enter an infrastructure funding agreement such as they will fund all necessary infrastructure for Warkworth South plan change area.

Not only has the Council promoted this FDS without considering this plan change request and the infrastructure proposals embodied with it; it has done this without any consultation with

the submitters. Given this plan change request has been lodged with the Council for 9 months it is incumbent on the Council to directly consult with the applicants prior to this policy change.

These aspects are clearly contrary to the Council's stated commitment to consultation and contrary to the requirements imposed on the Council under the Local Government Act for good faith consultation on policy changes of material significance. It also appears to be contrary to the requirement under the NPS-UD that the Council engage with the development sector to "identify significant future development opportunities and infrastructure requirements" when preparing the draft FDS i.e. prior to the Special Consultative Process (Clause 3.15.2(f) of the NPS-UD).

The FDS will set in place a 30-year growth strategy for the Auckland region. This proposed FDS involves a fundamental change from the long-established growth pattern that has been in existence since 2011. This major change to existing long-established policy is being done with very limited public consultation prior to the proposal being published. Despite the Council's extension of the consultation timeframe, this process is of questionable legality as outlined in the attached opinion and certainly contrary to democratic processes of consultation.

(p) Changes to the Rural Urban Boundary (RUB) Should Remain a District Plan Level Control (as opposed to a regional control as proposed within the FDS)

(a) The suggestion that the RUB should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change, is demonstrably a retrograde step.

(b) This approach was tested through the Auckland Unitary Plan process. That process found that a plan change to the RUB should remain a *district* matter and that it was inconsistent with the RMA to do otherwise. The Panel's views on this are set out earlier in this submission.

(c) The reasons why the Council's suggestion of a regional rule were rejected in 2016, are equally valid today. No modification is justified.

(d) The Council's track record in implementing greenfields development through plan changes under the FULSS is effectively zero. The only public plan change that the Council promoted giving effect to the FULSS was Whenuapai. Even then, the Council ended up withdrawing that plan change. <u>No public plan changes have been promoted</u> that would give effect to the current growth strategy. <u>Every</u> greenfields development has relied on a private sector initiative and a private plan change.

(e) Being able to deliver these critical plan changes to provide for growth, is essential. Since 2017, the Council has relied on the private sector to do this. In a time where the Council is signalling severe financial constraints, what confidence can the community or the sector have that the Council can and will deliver on these changes.

(f) All of Warkworth's implementation of the structure Plan has been through private plan change – and it has worked. The Warkworth South Plan Change will similarly work.

E. REQUESTED DECISION

(q) The submitters request:

(a) that Council pause the current programme on the FDS;

(b) there be meaningful consultation with the community including the development sector;

(c) some key principles be agreed including:

(i) sufficient land must be released at the appropriate time to cater for growth;

(ii) this will continue the combination of urban consolidation, greenfields development, and the expansion of satellite townships;

(iii) growth needs to be serviced by adequate infrastructure;

(iv) that infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(v) stormwater and flood plain management are important factors and need to be considered in the release of land while recognising different appropriate methods to manage such land.

(i) apply those principles on an area-by-area basis to identify the release of land;

(d) ensure there is sufficient continuous release of employment and residential land to cater for growth;

(e) enable the private sector to deliver the range and quality of urban growth that is good for the community and which the NPS-UD and RPS aspire to;

(f) retain changes to the RUB as a district control matter.

(g) That any new iteration of the FDS include the Warkworth South area as a committed growth area.

(h) That Warkworth South be shown as development ready in the 2023-2030 period.

i. It is recognised the Council may want to record that the live zoning is dependent on an infrastructure funding agreement between landowners and the Council over key infrastructure funding.

ii. The plan can record that as part of any rezoning, appropriate management of flood plain and overland flow will be required to ensure development sites are not within flood plains.

Future Development Plan 2023 #8647

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

Housing developments in existing Urban areas (and those detailed as Future Urban in the FDS) make more efficient use of exiting and planned transport infrastructure, especially public transport. Greater efficiencies will be made in upgrading existing infrastructure to support growing needs rather than establishing entirely new systems. This in turn leads to a reduction in greenhouse gas emissions. Allowing Urban developments in areas zoned Rural in the FDS will lead to reactive planning of infrastructure. This will inevitably be inefficient, uneconomic and fragmented. Rural areas are currently not well served with road transport infrastructure which is needed in lower density areas. These ad-hoc developments will mean out-dated services and unmanageable traffic volumes will cause more and more intense issues. The FDS will provide for enough housing and business capacity to meet foreseeable future needs without allowing for private plan changes to Future Urban, which would inevitably impact negatively on infrastructure planning and development. We need to protect existing Rural land with high-value soils from development so as not to diminish opportunities for the local production of food and produce. Protecting existing Rural areas from development will also halt the degradation of our natural wetland, freshwater, estuarine and marine water quality. There should be no further urban development beyond Drury/Oira Creeks into Karaka farmland. The Hingaia bridge forms a natural boundary to urban spread.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Provision of vital facilities (retail and service industries, employment etc) within close proximity to residential development opens up opportunities for alternatives to motor vehicle commuting. The social aspects of engaging with people on public transport or active mode connections to work, school, and recreation have a huge potential to strengthen the local community. Strong local communities have the potential to strengthen social resilience and provide safer neighbourhoods. The reduction of commuter time not only provides a greater opportunity to spend quality recreational and family time but would reduce family commuter expenses providing social benefit.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Avoiding future development in environmentally hazardous areas is logical. The FDS has identified areas that will provide for enough housing and business capacity to meet foreseeable future needs without compromising the health and safety of residents due to actual and potential hazards. Where developments have been allowed in hazardous areas some loss is highly likely. Home owners may end up losing over time and their properties may be uninsurable, therefore investigation (with published results) seems sensible. Invest where it is environmentally safe to invest, divest in areas that have proven unsafe in recent times, and allow these areas to slowly return to the way nature is guiding them. Areas which have been identified at risk can be utilised

to provide (for example) stormwater detention and retention so as to reduce the risk to the surrounding communities.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

High density development will potentially produce a large percentage of impermeable surface area which will require innovative management solutions to offset. Integrating stormwater runoff control with aesthetically pleasing and improved environmental solutions that provide public open space is a logical progression. These systems have proven effective and improve aesthetics for urban areas. Allowance for nature's deluge is most effectively controlled by nature itself. Therefore areas of nature-based infrastructure make sense, they are the lungs and veins of a modern cityscape. The Karaka area has a long coastline to the Manukau Harbour and its creeks. This coastline does not have public access, and is both nationally and internationally significant as a feeding and breeding ground for migratory birds. These birds depend on the Manukau and the continued health of the harbour is important to these species. Allowing urban development of the Karaka area gives rise to threats to the birds including runoff from the development, changes in tidal patterns due to sediment and land use changes, spread of Pacific oysters and expansion of mangroves, and pests such as cats, rats and off-leash dogs near nesting areas. We need to preserve rural areas with valuable food-producing soils such as in Karaka. Auckland has limited areas of high-value food-producing soil types and these must be maintained. Once these are taken away, they can never be replaced. Many of these areas are under intense pressure from development. Growers and farmers in areas like the wider Pukekohe region and the Karaka North Peninsula are being forced to make movements towards splillng their land into smaller pockets, to provide what will be their most profitable single harvest (being the sale of the land), but more importantly it will be THEIR FINAL HARVEST

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

We support the idea of regulated low density development around existing rural towns and villages to support and encourage local business. However, protecting existing rural greenfield areas is a priority. Extensive urban development in rural areas in Franklin (particularly around Pukekohe) has taken over large areas of previously highly productive market garden land. As our population grows, as is inevitable with the planned urban expansion, it is vital that local production of produce remains sustainable. Upgrading of, and the establishment of new infrastructure to cope with future urban growth and maintaining efficient roading and transport connections with existing outlying and planned new intensified urban and commercial development is a fundamental requirement before expanding existing urban boundaries further into existing rural areas. We understand that there is a proposal being developed to apply for a private plan change to Future Urban for a large area of Karaka. This is directly contrary to the FDS, to a sustainable environment, and the wider Karaka community. It must not be allowed to proceed.

Auckland Council – Future Development Strategy
Karaka Residents & Ratepayers Association
Feedback 31 July 2023

Q1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

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Areas which have been identified at risk can be utilised to provide (for example) stormwater detention and retention so as to reduce the risk to the surrounding communities.

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Future Development Plan 2023 #8648

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4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

WINDERMERE
HOLDINGS LIMITED

PRESENTATION TO AUCKLAND COUNCILLORS IN RELATION TO THE IMPLICATIONS OF THE FUTURE DEVELOPMENT STRATEGY FOR PROPOSED DEVELOPMENT AT ALFRISTON

Introduction

1. Windermere Holdings Limited (WHL) is a property development and investment company which has developed or invested throughout New Zealand. The company controls what it considers to be a unique and critically strategic parcel of land at [redacted]

2. The WHL land is adjacent (although across the road) from an equally strategically important parcel of land owned Kainga Ora at 2 Wastney Road. The Kainga Ora and WHL land has a combined area of 80ha.

3. WHL has, alongside Kainga Ora, developed a proposal for a new community on land at Alfriston – Alfriston Village - that would, by any measure, be consistent with and promote AC's objectives as regards housing supply and vibrant, well-functioning communities.

4. A fundamental premise of the Alfriston Village proposal is that WHL will pay its own way in terms of the provision of infrastructure – there will be no cost whatsoever to the Council.

5. WHL is also partnering with Ngai Tai ki Tamaki as a means of enabling them to exercise their kaitiaki responsibilities on this land, which is within their rohe and near their marae.

6. WHL intends to obtain approval for this development via a private plan change to the AUP. However, a major potential impediment are the assumptions underlying the Council's Future Development Strategy (FDS) that the land in Alfriston is within a floodplain and comprises peat soils. Extensive technical investigations commissioned by WHL demonstrate that that is not the case and that,

to that extent, the FDS should not stand in the way of, but accommodate, the Alfriston Village proposal.

7. In that regard, in light of the January and February storm events, it is important to recognise that developable land outside of floodplains is a scarce and valuable resource in the Auckland Region.

Purpose and scope of presentation

8. The purpose of this presentation is to address important issues relevant to WHL's proposal and to outline why the impediment represented by the FDS is not justified and needs to be modified. In doing so we address:

   (a) The Alfriston Village concept.

   (b) Growth in South Auckland.

   (c) The appropriateness of a substitute recognition / zoning.

   (d) The WHL Structure Plan.

The Alfriston Village concept

9. Windermere has engaged a team of experts who have undertaken a great deal of technical work in relation to site constraints and development opportunities at Alfriston. This work has included flooding and stormwater, geotechnical, archaeology, ecology, economics, social impact, urban design and transportation.

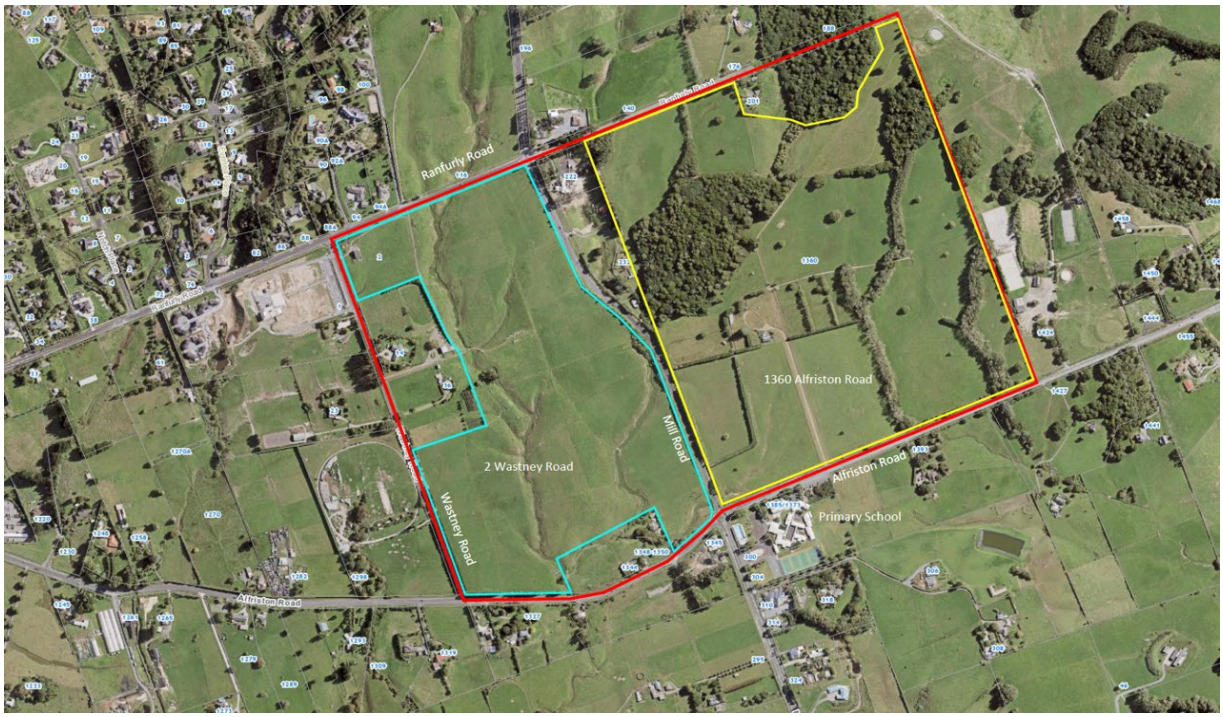
10. WHL has not undertaken a superficial analysis of the floodplain or applied a 'one size fits all' approach; rather, WHL's experts have undertaken a highly detailed analysis such that WHL can categorically state that the assumptions underlying the FDS as it relates to Alfriston are incorrect in terms of the existence of the floodplain and peat soils on WHL's land.

11. No criticism is intended of Council officers – the assumption made was justified at a 'broad brush' level until the detailed work undertaken by WHL was completed.

12. WHL has no concerns about Council's approach to the Takanini floodplain or peat soils. However, WHL's expert advice indicates that the land at Alfriston is not affected by the physical constraints that affect Takanini.

13. In light of the January and February storms and the effects of climate change and, recognising that these issues are not new to Takanini, WHL has identified methods to ensure that its development mitigates all its flood flows to the Papakura Stream by designing to detain the

100-year flood event. Our experts ran a stormwater model 1,000 times to achieve this level of confidence.



14. Alfriston has exceptional locational attributes. Within 10km there is access to:

(a) 153,000 jobs (2475 ha of business land);

(b) 21 primary schools, two intermediate schools and one secondary school;

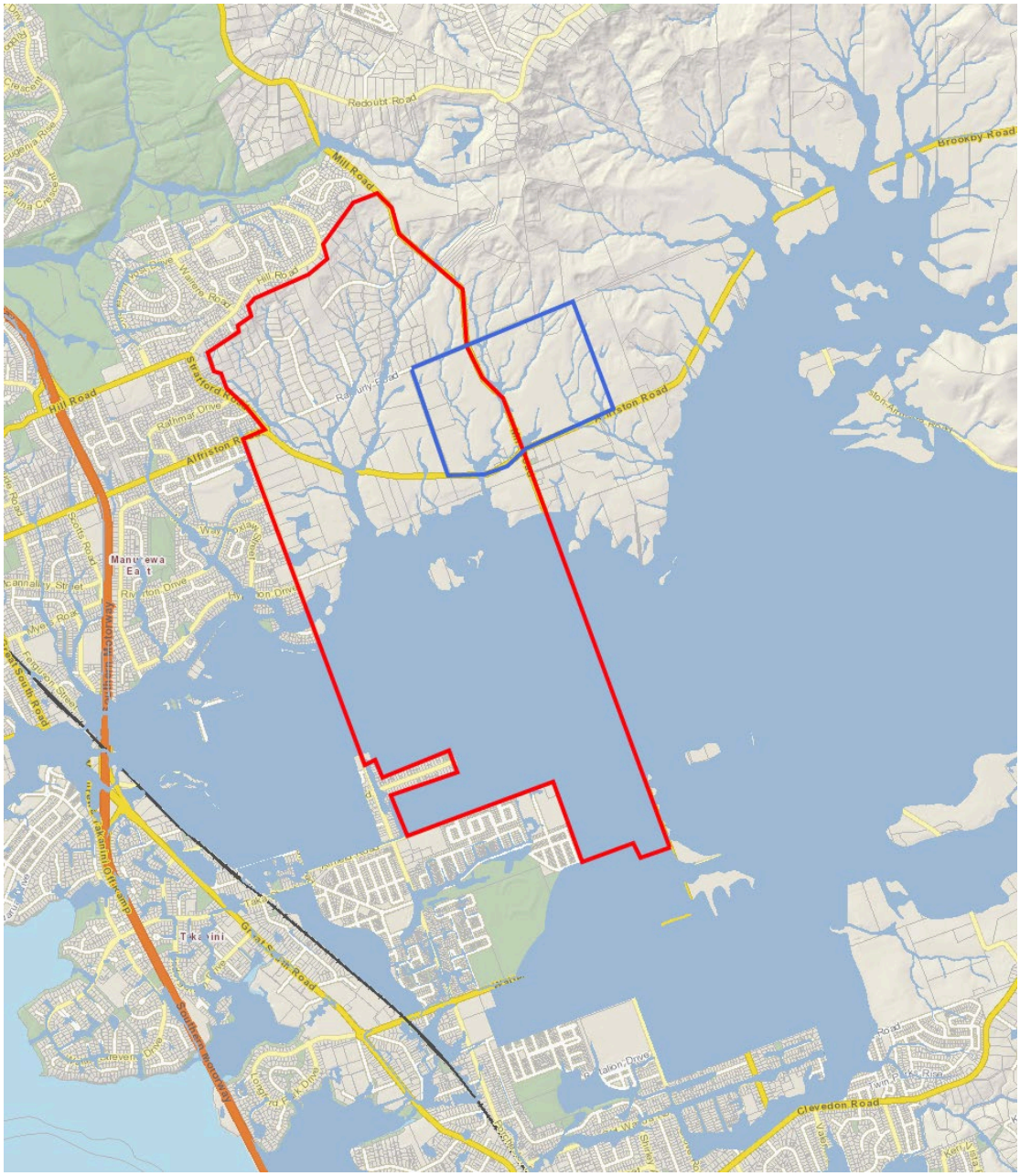
(c) The Manukau Institute of Technology;

(d) The Manukau and Papakura metro centres (6km), and Manurewa and Takanini town centres (4km);

(e) The Manurewa train station (4km);

(f) Medical and community facilities; and

(g) Regional, sub-regional and suburban sports facilities and parks.



Takanini and Alfriston FUZ (red), flood plain (light blue), Windermere and Kainga Ora sites (dark blue outline)

Growth in South Auckland

15. WHL considers that the identification of the Alfriston area as FUZ is correct other than the exclusion the WHL land from that zoning.

16. WHL's fundamental proposition is that there is no basis to assume that infill and intensification is better than anything that can be developed in greenfields. The opposite is usually the case.

17. WHL's technical work confirms that Alfriston would rank as one of Auckland's best performing greenfield sites and, for vehicle

kilometres travelled (VKT) achieves better reductions in travel distances than half of Auckland's existing urban areas. It is simply so much closer to jobs, community facilities and centres than anything else. All the matters FDS is seeking to measure growth against Alfriston out-competes half the existing areas in Auckland.

18. WHL considers that Alfriston (including its land) more than merits its FUZ and future residential zoning when compared to the Council's plans for Huapai, Silverdale, Orewa, Warkworth and even Drury.

The appropriateness of a substitute recognition / zoning

19. WHL considers that the Alfriston FUZ and RUB should be based on:

    (a) Defensible boundaries not the current approach of running the FUB down the middle of a road; and

    (b) Proposals that support solutions, for example we're working with the community and Auckland Transport to address freight bypass opportunities to move quarry trucks away from travelling in front of the primary school.

20. It is likely that there is a strong case to downzone Takanini in light of the floodplain and peat soils. As noted, these factors do not apply to the WHL / KO land in Alfriston. Based on WHL's detailed structure plan work, we consider that Alfriston provides an appropriate substitution.

21. As would be expected, Council officers have provided a coarse and high-level approach in the FDS. As far as Alfriston is concerned, WHL has undertaken the technical work to enable a more nuanced to be adopted, as reflected in the WHL Structure Plan.

The WHL Structure Plan

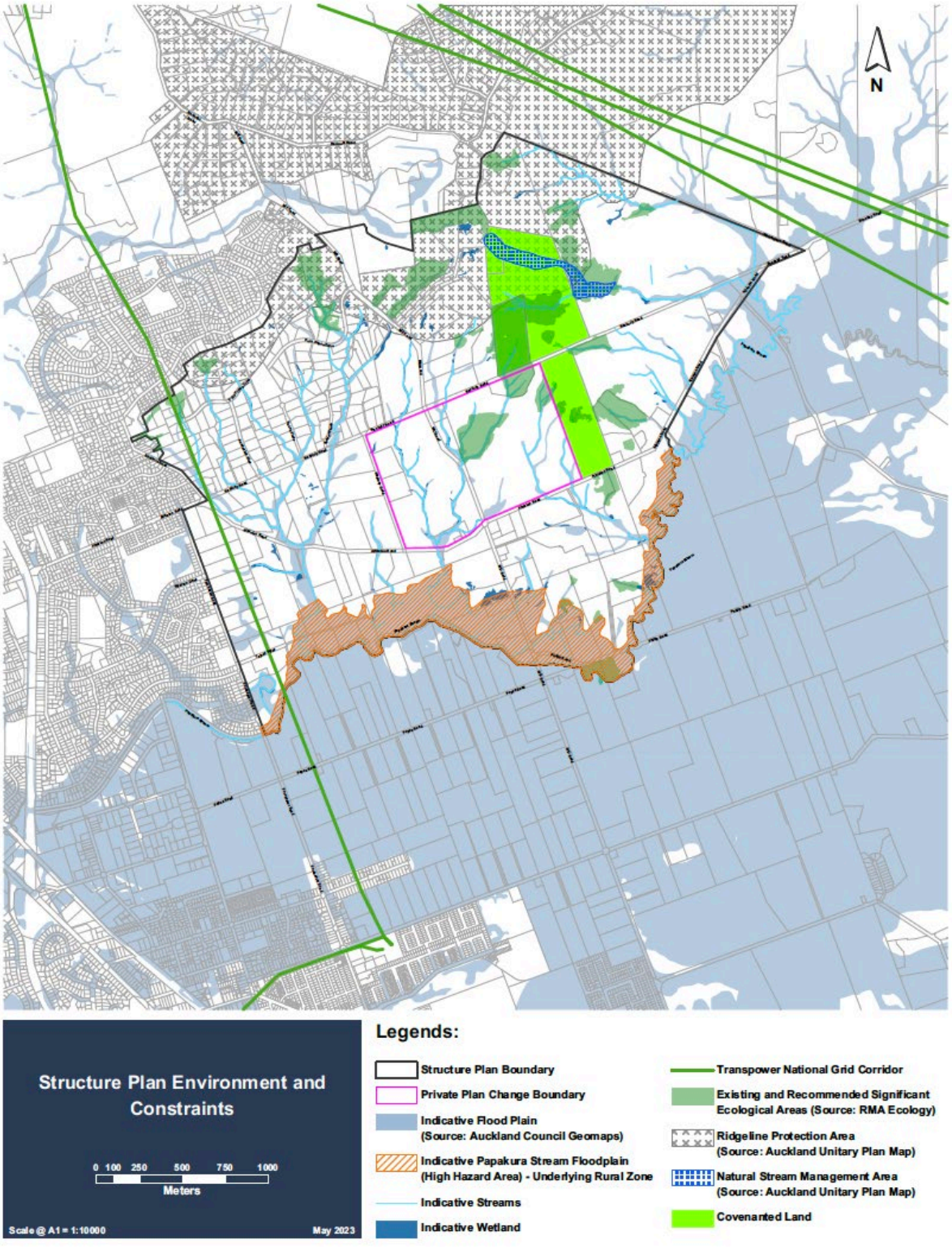
22. The two diagrams below illustrate the Alfriston Structure Plan environment and constraints and the Alfriston Structure Plan itself. The Structure Plan encompasses 730 ha of analysis.

23. Key features of the WHL Structure Plan are as follows:

    (a) It is above the floodplain (blue).

    (b) It keeps the floodplain north of the Papakura Stream zoned rural (brown hatch).

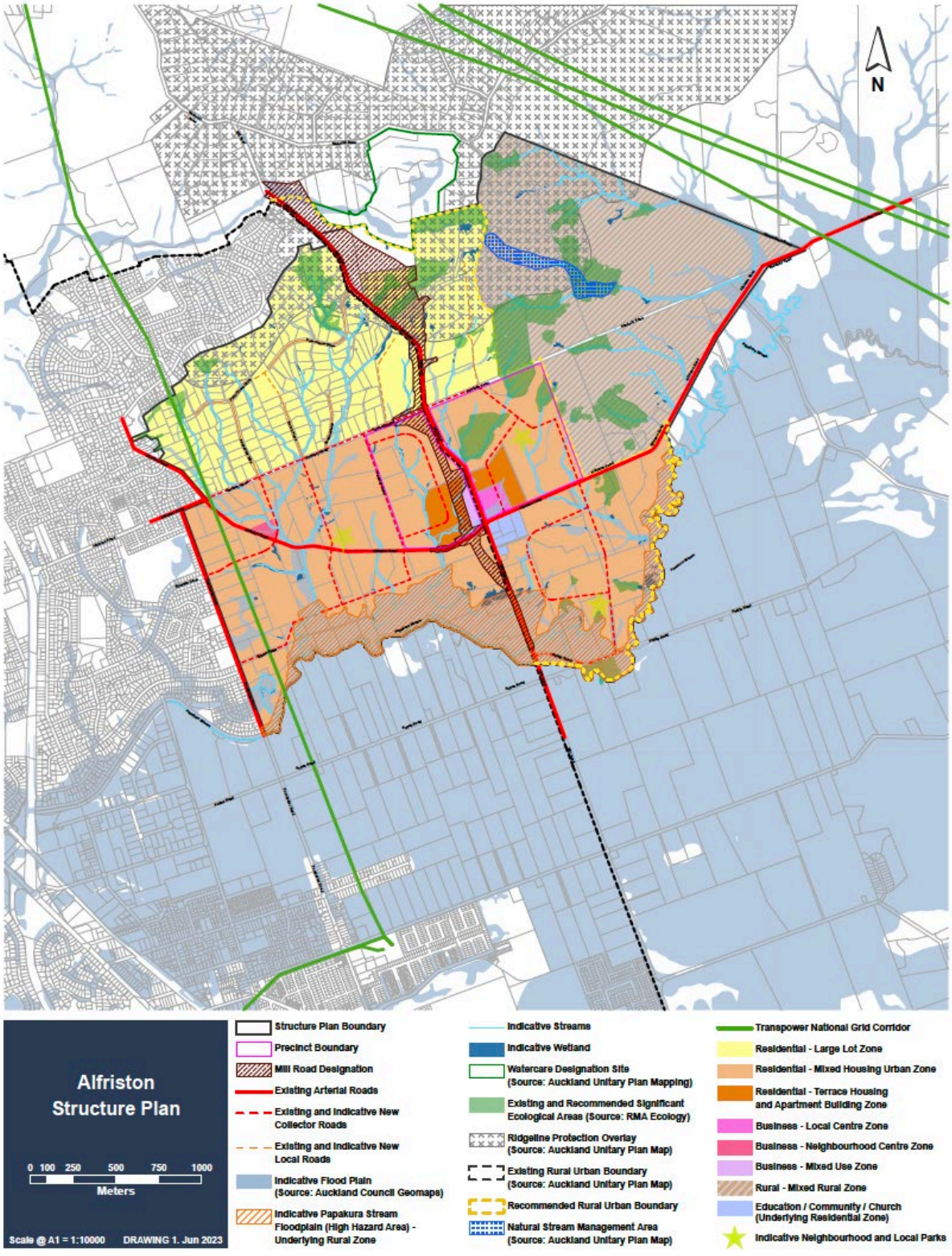
    (c) It has a strong defensible edge against a ridgeline and land covenanted (green) by QEII and Forest & Bird.



(d) It contemplates a largely self-contained community based on:

(i) Local centre opposite the primary school.

(ii) Supportive zones for intensification.



(iii) Mixed Housing Urban as the standard zone.

(iv) Large lot residential in the existing fragmented, steep and vegetated slopes north of Ranfurly Road.

24. WHL therefore respectfully requests that the fundamentally important issues that we have highlighted, including the prospect of a new community at Alfriston, needs to be reflected in the FDS.

25. WHL is grateful for the opportunity to present to you today.

Future Development Plan 2023 #8649

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Your feedback

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Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

#8649



Wellsford North – FDS Submission

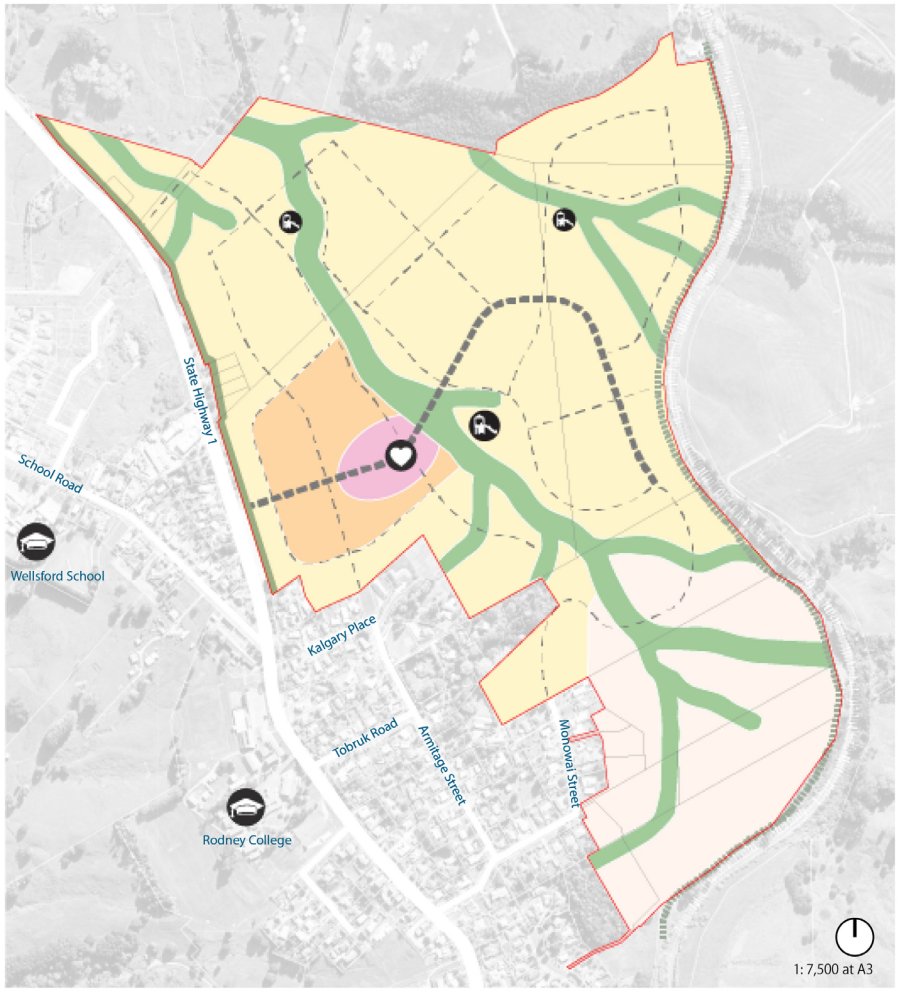
B&A

Urban & Environmental

#8649

- New residential community offering:
  - 650-800 houses
  - Village Centre
  - Open Spaces and greenway/cycleway
- 72 ha applicant majority landowner
- Significant consultation with Iwi, Council officers, community and other agencies
- Structure Planning Complete and Council officers supportive of the Plan Change
- Significant housing shortfall at Wellsford with no rental properties available

Significant opportunity to provide more capacity and much needed housing choice in Wellsford.

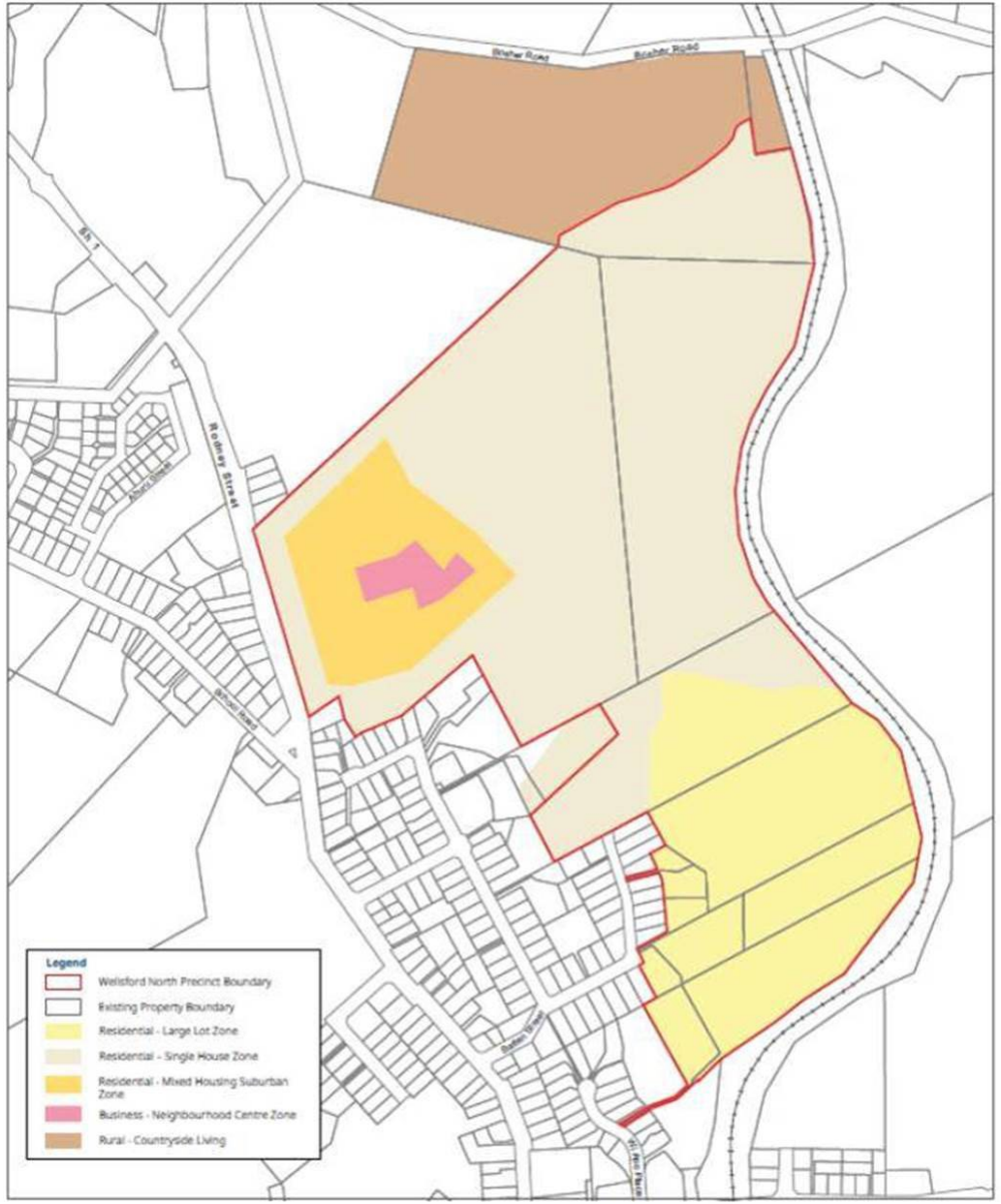


Structure Plan

Legend

- Structure plan extent
- Property Boundary
- Indicative Lifestyle Living
- Indicative Lower Density Residential
- Indicative Medium Density Residential
- Indicative Village Centre
- Ecological Areas / Open Spaces
- Main Collector Road
- Local Streets
- Greenway Cycleway
- 10m Landscape Buffer
- Indicative Playground
- Indicative Village Centre Public Space
- Existing Schools

Wellsford North Structure Plan



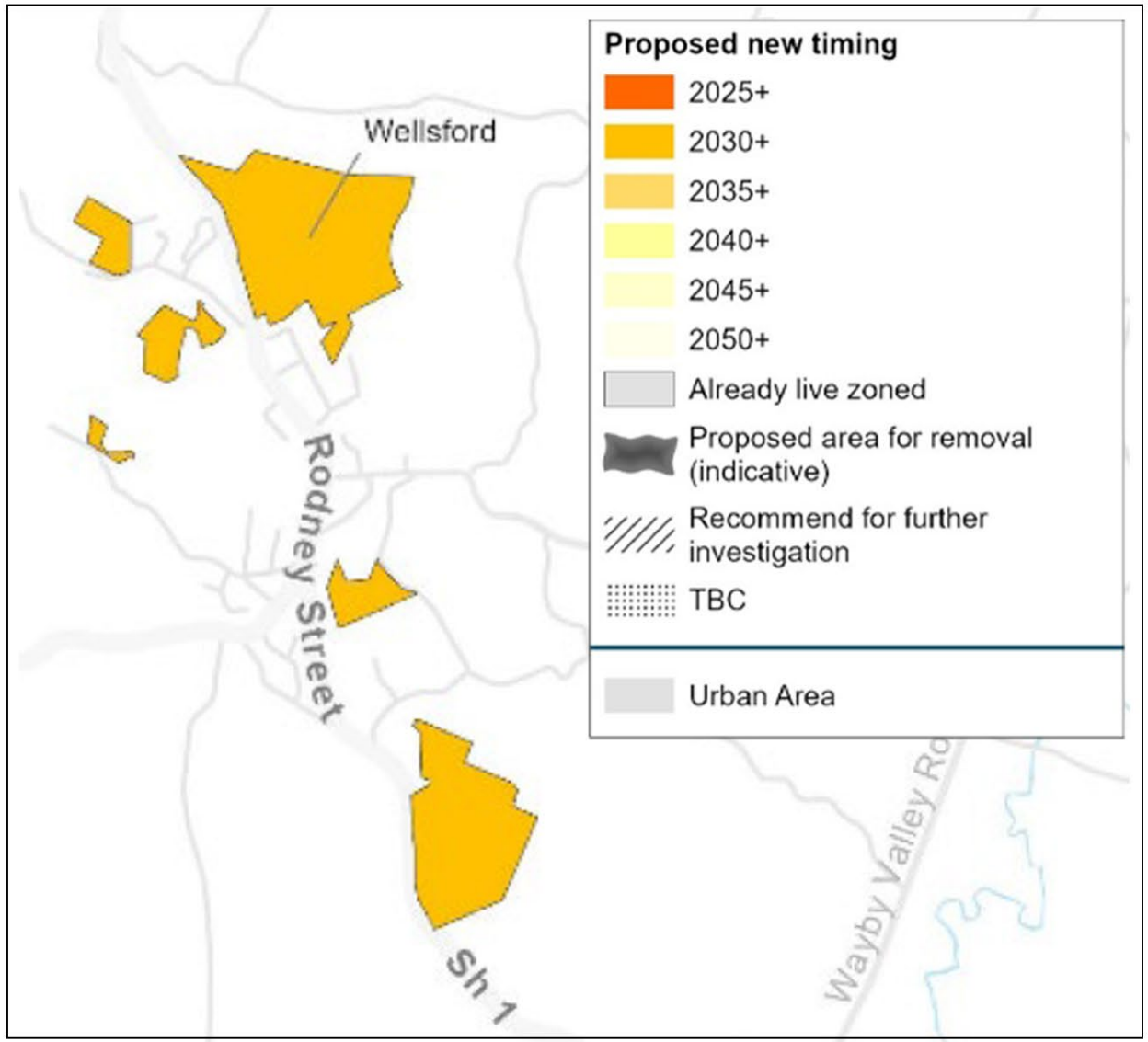
#8649

- Wellsford North Plan Change seeks to rezone 72.06ha of land:
  - 5.87 ha Residential – Mixed Housing Suburban (MHS) zone;
  - 39.64 ha Residential – Single House (SH) zone;
  - 17.04 ha Residential – Large Lot zone;
  - 0.89 ha Business – Neighbourhood Centre (NC) zone; and
  - 11.56 ha Rural – Countryside Living (RCL) zone.

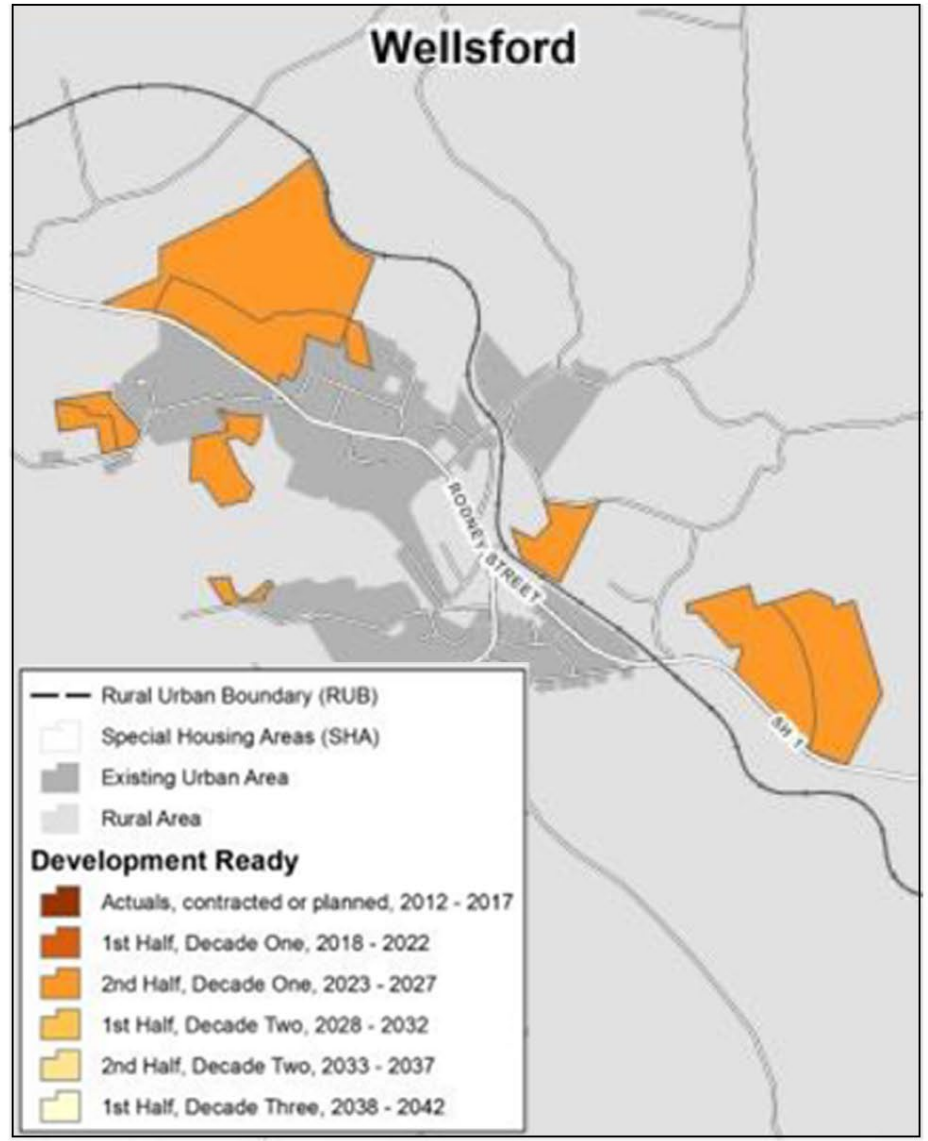
Wellsford North Plan Change

B&A
Urban & Environmental

Auckland Future Urban Land Supply#8649 Strategy 2017



Draft Auckland Future Development Strategy 2023-2053



#8649

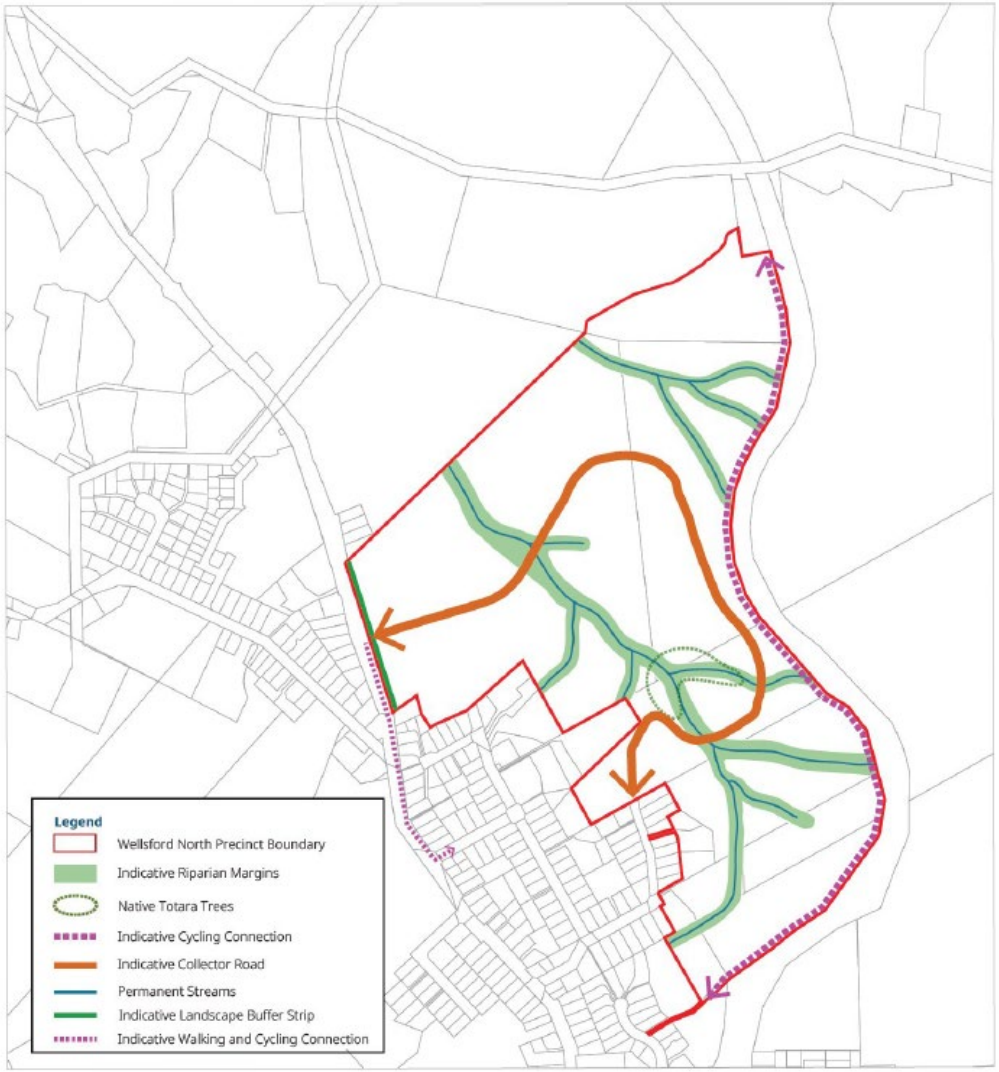
<u>All infrastructure</u> will be either developer funded, funded through the Watercare Assets Upgrade Plan or through the Infrastructure Funding Agreement between Watercare and the WWC.

Specific requirements include:

- New intersection connecting to SH1 (Rodney Street) - fully funded by the developer
- New internal roads, connections and cycleways - constructed and funded by the developer
- Watercare Services Limited have confirmed that the existing water supply network can cater for the development
- Wastewater capacity upgrades delivered through the Infrastructure Funding Agreement between Watercare and the WWC.

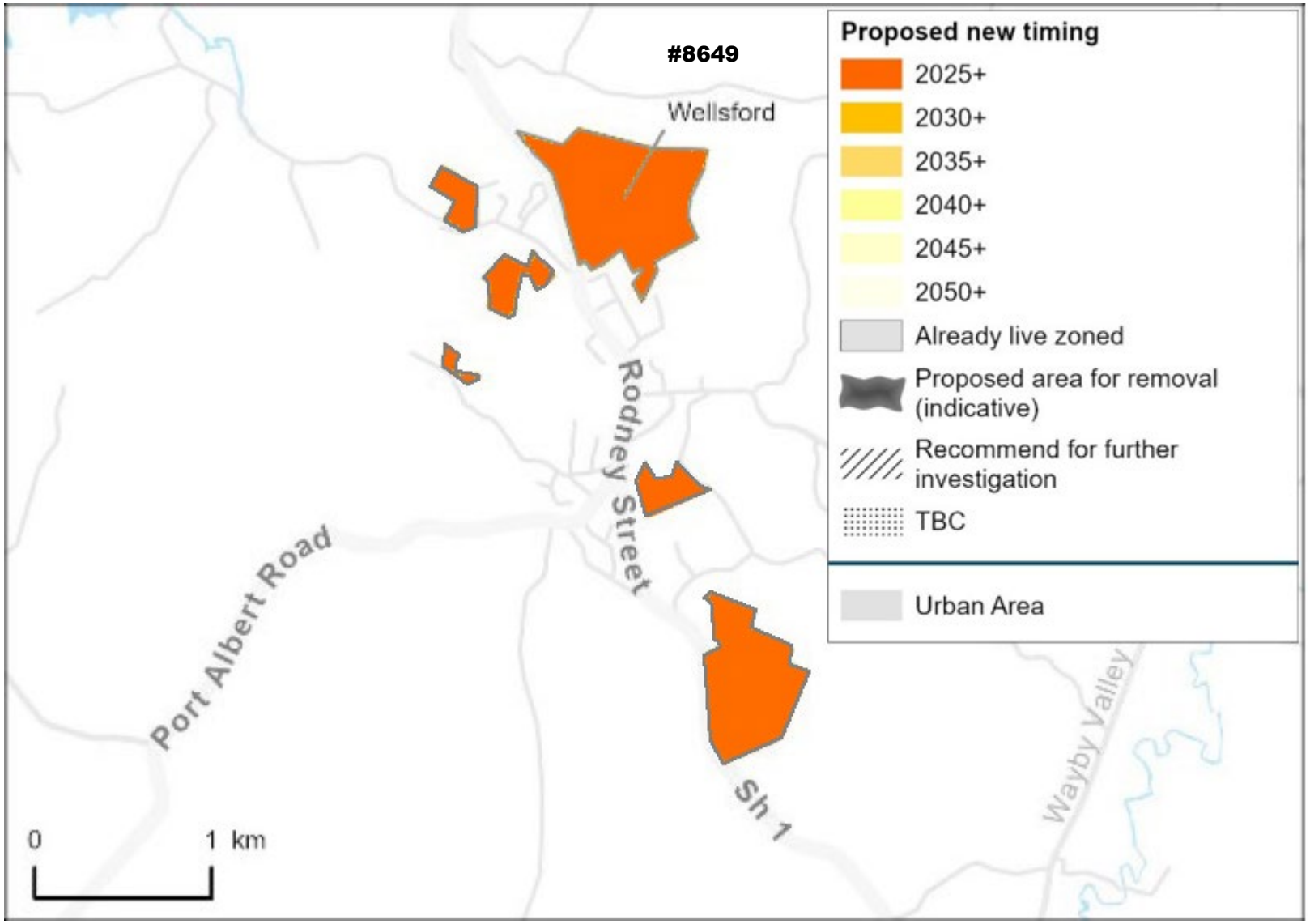
IX.10 Precinct Plans

Wellsford North: Precinct Plan 1 – Indicative Road and Open Space Network



Wellsford North - Infrastructure

B&A
Urban & Environmental



Wellsford North – Proposed Staging

B&A
Urban & Environmental

Future Development Plan 2023 #8651

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

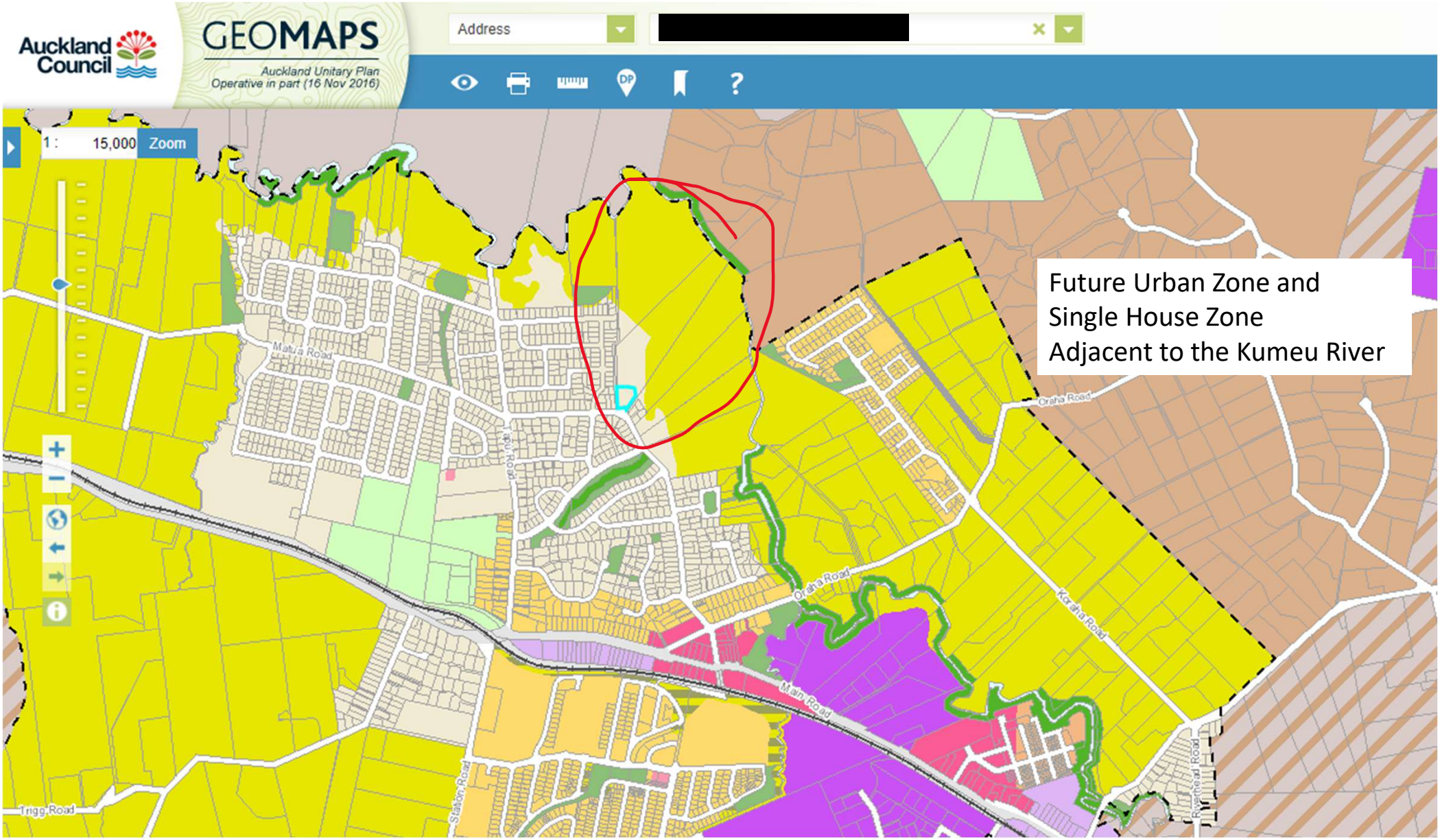
5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

#8651

Huapai North Community group

[redacted]

#8651


Auckland Council
GEOMAPS
Auckland Unitary Plan
Operative in part (16 Nov 2016)
Address
[redacted]
1 : 15,000
Zoom
Future Urban Zone and
Single House Zone
Adjacent to the Kumeu River
Matua Road
Main Road
Oraha Road
Korara Road
Main Road
Station Road
Trigg Road
Riverhead Road

Final Consultation Draft states:

Future urban areas proposed for removal, either partially or entirely

Kumeū-Huapai-Riverhead (in part)

- Kumeū-Huapai-Riverhead is recommended to be partially removed due to parts of the FUA not being suitable for development. The reasons for this partial removal are:
  - Significant hazard constraints, including approximately 30% of FUA covered by a 1% annual exceedance probability (1% AEP) flood plain. Portions of the Kumeū-Huapai-Riverhead FUA proposed for removal are parcels entirely or mostly within this floodplain extent and have few appropriate land uses.
  - Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs.
    - P.30 of Appendix of FDS Final Consultation Draft

#8651

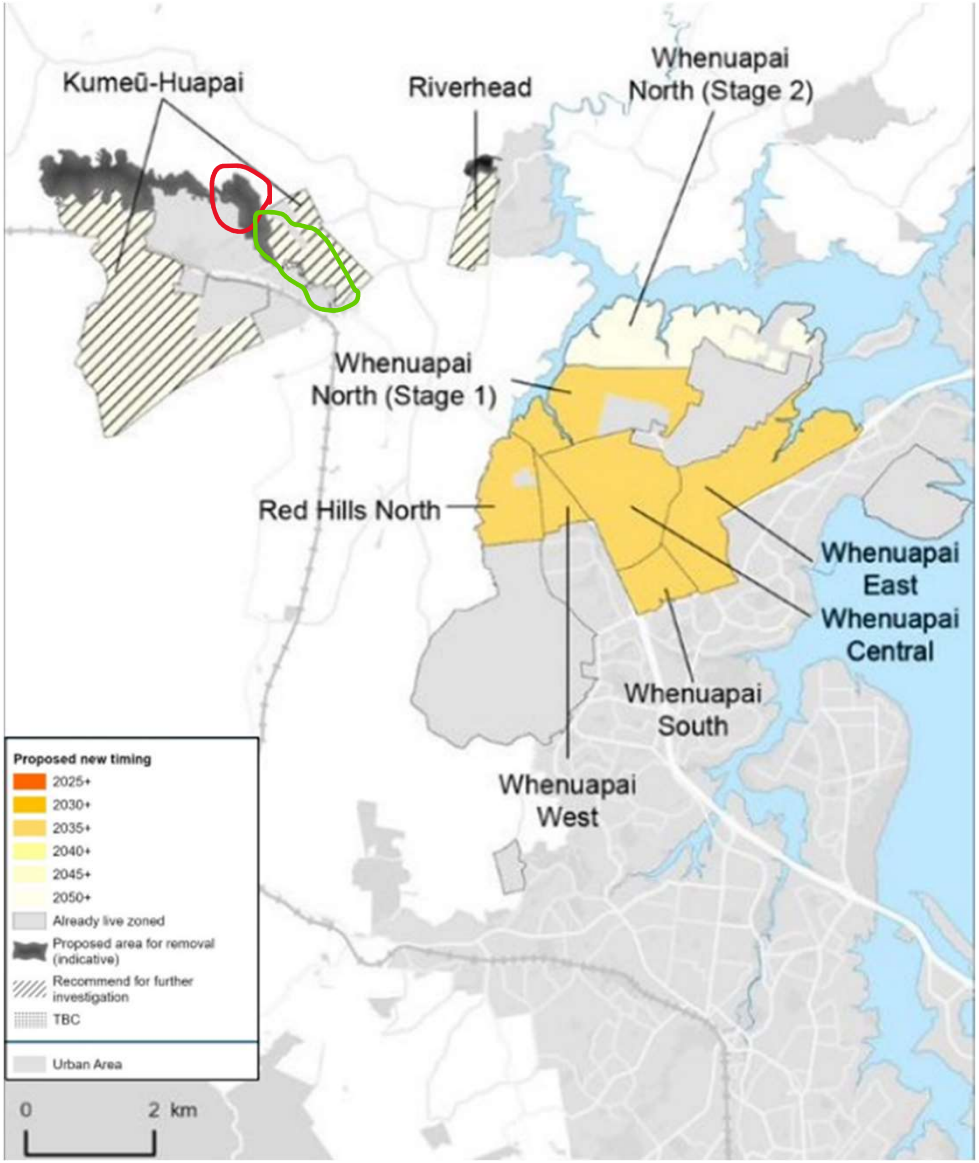
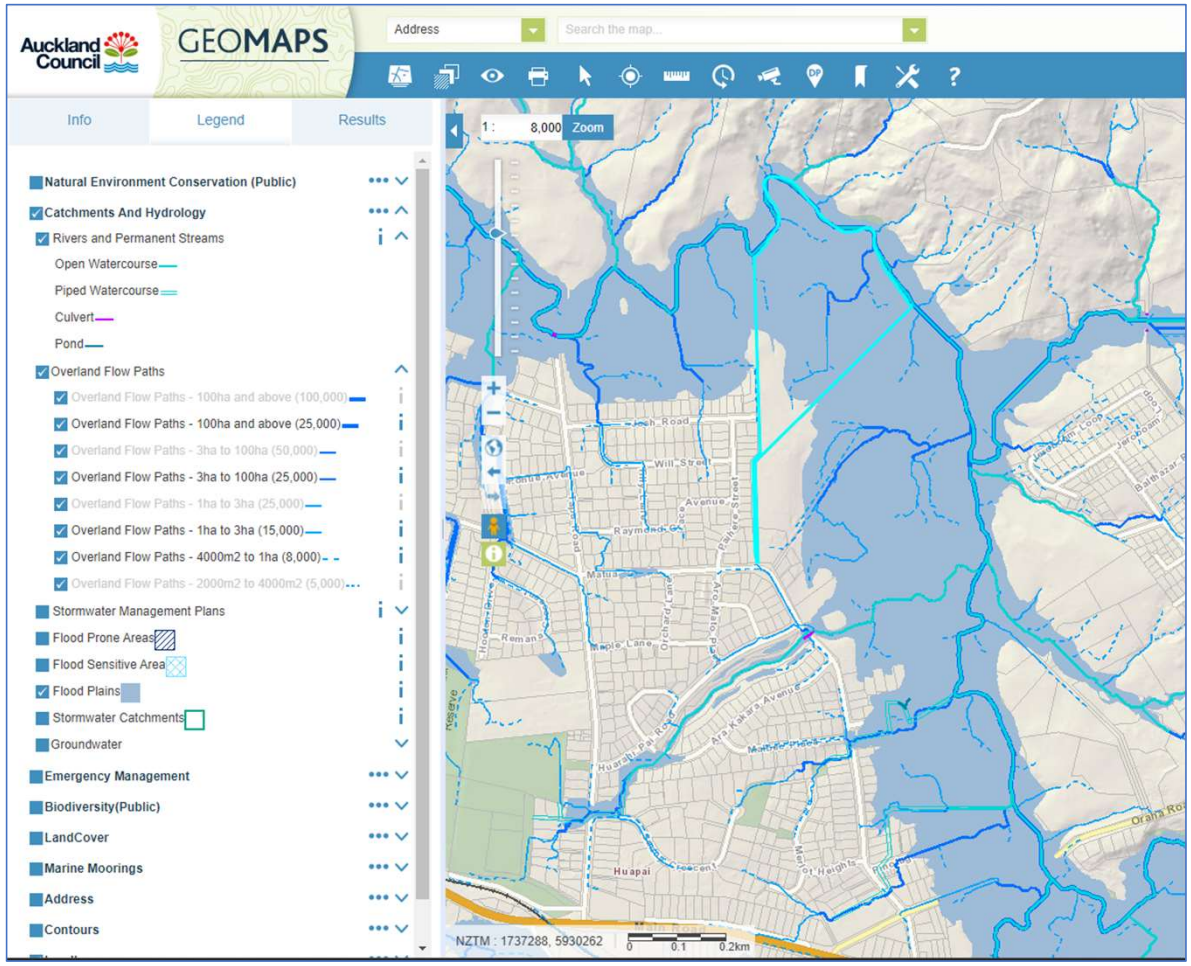
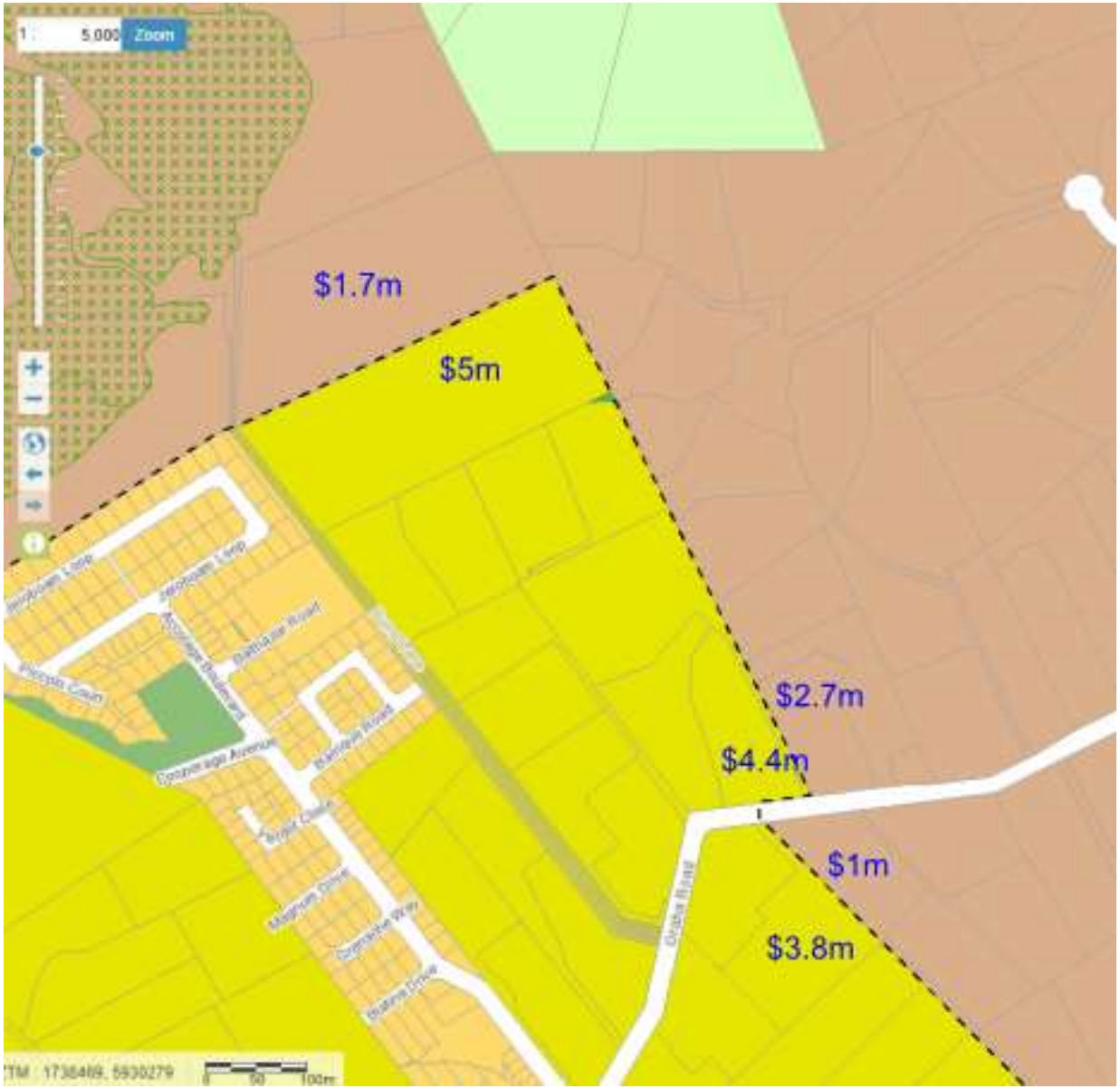


Figure 42 – Proposed timing and approach for Kumeū-Huapai…

- Kumeū-Huapai (whole FUA) is <u>recommended for further investigation</u>. Kumeū-Huapai is not planned to be developed before 2050+. This area is recommended for further investigation due to:
  - Infrastructure
  - Natural hazards
  - Emissions/VKT reduction
    - Appendix pp33-34
- Recommend <u>partial removal</u> of Kumeū-Huapai and Riverhead FUA
- Timing delay for Kumeū-Huapai and Riverhead remainder
- Recommend further investigation for whole of Kumeū-Huapai and Riverhead
  - Appendix p.38

- The land is proposed to be removed from the Future Urban Area
- The site contains mapped ‘flood plains’ but these have not been fully investigated
- Flood plains are valuable to Auckland Council to help mitigate flood hazards to existing and planned residential development
- Detailed design of a comprehensive flood management system for Kumeu is not readily available





- Homes.co.nz property value estimates show that Future Urban zone impacts land value

Summary

- Landowners want to retain the right to investigate options for the land
- High level policy planning has implications for land value
- There is a process involved to change the zoning of the land
- There is a lot of investigation and detailed design that is required before the use of the land can be changed
- Landowners want to ensure they are adding value to the community of Huapai, but feel they need more information before a decision can be made

Future Development Plan 2023 #8652

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Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future Development Strategy

Have your Say!

Recreation and Livelihood Disappearing

- With development, freedoms are taken away. People need space, grass and sunshine. Infrastructure is so important; however, the recent extreme weather conditions have shown us that water and drainage have to be a priority for the future.
- The residents are only the custodians of the land; It has to be looked after and maintained.
- Livelihoods taken away. Land and rural use employs so many, as well as servicing all sorts of industries. Sale yards. Farmers from the far north to Hamilton use these stock yards, transferring stock to freezing works in Auckland. Again providing food.
- Pukekohe has the A and P show-grounds which is used for not only the show but Gymnastics, Hot Rod car club, Joggers club and Equestrian events. The area also hosts up to 1200 children on a Saturday morning who play Soccer. This area is one of the main recreational hubs of Franklin.
- Equine industry at Takanini suffered with land re-zoning, upsetting so many families and people's lives for nothing as this land now is surplus and never needed to be under future urban. A community now gone.
- Recreation land. Parks, Golf courses, have been re-zoned for housing. E.G. Golf course at Manurewa.
- Rural and green space is so important not just for ourselves but for future generations to come that we preserve our natural spaces.
- Urban zoning slowly spreading like a cancer. We only get one chance to preserve and protect. Franklin has lost so much ground now.
- Development causes all sorts of traffic problems. Not just general traffic but emergency services as well. Very little thought has been put into new subdivisions. The Council's objective was supposedly to encourage people to work and live in the same area to lighten up the load from the motorway.

#8652

Golf club aces zoning battle

Auckland Council had marked course for housing under city's Unitary Plan

Bernard Orsman

The exclusive Royal Auckland and Grange Golf Club has stopped plans for more than 1600 houses and apartments on its greens.

A private plan change to rezone the 80-hectare Papatoetoe course from housing to open space for sport and recreation has been approved by independent planning commissioners.

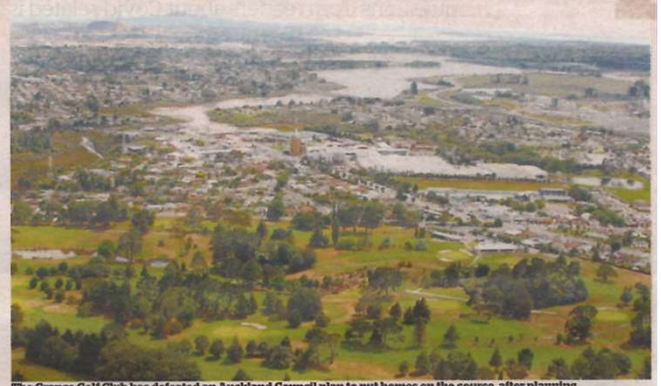
Auckland Council zoned the golf course for housing and apartments under the Unitary Plan and dug in its heels by opposing the plan change, partly because it is under instructions from the Government to support urban growth and intensification.

Club chief executive Warwick Hill-Rennie said it made practical sense to rezone the golf course as open space, saying the current zoning was incongruous with a golf course that has been around for 100 years.

He said golf was not permitted under the current zoning and shaping and making bunkers and greens require resource consent.

The golf course, which counts former Prime Minister Sir John Key among its 1872 members, is one of Auckland's premier private golf clubs.

In 2015, the Royal Auckland and Grange Golf clubs amalgamated and changed the name to Royal Auckland and Grange Golf Club to provide a long-term future for the club and develop a new club house and world-class 27-hole golf course.



The Grange Golf Club has defeated an Auckland Council plan to put homes on the course, after planning commissioners approved rezoning of the property from housing to open space. Photo Brett Phibbs

Since 2015, the club has sold 1.5ha adjoining King's College and 9.3ha of flat land off Grange Rd on a busy public transport route, which is being developed for terraced housing.

Another potential spin-off for the club is lower rates when the land is rezoned as open space.

The private plan change attracted 18 submissions, two in support, 15 opposed and a neutral submission from Transpower.

Among those opposed was former *Herald* owner and ex-club member Michael Horton who told The Spinoff there should be an opportunity for the public to use the space in an area with little public amenity.

Council planner Roger Eccles earlier said a common theme in submissions is that the site is in a well-established area with excellent transport and community infrastructure and would be better suited for residential development.

The club's lawyer, Richard Brabant, said at a hearing for the plan change it was "inexplicable" for council to decline the zoning request. The staff placed a heavy reliance on the Government's national policy statement on urban development, he said.

This document overrides the Unitary Plan and sets firm expectations on the council to increase housing intensification, particularly around public transport networks.

Commissioners Janine Bell and Trevor Mackie said the club's commitment and ongoing investment in the golf club meant there was a very low, if any, likelihood for housing development in the next 30 years.

Therefore, they said, it was appropriate to apply a zone that reflects the use on the privately owned land for the foreseeable future.

"If at some future time the club decides to reduce the area of its site used for golfing purposes or dispose of the site in its entirety, then the appropriateness of the zoning of these areas can be revisited at that time," the commissioners said.

Running out of racetrack

Two iconic South Auckland sports venues are exploring plans to develop or sell off land to save their futures. The moves raise questions about urban sprawl in semi-rural Pukekohe. Steve Kilgallon reports

Pukekohe Park – 50km south of the Auckland CBD, home of an iconic motorsport track and a 100-year-old horse-racing circuit – is pursuing a plan to build on some of its outer land.

And right next door, the Franklin Trotting Club – a major training base for trotting horses, jockeys and trainers – is being considered for sale.

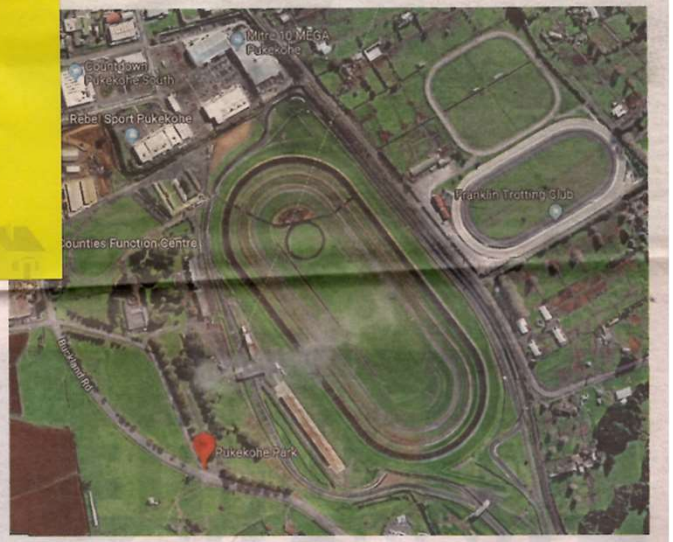
Both venues are protected under Auckland Council's urban plan.

But an urban boom in Pukekohe, a satellite town of 31,000 people, means more rural land is being taken for housing and commercial development and the two are now bordered by developments.

An Auckland mayoral candidate, Craig Lord, who discovered the plans, says he's worried for the future of the land.

Lord says it's time a greenbelt protected Pukekohe.

Mayoral hopeful Craig Lord is concerned. JASON DORDAY/STUFF



Google Earth view of Pukekohe Park, centre, and Franklin Trotting Club, top right. GOOGLE EARTH

PUKEKOHE PARK DEVELOPMENT

Counties Racing, owners of Pukekohe Park, want to re-zone 4.79 hectares of unused green land on the fringe of the 73ha park to build and lease commercial buildings.

Application documents say declining race attendances and the impact of online betting risk "potentially the ultimate closure of the park".

They also considered carving off a second block for housing, but feared 'reverse sensitivity', where new residents would complain about noise from the motor-racing, threatening the sport.

The park is presently one of 20 'special purpose – major recreation' zones designated for venues such as Auckland Zoo.

It hosts the New Zealand leg of the V8 Supercars series and past world champions such as Graham Hill, Jackie Stewart and Keke Rosberg have all raced there.

A consultant's report says the club has had interest from local businesses wanting more land. The report describes the "failing financial sustainability of the current operation."

"CRC has concluded that ... they must achieve a sustainable operation by 2020.

"The alternative is the closure of the current operation."

The club had considered complete relocation, but opening up some of its land for development would instead generate enough income for the medium term (five to ten years) and sustain the two sports.

* Continued P4

Elite Soils

- Pukekohe is one of the main Vege bowls of New Zealand.
- One thing Covid has taught us, that we as a nation can feed ourselves. Both in meat and vegetables.
- Pukekohe/Franklin area known for its potatoes and onions however grows a variety of greens suppling local markets as well as being one of New Zealand's main exports.
- Re-zoned land becomes unaffordable in rates for many. Restrictions come into play regarding sprays, ploughing or stock. Generations of land sold as a result of red tape and re-zoning.
- With development so close and closing in, growers and farmers cannot work their land as they have done for generations.
- There are 2 – 3 months a year Pukekohe supplies vege's to the South Island as well as the rest of the world as it has a climate that can grow all year round.
- Pukekohe hill can crop early potatoes as it is a frost-free area. An early crop that doesn't need irrigation, so farmers can work around the seasons and mother nature.
- Residential homes, schools and kindergartens have been allowed to be build next to gardens and farms. Farmers and growers have been stopped from doing what they do best.
- Once land is built on with bricks, mortar and concrete it cannot be bought back to elite soils.
- This land must be looked after for future generations to come.

#8652

Pukekohe Vegetable Growers

Preserving Pukekohe's Food Bowl.

By Kerry Monaghan



Elite land off limits from housing

GERARD HUTCHING

Councils will be required to protect New Zealand's best food-growing soils under new Government policy.

Pukekohe grower Bharat Bhana welcomed the move, saying something needed to be done to stop the most productive land in the country being converted into buildings before it was too late.

"We're only caretakers and we've got to leave some of this beautiful land we've got to generations that come after us."

Horticulture NZ and Federated Farmers have been pushing for a mechanism to stop subdivisions and lifestyle blocks swallowing up prime growing land.

Agriculture Minister Damien O'Connor and Environment Minister David Parker have announced a National Policy Statement for Highly Productive Land would be introduced, after a discussion period of two months.

Speaking at Bhana's property, O'Connor said once productive land was built on, it could no longer be used for food production.

About 14 per cent of New Zealand's land is categorised as highly productive. Since 1998, 5800 new lifestyle blocks a year have been given the green light by councils. Bhana said in recent years up to 150 hectares had been lost in Pukekohe to housing and light industrial.

"Once you've got the public surrounding you, your right to farm is eroded, so even if you have elite soils you can't use them."

Parker said the National Policy Statement would be nationwide, and would stand alongside the new National Policy Statement for Urban Development, which will be released soon.

"The National Policy Statement... proposes that councils be required to ensure there's enough highly productive land available for primary production now and in the future, and protect it from inappropriate subdivision, use and development.

"Councils would need to do a full analysis of alternatives, benefits and costs when considering whether urban expansion should be located on highly productive land used for growing food and vegetables and for other primary production."

HortNZ natural resources and environment manager Michelle Sands said with good planning and buffer zones, houses and horticulture could co-exist. This was important because growers could make best use of available land, quickly get fresh produce to market and have access to workers.

Keeping the best soils for producing food is also important in the transition to a low emissions economy, because countries needed to find ways to adapt to climate change in a manner that does not threaten food production.

Sands said at the moment poor rules were preventing new market gardens being established to replace land lost to housing in Auckland.

"We know the country needs more houses. However, the current situation means that horticulture land lost to houses cannot be replaced," Sands said.



Onion grower Vijay Bhana harvesting a crop from the rich volcanic soil of Pukekohe. SUPPLIED



Described by a real estate company as having "glorious views of the Waikato River and surrounding farmland", this productive land was recently up for sale. RAY WHITE DRURY

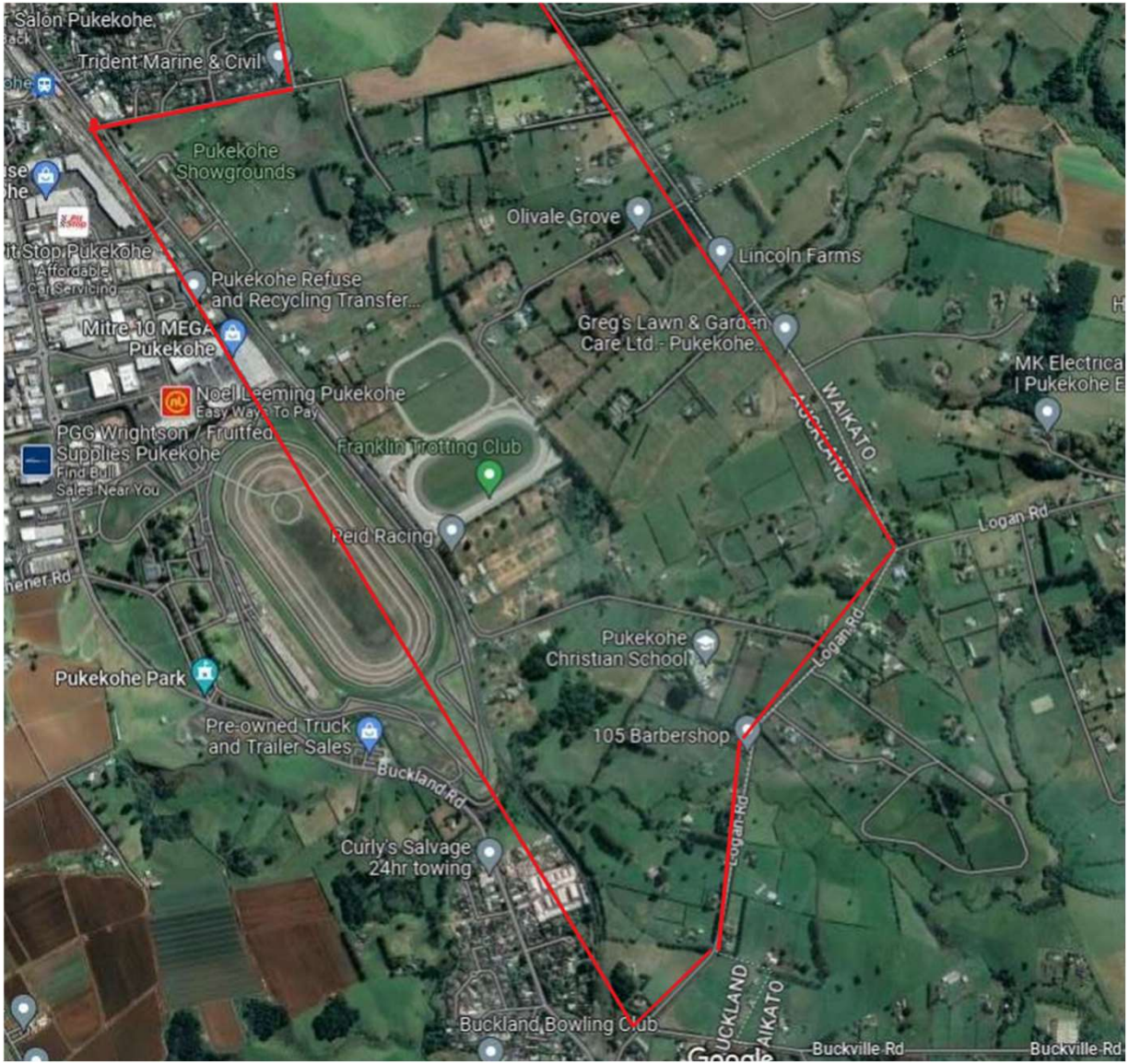


Environment Minister David Parker and Agriculture Minister Damien O'Connor say councils will be required to protect elite soils. STUFF

Flooding

- Building on area that is known to flood causes nothing but trouble.
- During a recent plan change application in Pukekohe, professional consultants involved had very little local knowledge of the area seeking to be re-zoned.
- Natural rural land and water ways provide drainage to disperse water quickly. Concrete does not.
- Yes, water can be re-directed however two things we can be sure of:
- We cannot stop or change:
  - Mother Nature. People are at the mercy of Mother Nature and the seasons. We have to work with it not try to change it.
  - We cannot change the way water flows. It will always find the easiest path. Water is destructive and destroys whatever is in its path.
  - Pictures below show the area that has just been rezoned in Pukekohe from a private plan change.
  - The next is a house that was built on a re-directed creek and the outcome 8 years after the CCC was signed off.

#8652

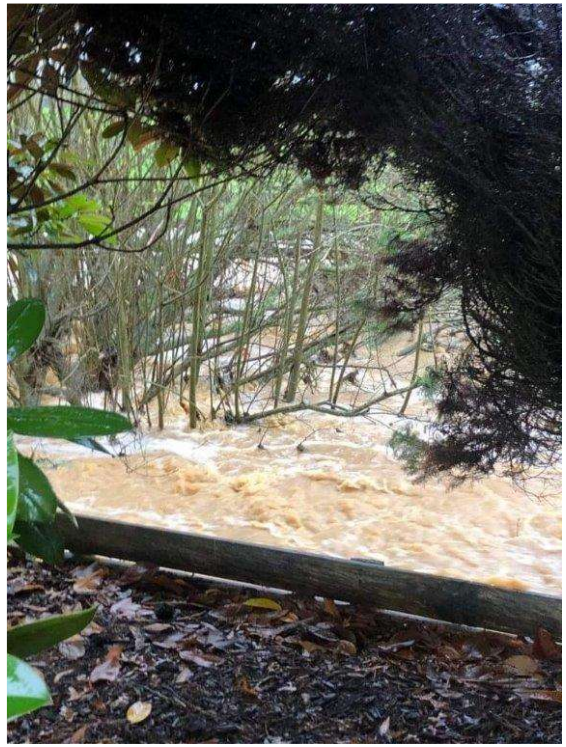

Salon Pukekohe
Trident Marine & Civil
Pukekohe Showgrounds
Olivale Grove
Lincoln Farms
Pukekohe Refuse and Recycling Transfer...
Greg's Lawn & Garden Care Ltd - Pukekohe
Mitre 10 MEGA Pukekohe
Noel Leeming Pukekohe
PGG Wrightson / Fruitfed Supplies Pukekohe
Franklin Trotting Club
Reid Racing
WAIKATO
Logan Rd
Pukekohe Christian School
Pukekohe Park
Pre-owned Truck and Trailer Sales
105 Barbershop
Buckland Rd
Curly's Salvage 24hr towing
Buckland Bowling Club
Buckville Rd

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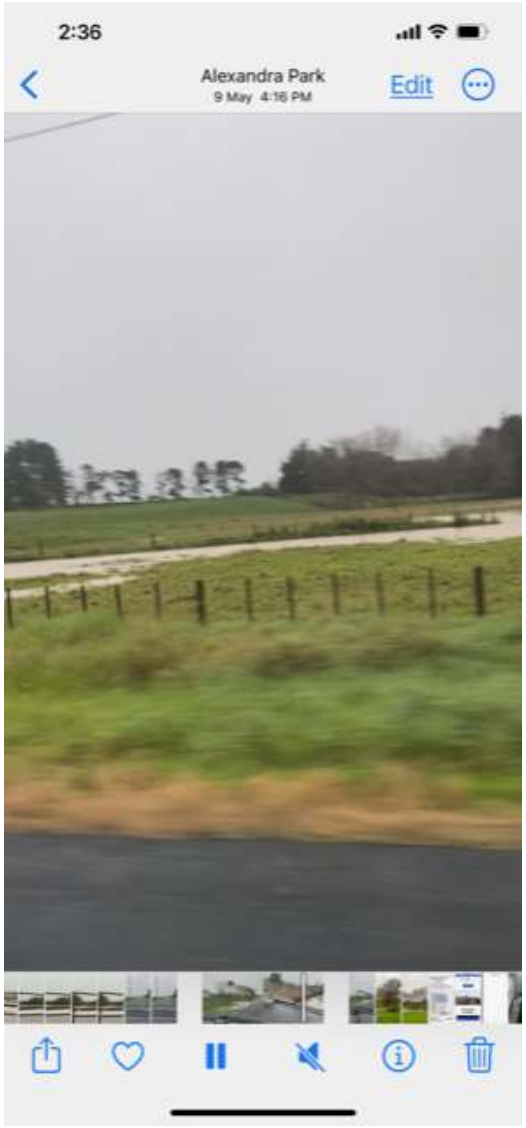

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Summary

- I believe that council should re-open FUZ land in Pukekohe for review based on elite soils and flooding considerations. Council has been reviewing the future of FUZ land and is proposing to rezone significant areas back from FUZ to rural, e.g. Takanini area. This same review process should apply to FUZ land in Pukekohe.
- Pukekohe provides food, recreation, employment to so many. This would be severely impacted by developing the current FUZ land in Pukekohe.
- Again, Natural rural land and water ways provides drainage to disperse water quickly. Concrete does not.
- We have enough subdivisions and development sites at this time. Complete what has already been started.
- Pukekohe is a very unique area. Council needs to review the FUZ to preserve this.
- A perfect example of why a review of FUZ land in Pukekohe is essential is the Riverhead development, which was recently declined by council because of flooding risks.